

# HOUSE OF LORDS

## Land Use in England Committee

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Report of Session 2022–23

# Making the most out of England's land

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### *Land Use in England Committee*

The Land Use in England Committee was appointed by the House of Lords 19 January 2022 and re-appointed on 12 May 2022 “to consider land use in England”.

### *Membership*

The Members of the Land Use in England Committee were:

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[Baroness Bakewell of Hardington Mandeville](#)

[Lord Borwick](#)

[Lord Curry of Kirkharle](#)

[Lord Goddard of Stockport](#)

[Lord Grantchester](#)

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### *Declaration of interests*

See Appendix 1.

A full list of Members’ interests can be found in the Register of Lords’ Interests:

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Evidence is published online at <https://committees.parliament.uk/committee/583/land-use-in-england-committee/publications/> and available for inspection at the Parliamentary Archives (020 7219 3074).

Q in footnotes refers to a question in oral evidence.

## SUMMARY

Land use in England is changing radically. Moving away from a landscape dominated by food production, we are now facing the challenges and opportunities of a new environment where nature and biodiversity restoration, carbon sequestration, new development and infrastructure needs and the role of the land for energy, access and wellbeing are all taking on a greater priority.

Outside of the planning system, however, competing land use needs are not assessed by any overarching framework across England and there is no formal advisory or coordinating body outside of Government departments. Based on the evidence we heard, we believe the case is compelling for the creation of a Land Use Commission, which will be tasked with enabling the development and promulgation of a land use framework to help landowners, managers and other decision makers to make the most appropriate decisions for land. It is not intended that the Commission should have any powers of direction, but rather for it to be a supporter and facilitator of effective land use. At the heart of this approach should be place-based multifunctionality—the concept that simultaneous multiple benefits can be achieved in the same location with the right approach.

To support the development and operation of the Commission and framework, our report is structured around a number of key recommendations, based on the evidence we heard on the current and future challenges of land use in England.

We note the uncertainty around the Environmental Land Management Schemes (ELMS) scheme and the impact this is having on landowners, managers and other decision makers. We call for Government to provide urgent clarity on the ELMS programme to give certainty and confidence to the farming community, and to ensure that much needed habitats are better promoted and managed across England to kickstart the essential recovery of our biodiversity. Government should also examine how it can best develop improved environmental management skills among all land managers.

We highlight the importance of Local Nature Recovery Strategies (LNRS) in ensuring that locally appropriate environmental initiatives are encouraged on the right land with input from their communities throughout every part of England. Government must ensure that the introduction of LNRS is properly resourced and with the necessary local cooperation and coordination. LNRS must also have sufficient weight in the planning system to ensure their effectiveness, so we call for a strengthening of planning rules and accompanying guidance to facilitate this, ensuring that LNRS are a material consideration in planning decision-making.

Similarly, the incoming policy of Biodiversity Net Gain (BNG) must be accompanied by proper monitoring and enforcement. This means that planning authorities should be given adequate resources and powers both to support BNG and to intervene in cases where BNG requirements are at risk of not being delivered.

Afforestation is clearly a priority in future land use to help meet climate goals. However, targets are being missed and necessary skills may not be present. Incentives, support and regulation must be reviewed. There should be more support for active woodland management of the existing resource and investment

in skills development. In pursuing their goals, Government must also ensure that tree planting is happening on the right land with the right species and that it is in balance with other land use targets.

The COVID-19 pandemic highlighted the importance of green and open space for access and recreation, and the ongoing revival of tourism following the end of the pandemic has given this issue further prominence. However, there is little commitment to supporting access in ELMS, and this must be reviewed as part of the development of a land use framework with a view to prioritising access as a public good and reducing potential conflict with other important land uses. It is particularly important to prioritise access near locations where people live, such as in and near urban and peri-urban areas.

While we do not propose that a land use framework and Commission replace or interfere with the current role and responsibilities of the English planning system, it is important for the Commission to acknowledge the role that the system plays in land use and the challenges and opportunities it generates. A framework should help better identify and define those areas where land should be optimised for priority uses other than housing—for example prime agricultural land for food production or land which is essential for carbon sequestration and nature recovery. A framework, supported by the Commission, could also advise Government on the reform and strengthening of planning policy based on the available evidence.

‘Green infrastructure’ describes the green and open spaces which are actively managed to deliver multiple public benefits. We heard about the importance of supporting green infrastructure networks through the planning system and through local cooperation. Planning rules and accompanying guidance should be changed to stress the need for sufficient green infrastructure provision and protection in new development, for the improvement and enhancement of existing infrastructure, and for maximum beneficial use to be made of it, using a multifunctional framework where possible. Similarly, we heard that much more could be made of the multifunctional potential of the Green Belt and this should also be a priority for the framework, integrated with objectives for green infrastructure where relevant.

In seeking to integrate the various land use priorities within a proposed framework, we considered evidence on approaches to multifunctionality and debates over “land sharing” and “land sparing”. We believe that a multifunctional approach lends itself most clearly to a principle of land sharing, driven by local circumstances and priorities. The framework should replace the current siloed approach to land use with a deliberative and cooperative process and make greater use of opportunities and synergies.

Finally, we turn to the practicalities of how a land use framework should be developed and implemented. Developing the framework should include extensive consultation with those directly affected, identifying opportunities for regular engagement and feedback, overseeing improvements to data collection and accessibility, and taking an open and transparent approach to information gathering and sharing.

We call for the Land Use Commission to be set up as an independent, statutory arms-length public body under the Cabinet Office, with commissioners

representing all relevant Government departments and with a budget similar to the Scottish Land Commission or the Climate Change Committee.

Among other priorities, we argue that the Commission's role should be to prepare and update the land use framework, to encourage the publication and use of accessible, open source land use data, to review the effectiveness and impact of laws and policies relating to land and to advise Government, to work across local and national government to enable an integrated approach, and to produce a triennial report on progress and on improving the effectiveness of the multifunctional land uses to be laid before Parliament for debate.





# Making the most out of England's land

## CHAPTER 1: INTRODUCTION

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1. All of us in England depend on land for food, energy, transport, recreation, housing, business and much more. Used well, it can provide us with multifunctional economic, environmental, and social benefits. Although there are no limits to the uses we as a nation have for land, land itself is frustratingly finite. Practical limitations mean that we need to get much better at deciding how to use land sustainably, making sure that we are doing the right thing, in the right place and at the appropriate scale. We also need to make the land work harder, providing as many benefits as possible.
2. Deciding what to do with land is complex, contested and can involve significant opportunity costs and difficult trade-offs. Separating one land issue from another can be hard; they are often interlinked and interdependent on each other. Tackling biodiversity loss offers a good example of this. It is an important task in its own right but also contributes to our efforts to tackle climate change and achieve net zero. Meanwhile, a key policy for supporting nature recovery—Biodiversity Net Gain (BNG)—is being rolled out through the planning system where it interacts with other land use priorities such as housing and infrastructure.
3. All of this makes for a very complicated policy landscape and we have seen that, despite good intentions to manage these complex issues and competing demands, siloed working and poor decision making over previous decades and under the oversight of successive governments have failed to halt economic and environmental damage. This is evident, for example, around policies and practices affecting tree planting, use of peatland and intensive farming. The complex reality of multiple competing demands and opportunities for land requires a well-considered, evidence-based approach to land use decision making.
4. The Government has set itself a range of targets that will require changes to how we use land. Its current commitments include:
  - Maintaining our current self-sufficiency in food at just over 60%;<sup>1</sup>
  - Increasing woodland in England by one million acres;<sup>2</sup>
  - Increasing new habitats for biodiversity by one million acres;<sup>3</sup>

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1 DEFRA, *Food Security Report 2021* (16 December 2021): [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1077015/United\\_Kingdom\\_Food\\_Security\\_Report\\_2021\\_19may2022.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1077015/United_Kingdom_Food_Security_Report_2021_19may2022.pdf) [accessed 22 November 2022]

2 DEFRA, *England Tree Action Plan 2021-2024* (May 2021): [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/987432/england-trees-action-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/987432/england-trees-action-plan.pdf) [accessed 22 November 2022]

3 DEFRA, *A Green Future: Our 25 Year Plan to Improve the Environment*: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) and DEFRA, *Outcome Indicator Framework for the 25 Year Environment Plan: 2022 update* (May 2022): [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1084360/25-year-environment-plan-2022-update.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1084360/25-year-environment-plan-2022-update.pdf) [accessed 22 November 2022].

- Enlarging the area of England covered by National Parks and Areas of Outstanding Natural Beauty from 27% to 30%, a 3% increase that amounts to around 1.8 million acres;<sup>4</sup> and
  - Building 300,000 new houses each and every year.<sup>5</sup>
5. When we consider that the county of Kent amounts to just under one million acres, it is clear that a new approach to land use is required to fulfil all these commitments. It is this quandary that this report seeks to address.
  6. At the outset of this inquiry, we were interested in exploring the potential role of a land use framework and were encouraged by the Government's food strategy, published in June 2022, which stated:
 

“In 2023, we will publish a land use framework that will reflect all our objectives for English agriculture, the environment and net zero. It will also reflect and respond to the work of the House of Lords special inquiry committee into land use in England”.<sup>6</sup>
  7. We welcome the Government's commitment to prepare a land use framework in 2023 and its commitment to reflect and respond to the work of this Committee. With that in mind, we wish to be very clear that the framework needs to encompass a wide range of land use priorities under the preserve of DEFRA, DLUHC, BEIS, DCMS and DfT. To that end, we see this report as an opportunity to present to the whole of Government, not just DEFRA, our vision for improving land use policy and decision making in England. We hope that this report acts as a catalyst for cross-departmental action.
  8. Based on the evidence we have heard and drawing on our experiences and discussions, we believe the case for a land use framework is now overwhelming. The Royal Society summed up the case for land use framework as follows:
 

“A national land use framework would allow for decisions concerning land use to be made in a coherent and consistent manner that recognises the finiteness of land. [A land use framework is] particularly important in operationalising the concept of multifunctionality since different incentives are needed in different places to reflect the varying suitability of landscapes for specific policy outcomes”.<sup>7</sup>
  9. This report will present our findings from the inquiry and our vision for a land use framework and how it might be developed, delivered and monitored. This includes our call for a Land Use Commission in England which would be the lead body for overseeing development and effective delivery and monitoring of the framework. Given its clear connection to the planning system, we would also like to see a land use framework firmly embedded in the National Planning Policy Framework (NPPF) (and associated documents including the National Planning Practice Guidance). We set out further details of our

4 DEFRA, ‘Landscapes review (National Parks and AONBs): government response’ (15 January 2022): <https://www.gov.uk/government/publications/landscapes-review-national-parks-and-aonbs-government-response/landscapes-review-national-parks-and-aonbs-government-response> [accessed 22 November 2022]

5 Ministry of Housing, Communities & Local Government, ‘Government announces new housing measures’ (1 October 2018): <https://www.gov.uk/government/news/government-announces-new-housing-measures> [accessed 22 November 2022]

6 DEFRA, *Government food strategy*, CP 698, June 2022, p 15: <http://www.gov.uk/government/publications/government-food-strategy> [accessed 22 November 2022]

7 Written evidence from the Royal Society ([LUE0111](#))

vision for a land use framework and the make-up and remit of the Land Use Commission in Chapter 5.

10. This Committee was appointed in January 2022 “to consider land use in England” and given a deadline of 30 November. The complexity of this issue and time constraints meant that we could not cover all issues related to land use as we would have liked. Having said that, and notwithstanding its importance and the valuable evidence received on maritime issues, maritime land and its relation to wider land use decision making lies outside the scope of this report.
11. The recent changes of Government have created a degree of uncertainty around the state of some of the policies discussed in this report. The change in Ministers at DEFRA, DLUHC and other key government departments meant that even before we had prepared our report, our information risked becoming obsolete. In September 2022 we wrote to the new Secretary of State, Rt. Hon. Ranil Jayawardena MP, to clarify the Government’s commitments to Environmental Land Management Schemes (ELMS) and a land use framework. Mr Jayawardena left the government following the appointment of Rt. Hon. Rishi Sunak MP as Prime Minister in October 2022 and we acknowledge the response of her successor, Rt. Hon. Thérèse Coffey MP. She reaffirmed the Government’s commitment to publish a land use framework in 2023 and that the department would consider the Committee’s report in developing it, along with environmental targets, net zero and food security objectives. She also said that the Government would “continue to finalise our approach” to ELMS, “and inform Parliament and the public in due course”.<sup>8</sup>
12. In written correspondence to us, the Department for Levelling Up, Housing and Communities said of the land use framework that “DEFRA worked with DLUHC while developing the broad proposals and the strategy as published was agreed by the department through the usual collective agreement process. We will continue to work with DEFRA as the approach to the framework develops, and will assess potential implications for DLUHC as it does”.<sup>9</sup>
13. ***We welcome that the Government is maintaining its commitment to publish a land use framework in 2023. We are, however, disappointed at the Government’s suggestion that the framework will focus on matters solely within the remit of DEFRA. The Government should review its approach to developing the framework to ensure that it fully addresses wider aspects of land use and that its remit crosses departments as required, avoiding the siloed approaches that have blighted land use policy in the past.***
14. ***In accordance with this cross-departmental approach, other departments should also be involved in the development and implementation of the framework, as active participants and not just as consultees.***
15. During the course of our inquiry we heard from 52 witnesses in public evidence sessions and received 108 pieces of written evidence. In June we

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8 Letter from Rt. Hon. Thérèse Coffey MP to the Chair of the Land Use Committee (22 November 2022): <https://committees.parliament.uk/publications/31740/documents/178146/default/>

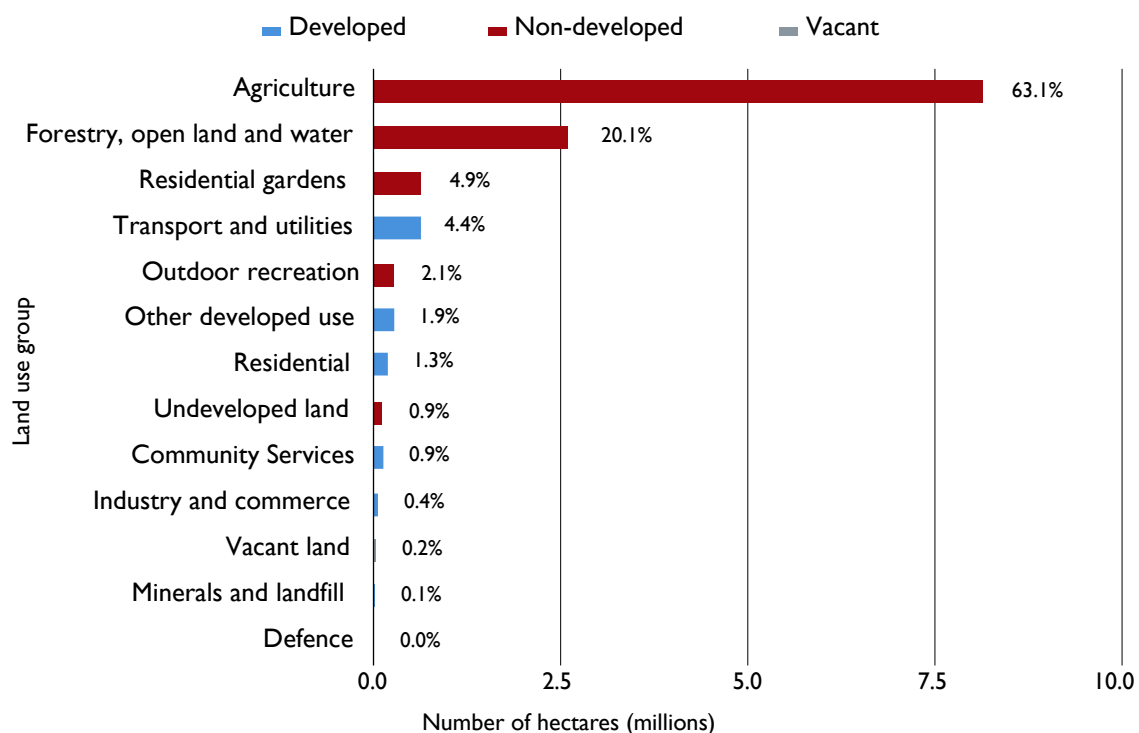
9 Letter from Rt. Hon. Lucy Frazer MP to Lord Cameron of Dillington (28 November 2022): <https://committees.parliament.uk/publications/31827/documents/178909/default/>

visited the 8 Hills Countryside Management Project, Worcestershire, to look at their pilot approach to integrated land use and, via the Countryside and Community Research Institute (CCRI), the Sapperton Nature Recovery project, Gloucestershire, to look at approaches to agroforestry and nature recovery, and meet with local stakeholders. We also held two private roundtable discussions with participants from a range of backgrounds. We would like to thank everyone who contributed to this inquiry. We would also like to thank our specialist adviser, Alister Scott, Professor of Environmental Geography and Planning at Northumbria University, who provided invaluable guidance and advice throughout the inquiry.

### Land use challenges and pressures

16. As of 2022, 91.1% of land in England is classified as non-developed, and 8.7% of land is of developed use.<sup>10</sup> The top land use group was ‘agriculture’ at 63.1%.<sup>11</sup> These figures show little change from previous years.<sup>12</sup>

**Figure 1: Land use by land use group: England 2022**

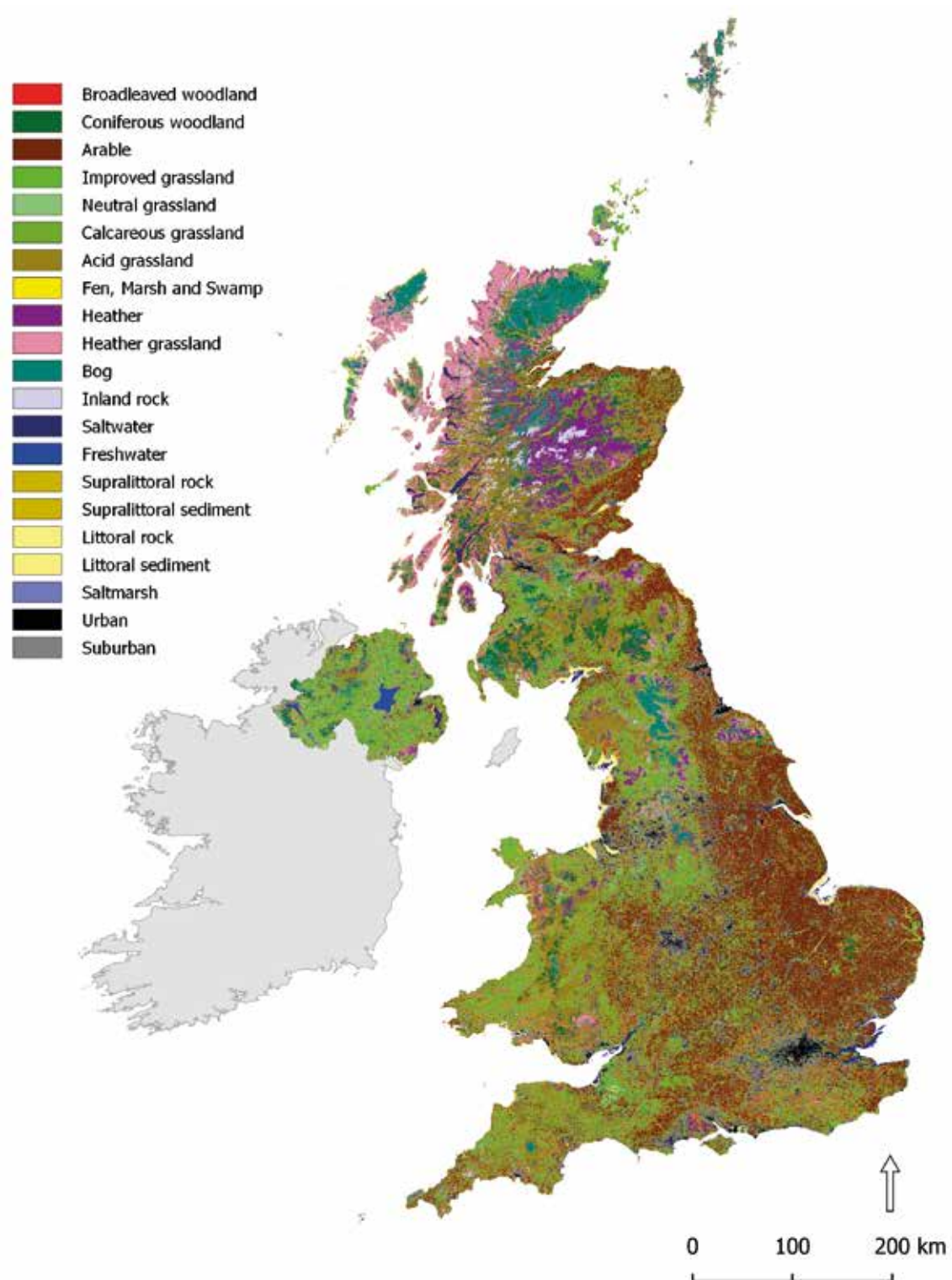


Source: DLUHC, *Land Use Statistics: England 2022*

- 10 Developed Land includes community services (community buildings leisure (indoors)); defence buildings; industry and commerce including offices, retail, storage and warehousing; minerals and landfill including waste disposal; other developed use including unidentified buildings and structures; residential accommodation; and transport and utilities. Non-developed land includes agricultural land and agricultural buildings; forestry and woodland, rough grassland, natural land and water; outdoor recreation; residential gardens; and other undeveloped land. See DLUHC, *Land Use in England and Land Use Change Statistics* (October 2022): [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1113711/Land\\_Use\\_and\\_Land\\_Use\\_Change\\_-\\_Technical\\_Notes.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1113711/Land_Use_and_Land_Use_Change_-_Technical_Notes.pdf) [accessed 22 November 2022].
- 11 DLUHC, ‘Land use statistics: England 2022’ (27 October 2022): <https://www.gov.uk/government/statistics/land-use-in-england-2022/land-use-statistics-england-2022> [accessed 22 November 2022]
- 12 For example statistics for 2017 show that 92% of land was classified as non-developed land and 8 % developed, agriculture land was 63%. See Ministry of Housing, Communities & Local Government, *Land Use in England, 2017* (31 May 2019): [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/808325/Land\\_Use\\_Experimental\\_statistic\\_England\\_2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/808325/Land_Use_Experimental_statistic_England_2017.pdf) [accessed 22 November 2022].



**Figure 2: Land use cover map 2021**



Source: Marston, C.; Rowland, C.S.; O'Neil, A.W.; Morton, R.D. (2022). Land Cover Map 2021 (10m classified pixels, GB). NERC EDS Environmental Information Data Centre. <https://doi.org/10.5285/a22baa7c-5809-4a02-87e0-3cf87d4e223a>; Marston, C.; Rowland, C.S.; O'Neil, A.W.; Morton, R.D. (2022). Land Cover Map 2021 (10m classified pixels, N. Ireland). NERC EDS Environmental Information Data Centre. <https://doi.org/10.5285/e44ae9bd-fa32-4aab-9524-fbb11d34a20a>; UKCEH, 'UKCEH Land Cover Maps': <https://www.ceh.ac.uk/data/ukceh-land-cover-maps> [accessed 22 November 2022]

## Box 1: Land use challenges and the Foresight Land Use Futures Study

In 2010 the Government Office for Science's Foresight Project<sup>13</sup> conducted a land use futures study which looked at the future of UK land use for the next 50 years.

The report highlighted six “drivers of change” which will place ever greater pressure on land use. These are demographic change; economic growth and changing global economic conditions; climate change; new technologies; societal preferences and attitudes; and the policy and regulatory environment.

The study predicted that the drivers of change “will exacerbate existing tensions and challenges” and generate new ones, and highlighted three cross-sectoral challenges requiring specific attention—rising demand for land in and around the South-East of England, climate change and land use, and delivery of public goods and services.

The Foresight study noted that there are “multiple and growing demands” being placed on land and identified nine “sectoral pressures” on land use—water resources, conservation, agriculture, woodlands and forests, flood risk management, energy infrastructure, residential and commercial development, transport infrastructure and recreation.

Source: Government Office for Science, *Land Use Futures Project Executive Summary* (February 2010): <https://www.gov.uk/government/publications/land-use-futures-making-the-most-of-land-in-the-21st-century> [accessed 5 December 2022]

17. Challenges and pressures highlighted by witnesses were largely in line with those identified in the Foresight Study.<sup>14</sup>

### Overarching themes

18. In line with our desire to focus on developing an integrated, solution-based approach, we set out below some of the overarching themes identified during this inquiry. We revisit these themes throughout this report as we examine the challenges facing land use in England and look to solutions.

### *Siloed working and conflicting priorities*

19. We heard repeatedly that Government—at both the national and local level—works in silos, leading to lost opportunities, underwhelming results and unintended consequences.<sup>15</sup>

### *Lack of strategic thinking and coordination including between national, regional and local government*

20. Along the lines of siloed working, we heard concerns that there is not enough strategic thinking across local government boundaries or at different scales.

<sup>13</sup> Foresight projects look at cross-cutting topics, summarise the evidence, explore future possibilities and identify key challenges and opportunities for government with a view to informing policy making.

<sup>14</sup> For example, written evidence from Royal Town Planning Institute ([LUE0031](#)), the Soil Association ([LUE0037](#)), National Trust ([LUE0039](#)) Town and Country Planning Association ([LUE0045](#)), UKRI ([LUE0047](#)), Environmental Change Institute ([LUE0067](#)), CLA, ([LUE0096](#)), Woodland Trust ([LUE0097](#)), Green Alliance ([LUE0095](#)), Save Newcastle Wildlife ([LUE0101](#)), Chester Zoo ([LUE0102](#)), and DEFRA ([LUE0103](#)).

<sup>15</sup> Written evidence from Lisa Phipps ([LUE0002](#)), Dr Tim Marshall ([LUE0040](#)), Matthew Kirby ([LUE0042](#)), NFU ([LUE0049](#)), CPRE ([LUE0055](#)), Broadway Initiative ([LUE0068](#)), Environment Agency ([LUE0073](#)), Community Planning Alliance ([LUE0080](#)), National Association of Local Councils ([LUE0081](#)), Food, Farming and Countryside Commission ([LUE0088](#)), and CLA ([LUE0096](#)).

The loss of regional tiers in parts of the country and the proposed replacement of the Duty to Cooperate points to the wider challenges of cross-boundary cooperation.<sup>16</sup>

*Uncertainty surrounding government policy*

21. Uncertainty is the enemy of good decision making. Unfortunately, we heard that there is uncertainty around several key policy areas including ELMS, BNG, Local Nature Recovery Strategies (LNRS), planning reform, and energy policy. Recent changes of Government have exacerbated the problem.

*Gaps and accessibility concerns around data and evidence*

22. To be as useful as possible data needs to be relevant, good quality, accessible and presented in an understandable and user-friendly way. Achieving this will facilitate interpretation, analysis and informed decision making. However, we heard that this is currently not the case.<sup>17</sup>

*Lack of governance including lack of monitoring and evaluation*

23. We heard concerns around governance issues including the lack of overarching national objectives around which stakeholders can cohere, lack of a clear, overarching land use strategy, issues with legislation and regulatory approaches, lack of clarity on managing larger-than-local and cross-boundary scales, and approaches for engaging with stakeholders and the wider public.<sup>18</sup>

*Lack of understanding of multifunctionality in policy and practice*

24. Although the term came up frequently during the inquiry, we identified a lack of understanding of what a multifunctional approach would look like in policy and in practice. As a committee, we advocate a multifunctional approach to land use. By this, we mean the idea that land can deliver multiple benefits simultaneously and dynamically, moving away from a narrower approach based on fixed and unchanging functions. We discuss the concept of multifunctionality further in Chapter 4.

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16 DLUHC, *Planning for the Future* (August 2020), p 20: <https://www.gov.uk/government/consultations/planning-for-the-future> [accessed 22 November 2022]. See also written evidence from Professor Ian Hodge (LUE0033), National Association of Local Councils (LUE0081), Food, Farming and Countryside Commission (LUE0088), and CLA (LUE0096).

17 For example, Q 47 (John Watkins), Q 99 (Benet Northcote), Professor Mark Tewdwr-Jones (LUE0030), Q 46 (Kevin Austin), written evidence from Community Planning Alliance (LUE0080) and Natural England (LUE0104).

18 For example, written evidence from Town and Country Planning Association (LUE0045), UKRI (LUE0047), Professor Ian Hodge (LUE0033) and Q 153 (David Young).

**Table 1: Summary of overarching themes**

Theme	Why is this a problem	Selected quotes from witnesses
Siloed working and conflicting priorities	Can lead to conflicting priorities, lost opportunities, underwhelming results and unintended consequences	<p>“One of the biggest challenges is that no one government department oversees [land use planning]” (Written evidence from RTPI (<a href="#">LUE0031</a>))</p> <p>“A much clearer cross-government prioritisation exercise must be developed considering the broad spectrum of domestic and international policies. Crucially this exercise must address the compatibility of these policies to actually co-exist on what is a finite land resource” (Written evidence from NFU (<a href="#">LUE0049</a>))</p>
Lack of strategic thinking and poor coordination between national, regional and local government	Can limit our ability to think about land use issues at landscape level and to identify and implement cross-boundary initiatives	<p>“Local leaders around the country want to see a more strategic approach to allow better land use decision making at local authority, catchment and landscape scales” (Written evidence from Food, Farming and Countryside Commission (<a href="#">LUE0088</a>))</p> <p>“Decisions about land use need to reflect a combination of national and local priorities.” (Written evidence from Professor Ian Hodge (<a href="#">LUE0033</a>))</p>
Uncertainty around government policy	Can lead to poor decision making based on incomplete information	<p>“Decision makers should not underestimate the disruption and uncertainty associated with subsidy transition and future support.” (Written evidence from Countryside and Community Research Institute (<a href="#">LUE0071</a>))</p> <p>“There is a general lack of clarity over how delivery of nature objectives and goals for ELM will work alongside and with future ambitions around food production as well as with other environmental policy priorities such as Biodiversity Net Gain.” (Written evidence National Trust (<a href="#">LUE0039</a>))</p>



Theme	Why is this a problem	Selected quotes from witnesses
Gaps and accessibility concerns around data and evidence	Can lead to duplication of evidence gathering, incomplete understanding of trade-offs, resulting in poor decision making	<p>“[Research and Development] is clearly an area where a lot of the basic data collection needs to be scaled up.” (Q99 (Benet Northcote))</p> <p>“... there is an issue about better data sharing ... It would be helpful to have a comprehensive shared evidence base for data in relation to land use and land use change.” (Q46 (Kevin Austin))</p> <p>“Whilst the UK is relatively data rich, there isn’t currently a comprehensive, systematically and regularly collected data set on changes in natural capital/ ecosystem assets and ecosystem services ... There have been significant gaps in the data and information and important data sets are out of date and not regularly updated.” (Written evidence from Natural England (LUE0104))</p>
Lack of governance including lack of monitoring and evaluation	Can lead to a mixture of different objectives, approaches and regulations being adopted at various levels and a lack of agreement on outcomes	<p>“The move towards land use that addresses long-term strategic visions requires the application of holistic approaches recognising the multi-objective and multi-level governance.” (Written evidence from UKRI (LUE0047))</p> <p>“There needs to be a system of governance that can generate high quality information on local circumstances and capabilities; can elucidate local values and priorities; can balance the demand for ecosystem services with the capacity of the local area to deliver them; and can create incentives for delivery from landholders and monitor outcomes.” (Written evidence from Professor Ian Hodge (LUE0033))</p>
Lack of understanding of multifunctionality in policy and practice	Can lead to lost opportunities to seek out and/or identify greater inter-connections, interdependences, synergies and trade-offs	<p>“Multifunctionality can be seen as various ways of physically using land. But within each physical use are multiple layers of impact.” (Written evidence from Black Environment Network (LUE0032))</p> <p>“Land is finite so the only way to deliver more of the urgent priorities needed is to support multifunctional solutions and this will require improved and careful policy integration to avoid the objectives of one policy being undermined by another.” (Written evidence from Association of Drainage Authorities (LUE0075))</p>

## CHAPTER 2: LAND USE SECTORS AND THEIR ROLE IN A LAND USE FRAMEWORK

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25. This chapter focuses on evidence we heard on the various sectors and types of land use which are core components of, or relevant to, a land use framework, and whose needs and priorities will need to be incorporated within it.
26. Historically, food production has been accorded the highest priority in the land use hierarchy and recent global events have seen a renewed focus on achieving greater food security; we also heard evidence on the potential impact of agricultural innovation and how this might affect land use needs for food production in the future.
27. However, the increasing priority given to carbon sequestration within net zero commitments, as well as national and global commitments to protect and restore nature and biodiversity, mean there is increasing pressure and competition for land use, and it is now widely recognised that other uses may need to be prioritised in specific locations. A more comprehensive framework for understanding and prioritising the most appropriate land uses in the most appropriate areas is therefore of increasing importance.
28. It is also important to consider needs such as new housing and associated development, and energy and related infrastructure, which place significant demands on land in specific areas. Finally, we took evidence on the importance of access to the countryside and to open spaces, the importance of which was highlighted during the COVID-19 pandemic but which, we heard, has not always been granted the same priority as other uses.
29. We heard evidence that there is a need to reconsider how we understand and manage land and assess the appropriateness of different uses. At the core of this reconsideration is the concept of multifunctionality. Also relevant to this approach is the question of scale and at what level it is most appropriate to make land use decisions in particular contexts.
30. This chapter will assess each of the land use sectors in turn and consider how they might be incorporated within a multifunctional land use framework. This is not intended to represent an exhaustive survey of all possible uses; there are others, such as transport and flood defences, which will also require consideration in a comprehensive framework but on which we heard limited evidence. We do, however, consider that our proposed multifunctional framework will enable additional uses to be incorporated where necessary and appropriate.
31. Issues relating to the operation of the town and country planning system are addressed in the next chapter. As housing is closely linked with planning in land use policy, we cover this in the next chapter.

### Food production

32. The debates over the Government's food strategy (see Box 2) and the preceding independent review led by Henry Dimbleby have highlighted wider discussions over how food production in England should be managed and prioritised. As with all aspects of land use, this is a dynamic debate, and current events such as the war in Ukraine have renewed focus on the importance of food security and the contribution of domestic production to this.

33. It is inescapable, however, that other pressures and demands on English land set out in this report require a new approach to food production in England. Technological changes and innovations, as well as changing diets, mean that change is inevitable. This section will cover these debates and their implications for a land use framework.

### Box 2: The Government food strategy

In June 2022 the Government published its *Government food strategy*.<sup>19</sup> In its words, the strategy was intended to “help ensure we deliver our ambition for a prosperous agri-food sector, and that healthier and more sustainable diets can be achieved by all”. The publication of the strategy followed the publication of the independent review of the food system, the *National Food Strategy*, led by Henry Dimbleby.<sup>20</sup>

The Government’s strategy noted that for the foods that are able to be produced in the UK, we produce around 75% of what we consume (the figure for all domestic food consumption is around 60%<sup>21</sup>), and the strategy committed the Government to maintaining this percentage—which has been broadly stable for around 20 years—in the future. The strategy also committed to the production of a land use framework in 2023 which would “ensure we meet our net zero and biodiversity targets, and help our farmers adapt to a changing climate, whilst continuing to produce high quality, affordable produce that supports a healthier diet”. Other commitments in the strategy included a £270 million investment through the farming innovation programme, and to use the proposals set out in the Agricultural Transition Plan to ensure that output can be maintained while meeting the Government’s climate and environmental goals.

Henry Dimbleby told us that the strategy is “not a strategy in that it is not a holistic explanation of how the Government want to create a food system that can feed us affordably, keep us healthy and maintain and improve the environment”.<sup>22</sup> He welcomed some aspects of the strategy but criticised it for not putting the transition of our food system on a statutory basis, with no targets committed to in law and no provision for independent review of progress on transition.<sup>23</sup>

#### *Protecting land for food production*

34. Some witnesses argued for a stronger policy focus on food production and on protecting land for this purpose. For example, the NFU told us that the country should be “looking to maintain and increase domestic food production to help sustainably feed the world’s growing population”.<sup>24</sup>
35. Professor Michael Winter also told us that “If a national land use strategy were to be produced it would have to confront the potential impact of

19 DEFRA, *Government Food Strategy*, CP 698, June 2022: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1082026/government-food-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1082026/government-food-strategy.pdf) [accessed 22 November 2022]

20 National Food Strategy, *Independent Review - The Plan*, 15 July 2021: [https://www.nationalfoodstrategy.org/wp-content/uploads/2021/10/25585\\_1669\\_NFS\\_The\\_Plan\\_July21\\_S12\\_New-1.pdf](https://www.nationalfoodstrategy.org/wp-content/uploads/2021/10/25585_1669_NFS_The_Plan_July21_S12_New-1.pdf) [accessed 5 December 2022]

21 DEFRA, ‘United Kingdom Food Security Report 2021: Theme 2: UK Food Supply Sources’: <https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021/united-kingdom-food-security-report-2021-theme-2-uk-food-supply-sources> [accessed 22 November 2022]

22 Q 190 (Henry Dimbleby)

23 *Ibid.*

24 Written evidence from NFU (LUE0049)

choices we make about our land use to the trade we conduct with the rest of the world... if we reduce our food and/or energy production to encourage nature recovery and recreation, potentially we will import more food and energy and relocate some of the negative environmental costs (externalities) to third countries”.<sup>25</sup> Other witnesses—including the Community Planning Alliance and the National Association of Local Councils—also called for the protection of productive agricultural land, while Dr Keith Kirby suggested that it may not be appropriate to take land out of production in the context of global supply challenges.<sup>26</sup>

36. We also heard evidence on existing pressures on land availability for food production, for example from Professor Michael Alder, Professor Emeritus at University of Essex, who argued that bioenergy crop requirements might reduce the land available for food.<sup>27</sup> Others disputed this suggestion and we discuss other perspectives on land demand for bioenergy crops later in this chapter.

### *Technology and agricultural innovation*

37. Jake Fiennes, Director of Holkham Nature Reserve, told us that that “current agricultural and farming practices are generally unsustainable for the medium to long term. Our reliance on synthetic inputs and the effects they have on the wider environment are all too clear”.<sup>28</sup> The Wildlife Trusts also called for a transition to a new model of food production.<sup>29</sup>
38. Many responses to the Committee made clear that agricultural innovation would be key to the future of food production and to ensuring that food security could be supported in tandem with other land use objectives. For example, UK Centre for Ecology and Hydrology (UKCEH) told us that the UKRI-funded Achieving Sustainable Agricultural Systems programme “has shown that it is possible to produce food on commercial arable and livestock farms efficiently whilst significantly reducing the environmental footprint of agriculture”, through co-development of new farming systems with the farming industry.<sup>30</sup>
39. The CLA said that “innovations around data and precision farming, artificial intelligence and robotics, livestock diets, crop and livestock genetics, and (the) shift to circular approaches to farming could have a significant impact. The pace of their adoption will be determined by their costs and by the skills needed to use them, both of which can be influenced by Government incentives and policies”.<sup>31</sup> Dr Kelly Jowett of Rothamsted Research also told us that precision agriculture allows reduced applications of pesticides, which “not only reduces the risk of pesticide failure (with dramatic cascade effects as in the case of oilseed rape) but may also help to achieve environmental targets surrounding the reduced use of agrochemicals”.<sup>32</sup>

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25 Written evidence from Professor Michael Winter ([LUE0038](#))

26 Written evidence from Community Planning Alliance ([LUE0080](#)), National Association of Local Councils ([LUE0081](#)) and Dr Keith Kirby ([LUE0013](#))

27 Written evidence from Professor Michael Alder ([LUE0008](#))

28 Written evidence from Jake Fiennes ([LUE0063](#))

29 Written evidence from The Wildlife Trusts ([LUE0077](#))

30 Written evidence from UKCEH ([LUE0078](#))

31 Written evidence from CLA ([LUE0096](#))

32 Written evidence from Dr Kelly Jowett ([LUE0079](#))

40. We also heard from organisations working on specific agricultural and scientific innovations that may help to considerably reduce the footprint of land use in the future. These included Harvest Farms, a vertical farming initiative. They said that that vertical farms can be more flexible in where they are located, are far more productive than open fields per square metre, and best suited for growing salads, herbs, leafy greens and some fruits, providing considerable scope for the industry to “grow as a substitute for imports, improving food security and reducing food miles”.
41. Harvest Farms also noted that new technologies can help support changing diets and associated emission reductions—for example via the growth of plant-based meat substitutes.<sup>33</sup> A further example of innovation was cultivated meat; Russ Tucker, founder of the company Ivy Farms, told us that this process “translates into improvements on greenhouse gas emissions, land use and water use. On greenhouse gas emissions for beef ... there are potential savings of up to 92% ... on land use it is 95% efficiency, and on water use it is 95% because we recycle all the water we use in the process”.<sup>34</sup>

### *Food production and ELMS*

42. The Government’s proposed Environmental Land Management Schemes (ELMS), by which farmers and land managers can be paid to deliver environmental goods,<sup>35</sup> were also discussed in relation to their potential impact on food production. For example, the Community Planning Alliance stated that while ELMS will be “very beneficial for the environment, biodiversity, landscapes and well-being”, it stressed that “priority must be given to protecting best food-producing land and facilitating ELMS schemes on least productive land”.<sup>36</sup>
43. Andrew Clark of the National Farmers’ Union (NFU) expressed concern that potential conflicts in land use may compromise the ability to support food production. He told us: “the question is how these various land uses fit together and whether the countryside is still recognised as multifunctional so that you can stack these various land uses together. It is concerning to us that so many of them appear to conflict with food production”.<sup>37</sup>
44. Andrew Clark also said that, according to the NFU’s estimates, “about 2 million hectares of land in England are up for grabs or being claimed [for non-food uses]” and said that this figure would “clearly” conflict with national food security, “but not if they were largely complementary to food production... we have a countryside where we get multifunctional outcomes: food production and protection ... so it could be made to work if we had joined-up policy”.<sup>38</sup>
45. ***New priorities for land use and management in England such as nature restoration and carbon sequestration mean that food production is experiencing new pressures. There is, however, no reason why our ability to achieve food security should be compromised by these new priorities. A multifunctional approach is key to ensuring this.***

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33 Written evidence from Harvest Farms ([LUE0053](#))

34 [Q 158](#) (Russ Tucker)

35 Further information about ELMS may be found in Box 5 in the nature and biodiversity section below.

36 Written evidence from Community Planning Alliance ([LUE0080](#))

37 [Q 28](#) (Andrew Clark)

38 *Ibid.*



46. *Under Section 19 of the Agriculture Act 2020, the government has a statutory duty to lay before Parliament every three years a report relating to our national food security and to the resilience of the supply chain for food. This report should be informed by a wider framework for land use which balances the production of food with other emerging land use needs. Energy resilience, for instance, has grown considerably in importance. This framework should also assess the degree to which agricultural innovation can reduce land use pressures.*

### Nature and biodiversity

47. The planet has seen alarming nature and biodiversity loss over recent decades and England is no exception. Professor Sir Partha Dasgupta issued a stark warning about the situation in his 2021 independent review *The Economics of Biodiversity*, stating that biodiversity declines “are undermining nature’s productivity, resilience and adaptability, and are in turn fuelling extreme risk and uncertainty for our economies and well-being”.<sup>39</sup>
48. The measures discussed in this section, including ELMS, Biodiversity Net Gain (BNG) and Local Nature Recovery Strategies (LNRS), are all seen as crucial elements for restoring nature and tackling biodiversity loss. We discuss each of these measures in turn. We note here that each of these measures place new responsibilities on local authorities which will have a cumulative impact on their capacity to deliver them.

### Environment Act 2021

49. The Environment Act 2021—together with the Agriculture Act 2020 and the 25 Year Environment Plan (25 YEP)—set out the Government’s road map for restoring nature and biodiversity in the UK.

### Box 3: Nature and biodiversity provisions in the Environment Act 2021

The Environment Act 2021 creates a new legal framework for environmental governance and established provisions for the Government to set long-term targets for specific environmental improvements in the areas of air quality, water, biodiversity, and resources efficiency and waste reduction. The Act requires the Government to have and maintain an Environmental Improvement Plan (EIP) to significantly improve the natural environment. The Government must produce an annual report on the EIP and regularly review and update the plan as appropriate.

The Act establishes the statutory and independent environmental body, the Office for Environmental Protection. Its key role is to hold the government to account. It monitors progress in improving the natural environment in accordance with the 25 YEP and with targets set under the Environment Act. It also monitors implementation of environmental law and advises government on any proposed changes to relevant laws or matters relating to the natural environment. It is required to prepare annual progress reports which are laid before Parliament.

39 HM Treasury, *The Economics of Biodiversity: The Dasgupta Review* (February 2021), p 1: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/957629/Dasgupta\\_Review\\_-\\_Headline\\_Messages.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957629/Dasgupta_Review_-_Headline_Messages.pdf) [accessed 22 November 2022]

The Act commits the Government to halt the decline in species by 2030 and includes a suite of provisions targeting the improvement of nature and biodiversity. These include provisions to:

- strengthen and improve the duty on public bodies to conserve and enhance biodiversity prior to development taking place;
- mandate biodiversity net gain through the planning system, requiring a 10% increase in biodiversity after development, compared to the level of biodiversity prior to the development taking place;
- prepare and publish Local Nature Recovery Strategies, as a tool to direct action for nature, and place an emphasis on supporting local leadership of nature improvement;
- provide for Species Conservation and Protected Site Strategies to improve the conservation and protection of the most vulnerable species and habitats;
- provide powers to amend and re-focus regulations to support delivery of domestic biodiversity priorities;
- provide greater enforcement powers to the Forestry Commission to reduce illegal tree felling, and require local authorities to consult with local residents prior to felling street trees; and
- address illegal deforestation in the supply chains.

The Act requires the Government to set at least one long-term target in each of the priority areas of air quality, water, biodiversity and resources efficiency and waste reduction by October 2022. The Government has missed this deadline but has said that “ambitious, achievable and robust targets” will be published “soon”.

Source: *Explanatory notes to the Environment Act 2021* and *HL Deb*, 25 October 2022, *col 1378*

50. DEFRA provided an update on this agenda, telling us:

“[The Government is] implementing the new legislative framework set out in the Environment Act 2021; including our commitment to set new, legally binding biodiversity targets to halt the decline in species by 2030, alongside other environmental targets for England on which we are currently consulting; producing a new Environmental Improvement Plan, and implementing measures such as Local Nature Recovery Strategies and Biodiversity Net Gain which build on the long-term approach to protect and enhance our natural environment, as set out in the 25 Year Environment Plan.”<sup>40</sup>

51. Witnesses were generally positive about the direction of travel set out in the Environment Act and associated strategies.<sup>41</sup> While supporting the main thrust of the Act, others expressed concern that the targets being set and plans for LNRS were not ambitious enough; that the details on how these targets could be achieved, including funding and delivery mechanisms, were lacking; and that the burden of new responsibilities placed on local authorities to deliver LNRS and BNG were being introduced at a time when local authorities are already “very under resourced”.<sup>42</sup>

40 Written evidence from DEFRA ([LUE0103](#))

41 For example, written evidence from Natural England ([LUE0104](#)) and Wildlife Trusts ([LUE0077](#))

42 [Q 87](#) (Elliot Chapman-Jones), written evidence from the Broadway Initiative ([LUE0068](#)), Professor Ian Hodge ([LUE0033](#)) and [Q 97](#) (Ben Kite)

### *Natural capital approach*

52. We heard that pursuing a natural capital approach is crucial for improving decision making around land use and for delivering the Government's targets for nature restoration and biodiversity. For example, both DEFRA and Natural England told us that developing a robust natural capital approach is absolutely essential to ensure that policy is delivering genuine gains for nature and emphasised that key to this is developing robust base line measurements and values.<sup>43</sup>

### **Box 4: What is Natural Capital?**

Natural Capital can be defined as “elements of nature that directly or indirectly produce value to people, including living and non-living aspects of ecosystems, species, freshwater, land, minerals, the air and oceans”. Failure to account properly for Natural Capital can mean that natural resources are exploited for short-term gain at the expense of long-term benefits. Measuring and valuing natural capital can help to identify the costs and benefits of how we use natural assets and help manage environmental risks.

The Office for National Statistics (ONS) publishes the UK Environmental Accounts and the UK Natural Capital Accounts. Natural Capital accounts have been included in the UK Blue Book (UK National Accounts) since 2020. Measuring and valuing natural capital accounts continues to be a work in progress.

In 2020 DEFRA published *Enabling a Natural Capital Approach* to help government policy makers, public sector bodies and private practitioners understand natural capital and how to take it into account in policy planning and decision making, and has established a Natural Capital and Ecosystem Assessment Programme to collect evidence on the extent, condition and change over time of England's ecosystems and natural capital.

Source: See Parliamentary Office of Science and Technology, *Natural Capital: An Overview* (December 2016), [POSTnote 542](#). Natural Capital Committee, *The State of Natural Capital: Restoring our Natural Assets* (March 2014): [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/516698/ncc-state-natural-capital-second-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/516698/ncc-state-natural-capital-second-report.pdf) [accessed 5 December 2022]. ONS, 'Natural Capital Accounts roadmap: 2022': <https://www.ons.gov.uk/economy/environmentalaccounts/articles/naturalcapitalaccountsroadmap/2022> [accessed 5 December 2022]. DEFRA, 'Enabling a Natural Capital Approach' (22 January 2020): <https://www.gov.uk/guidance/enabling-a-natural-capital-approach-enca> [accessed 5 December 2022] and DEFRA, 'Natural Capital and Ecosystem Assessment Programme' (5 October 2022): <https://www.gov.uk/government/publications/natural-capital-and-ecosystem-assessment-programme/natural-capital-and-ecosystem-assessment-programme> [accessed 5 December 2022]

53. We heard that developing a robust natural capital approach will be crucial to support wider environmental gains and for making better use of specific areas of land such as Green Belt. For example, Kevin Austin of the Environment Agency told us that “there is huge potential for capturing wider natural capital benefits through environmental net gain, in flood protection, carbon sequestration, air and water, et cetera” but acknowledged that doing so will be complicated.<sup>44</sup> Matthew Kirby, a PhD researcher at Northumbria University, told us that—when viewed through a natural capital lens—Green Belt areas have the potential to deliver significant multifunctional land uses, including carbon sequestration, flood management and recreation.<sup>45</sup>

43 [Q 6](#) (Rachel Fisher) and [Q 40](#) (Alan Law)

44 [Q 43](#) (Kevin Austin)

45 Written evidence from Matthew Kirby ([LUE0042](#))



54. The Environmental Change Institute at the University of Oxford reminded us that a natural capital approach is something that should link in with other aspects of planning around land use, telling us that adopting a natural capital approach and mapping existing natural assets should underpin spatial planning policy.<sup>46</sup> The view that a natural capital approach should underpin spatial planning resonated across several witnesses who stressed the importance of its operation at different scales including catchment, regional and local.<sup>47</sup>
55. We also heard that a natural capital approach can assist in identifying and assessing trade-offs and finding opportunities to support multifunctionality, both of which we consider very important for improving our current approach to land use. For example, we heard that it can help identify and manage trade-offs in cases where pursuit of some land uses, such as net zero and other environmental targets, may undermine efforts to halt or reverse biodiversity loss, and can help identify cross-sectoral land use interactions and trade-offs.<sup>48</sup> The Case Study on South Downs at Box 7 provides a further illustration of these issues.

### *Environmental Land Management Schemes (ELMS)*

56. Environmental Land Management schemes (ELMS) lie at the heart of plans to incentivise landowners and managers to undertake measures to improve biodiversity and help restore nature.

### **Box 5: Environmental Land Management Schemes (ELMS)**

ELMS offer arrangements through which farmers and land managers can be paid to deliver environmental goods. They are intended to contribute to the 25 YEP and net zero targets.

There are three types of ELMS:

- Sustainable Farming Incentive (SFI)—this will pay farmers to manage their land in an environmentally sustainable way. The scheme includes a set of standards and will pay for actions that can be taken at scale across the whole farmed landscape (eg: reducing inorganic fertiliser and pesticide, taking care of soils and improving farmland biodiversity, water quality and carbon sequestration).
- Local Nature Recovery Schemes: this will pay for actions that support local nature recovery and meet local environmental priorities. It will encourage collaboration between farmers to improve their local environment. The scheme is expected to contribute to tree targets, peatland restoration, habitat creation and restoration and natural flood management. (Local Nature Recovery Schemes should not be confused with Local Nature Recovery Strategies, which are discussed in more detail below).
- Landscape Recovery Schemes: this scheme will support landscape and ecosystem recovery through long-term projects such as re-wilding, extensive grazing, large-scale tree planting and peatland and salt marsh restoration.

46 Written evidence from the Environmental Change Institute ([LUE0067](#))

47 For example, see written evidence from the Floodplains Meadow Partnership ([LUE0043](#)) and [Q 250](#) (Professor Mark Scott)

48 Written evidence from the Soil Association ([LUE0037](#)) and UKRI ([LUE0047](#))

At the time of writing the final shape of ELMS has yet to be confirmed by Government, and the Secretary of State confirmed to us in writing that “we continue to finalise our approach and will inform Parliament and the public in due course”.<sup>49</sup>

Source: DEFRA, ‘Environmental Land Management Schemes: overview’ (15 March 2021): <https://www.gov.uk/government/publications/environmental-land-management-schemes-overview/environmental-land-management-scheme-overview> and DEFRA, ‘Get ready for our 3 new environmental land management schemes’ (6 January 2022): <https://defra.farming.blog.gov.uk/2022/01/06/get-ready-for-our-3-new-environmental-land-management-schemes/> [accessed 5 December 2022]

57. The overwhelming message we received on ELMS is that they are going in the right direction but that more clarity and certainty is urgently needed to enable farmers and land managers to invest in them. Furthermore, farmers and land managers need much more support to encourage suitably ambitious projects. Natural England emphasised the important role that ELMS stand to play in restoring nature and biodiversity, telling us that the initiative “paves the way for addressing Government targets under the Environment Act 2021 and the 25 Year Environment Plan”.<sup>50</sup>
58. We heard that supporting collaborative approaches and developing clear, financially attractive incentives to landowners and managers will be key to ensuring high take up of ELMS.<sup>51</sup> The CLA also highlighted the need to offer choices to landowners and managers to pick programmes best suited to their land and circumstances.<sup>52</sup>
59. We heard that a significant barrier to achieving high take up of ELMS among farmers, landowners and land managers is uncertainty around the schemes and how they will work in practice.<sup>53</sup> This includes provision of access to these schemes for tenant farmers, which we heard is still one of the areas of greatest uncertainty.<sup>54</sup> Our concerns about the uptake of ELMS on the part of tenant farmers dovetail with recommendations made in the recent independent review of the agricultural tenanted sector carried out by the Tenancy Working Group chaired by Baroness Rock.<sup>55</sup>
60. We also heard that farmers and landowners need greater support and access to good quality advice about ELMS, potentially through organisations such as the Farming and Wildlife Advisory Group (FWAG). John Watkins of the National Association for Areas of Outstanding Natural Beauty (AONBs) summed up the issue of advising farmers, telling us:

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49 Letter from Rt. Hon. Thérèse Coffey MP to the Chair of the Land Use Committee (22 November 2022): <https://committees.parliament.uk/publications/31740/documents/178146/default/>

50 Written evidence from Natural England (LUE0074)

51 Written evidence from Professor Ian Hodge (LUE0033), Environment Agency (LUE0073) and CLA (LUE0096),

52 Written evidence from the CLA (LUE0096). While some witnesses agreed on the need for appropriate incentives to accommodate different types of land ownership in England (for example see written evidence from the Tenant Farmers Association (LUE0099) and the Food, Farming and Countryside Commission (LUE0088)), some witnesses saw the current concentration of land ownership as a barrier to achieving environmental targets and supported changes to the structure of land ownership including more community ownership of land (for example see written evidence from the Community Land Trust (LUE0010), Save Newcastle Wildlife (LUE0101) and Guy Shrubsole (LUE0027)).

53 For example, see written evidence from the NFU (LUE0049), Food, Farming and Countryside Commission (LUE0088).

54 Written evidence from the Tenant Farmers Association (LUE0099)

55 Baroness Rock, *Rock Review: Working Together for a Thriving Agricultural Tenanted Sector* (October 2022): [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1110806/rock-review-accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1110806/rock-review-accessible.pdf) [accessed 21 November 2022]

“[The National Association of AONBs] undertook part of the test and trials for the development of the ELM scheme. One of the clear results from that, which has been echoed in other evaluations, is the importance of having good, trusted farm advisers for farmers, which tends to mean that you have better and more ambitious schemes entered into at farm level and the ability to connect across landscapes, resulting in both better outcomes for nature and better payments for farmers”.<sup>56</sup>

61. In correspondence to us in November 2022, the new Secretary of State for Environment, Food and Rural Affairs, Rt. Hon. Thérèse Coffey MP, told us that “the principles of ELMS have been set out clearly. We continue to finalise our approach and will inform Parliament and the public in due course”.<sup>57</sup> The response did not address the concerns we heard regarding uncertainty over ELMS and how they will work in practice.
62. ***It is important that the Government urgently provide clarity on the ELMS programme to give certainty and confidence to the farming community, and to ensure that much needed habitats are better promoted and managed across England to kickstart the essential recovery of our biodiversity.***
63. ***The Government should ensure that the Farming and Wildlife Advisory Group (FWAG) and other environmental advisers are well funded and equipped to deliver advice to all farmers on how best to incorporate environmental services within their day-to-day farming activities. It should also examine how it can best develop improved environmental management skills among all land managers.***

#### *Local Nature Recovery Strategies (LNRS)*

64. The Environment Act sets out provisions for local authorities (and other responsible bodies) to develop Local Nature Recovery Strategies to deliver benefits for nature and biodiversity.

### **Box 6: Local Nature Recovery Strategies (LNRS)**

The Environment Act 2021 requires the preparation and publication of Local Nature Recovery Strategies (LNRS), a tool to direct action for nature, and place an emphasis on supporting local leadership of nature improvement. LNRS must include a statement on biodiversity priorities for the area covered and a local habitat map(s) covering the whole strategy area.

The 25 YEP commits the Government to establishing a national Nature Recovery Network (NRN), creating 500,000 hectares of wildlife habitat. The network is intended to link protected sites and landscapes with urban green and blue infrastructure such as parks, rivers, valleys and canals. LNRS are intended to act as the spatial planning framework for the NRN, by bringing public, private and voluntary organisations together around a shared plan.

Source: *Environment Act 2021*, and the Environmental Audit Committee, *Biodiversity in the UK: bloom or bust?* (First Report, Session 2021–22, HC 136)

65. The importance of LNRS was not in doubt among witnesses. Rachel Fisher from DEFRA told us that LNRS will be the bridge between land

<sup>56</sup> Q 52 (John Watkins)

<sup>57</sup> Letter from Rt. Hon. Thérèse Coffey MP to Lord Cameron of Dillington (22 November 2022): <https://committees.parliament.uk/publications/31740/documents/178146/default/>

use planning, which sits with DLUHC, and the Government's wider nature recovery and nature-based solutions work led by DEFRA.<sup>58</sup> Natural England told us that "the development of LNRS has huge potential to deliver nature recovery and present an opportunity to support integrated planning at the local scale".<sup>59</sup>

66. Some witnesses highlighted the importance of ensuring that LNRS are embedded in wider planning policy. The Royal Town Planning Institute (RTPI) suggested the creation of Local Environment Improvement Plans which would draw together various policy areas including ELMS, LNRS and BNG in a unified plan "so that funds can be channelled into strategic landscape improvement with a local democratic mandate".<sup>60</sup> The Broadway Initiative told us that LNRS present an opportunity to "consolidate and expand the digitisation of local planning" and to "simplify the confusing and siloed array of local environmental plans".<sup>61</sup>
67. In correspondence with us, DLUHC said that "we committed in the Environment Act to delivering statutory guidance for how local planning authorities should have regard to local nature recovery strategies. We are doing that jointly with DEFRA, and we will have firm guidance for local planning authorities to have regard to LNRSs".<sup>62</sup>
68. Despite the support for LNRS, we heard that there is not yet enough clarity on how they will work in practice and how they will work alongside (or compete for prioritisation against) other objectives such as BNG and delivery of the Government's target to build 300,000 homes per year. Professor Katherine Willis told us that the structures for delivering LNRS are unwieldy and that "by trying to include everyone and make sure that every stakeholder is involved in [LNRS], I think you lose sight of the overarching objective and how you will deliver it."<sup>63</sup> The CLA noted "significant challenges" including the capacity of local authorities to produce (and subsequently monitor and report on) LNRSs; the mechanism for read across with local development plans; and the process of appeals and sign off for strategies.<sup>64</sup>
69. ***Local Nature Recovery Strategies are vital vehicles for ensuring that locally appropriate environmental initiatives are encouraged on the right land with input from their communities throughout every part of England. It is crucial that Government ensures that the local authorities work together and with other partners and that they are given the resources necessary to design, implement and monitor these strategies. The Government's commitment that it will "have firm guidance for local planning authorities to have regard to LNRS" is too weak. LNRS should have the necessary statutory status of being a material consideration within local authority development plans with policy wording robust enough to protect their integrity, including a commitment for LNRS to be protected and enhanced wherever possible.***

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58 [Q 1](#) (Rachel Fisher)

59 Written evidence from Natural England ([LUE0074](#))

60 Written evidence from the Royal Town Planning Institute ([LUE0031](#))

61 Written evidence from the Broadway Initiative ([LUE0068](#))

62 Letter from Rt. Hon. Lucy Frazer MP to Lord Cameron of Dillington (28 November 2022): <https://committees.parliament.uk/publications/31827/documents/178909/default/>

63 [Q 97](#) (Professor Katherine Willis)

64 Written evidence from CLA ([LUE0096](#)). Also expressing concern about resource constraints at local authority level see [Q 51](#) (David Butterworth and John Watkins).

70. *The status of LNRS in planning policy should also be recognised and reflected in National Planning Practice Guidance. Their explicit inclusion in any successor to the duty to cooperate would be an important step forward in this regard. The strategies and the extent of their audited delivery should form an essential part of the Land Use Commission triennial reports.*

#### **Box 7: Land Use Case Study: South Downs National Park Authority**

This case study sets out how using a natural capital approach can help embed and integrate land use planning and town and country planning, providing a useful potential template for the use of LNRS.

The South Downs National Park Authority (SDNPA) works in partnership with its 15 constituent local authorities and other key stakeholders. The SDNPA has embedded a natural capital approach within all their work and plans, including the statutory Partnership Management Plan<sup>65</sup> and Local Plan<sup>66</sup>. Nine ecosystem services were prioritised and mapped: accessible nature, air purification, carbon storage, education, green travel, local climate regulation, noise regulation, pollination and water purification.

These maps provided an evidence base for a core local plan policy, “SD2”, which states that “development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services”.<sup>67</sup>

The policy went on to state that this will be achieved through the use of high quality design, and by delivering all opportunities to achieve a range of priorities including:

- sustainably manage land and water environments
- protect and provide more, better and joined up natural habitats;
- improve the National Park’s resilience to, and mitigation of, climate change;
- increase the ability to store carbon through new planting or other means;
- support the sustainable production and use of food, forestry and raw materials; and
- improve opportunities for peoples’ health and wellbeing.

The policy required an assessment of the impact of the development on these ecosystem services. Uniquely, this policy was supported by both household and developer guidance to help exploit opportunities for multifunctionality.

65 South Downs National Park Authority, *Partnership Management Plan 2020–25*: [https://www.southdowns.gov.uk/wp-content/uploads/2020/04/SD\\_PMP\\_2019\\_F\\_22-FINAL.pdf](https://www.southdowns.gov.uk/wp-content/uploads/2020/04/SD_PMP_2019_F_22-FINAL.pdf) [accessed 5 December 2022]

66 South Downs National Park Authority, ‘South Downs Local Plan’ (July 2019): <https://www.southdowns.gov.uk/planning-policy/south-downs-local-plan/local-plan/> [accessed 5 December 2022]

67 *Ibid.*



The development of ‘natural capital investment areas’, which form part of the LNRS for the South Downs, enables this policy to support wider LNRS goals, and allows developments to become important sources of negotiation for delivery of wider benefits associated with policy SD2.

### *Biodiversity Net Gain (BNG)*

71. Alongside ELMS and LNRS, the other main pillar for restoring nature and biodiversity is Biodiversity Net Gain (BNG). Witnesses told us that BNG is a sound principle but there are practical challenges around implementation and monitoring.

### **Box 8: What is Biodiversity Net Gain (BNG)?**

Like LNRS, provisions for BNG are set out in the Environment Act 2021. It provides for a mandatory net gain in biodiversity through the planning system, requiring a minimum 10% increase in biodiversity after development, compared to the level of biodiversity prior to the development taking place. The metrics for determining and measuring BNG are set out by DEFRA. BNG also applies to Nationally Significant Infrastructure Projects (NSIPs: discussed later in this chapter in the section on energy and infrastructure).

There have been provisions in the National Planning Policy Framework (NPPF) since 2018 to embed net environmental gains in development and infrastructure projects. It is expected that LNRS will be used to inform how and where BNG should be delivered.

Source: *Explanatory notes to the Environment Act 2021*

72. Witnesses noted that there is not yet enough clarity on how BNG will work in practice and emphasised key principles that should underpin the process. The Wildlife and Countryside Link told us that, to fulfil its potential, BNG must reinforce the mitigation hierarchy,<sup>68</sup> steer development away from sites that are most important for nature, and be spatially aware of the needs of impact species.<sup>69</sup> Also emphasising the importance of adhering to the mitigation hierarchy, Kevin Austin of the Environment Agency told us that “off-site BNG should be considered only after on-site impacts are avoided and/or on-site BNG has been deemed not possible”.<sup>70</sup>
73. Several witnesses raised concerns about the capacity of local authorities to deliver BNG. For example, the CLA expressed concern about “the capacity of already stretched planning authorities to deliver BNG, including evaluating and processing developers’ net gain plans and monitoring, enforcing and reporting on net gain delivery” and the RTPI called for closer integration of BNG and planning policy.<sup>71</sup>
74. DLUHC told us that it had “announced £4.18 million initial set up funding to support LPAs with preparation for mandatory biodiversity net gain”, and that it “has committed to funding all new burdens on Local Authorities arising from the Environment Act”, including BNG. It also said that, following the consultation on the implementation of mandatory BNG, it “is considering

68 The mitigation hierarchy sets out the priorities and options for addressing BNG. They are (1) avoid any biodiversity loss; (2) minimise or mitigate; (3) restore; and (4) offset.

69 Written evidence from the Wildlife and Countryside Link ([LUE0094](#))

70 Written evidence from Environment Agency ([LUE0073](#))

71 Written evidence from the CLA ([LUE0096](#)) and RTPI ([LUE0031](#))

further new burdens requirements during the remaining transition period and once BNG is mandatory”.<sup>72</sup>

75. We were also urged to consider the potential of BNG to deliver unintended consequences. On this issue, CPRE expressed concern “that BNG requirements produce a perverse incentive to landowners and developers to deliberately degrade or hold down the ecological status of their land, so as to reduce the BNG measures needed to secure planning permission” and called for “more robust baselining of ecological assets.”<sup>73</sup>
76. Nationally Strategic Infrastructure Projects (NSIPs) are now also subject to mandatory BNG. This was generally seen as a positive development. For example, the Wildlife Trusts noted that “many” NSIPs “have proven to be incompatible with the net zero target and actively contributed to nature’s decline” and welcomed the provision in the Environment Act that requires terrestrial NSIPs to deliver biodiversity net gain.<sup>74</sup>
77. *To better coordinate biodiversity gains and nature’s recovery, the Government must ensure that BNG and LNRS are not marginalised within the planning system in favour of other requirements and obligations. This should include strengthening their status in planning policy and practice guidance so that greater regard is paid to them.*
78. *Monitoring and enforcement of BNG will play a key role in its success. Local authorities need to be adequately staffed and resourced to undertake all tasks necessary for overseeing genuine BNG projects and should be given the authority to intervene before the end of a BNG project if it is clear that gains cannot be delivered.*

#### *Nature-based Solutions (NbS)*

79. Restoring nature and tackling climate change are inextricably linked. Among the steps being taken to address climate change and reduce or offset greenhouse gas emissions is the emergence of nature-based solutions (NbS). NbS can include schemes which incorporate market mechanisms and allow businesses and other organisations to invest in the restoration of nature (see Box 9 on carbon codes). Under these schemes, farmers, landowners and land managers may use part of their land to participate in these markets for commercial gain as well as to support environmental objectives. In urban and peri-urban areas, green and blue infrastructure is an important mechanism to deliver NbS projects (green infrastructure is discussed in more detail in Chapter 4).
80. Attracting private finance to support nature and biodiversity is a key part of how the Government intends to meet its targets. DEFRA told us that the Government is introducing “substantial new funding” into NbS and has set itself a target of raising “at least £500m of private finance into nature recovery per year by 2027, rising to more than £1bn by 2030”.<sup>75</sup>

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72 Letter from Rt. Hon. Lucy Frazer MP to Lord Cameron of Dillington (28 November 2022): <https://committees.parliament.uk/publications/31827/documents/178909/default/>

73 Written evidence from CPRE ([LUE0055](#))

74 Written evidence from the Wildlife Trusts ([LUE0077](#))

75 Written evidence from DEFRA ([LUE0103](#))

## Box 9: Carbon Codes

The Carbon Codes set out a series of standards and requirements for voluntary carbon sequestration, such as afforestation or peatland restoration. They are intended to provide:

- A set of standards for carbon sequestration projects;
- A transparent and open registry of carbon sequestration projects;
- An agreed upon scientific basis to predict and monitor carbon sequestration from these interventions; and
- Independent validation and verification of projects under the code.

There are currently two carbon codes in operation—the Woodland Carbon Code and the Peatland Code. A Saltmarsh Code is under development. The Woodland Carbon Code is also discussed below in the forestry and woodland section.

Source: UK Woodland Carbon Code, 'Context' (2019): <https://woodlandcarboncode.org.uk/about/context> [accessed 5 December 2022], and Science and Technology Committee, *Nature-based solutions: rhetoric or reality?* (2nd Report, Session 2021–22, HL Paper 47)

81. In addition to the woodland and peatland carbon codes, DEFRA noted that it is developing other market mechanisms to scale private finance towards nature and piloting “nutrient trading in nutrient-sensitive catchments”. DEFRA also noted risks to private funding including double-funding and the need to ensure that payments are made for genuinely additional benefits and that projects are supported by, and benefit, local communities.<sup>76</sup>
82. Witnesses told us that there is a lot of interest in NbS but that this carries risks. Some witnesses referred to the state of private markets as “the wild west”.<sup>77</sup> Professor Mark Reed, Co-Director, Thriving Natural Capital Challenge Centre, SRUC, told us that “natural capital buyers and carbon markets are creating significant, but poorly understood risks for markets, land managers and rural communities”.<sup>78</sup> He further noted that “... there is currently limited evidence in relation to what the wider outcomes of [the growth in natural capital markets] are for rural communities and economics and how this varies based on the resulting land use outcomes.”<sup>79</sup> He added that interest in carbon markets has increased rapidly in recent months, leading to new market opportunities and interest in acquiring land to invest in natural capital, typically through tree planting and restoration of degraded peatland habitats.<sup>80</sup>
83. As with BNG, we heard about the risk that poorly designed carbon markets may lead to unintended consequences. For example, the Environmental Change Institute warned that there is a tendency for the term NbS to be used to describe actions that do not meet criteria of being truly NbS and expressed concern about the practice of “greenwashing”, where companies use NbS to claim progress on becoming carbon neutral while continuing with business as usual.<sup>81</sup>

76 Written evidence from DEFRA ([LUE0103](#))

77 [Q 22](#) (Susan Twining) and [Q 62](#) (Dr Darren Moorcroft)

78 Written evidence from Professor Mark Reed ([LUE0014](#))

79 *Ibid.*

80 *Ibid.*

81 Written evidence from the Environmental Change Institute ([LUE0067](#))



84. We heard that the lack of regulation and nascent state of some markets is causing problems that need to be urgently addressed.<sup>82</sup> We heard, for example, from the Soil Association that sellers of offsets should have a plan in place to avoid and reduce all emissions in their own enterprise, including offsetting their own unavoidable emissions, before they are rewarded via the carbon market.<sup>83</sup>
85. Witnesses raised other challenges that need to be considered as the Government embarks on supporting the development of more carbon markets and encouraging NbS. For example, UKRI told us that a one-size-fits-all approach won't work and that "spatial targeting of incentives based on local landscape contexts is required". UKRI also cautioned about the need to avoid uptake being dominated "by those who are most aware of how to opportunistically access schemes".<sup>84</sup> UKCEH told us that "the key challenge is the development of cost-effective and independent means of verifying the outcomes and benefits of these market-driven policies".<sup>85</sup>
86. ***The Government must ensure that both BNG and NbS include sufficient funding to allow for effective monitoring and auditing of projects. Monitoring must pay particular attention to ensuring that the mitigation hierarchy is being adhered to and that compensation and off-setting are only used as measures of last resort so that the biodiversity gains are both genuine and long-lasting. A Land Use Commission would play an important oversight role in making sure that monitoring and evaluations are carried out to the highest standards.***

### Forestry and woodland

87. Woodland covers the second largest area of land in the UK, after farmland. 1.31 million hectares of land in the England were covered by woodland in 2019, accounting for approximately 10% of all land in the England.<sup>86</sup>
88. Several witnesses commented on the multifunctional benefits provided by well managed woodlands including timber production, carbon capture, support for biodiversity and health-giving access opportunities.<sup>87</sup> These benefits highlight the important role of England's woodland in supporting the UK's net zero target. This is true for both the productive woodland in the forestry sector and the conservation woodland that will be planted by landowners and farmers under schemes such as ELMS<sup>88</sup> and the English Woodland Creation Offer, a new Forestry Commission fund available for landowners, land managers and public bodies to support the creation of new woodland, including through natural colonisation.<sup>89</sup>

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82 See for example, written evidence from the Community Land Trust Network (LUE0010), Broadway Initiative (LUE0068) and the National Trust (LUE0039).

83 Written evidence from the Soil Association (LUE0037)

84 Written evidence from UKRI (LUE0047)

85 Written evidence from UK CEH (LUE0078)

86 ONS, 'Woodland Natural Capital Accounts, UK:2020': <https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/woodlandnaturalcapitalaccountsuk/2020> [accessed 21 November 2022]

87 See for example written evidence from Environment Agency (LUE0073) and Confor (LUE0029), and Q 1 (Rachel Fisher).

88 Productive woodland is defined as woodland that is used for industry, construction, fuel and for other purposes and that can be capable of forest production. Conservation Woodland is defined as an area of forest which is focused on conserving and protecting nature.

89 Forestry Commission, 'English Woodland Creation Offer' (3 October 2022): <https://www.gov.uk/guidance/england-woodland-creation-offer> [accessed 21 November 2022]

89. Sir William Worsley agreed that the Government's target of planting 7,000 hectares a year was "significant" and added that "in 1971, when you had tax relief for planting trees, we got 6,500 hectares planted, so I do not want to underestimate the challenge of doing this."<sup>90</sup>
90. It was agreed that the funding to achieve these targets is available; Sir William told us that "the England Woodland Creation Offer is a very generous grant scheme. It effectively pays you to plant your land, and then there is the £300 per hectare payment for 10 years. That is absolutely super for a 10-year window."<sup>91</sup>
91. Carolyn Ayre, England National Manager at Confor, told us that the main challenges to achieving these targets were not the funding, but that "we have an ageing and declining workforce with the skills to deliver what we should be delivering, which is quality tree planting and woodland management".<sup>92</sup> The scale of this challenge is large, as exemplified by Sir William Worsley's evidence that "20% of our broadleaf woods in England are managed", which he called an "extraordinarily low proportion."
92. The Institute of Chartered Foresters also raised what they called the "critical skills shortage" while pointing out that "a lack of clarity and join-up of tree planting and management schemes [is] reducing confidence" and the difficulties surrounding "finding the land for trees" are the major barriers to increasing afforestation in England.<sup>93</sup>
93. Regarding the issue of finding the land, Guy Shrubsole, author of *Who Owns England?*, discussed the National Food Strategy's findings, noting in particular that "we could effectively cease farming on 20% of our least productive land, and only have a 3% impact on food production", and that "this least productive land is almost exactly the same land where we find most of our carbon-rich peat soils; where land is most suitable for broadleaved woodland regeneration; and where we find most of our national parks".<sup>94</sup>
94. Equally, if England is going to achieve its tree planting targets, developers must ensure that appropriate tree cover is included in new developments. However, Dr Darren Moorcroft from the Woodland Trust told us that "we are not seeing it at the moment. There is an opportunity in urban developments. From a Woodland Trust perspective, we believe that every new development should have at least 30% canopy cover within it". He also raised the benefits which ensuring appropriate tree cover in new developments could have beyond carbon sequestration, saying that "the shade from the trees will provide a cooling element for the development and will be able to capture rainwater and potentially alleviate the risk of flooding. There is a whole range of benefits if we get the systems in place to deliver them."<sup>95</sup>
95. However, it is also important that farmers, developers and landowners know where not to grow trees. We heard that grades 1 and 2 land should be protected from tree planting and building; David Robertson, Director of Investment and Business Development at Scottish Woodland, said "I have

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90 [Q 55](#) (Sir William Worsley)

91 *Ibid.*

92 [Q 55](#) (Carolyn Ayre)

93 Written evidence from the Institute of Chartered Foresters ([LUE0021](#))

94 Written evidence from Guy Shrubsole ([LUE0027](#))

95 [Q 55](#) (Dr Darren Moorcroft)

absolutely no doubt that grade 1 should be protected. Should that extend to grade 2? Very likely”.<sup>96</sup>

96. The Environment Agency said that “afforestation to meet net-zero targets is clearly a priority. However, decisions on location need to consider catchment water balances and be managed appropriately so as not to have an adverse effect on water resources. Afforestation leads to greater evaporation, which can reduce the amount of aquifer recharge and or runoff during low flows. This can impact aquatic ecology and water supplies. Woodland planting can also help to achieve water quality, biodiversity and flood risk benefits but only if appropriately targeted for water benefits first”.<sup>97</sup>
97. Dr Carolyn Cobbold expanded on this, explaining that because a Woodland Code has been developed before a Wetland Code, this is “encouraging farmland that cannot be converted into housing to be wooded over rather than used for farming or the creation of wetlands.”
98. It was also raised by several witnesses that all forestry—whether existing or new—needs to promote biodiversity. The Environmental Change Institute particularly pointed to the “large scale planting of non-native species such as Sitka Spruce,” as an example of forestry initiatives which have been damaging to biodiversity in England.<sup>98</sup>
99. Carolyn Ayre from Confor laid out how to avoid this outcome, telling us that, “it absolutely comes back to the multipurpose, multiobjectivity, of woodland, and what it can deliver... we should be looking at a mosaic of different types of woodland within the landscape, from short rotation forestry that can deliver very fast-yielding productive timber through to protecting parkland trees, individual trees and veteran trees”.<sup>99</sup> She also pushed back strongly against framing the use of England’s productive woodland as a “dichotomy of production versus conservation”. In their evidence the Soil Association was one of several witnesses to raise agroforestry as an important example of a tool that can “help restore biodiversity on our farms, working with nature rather than against it”.<sup>100</sup>
100. Balancing these issues will require multifunctional land use, good mapping, and the right incentives to plant trees. Carbon Markets have the potential to act as an incentive for tree planting and The Woodland Carbon Code had support from a number of witnesses that gave evidence. These included the National Trust, who said, “we endorse the Woodland Code and the Peatland Code”.<sup>101</sup>
101. The Woodland Carbon Code market was described to us as “genuinely embryonic” by David Young, from the Broadway Initiative, who added that therefore its impact may be limited.<sup>102</sup> There were a number of other concerns raised about it, with David Robertson from Scottish Woodlands Ltd informing us that recent changes to the Code produce “a perverse outcome” that “incentivise people to buy better-quality land because you are required to prove that forestry is a worse option than the current land

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96 [Q 150](#) (David Robertson)

97 Written evidence from the Environment Agency ([LUE0073](#))

98 Written evidence from the Environmental Change Institute ([LUE0067](#))

99 [Q 62](#) (Carolyn Ayre)

100 Written evidence from Confor ([LUE0037](#))

101 Written evidence from the National Trust ([LUE0039](#))

102 [Q 146](#) (David Young)

use in net present value terms in order to gain additionality to gain carbon credits”.<sup>103</sup> He believed that for it to work effectively the Woodland Carbon Code must incentivise farmers to plant on “the poor corners of their fields and farms and unproductive hill land, to allow them to make their farms more efficient”.<sup>104</sup> This was a position shared by a numbers of witnesses, who raised concerns that the Woodland Carbon Code is not achieving this but rather incentivises “inappropriate” tree planting and puts “nature and climate objectives in tension”.<sup>105</sup>

102. Equally, Government schemes need to provide an incentive for farmers and landowners to plant the right trees in the right place. However, there were concerns that there is a “complexity of opportunity” due to the number of woodland creation schemes that the government is offering. Dr Darren Moorcroft said that, due to the number of schemes, “people may not know which one to go for and so go for none of them”. He saw that there is an “opportunity with ELMS to simplify the offer.”<sup>106</sup>
103. Sir William Worsley agreed with this, and added that “a lot of landowners are hanging back from making decisions as to whether to plant land ... because they want to know what the requirements of ELMS will be”.<sup>107</sup> He explained that this is because “once you have planted your land, it is there; you cannot change it. It is forestry or woodland in perpetuity”, and if a landowner has planted at any time before the requirements for ELMS are released, they may find themselves unable to achieve these requirements and access the ELMS payments.<sup>108</sup> This is further compounded by the reduction in the value of the land that results from planting trees even on lower graded farming land. For these issues to be resolved the ELMS schemes and Forestry Commission Schemes need to be improved upon significantly, so that there is a stronger incentive for tree planting.
104. *Afforestation, woodland management and wider tree planting are seen by many witnesses as playing a key and increasing role in future land use requirements. We heard that incentives and regulations are not always properly aligned to generate the best outcomes, and a land use framework will need to address this.*
105. *Tree planting must always be seen in a multifunctional context and may not always be suitable in particular locations. It is important that the framework supports a balanced approach which takes factors such as biodiversity, the quality of the land for food production, and the suitability of land for tree planting into account.*
106. *England currently has a number of targets for afforestation that are not being met. Attention needs to be paid to the development of incentives, support and regulations to improve progress in this regard.*
107. *More support needs to be given for active woodland management and the development of skills, to ensure woodland can continue to*

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103 [Q 150](#) (David Robertson)

104 *Ibid.*

105 See for example written evidence from the Environmental Change Institute ([LUE0067](#)) and the Green Alliance ([LUE0095](#)).

106 [Q 60](#) (Dr Darren Moorcroft)

107 [Q 60](#) (Sir William Worsley)

108 [QQ 60, 61](#) (Sir William Worsley)

*enhance nature and recreation while providing sustainable income streams for landowners.*

108. *Any future land use framework will need to carefully monitor the rollout of the Government's tree-planting programme. They must ensure that tree planting is delivering the required progress, happening on the right land with the right species, and ensure that it is in balance with other land use targets.*

### **Tourism, recreation and access to nature**

109. For as long as we have been moving from rural to urban societies there has been a recognition that access to natural space offers significant health advantages to the population. Dr Richard Denman agreed with this and also pointed out that the economic gains that come from greater access in tourism and recreation. He particularly pointed to “the opportunity that tourism has to deliver benefits to landowners and land managers”, and used the example that “20% of farms in England were estimated to provide some sort of tourism accommodation”.<sup>109</sup>
110. The recognition of the benefits of access to nature was used as part of the justification for providing the parks and natural areas that currently exist in English cities.<sup>110</sup> However, we heard that access to nature has not been prioritised in policy and legislation to the same level as other land uses, with particular consequences for those who may not often have the opportunity to enjoy the benefits of open space.
111. Tompion Platt, Director of Operations and Advocacy for Ramblers, pointed to “the huge amount of evidence” that supports our understanding of “just how important access to nature is to our health and quality of life”. He also emphasised that during the COVID-19 pandemic we have seen “just how important green infrastructure is to enable us to access nature” and by extension, the health benefits that it offers.<sup>111</sup> This is backed by recent research indicating that nature exposure during the pandemic was associated with less depression, anxiety, and stress, and more happiness and life satisfaction.<sup>112</sup>
112. Several witnesses informed us that more work needs to be done to identify, quantify and assess these health benefits. Elliot Chapman-Jones, Head of Public Affairs at the Wildlife Trust, told us: “if you took your Local Nature Recovery Strategy and overlaid it with indices of deprivation, health inequalities or lack of access to green space” you would gain a clear picture of the health benefits, and “you would clearly see the areas where it was most important to intervene to ensure that people have good-quality access to nature”.<sup>113</sup>
113. The pandemic also brought the issue of lack of access to green spaces for those living in urban areas to the forefront. The National Trust informed us

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109 Q 222 (Dr Richard Denman)

110 Health Promotion International, ‘Heathy nature heathy people:’contact contact with nature’ as an upstream health promotion intervention for populations’, vol 21 (2006) pp 45–54: <https://academic.oup.com/heapro/article/21/1/45/646436> [accessed 21 September 2022]

111 Q 212 (Tompion Platt)

112 Science Direct, ‘Nature’s Contribution in coping with a pandemic in the 21st century: A narrative review of evidence during COVID 19’, vol 833 (2022): <https://www.sciencedirect.com/science/article/pii/S004896972202188X> [accessed 21 September 2022]

113 Q 92 (The Wildlife Trust)



that “some inner-city parks experienced close to a 300% increase in visits in Spring 2020 compared to 2018”, and that they “experienced unprecedented visitor numbers to urban fringe sites”. They also noted that there are some “deep inequalities in such access to green space” with National Trust commissioned research finding “295 deprived neighbourhoods had no trees or accessible green space, affecting 440,000 people”.<sup>114</sup>

114. Several witnesses commented on the opportunity that the fringes of urban areas present as natural areas that could be accessible to large numbers of people.
115. During our visit to the 8 Hills project in Worcestershire, just outside Birmingham, we heard that the National Trust was seeking to work with partners to promote a new model of countryside management, with one strand being to improve access based on using GPS data to assess visitor numbers and to provide payments to landowners on this basis. Matt Doran of the National Trust noted that locations such as Lickey Hills, where the Committee visited, would be seen by economists as offering the most value through the provision of access to the nearby population. However, he noted that at present there is little accounting for this in economic models of land use and that access was not being treated as a priority by DEFRA in the introduction of ELMS. Further detail on the 8 Hills project may be found in Box 10.<sup>115</sup>

#### **Box 10: Case Study: 8 Hills Countryside Management Project**

The Committee visited the 8 Hills project, south-west of Birmingham, to assess the opportunities and challenges of land use in an area of peri-urban green belt land, where access and wellbeing for the neighbouring urban area was of particular importance. The project, led by the National Trust, focuses on an innovative countryside management approach linking governance, people, place and delivery.

The project sought to overcome traditional planning and land management silos through a partnership approach involving agencies, business, finance and project management at the landscape scale. In particular, there was a need to embed within local plans an interlinked approach incorporating access, nature, climate and economic development in the green belt location. There was a particular focus on using technology to develop financial incentives for landowners to grant access, with payments based on numbers of visitors. It was noted that an economic analysis of the land would find that by far the greatest benefit would be offered through the provision of access. There were inherent challenges in the project, however, as some of the finance for multifunctional outcomes would result from the release of Green Belt land for development.

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<sup>114</sup> Written evidence from the National Trust ([LUE0039](#))

<sup>115</sup> A full note of the visit is available at Appendix 4.

### Implications for a land use framework

The role of the National Trust as an enabler helped join up disparate land use planning systems in a countryside management approach which provides a useful integrated land use model for other areas of green belt and green infrastructure in a peri-urban setting.

The importance of the peri-urban spaces in England challenges our simple urban and rural classifications so often used in land use debates. The peri-urban should be seen as a key opportunity space for people, climate and nature which needs proactive policies, tools and finance in order to achieve multifunctional outcomes.

Far more policy attention needs to be placed on peri-urban spaces, whether in Green Belts or green infrastructure networks, and grant schemes should reflect the public benefits these spaces can offer.

116. We heard that for access to nature to be beneficial, it must be well managed; Kevin Beaty, Director at FERN, raised the issue of littering and crop damage that are common in “honey pot areas” which get used by large numbers of people. However, Kate Ashbrook, General Secretary of the Open Spaces Society, made it clear that if well managed “by granting access, you make people care about things and take an interest”, and gain an opportunity to give them education and information on the ground that will not only help them mitigate their impact on nature but be an active part in its recovery.<sup>116</sup>
117. Many of our witnesses agreed that ELMS can be an important tool in increasing access to nature and were encouraged that DEFRA has recognised that by including access as part of the schemes. Tompion Platt told us, however, that he did not believe access is at the heart of ELMS; while there have been positive noises from Ministers, we “have yet to see any detail of how access will be delivered through ELMS”.<sup>117</sup>
118. Looking more specifically at planning policy, while nature is being increasingly prioritised, we have heard that access to nature has not necessarily received the same level of attention in the planning system. Kate Ashbrook argued that access needs to be recognised in the planning system, telling us that “it should just be a quid pro quo for developers offering something over a certain size that they provide something for the public, whether new rights of way or new access”.<sup>118</sup>
119. The Wildlife Trust agreed with this, saying that access to nature should be “designed into every level of the planning system.” However, they were concerned that the planning system was not designed to meet the scale of the challenges that it currently faces and “that reform was therefore necessary”.<sup>119</sup>
120. *Access to green and open spaces is important for health and wellbeing, as well as providing an important economic function through tourism. While the Government has made commitments to access in its 25 YEP and as part of ELMS, these do not have the same status as other land commitments. This should be reviewed in the context of a land use framework and a clear prioritisation*

116 Q 216 (Kate Ashbrook)

117 Q 212 (Tompion Platt)

118 Q 214 (Kate Ashbrook)

119 Written evidence from the Wildlife Trust (LUE0077)

*of access embodied within it, to emphasise its importance and reduce potential conflict with other important uses. It is particularly important to prioritise access near locations where people live, such as in and near urban and peri-urban areas.*

### Energy and infrastructure

121. Energy policy is driven by the vision set out in the Government's Ten Point Plan for a Green Industrial Revolution and its Net zero strategy. In April 2022, on the back of rising energy prices caused by increased demand and exacerbated by the conflict in Ukraine, the Government published its *Energy Security Strategy*.<sup>120</sup> The new strategy emphasises the need to reduce dependence on imported oil and gas, improve energy efficiency and to foster a more diverse source of homegrown energy sources.
122. Large-scale energy infrastructure developments fall under the system covering Nationally Significant Infrastructure Projects (NSIPs). These are large-scale projects relating to energy, transport, water and waste. National Policy Statements set out government policy on different national infrastructure development plans and the National Infrastructure Commission advises the government on all sectors of economic infrastructure. In this section we look at both NSIPs and smaller energy infrastructure projects that go through the planning system.
123. The overarching theme raised by witnesses regarding NSIPs was their lack of integration—with other NSIPs (including other projects within same policy area), and with the wider planning system. Witnesses told us this leads to inefficiencies, poor management of trade-offs and lost opportunities. Richard Blyth, Head of Policy Practice and Research at RTPI, told us that having a series of unrelated, standalone National Policy Statements makes it difficult “to iron out” contradictions and difficulties.”<sup>121</sup> Others highlighted that the current approach can result in projects that are stand-alone rather than part of a combined programme of infrastructure and service delivery; that are economically inefficient; and that can hurt delivery of BNG.<sup>122</sup> We heard that a comprehensive vision or national level framework could help address this issue.<sup>123</sup> Natural England suggested that “it would be beneficial to fully integrate energy and other infrastructure planning with other aspects of the land use and marine planning systems”.<sup>124</sup>
124. DEFRA told us that it is aware of these concerns, noting that:

“DLUHC is working across Government and with stakeholders to review the [NSIP] regime, including how the operational system can balance the range of issues that are considered through the planning process, as well as land use pressures from food and the environment. The application of Biodiversity Net Gain to NSIPs will also help to clarify

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120 BEIS, ‘British Energy Security Strategy’ (7 April 2022): <https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-security-strategy>: [accessed 21 November 2022]

121 Q 144 (Richard Blyth), see also Q 96 (Elliot Chapman-Jones).

122 Q 96 (Elliot Chapman-Jones), Q 124 (Professor Rob Gross), written evidence from Lightsources bp (LUE0076)

123 See for example, Q 46 (Kevin Austin and Alan Law) and written evidence from the National Trust (LUE0039) and the Wildlife Trusts (LUE0077).

124 Written evidence from Natural England (LUE0074)



some trade-offs between the natural environment and infrastructure delivery”.<sup>125</sup>

### *Delivering solar energy*

125. When it came to energy and particularly renewable energy, the issue that got most witnesses exercised was the development of ground level solar farms.
126. There was strong support among some witnesses for solar panels to be integrated into industrial, commercial and domestic buildings, especially new developments.<sup>126</sup> The National Association of Local Councils (NALC) supported solar panels being located on rooftops, particularly warehouses and supermarkets.<sup>127</sup> Witnesses argued that doing so would negate the need for solar panels to be located on land classified as Best and Most Versatile (BMV) land, which should be reserved for food production.<sup>128</sup>
127. CPRE noted that “NPPF paragraph 174 (b) aims to protect best and most versatile land from development but in practice this is not being achieved. To effectively implement this policy, the government needs to revisit and either update or reform the Agricultural Land Classification system by including it in any national land use strategy and giving it more emphasis in the next review of the NPPF”.<sup>129</sup>
128. However, others noted that ground level solar farms are cheaper to install than placing solar panels on rooftops and other less conspicuous sites.<sup>130</sup> Solar Energy UK told us that “large-scale ground-mounted solar is one of the most cost-effective forms of renewable energy generation” and that solar farms would “at most account for 0.4% of total UK land”.<sup>131</sup>
129. Some witnesses also expressed concern that, notwithstanding provisions in planning practice guidance to restrict development of solar farms on BMV land, too many exceptions were being made.<sup>132</sup> We also heard that there are insufficient provisions in place to protect tenant farmers from having land taken out of tenancy by landowners looking to turn their land over to solar farms and heard opposing views about the extent to which solar farms offer the potential for genuine multifunctional uses.<sup>133</sup>

### *Other forms of renewable energy—wind and bioenergy crops*

130. We heard that there is also a role for on- and off-shore wind and bioenergy in achieving the Government’s energy strategy to meet net zero targets, although witnesses were not in agreement over which of these should be prioritised.<sup>134</sup> For example, NALC supported off-shore wind, telling us that on-shore wind projects tend to be unpopular among local communities.

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125 Written evidence from DEFRA ([LUE0103](#))

126 See for example written evidence from the Food, Farming and Countryside Commission ([LUE0088](#)), Sturdy submission, Care Suffolk, Community Planning Alliance, Professor Michael Alder ([LUE0008](#)) and John Foster ([LUE0052](#)).

127 Written evidence from National Association of Local Councils ([LUE0081](#))

128 BMV land is land that is typically classified as Grade 1, 2 and 3a.

129 Written evidence from CPRE ([LUE0055](#))

130 [Q 121](#) (Professor Rob Gross and Adam Berman)

131 Written evidence from Solar Energy UK ([LUE0064](#))

132 See for example written evidence from Community Planning Alliance ([LUE0080](#)) and Emma Sturdy ([LUE0057](#)).

133 [Q 114](#) (Dr James Richardson), written evidence from Lightsources bp ([LUE0076](#)), Care Suffolk ([LUE0100](#)). Say No to Sunnica Community Action Group ([LUE0056](#)) and Emma Sturdy ([LUE0057](#))

134 Written evidence from John Foster ([LUE0052](#))

However, this was not viewed as an insurmountable barrier by The Edge, a built and natural environment think tank, which suggested that support for onshore wind generation could be gained by ensuring that projects are “part of community initiatives designed to benefit the immediate locality”.<sup>135</sup>

131. We also heard that bioenergy/biofuel crops could be a driver of land use change, but that its impact is as yet unclear. David Kennedy, Director-General for Food, Farming and Biosecurity at DEFRA, suggested that bioenergy feedstocks could be “a major part of the broader carbon strategy with big land use implications”.<sup>136</sup> However, Professor Rob Gross from the UK Energy Research Centre, suggested that demand for domestically grown bioenergy is looking less likely because “the technology options available to us have changed”.<sup>137</sup> Adam Berman from Energy UK expressed doubt that demand for domestically produced biomass would grow, citing an already existing infrastructure servicing demand.<sup>138</sup>
132. *Although there are provisions within the NPPF to dissuade the development of solar farms on Best and Most Versatile land, from the evidence received we are concerned that too many exceptions are being made. We believe that a consistent policy toward encouraging the installation of solar panels on industrial, commercial and domestic buildings is needed and would negate the need for large-scale ground mounted solar farms. Alongside that, we would like to see stricter regulations put in place to prevent the development of solar farms on BMV land. We also believe onshore wind turbines still have a crucial role to play in achieving national energy self-sufficiency.*
133. *Energy and other large-scale infrastructure projects should be incorporated into a land use framework. The Land Use Commission would be tasked with doing this in close cooperation with relevant bodies including the National Infrastructure Commission.*

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135 Written evidence from the Edge ([LUE0058](#))

136 [Q 237](#) (David Kennedy)

137 [Q 120](#) (Professor Rob Gross)

138 [Q 120](#) (Adam Berman)

## CHAPTER 3: HOUSING AND THE PLANNING SYSTEM

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### Background

134. In developing and implementing a land use framework, it is important to understand other existing statutory and non-statutory frameworks which govern and regulate land use. Chief among these is the statutory planning system, which regulates the development and use of land in the public interest. The role of national and local planning frameworks is discussed in Box 11.
135. It has not been suggested in evidence, and we do not propose, that a land use framework should supersede or disrupt the planning system; rather it needs to be integrated with it based on a clear understanding of connections and interdependencies. It is not possible to understand how the land use system currently functions, and how this functioning might be improved, without understanding its interaction with planning. We note in particular that chapter 11 of the National Planning Policy Framework (NPPF) includes detailed provisions for “making effective use of land” and sets out the role of planning policy in supporting this (See Box 11).
136. This context is particularly (but not exclusively) relevant for land which may have benefits for uses which generally lie outside the formal planning regulatory framework, such as agriculture, carbon sequestration or nature recovery, but which has been identified as suitable for development.
137. Land use planning policies and decisions can also have major consequences for issues outside of planning: for example, a new development might have a wider impact on health and wellbeing which is not directly addressed in planning policy and so might escape proper consideration in the decision-making process. A land use framework could help tackle challenges such as this by enabling strategic planning for the beneficial use of land and its outputs and outcomes, establishing a strategy through which land can be properly viewed as an economic, environmental, social and cultural resource.

### Box 11: National and local planning frameworks

Planning at all levels in England is largely governed by the National Planning Policy Framework (NPPF) and its associated National Planning Practice Guidance (NPPG). The NPPF, first introduced in 2012 and most recently updated in July 2021, sets out a range of policies which local authorities must abide by when drawing up their development plans and making planning decisions. The development plan incorporates strategic policies, which address the priorities for an area, and non-strategic policies, covering more specific and detailed matters. Strategic policies are often set at local authority level but they may also be produced in the form of joint plans or, where there is an elected Mayor or combined authority with planning powers, in the form of a wider spatial development strategy covering the Mayoral or combined authority area.

Chapter 11 of the NPPF focuses specifically on “making effective use of land”, including specifying that planning policies should “encourage multiple benefits from both urban and rural land” and that they should “recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production”. It also states that policies “should be informed by regular reviews of both the land allocated for development in plans, and of land availability” and that “local planning authorities should refuse applications which they consider fail to make efficient use of land”.

There is a separate planning process for Nationally Significant Infrastructure Projects (NSIPs), which include major energy, transport, waste and water projects. These require a Development Consent Order, which is determined by the relevant Secretary of State on the advice of the National Infrastructure Planning Team at the Planning Inspectorate.<sup>139</sup>

The NPPF also asks local authorities to prepare design guidance in conformity with the principles set out in the National Design Guide and National Model Design Code (NMDC) which reflects local character and design preferences. As Joanna Averley of DLUHC noted, “the National Design Guide sets out ten characteristics of well-designed places and how these can be achieved in practice”.<sup>140</sup> In addition, new developments must also comply with Building Regulations, which cover the construction and extension of buildings;<sup>141</sup> for example, rules for sustainable drainage systems (SUDs)—which concern the management of surface water—are set within these Regulations.<sup>142</sup>

There is currently no statutory regional-level planning framework covering the whole of England, although the Greater London Authority produces a spatial framework for London known as the London Plan and, more recently, some combined authorities have taken on strategic regional planning powers; for example, the Greater Manchester Combined Authority has recently brought forward a voluntary spatial framework for its areas.

138. We heard a range of evidence on the role of housing in the land use system, and how pressures for new housing interact and potentially conflict with other land uses.
139. We heard that the planning system does not always achieve the most effective use of land even when it is subject to development protection in policy, that the planning system faces severe resourcing issues, that it lacked an integrated and strategic approach, and that there was often a gap between policy and implementation, leading to inferior outcomes.<sup>143</sup>
140. A proposal for comprehensive planning reform was set out in the white paper *Planning For the Future*, published in August 2020, but many proposals have yet to be pursued by the Government.<sup>144</sup> However, some of its proposals,

139 Hampshire County Council, ‘Nationally Significant Infrastructure Projects (NSIP)’: <https://www.hants.gov.uk/landplanningandenvironment/strategic-planning/nationally-significant-infrastructure-projects> [accessed 22 November 2022]

140 Written evidence from DLUHC (LUE0003)

141 HM Government, ‘Building Regulations Approval’: <https://www.gov.uk/building-regulations-approval> [accessed 18 November 2022]

142 Local Government Association, ‘Sustainable drainage systems’: <https://www.local.gov.uk/topics/severe-weather/flooding/sustainable-drainage-systems> [accessed 18 November 2022]

143 See for example written evidence from RTPI (LUE0031), CPRE (LUE0055), Community Planning Alliance (LUE0080), Catriona Riddell (LUE0035), and Natural England (LUE0074).

144 DLUHC, *Planning for the Future*

such as the abolition of the duty to cooperate, have been included in the Government's Levelling Up and Regeneration Bill, which at time of publication is progressing through Parliament.

141. The Bill provides that the duty to cooperate is replaced with a 'more flexible alignment test' to be set in national policy, but at time of publication the details on this proposal were yet to be provided.<sup>145</sup> In correspondence to us in November 2022, DLUHC also noted that the Bill will introduce reforms to the plan-making system, to ensure that "plans will be produced more quickly, and the content of plans will be simplified. Plans will also enjoy greater weight in the decision-making process, reducing the opportunity for unplanned development to be approved".<sup>146</sup>
142. This chapter will discuss the existing planning system, summarise the evidence on how it may be improved, and discuss how it may integrate with a land use framework in practice, in particular those areas of planning which may overlap with the framework, such as new housing development needs in particular locations.

### Housing in England

143. The overall footprint of the built environment in England is relatively small and new housing as a proportion of this is yet smaller. However, the impact of new development on the natural environment is very large, while development pressures for new housing are high and increasing, especially in locations adjacent to, or within reasonable distance of, major towns and cities, but also in rural locations.
144. The NPPF requires local planning authorities to have a clear understanding of the land available for development in their area by preparing a Housing and Economic Land Availability Assessment (HELAA). This technical document helps to identify a supply of potentially suitable sites for housing and is used to inform planning policies.<sup>147</sup> In addition, in 2017 the Government set and committed to achieving a housing target of 300,000 new homes per year, and local authorities are expected to enable the delivery of this target by conducting a local housing need assessment.<sup>148</sup> These centrally imposed requirements place a significant responsibility on local authorities to plan for housing need and ensure sufficient availability of land for housing.
145. During the course of our inquiry there were two changes of Prime Ministerial administration, with some suggestions that the administration led by Rt. Hon. Liz Truss MP would repeal the nationally set targets. Following her departure, however, in November 2022, DLUHC told us that "we remain committed to continuing to work towards our ambition of delivering 300,000 homes a year in England, as set out in the 2019 Conservative manifesto".<sup>149</sup>

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145 DLUHC, 'Levelling Up and Regeneration: Further Information' (May 2022): <https://www.gov.uk/government/publications/levelling-up-and-regeneration-further-information/levelling-up-and-regeneration-further-information> [accessed 23 November 2022]

146 Letter from Rt. Hon. Lucy Frazer MP to Lord Cameron of Dillington (28 November 2022): <https://committees.parliament.uk/publications/31827/documents/178909/default/>

147 HM Government, 'National Planning Policy Framework' (20 July 2021): <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [accessed 9 November 2022]

148 *Ibid.*

149 Letter from Rt. Hon. Lucy Frazer MP to Lord Cameron of Dillington (28 November 2022): <https://committees.parliament.uk/publications/31827/documents/178909/default/>



### *Housing and land use impact*

146. CPRE told us that since the 2000s there has been a “clear lack of integration” between objectives and policies on land use and those for new development through the planning system... [which] has led... to a seriously unbalanced and wasteful pattern of new housing development... there has been a substantially increased take of greenfield land that would often have had more functionality for climate adaptation or nature conservation if left undeveloped”.<sup>150</sup> Dr Alison Caffyn of the Food, Farming and Countryside Commission said that, while communities were not necessarily against new housing, “they see so many missed opportunities for integrating more trees, more biodiversity, more play areas and more transport connections, cycle routes ... they are frustrated that much better decisions could be made if there was a more integrated and holistic system”.<sup>151</sup>
147. Some witnesses argued that the footprint of housing on land in England should not be overstated. For example, Professor Mark Tewdwr-Jones noted that when the Foresight Study was undertaken in 2010, it was expected that housing development would be one of the biggest takers of land in the previous 20 years; but that, while housing has been a “big driver of change”, he said that “the real prominent land takers were actually airport development (including all the ancillary developments associated with air travel and servicing), logistic and distribution depots, and woodland”.<sup>152</sup> Paul Cheshire of LSE noted that in the most urbanised region of England, the Greater London Authority area, only 27.5% of land was built on; in the wider south east the figure was 4.7%. Excluding the GLA, across regions around half of new development had taken place on previously developed land.<sup>153</sup>

### *Housing and the planning system*

148. There is undoubtedly a need to support new homes across the country and for new housing development to be accompanied with appropriate infrastructure such as amenities, transport connections and open space provision. Elsewhere in this chapter we highlight the role of green infrastructure in land use management, and policies such as Biodiversity Net Gain (BNG) are intended to ensure that development works to support nature and environmental objectives rather than against them. Nevertheless, we heard that too often housing is brought forward without consideration of its supporting needs and of its potential to support broader land use aspirations.
149. Dr Gemma Jerome, Director of Building with Nature, gave some examples of how changing living patterns will result in new infrastructure requirements, telling us that “... the digitally-enabled delivery economy will mean increased demand for sheds, logistics space and delivery infrastructure—including last mile.”<sup>154</sup> Hybrid working will change commercial and residential real estate patterns, with requirements for more space in homes and the need to re-purpose redundant capacity in commercial office space”.<sup>155</sup>

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150 Written evidence from CPRE ([LUE0055](#))

151 [Q 83](#) (Alison Caffyn)

152 Written evidence from Mark Tewdwr-Jones ([LUE0030](#))

153 Written evidence from Paul Cheshire ([LUE0012](#))

154 Written evidence from Dr Gemma Jerome ([LUE0051](#)). Last mile refers to the final stage of a supply chain or delivery process, typically the stage at which the product or service reaches the end user.

155 Written evidence from Dr Gemma Jerome ([LUE0051](#))

150. Hugh Ellis of TCPA criticised the Government's focus on the planning system as a means to deliver housing, telling us that "If you spend 10 years insisting that the planning process is solely about allocating housing numbers, it's not surprising that the system narrows to a point where it is no longer a holistic framework for change".<sup>156</sup> The National Association of Local Councils also told us that "overly optimistic employment and economic projections and housebuilding targets that have no firm evidence base are often allowed to override environmental considerations and spatial plans, (i.e. Neighbourhood Plans and Local Plans)".<sup>157</sup>
151. The Food, Farming and Countryside Commission said that multifunctionality offers the opportunity to approach land use differently in a housing context as in others. It said that "planning in green space, active travel, 'agri-hoods', trees and allotments to housing developments [can] improve health and wellbeing, whilst also perhaps mitigating flood risk and reducing air pollution".<sup>158</sup>

### *Impacts on nature and habitats*

152. Some witnesses expressed concern at the damage to nature and habitats caused by new housing with associated development and infrastructure, which may not be adequately mitigated by policies such as BNG. For example, Wildlife and Countryside Link told us that "the ongoing destruction and degradation of habitats on a significant scale as a result of private sector housing development is incompatible with the Government's Environment Act apex target to halt the decline in species abundance by 2030". It also stated that "grassland habitats the size of Dorset have been lost to development in Great Britain since 1990 and that "over 1,000 ancient woodlands are currently under threat from development".<sup>159</sup> Similarly, Natural England said that "nature and climate are at risk of further and irreparable damage" from a range of pressures including the need for new housing.<sup>160</sup>
153. The Environmental Change Institute at the University of Oxford made similar points, stating that "any new housing and infrastructure developments should not damage the integrity of existing natural capital assets or future nature recovery and NbS networks. For example, new housing developments must avoid high grade farmland, and should incorporate existing hedgerows, woodlands and field trees into the development plan with wide buffers".<sup>161</sup>
154. ***It is not suggested, and we do not propose, that the land use framework sets any distinct housing development policy or replaces the planning system in any way. Nevertheless, the framework cannot ignore the interaction of housing with land use and so it must incorporate some acknowledgement of this.***
155. ***A Land Use Commission should assess the amount of new land used for housing and employment on a three-yearly basis, and also collate existing information on likely future demand to contribute to the data and evidence supporting the framework.***

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<sup>156</sup> Q 140 (Hugh Ellis)

<sup>157</sup> Written evidence from National Association of Local Councils ([LUE0081](#))

<sup>158</sup> Written evidence from Food, Farming and Countryside Commission ([LUE0088](#))

<sup>159</sup> Written evidence from Wildlife and Countryside Link ([LUE0094](#))

<sup>160</sup> Written evidence from Natural England ([LUE0074](#))

<sup>161</sup> Written evidence from Alison Smith ([LUE0067](#))

156. *A framework should also help better identify and define those areas where land should be optimised for priority uses other than housing—for example prime agricultural land or land which is essential for carbon sequestration and nature recovery. While some such measures are set out in national policy, they clearly lack the strength to be effective. A land use framework, supported by the Commission, could also advise on the reform and strengthening of policy and practice based on the available evidence.*

### The planning system and nature recovery

157. As discussed elsewhere in the report, BNG and LNRS are intended to be delivered through the planning system. Rachel Fisher of DEFRA told us that “we are looking at appointing responsible authorities at the moment for delivering LNRSs. Those are probably county and combined authority scale... those would be ready for the delivery of mandatory net gain in November 2023, so we would want to see local nature recovery strategies being developed very rapidly over the next 18 months”.<sup>162</sup> Joanna Averley added that there were also existing nature protections in the relevant section of the NPPF as well as an expectation for safeguarding and enhancing biodiversity and wildlife.<sup>163</sup>
158. The Broadway Initiative told us that “The creation of the LNRS system... provides an opportunity to embed the good practice being developed by some local authorities into the way all local authorities approach local environmental planning”, as well as to support digitalisation of planning and simplify the local environmental plan framework.<sup>164</sup>
159. Tom Lancaster of RSPB raised the question of resources, telling us that “only about 40% of local authorities have an ecologist, so if local authorities are to be given a big role in nature recovery, as they are through the development of local nature recovery strategies and the incorporation of biodiversity net gain in the planning system, we need to do something fairly urgently to address the long-standing decline in local authority capacity in that ecological expertise”.<sup>165</sup> The National Association of AONBs also raised questions about resources.<sup>166</sup>

### Green infrastructure

160. Green infrastructure—a managed network intended to deliver multiple benefits—was identified by many witnesses as a key element in supporting sustainable land use through the planning system. Its importance was particularly highlighted with regard to supporting multifunctional land use systems. Further information on the concept of green infrastructure and its relevance to multifunctionality may be found in Box 12.

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162 [Q 5](#) (Rachel Fisher)

163 [Q 6](#) (Joanna Averley)

164 Written evidence from Broadway Initiative ([LUE0068](#))

165 [Q 87](#) (Tom Lancaster)

166 [Q 51](#) (John Watkins)

## Box 12: What is green infrastructure?

Green infrastructure is commonly used to refer to a green network that is actively managed to deliver multiple benefits. The Government states that green infrastructure “can embrace a range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and ‘blue infrastructure’ such as streams, ponds, canals and other water bodies”. Where relevant, it can and should incorporate other land use initiatives such as Local Nature Recovery Strategies, biodiversity net gain sites, and Green Belt land.

DEFRA told us that “green infrastructure can help in building a strong, competitive economy, promoting healthy communities, mitigating climate change, flooding and coastal change, while conserving and enhancing the natural environment”. It noted that it was possible for existing and proposed green infrastructure networks to be supported through local plans, which could set out policies for their protection and enhancement.<sup>167</sup>

The Environment Agency stressed the multifunctional benefits of green infrastructure, telling us that it “is a vital natural capital asset in its own right and green infrastructure plans can help identify where multiple objectives—such as flood risk management, health benefits, improved water quality and climate benefits—can be delivered. Green infrastructure strategies should complement planning decision-making rather than be used to support trade-offs.”<sup>168</sup>

161. Natural England told us that it is “delivering the Government’s commitment to producing a Green Infrastructure framework... mapping variation across the country means we can support better planning for good quality green infrastructure and help to target the creation or improvement of this. Understanding the location and extent of green infrastructure is critical and a mapping tool is part of the framework. We still need better data on the quality of these assets”.<sup>169</sup>
162. Joanna Averley of DLUHC praised the framework, stating that it “gives you a real indication of where this digital approach can give you the data, and the spatial data at a very fine grain level, and enable you to analyse what that means for adjacent communities”, while Tompion Platt of the Ramblers also said that the Framework “for the first time gives us some real data to make decisions about how we set ambitious targets on access to nature, using those frameworks as a baseline, but also identifying areas where inequality of access exists and taking action to address them”.<sup>170</sup>
163. Rich Cooke of Essex County Council set out how approaches to green infrastructure might operate at a local level, telling us that “in Essex, a lot of work has been done to map and record green infrastructure across the county. We have a digital map-based system to understand and explain where the green infrastructure is and what its qualities and characteristics are. It is a good, strong evidence base of what is out there, what is important, what is valued, and that can assist if any decisions need to be made about any potential trade-offs”.<sup>171</sup>

167 Written evidence from DEFRA ([LUE0103](#))

168 Written evidence from Environment Agency ([LUE0073](#))

169 Written evidence from Natural England ([LUE0104](#))

170 [Q 1](#) (Joanna Averley) and [Q 214](#) (Tompion Platt)

171 [Q 130](#) (Rich Cooke)

164. *More must be done nationally and locally to increase the prevalence of green infrastructure and to make the most of the opportunities it offers. In particular, as well as supporting its protective aspects, there is unfulfilled potential for green infrastructure to deliver multifunctional land use benefits, for example through combining public health benefits with environmental enhancement. We welcome Natural England's development of a Green Infrastructure Framework and hope that it will fulfil its potential. Attention must also be given to integrating effectively green infrastructure networks with other policies such as Local Nature Recovery Strategies, Biodiversity Net Gain, and Green Belt.*
165. *We believe that planning rules and accompanying National Planning Practice Guidance should be changed to stress the need both for sufficient green infrastructure provision and protection through new development and for maximum beneficial use to be made of that infrastructure, using a multifunctional framework to deliver simultaneous benefits where possible.*

### **Strategic planning and cooperation**

166. A recurring theme of evidence was the importance of strategic cooperation and cross-border working, in relation both to development planning and to wider land use matters. Most land use policy is implemented at local authority level but we heard that it is not possible to achieve successful outcomes without understanding the wider land use context and the needs of neighbouring areas. This in turn requires some cooperation to ensure that these needs are fulfilled, both within and outside the planning system. In addition, many of the issues on which we heard evidence must be dealt with strategically as they do not recognise local authority boundaries. These include nature recovery, climate mitigation, access and recreation.
167. While some regional development frameworks exist or are in development, much of the country has no formal “larger than local” framework and matters of cross-border interest are often only scrutinised in the context of the local development plan process at district, unitary or county level, meaning that key pressures and conflicts may not be properly considered or addressed.
168. National planning and land use policy provides for a range of designations which are intended to protect land for environmental, habitat or other purposes. In many cases these cover significant parts of local authority areas, especially in rural locations. Ensuring effective protection and enhancement of these locations also requires strategic cooperation, but we heard that this is sometimes not the case in practice and that more measures are required to ensure both that protections are effectively maintained and that protected land fulfils its objectives.
169. New initiatives such as LNRS, which are expected to have a “larger than local” geographic focus, offer a clearer opportunity for local areas to collaborate on strategic land use matters beyond the built environment. We heard a range of evidence on how joint working and cooperation might best be facilitated and how a land use framework could help support this.
170. A number of witnesses expressed concern that the planning system is not sufficiently integrated or connected between national aspirations and regional and local priorities. For example, the National Association of Local



Councils (NALC) told us that “for major progress to be made in land use planning and climate adaptation, far better cross-sectoral working is required than currently exists and also much-improved cross-boundary working between local authorities—as had started to happen under the regional planning regime”.<sup>172</sup> Similar points were made by Natural England, who made particular reference to the National Strategic Infrastructure Project (NSIP) regime, which sits apart from the rest of the planning system. It said that “whilst Local Authorities are developing a plan-led approach in a place, the NSIP system works outside this often over-riding local plans and community engagement.”<sup>173</sup>

171. It has been recognised that the introduction of LNRS will require cross-border cooperation; the Government has previously indicated that DEFRA will set the areas covered by each LNRS, and that a “responsible authority” will be assigned to deliver them, though these areas and authorities have yet to be confirmed. The landscape scale was also recognised by a number of witnesses as increasingly important for addressing land use challenges and opportunities.<sup>174</sup> The Royal Institution of Chartered Surveyors (RICS) called for a more coherent strategic spatial plan system, stating that “many [local] plans are fitted to a geographical area related to political administrative boundaries rather than the more relevant functional socio-economic area”.<sup>175</sup>
172. In the NPPF local authorities are currently subject to the “duty to cooperate” meaning that local authorities must take account of, and consult with, neighbouring authorities on development needs. As noted above, the Government has made provision in the Levelling Up and Regeneration Bill for the duty to be abolished and replaced with a ‘more flexible alignment test’ to be set in national policy.<sup>176</sup>
173. It is generally perceived that the duty to cooperate has not achieved its objectives; Wildlife and Countryside Link said that the duty “has failed and left us with a situation where there is no tier of statutory planning activity operating between national and local... as ecological networks extend across local authority boundaries, local authority policies that stop at those boundaries can only have a limited, disjointed, impact”.<sup>177</sup> The National Trust also criticised the duty, stating that it “does not secure the ability to plan and deliver at scale to address the full range of economic, social and environmental issues we face, nor does it allow the ability to address these issues at a landscape-scale or ecosystems level, such as river catchments or corridors or linking the functional need for green infrastructure with modern cities or city regions”.<sup>178</sup>
174. National Parks, AONBs, National Nature Reserves and Sites of Special Scientific Interest, as well as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) all have enhanced levels of protection in the planning system to ensure that their important environmental, landscape

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172 Written evidence from National Association of Local Councils (LUE0081)

173 Written evidence from Natural England (LUE0074)

174 See for example written evidence from CPRE (LUE0055), Aimee Morse (LUE0071) and Natural England (LUE0074).

175 Written evidence from Royal Institute of Chartered Surveyors (LUE0072)

176 DLUHC, Levelling Up and Regeneration: Further Information (11 May 2022): <https://www.gov.uk/government/publications/levelling-up-and-regeneration-further-information/levelling-up-and-regeneration-further-information> [accessed 23 November 2022]

177 Written evidence from Wildlife and Countryside Link (LUE0094)

178 Written evidence from National Trust (LUE0039)

and habitat benefits are secured and enhanced. National Parks have their own planning authorities which govern development within their boundaries, while AONBs have the same level of legal protection but do not have their own authorities, instead being protected by partnerships between local communities and local authorities.

175. The Campaign for National Parks told us that “having dedicated planning authorities for National Parks is critically important to the protection and enhancement of the Parks and the well-being of the communities that live within them”. It also said that “particular attention should be given to restoring landscapes which could lead to the creation of future National Parks in areas where there are significant gaps in the existing network of designated landscapes in terms of both public accessibility and ecological connectivity, and where there are particularly rare or threatened habitats”.<sup>179</sup>
176. John Watkins of the National Association of AONBs expressed concern that, while AONBs have equivalent statutory protections to National Parks, they lacked equivalent enforcement powers; he told us that “beyond a soft power to convene and the duty to produce a management plan, some of the strong-arming cannot be done by AONBs and AONB teams; it is down to negotiation and partnerships. There is scope in the landscapes review and the proposals on which the Government are currently consulting to strengthen some of that, and that would be welcome”.<sup>180</sup>
177. The Green Belt is primarily intended to contain and minimise urban sprawl around large cities and historic towns. We heard evidence as to whether it could be more actively used to achieve multifaceted land use objectives. For example, PhD researcher Matthew Kirby said that “the proximity of large urban populations to large swaths of green belt makes them ideal opportunity spaces to integrate built and natural environment policy to help tackle challenges of climate change biodiversity loss and access to green space”, but that, according to his survey findings on green belt use, “policies to improve its beneficial and multifunctional use are lacking. Central to this is the disconnect between planning policy which is responsible for green belt and the range of emerging policies which seek to improve the benefits we get from nature”.<sup>181</sup>
178. Ben Kite of the Chartered Institute of Ecology and Environmental Management made similar observations, telling us that “A lot of land in the green belt is biodiversity poor; it is not contributing what it could contribute and it is not used by people for access and supporting mental and physical well-being and all the rest of it”.<sup>182</sup> Professor Katherine Willis agreed, telling us that “if it is green belt and it is very poor agricultural land, we should be planting trees on that land for carbon offset. We should be planting scrubland for butterflies. You take the basic asset, you build on that asset, and you view nature as an asset that is not to be destroyed, rather something to be enhanced. It is a different way of viewing biodiversity”.<sup>183</sup>

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179 Written evidence from the Campaign for National Parks ([LUE0048](#))

180 [Q 48](#) (John Watkins)

181 Written evidence from Matthew Kirby ([LUE0042](#))

182 [Q 109](#) (Ben Kite)

183 [Q 109](#) (Professor Katherine Willis)

179. Tim Slaney of the South Downs National Park Authority argued that, in addition to the five existing Green Belt purposes set out in planning policy,<sup>184</sup> “we should have a sixth purpose: that the green belt positively contributes towards nature recovery and all the benefits that provides. That could be done relatively simply”.<sup>185</sup>
180. The NFU also noted that “The NPPF sets out what the Government expects from local plans and how these expectations should be delivered on the ground. However, it does not set out an order of priority for land use. This may be a useful task for a sub-regional or national structure plan”.<sup>186</sup>
181. *It is important that any land use framework works together with existing national, regional and local planning frameworks and guidance, and that they reflect and complement their priorities, as well as enabling closer cooperation on non-planning land use matters. LNRS provide a key opportunity for more coordinated and cohesive joint working to achieve wider and more strategic land use objectives. It is important that everything is done to ensure this opportunity is optimised. Government should therefore consult closely with local and regional authorities as well as landowners and managers on the implementation of these strategies, and ensure that they are established at an appropriate scale and that decisions are driven by local input.*
182. *Among their other objectives, LNRS should also act as the local delivery arm for the nature and biodiversity agenda of the Land Use Commission, acting in conjunction with the delivery of biodiversity net gain and green infrastructure networks. It is important that LNRS are devised by groups consisting of all local relevant stakeholders, particularly those who might be responsible for implementing their priorities. While not proposing a standardised constitution or format for these groups, we would recommend that they cover as large an area of land as possible, such as countywide or larger where councils can cooperate, but without losing their sense of regionality. The Land Use Commission should be responsible for promulgating best practice. It is important that Local Authorities are properly funded to assist in the planning and delivery of LNRS.*
183. *In bringing forward a replacement for the duty to cooperate, Government must ensure a more coherent and strategic approach to cross-border land use planning and incorporate the key wider land use issues we have discussed in this report within any such replacement.*
184. *A land use framework should also be cognisant of housing and development needs in particular areas, as well as associated supporting infrastructure. The framework gives an opportunity to establish a clearer pattern of appropriate use, and to support (although not enforce) additional protections where necessary; for*

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184 The five existing purposes are to check the unrestricted sprawl of large built-up areas, to prevent neighbouring towns merging into one another, to assist in safeguarding the countryside from encroachment, to preserve the setting and special character of historic towns, and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

185 [Q 134](#) (Tim Slaney)

186 Written evidence from NFU ([LUE0049](#))

*example, in areas adjacent to existing settlements which are in alternative beneficial use, or have the potential to be.*

185. *A land use framework has particular potential to encourage better use of the Green Belt, which fulfils the purpose of preventing development but could deliver many wider benefits including enhanced support for nature, biodiversity, environmental objectives and access to the countryside, particularly for people in neighbouring urban areas who may have limited access to open space. Enhancement of the Green Belt for delivering these multifunctional benefits should be a central priority for the framework, and local authority 'Green Belt enablers' should be tasked with promoting positive Green Belt uses within their communities. The objective to support multifunctional enhancement of the Green Belt should, in the relevant locations, be integrated with the objectives we have set out for securing and enhancing green infrastructure networks.*
186. *Although some changes are proposed within the Levelling Up and Regeneration Bill, there continues to be a lack of clarity available on plans for wider reforms to the planning system, and this presents a serious difficulty in developing a land use framework that takes account of development and planning requirements and expectations. This uncertainty also has a negative impact on existing planning and development policies, including the production and submission of development plans. We call on the government to aid the development of the framework by providing clarity on plans for future reform beyond those set out in the current Bill. Reforms should include changes to chapter 11 of the National Planning Policy Framework, "Making effective use of land", to help enable the delivery of effective land use through the proposed framework.*
187. *In addition, Government is unlikely to achieve its objectives for delivering nature recovery and biodiversity restoration through the planning system if local authorities and planning departments are not adequately resourced for the task. Departments have had their staffing resources cut significantly in recent years. Urgent attention needs to be given to ensure that planning departments are properly resourced with the necessary staffing and skills, and local authorities should be encouraged to share expertise and work in clusters to help enable effective delivery of these priorities.*

## CHAPTER 4: THE FUTURE OF LAND USE: MULTIFUNCTIONALITY AND INTEGRATION OF PRIORITIES

188. As may be seen from the evidence discussed in our report, core to the principle of a successful land use framework is the concept of multifunctionality—the notion that land is a dynamic resource offering multiple simultaneous benefits, which can work in harmony with each other when utilised effectively. Multifunctionality does not eliminate trade-offs or potential conflicts in land use, but it makes clear that the recent priorities accorded to nature recovery and carbon sequestration, among other uses, need not be to the wholesale detriment of food production.
189. We heard, and agree strongly, that a land use framework must have multifunctionality at its heart. There were a range of views as to how multifunctionality might be defined and implemented in a framework. This chapter looks at the evidence we heard on multifunctionality, and then considers how the themes discussed in the preceding chapters may be integrated within a multifunctional framework, including addressing synergies and trade-offs, and discussing the role and approach of data and evidence in supporting the framework.

### Box 13: What is multifunctionality?

Despite its importance and widespread use, there is no single universally accepted definition of multifunctionality, nor any agreed methods for assessing and measuring its performance.<sup>187</sup> This can cause problems because it is widely used in research, policy and practice, often obscuring its purpose and limiting wider understanding of its benefits and limits.

It has nevertheless been positioned as a goal in many policy endeavours and has been cited in this inquiry by many witnesses as a desirable goal to pursue. For example, Kevin Austin, Deputy Director, Agriculture, Fisheries and the Natural Environment, at the Environment Agency, aligned the pursuit of multiple benefits with achieving value for money in the use of our resources.<sup>188</sup> Professor Katherine Willis, Professor of Biodiversity at the University of Oxford, highlighted the benefits of a multifunctional approach in delivering “maximum benefit from a single piece of land”.<sup>189</sup> A core principle is that an economic activity may have multiple outputs and contribute to several societal objectives at once. This places “activity” at the core of the definition.

In academic literature the definition has been advanced by Hansen and Pauleit, who state that “The concept of multifunctionality (in GI [green infrastructure] planning) means that multiple ecological, social, and also economic functions shall be explicitly considered in a managed process instead of being a product of chance. Multifunctionality aims at intertwining or combining different functions and thus using limited space more effectively”.<sup>190</sup>

187 Manning, P., van der Plas, F., Soliveres, S. et al., *Nature Ecology & Evolution*, ‘Redefining ecosystem multifunctionality’ (2018), vol.2, pp 427–436: <https://doi.org/10.1038/s41559-017-0461-7> [accessed 22 November 2022]

188 Q 39 (Kevin Austin)

189 Q 98 (Professor Katherine Willis)

190 Hansen, R., & Pauleit, S., *Ambio*, ‘From multifunctionality to multiple ecosystem services? A conceptual framework for multifunctionality in green infrastructure planning for urban areas’ (2014), vol.43, pp 516–529: <https://link.springer.com/article/10.1007/s13280-014-0510-2> [accessed 22 November 2022]



### Multifunctionality in practice

190. Multifunctionality is widely understood as an important aspect of land use and management, although there is no single definition and it may be interpreted in different ways in differing contexts (see Box 13). In the UK it can be seen as a pragmatic response to our finite and contested land resources; in this light it is a mechanism to help deliver multiple benefits, supporting policy integration and effective land use management and planning.
191. Overlapping with debates over multifunctionality has been the debate over “land sparing” and “land sharing”. These definitions are discussed further in Box 14. We heard differing views on the merits of these approaches; for example, Dr Kelly Jowett said that “the flaw of the land sparing argument is that the technologies we currently have available to achieve these improvements in yield are not sustainable agronomically (e.g. rapid evolution of herbicide-resistance) let alone environmentally (e.g. pollution of watercourses through increased agrochemical use)”.<sup>191</sup> Professor Michael Winter argued that although the delivery of land sharing through agroecology is seen as the “quintessential multifunctional farming system”, he argued that “there is compelling scientific and modelling evidence that land sparing, whereby some land is intensively (but sustainably) farmed thereby potentially releasing land for nature, can have better overall results for both nature and food production than the alternative land sharing approach”.<sup>192</sup>

#### Box 14: Land sharing and land sparing

The Royal Society notes that “land sharing and land sparing sit at either end of a continuum. A Land Sparing system involves large, separate areas of sustainably intensified agriculture and wilderness, whereas Land Sharing involves a patchwork of low-intensity agriculture incorporating natural features such as ponds and hedgerows, rather than keeping agriculture and wilderness separate”.<sup>193</sup>

The difference in these approaches is also reflected in the apparently differing objectives within the ELMS framework. Dr Kelly Jowett noted to us that: “whilst the landscape recovery aspect of ELMS promotes a ‘land sparing’ approach, the local nature recovery aspects of the scheme are more indicative of ‘land sharing’... ‘Land sparing’ involves a varied landscape with defined areas partitioned for either natural habitats or intensive food production”.<sup>194</sup>

The CLA told us that ELMS has the potential to deliver the best of both the land sparing and land sharing approaches, and that “this could lead to more sustainable and resilient production, embracing new technology and practices such as precision agriculture, agroecology and regenerative farming”.<sup>195</sup>

### *The ‘three compartment model’*

192. A related approach to land use and management was proposed in Henry Dimbleby’s independent food strategy review by way of a ‘three compartment model’. This was based around the notion that land could be divided into

191 Written evidence from Dr Kelly Jowett (LUE0079)

192 Written evidence from Professor Michael Winter (LUE0038)

193 The Royal Society, ‘Land Sharing vs Sparing: can we feed the world without destroying it?’ (December 2014): <https://royalsociety.org/blog/2014/12/land-sharing-vs-land-sparing/> [accessed 22 November 2022]

194 Written evidence from Dr Kelly Jowett (LUE0079)

195 Written evidence from CLA (LUE0096)

three categories; broadly speaking, these can be defined as sustainable intensification, agroecology, and rewilding or environmental projects.

193. We heard a range of evidence on the three compartment model, including from the Green Alliance which described it as a “helpful conceptual tool in informing trade-offs between nature protection, carbon sequestration and food production”.<sup>196</sup> However, the Food, Farming and Countryside Commission was more critical of the model, stating that it was “too segregated, simplistic and sends the wrong message” and added that “it suggests the UK can be divided up into defined areas with the risk that environmental protection in one area could lead to environmental damage in another. It concluded that “whilst we agree that some land requires more protection, e.g. peatlands, we argue that all farmed land can be farmed for climate and nature”.<sup>197</sup>
194. We took the opportunity to ask Henry Dimbleby about his advocacy of the “three compartment model”. He noted that “there has been some confusion... it is probably more of a continuum. People just assumed that the conceptual model was either deep intensification or regenerative or wild, and I think you will see a continuum of farming approaches, not just the three compartments”.<sup>198</sup> This implies that there may not in fact be a contradiction between multifunctionality and the three-compartment approach.

### *Synergies and trade-offs*

195. The intention of a multifunctional approach is, so far as possible, to support complementary uses and to reduce and minimise conflict. However, a coherent framework will also need to address and manage land use trade-offs; for example, understanding where a particular use may need to be sidelined or reduced in a particular location to maximise benefits of other uses. While multifunctionality can reduce the need for such trade-offs it would be wrong to suggest they can be eliminated. A multifunctional framework should, however, ensure that there has been a proper examination of how synergies can be addressed. Where trade-offs happen it is important that they are identified and managed within a transparent and accountable process.
196. Existing mechanisms for managing trade-offs are not always well managed, and there may be potential for a bigger role for existing tools within the system. Wildlife and Countryside Link noted that tools such as environmental impact assessments (EIAs) and strategic environmental assessments (SEAs) “are intended to direct development away from nature-rich sites, but currently are failing to do so due to flaws in implementation”, and called for SEAs to be conducted for all Local Plans and strategic plans, with EIAs for those sites indicated as appropriate for development.<sup>199</sup> The Government noted that it is proposing to replace EIAs and SEAs as part of the Levelling Up and Regeneration Bill, saying that there would be a new “outcomes-based approach”, which will “maintain and even enhance environmental protections by bringing environmental commitments to the centre of decision-making”.<sup>200</sup>

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196 Written evidence from Green Alliance ([LUE0095](#))

197 Written evidence from Food, Farming and Countryside Commission ([LUE0088](#))

198 [Q 191](#) (Henry Dimbleby)

199 Written evidence from Wildlife and Countryside Link ([LUE0094](#))

200 Written evidence from DEFRA ([LUE0103](#))

197. Rachel Fisher of DEFRA discussed synergies and trade-offs in land use in the context of LNRS. She told us:

“One reason why we have introduced local nature recovery strategies is to deliver that middle layer and to focus minds at a strategic scale on the decisions, trade-offs and synergies that you can have through multi-functional land use... we are trying to create an overarching system in which decisions are taken at a local level that also support landowners and land managers to take decisions on their land and which of the incentives that we are setting up through ELMS would make the most sense for them.”<sup>201</sup>

198. The Environment Agency also stressed the importance of integrated policy in managing trade-offs, telling us that “It is crucial that we do not pursue policy outcomes independently but explore trade-offs and optimise land use to meet as many of these outcomes as possible through creating the right land use or management in the right place. This will be challenging because we haven’t got enough land to do all things everywhere, so prioritisation will be necessary”.<sup>202</sup>

199. *A multifunctional land use framework should take account of debates over ‘land sharing and land sparing’, including the ‘three compartment model’ proposed in the Dimbleby Review. We believe that a multifunctional approach lends itself most clearly to a principle of land sharing, delivering multiple benefits simultaneously in the same location. We recognise that different locations are suited for different benefits and any decisions must be driven by local circumstances and priorities. A ‘three compartment’ model should only be considered if it is understood as a continuum of land use rather than a specification with rigid boundaries.*

200. *A Land Use Commission should have a multifunctional, locally-driven approach based on the principle of land sharing at the forefront of its thinking when devising a framework, and Government should put this at the core of its remit.*

201. *The concepts of integration and multifunctionality are key to any successful land use framework. At present, land use policy is often delivered in a siloed manner with conflicts and trade-offs not adequately explored or resolved. The aim of a framework should be to replace this with a deliberative and cooperative approach, and to make use of the opportunities and synergies it provides. This should also involve strengthening the role of existing tools such as sustainability and environmental assessments, or their replacements proposed within the Levelling Up and Regeneration Bill, which can help support such an approach.*

### Tools, data and evidence

202. Many respondents to our inquiry stressed the importance of a land use framework being backed up by a strong and up to date evidence base. We heard criticisms that, at present, data is either unavailable, inaccessible or poorly interpreted and communicated, and so it remains difficult for

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201 [Q 14](#) (Rachel Fisher)

202 Written evidence from Environment Agency ([LUE0073](#))

landowners, managers and practitioners to make the most appropriate and informed decisions.

203. Dr Ruth Waters of Natural England stated that “whilst the UK is relatively data rich, there isn’t currently a comprehensive, systematically and regularly collected data set on changes in natural capital/ecosystem assets and ecosystem services”.<sup>203</sup> The Green Alliance agreed, pointing to an absence of agreed data on the most appropriate use of land in specific locations.<sup>204</sup>
204. We received evidence from the Geospatial Commission, an independent Committee tasked with advising Government on “unlocking the significant economic, social and environmental opportunities offered by location data”. It noted that its work was relevant to our inquiry because it shows “how effective use of location data can help understand land use trade-offs and support better decisions about how land is used at national, regional and local geographic levels”. In particular, it told us that it was initiating a set of activities under the National Land Data Programme (NLDP), “working with relevant departments and in local and national pilot areas to demonstrate the value of an improved geospatial modelling capability to inform future land use strategy”.<sup>205</sup>
205. The Geospatial Commission also argued that, while data alone is not the solution, “by integrating multiple datasets via spatial modelling we can provide a joined-up view of land use systems and answer strategic land use questions, such as: What are the realistic spatially-informed scenarios for land use change, taking a view that spans multiple domains and outcomes”.<sup>206</sup>
206. Some witnesses stressed the importance of high quality analysis as well as availability of data. Dr Tim Marshall noted that the Levelling Up White Paper had committed to establishing a spatial data unit in DLUHC. He said that “this could become one part of a very greatly increased capacity in that Department to undertake the sort of analysis which would be needed to lead work on a Land Use and Spatial Strategy for England”.<sup>207</sup> Similarly, the Digital Task Force for Planning called for “a Common Spatial Data Environment” which “would enable a consistent baseline study for forecasting, simulation, modelling, and monitoring”.<sup>208</sup>
207. As well as new data initiatives, we also heard that more could be done to open up existing sources of data. For example, Guy Shrubsole told us that if the Government were to drop search fees for the land registry it would be “easier to map land ownership and to link up contiguous landowners to create wildlife corridors”. Similarly, he called for DEFRA to negotiate with Cranfield University to publish the National Soils Map, which is currently a proprietary dataset, as open data.<sup>209</sup>
208. The TCPA also argued that a land use framework could help consolidate the existing data holdings. It told us that “much of this data is spread across governmental bodies such as the Adaptation Subcommittee, the Environment Agency, the Office for National Statistics and the National Infrastructure

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203 Written evidence from Ruth Waters ([LUE0104](#))

204 Written evidence from Green Alliance ([LUE0095](#))

205 Written evidence from Geospatial Commission ([LUE0087](#))

206 *Ibid.*

207 Written evidence from Dr Tim Marshall ([LUE0040](#))

208 Written evidence from Digital Task Force for Planning ([LUE0041](#))

209 Written evidence from Guy Shrubsole ([LUE0027](#))

Commission and there would be significant benefits in a single entity which could compile and digitally publish our national land use data”.<sup>210</sup>

209. *An effective and up to date evidence base is critical for the development of a successful land use framework, and accessible data can offer a wide range of benefits, including prompting discussion around land use opportunities, fostering collaboration and discussion. Ideally there should be structures to capture and update data in central and/or perhaps regional hubs with open access to all involved, to help transparency and accountability and show how the necessary trade-offs are identified and managed. This will also ensure that policies and decisions are based on evidence, not presumption. These data hubs also need provision for improved data to be fed in from the bottom up. Data must be accessible, understandable and user-friendly at all levels, particularly locally where decisions are made.*
210. *A proposed Land Use Commission should ensure that existing sources of data are accessible, rigorous and updated frequently, and use the framework to consolidate data sources where appropriate. It should also support and invest in new sources of data and mapping which will both add to the rigour of a framework and ensure that it is usable in practice for land use practitioners.*

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210 Written evidence from Town and Country Planning Association ([LUE0045](#))



## CHAPTER 5: A LAND USE FRAMEWORK AND A LAND USE COMMISSION

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211. At the beginning of this report we identified overarching themes that are impacting our ability to make better land use decisions—siloed working and conflicting priorities; lack of coordination between national, regional and local government; policy uncertainty; gaps in evidence and poor access to high quality, user-friendly data; inadequate monitoring and evaluation of policies; and a lack of understanding of multifunctionality. We believe these challenges are best addressed through a land use framework and propose that it be developed, overseen and monitored by a new English Land Use Commission.

### A land use framework

212. The case for a land use framework was viewed by many witnesses as a crucial step to solving the challenges mentioned above.<sup>211</sup> The model put forward by the Food, Farming and Countryside Commission, in particular, provides a comprehensive vision and was widely endorsed by those who championed a land use framework.<sup>212</sup> We also heard that the value of a land use framework would rest in its ability to bring together national targets, objectives and funding streams; show the “line of sight” from national strategy to local plans to individual holdings; consider resourcing needs; take advantage of new growth and investment opportunities; and be flexible and adaptive at every level.<sup>213</sup> The Woodland Trust highlighted the need for the land use framework to have “meaningful legal standing” to ensure it has the authority to resolve competing or incompatible policy objectives.<sup>214</sup>
213. While supporters of a land use framework agreed that it should be designed to address multiple challenges, many highlighted its potential to encourage and support greater integration between national, regional and local levels. Witnesses suggested ways that this could be achieved: for example, by having nationally-set targets which could inform local and regional approaches, by embedding the framework in all statutory development plans and by providing access to data and evidence relevant to all levels of government and stakeholders engaged in delivery of the framework.<sup>215</sup>
214. We were also guided by evidence highlighting the role that a land use framework could play in supporting a ‘greater than local’ approach to land use decision making. We heard that a framework could provide a greater diversity of scenarios and scales including farm level, county level, landscape level, catchment area, or even larger scales, which in turn could help to

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211 Witnesses who advocated some form of a land use framework and/or endorsed the Food, Farming and Countryside Commission’s approach include Professor Michael Winter, Community Planning Alliance ([LUE0080](#)), Trees and Design Action Group ([LUE0082](#)), The Edge ([LUE0058](#)), Professor Ian Hodge ([LUE0033](#)), Friends of Carrington Moss ([LUE0023](#)), Green Alliance ([LUE0095](#)), Confor ([LUE0029](#)), Game and Wildlife Conservation Trust ([LUE0020](#)), Highbury Group on Housing Delivery ([LUE0085](#)), Woodland Trust ([LUE0097](#)), [Q 47](#) (David Butterworth).

212 Written evidence from the Food, Farming and Countryside Commission ([LUE0088](#))

213 See for example written evidence from the National Trust ([LUE0039](#)), the Environment Agency ([LUE0073](#)) and the Environment Institute for Change ([LUE0067](#))

214 Written evidence from Woodland Trust ([LUE0097](#))

215 See for example written evidence from The Edge ([LUE0058](#)), Professor Mark Tewdwr-Jones ([LUE0030](#)), Professor Ian Hodge ([LUE0033](#)), [Q 94](#) (Alec Taylor) and Environmental Institute for Change ([LUE0067](#))

identify opportunities for creating synergies at different scales.<sup>216</sup> Dame Fiona Reynolds of the Food, Farming and Countryside Commission suggested the framework could reveal opportunities that would allow for multiple farmers or landowners in a single area to “contribute collectively” to a greater goal.<sup>217</sup> Alec Taylor from the World Wildlife Fund (WWF) noted that, given the variety of landscapes across England, this approach could help local and regional decision makers identify opportunities that are both suitable for their area and in line with nationally-set targets.<sup>218</sup>

215. Although we felt the evidence in favour of a land use framework was overwhelming, we also noted words of warning from witnesses to ensure that a land use framework does not become too prescriptive and inflexible; favour some objectives over others; lead to “zoning by the back door”; or embed top-down decision-making powers.<sup>219</sup> Dr James Richardson, Chief Economist at National Infrastructure Commission, also warned that putting a strategy together could prove time consuming and disruptive to current efforts to achieve net zero targets.<sup>220</sup> We agree on the need to avoid these pitfalls and believe that this can be done through careful design of the framework.

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216 Written evidence from The Edge ([LUE0058](#)), [Q 94](#) (Alec Taylor) and [Q 78](#) (Dame Fiona Reynolds)

217 [Q 78](#) (Dame Fiona Reynolds)

218 [Q 94](#) (Alec Taylor)

219 See for example evidence from the CLA, [Q 24](#) (Susan Twining), Roundtable discussion held on 21 March 2022 (Tom Lancaster, RSPB)

220 [Q 117](#) (Dr James Richardson)

### Box 15: Land Use Case Study: Food, Farming and Countryside Commission

Since 2018 the Food, Farming and Countryside Commission (FFCC) has been convening discussions nationally, and trialling a Land Use Framework approach at a local level through pilots in Devon and Cambridgeshire, funded jointly by FFCC, Environment Agency and the Geospatial Commission. The rationale is that pursuing a more deliberative and strategic approach to land use decision making would enable more government targets to be achieved, joining up the delivery of many complementary goals for jobs, housing, nature recovery and net zero. Key issues addressed include what a good land use framework process and outcome look like, and what are the core ingredients needed to break down current sector silos and targets.

Two pilot projects (Devon and Cambridgeshire) were used in a series of deliberative discussions involving bodies across the land use sector operating at different scales and across different governance frameworks to try to understand what a good land use framework might look like, covering both the process and outcome.

The work also identified gaps and key questions affecting government targets, as well as trying to work out the trade-offs between the current plethora of government targets in each land use sector. These include how much food the UK should aim to produce and where; how much land should be devoted to energy and where it should go; how we can incorporate green infrastructure across the landscape and improve public access to nature; and how sustainable the UK should be for timber production.

Implications for a wider land use framework are that it must bridge across the whole of land use—urban and rural—and should cover not only agriculture, nature and net zero land uses, but also the planning system, and national planning schemes. It must also integrate with local land use frameworks if the approach is to succeed; top-down and bottom-up approaches need to work effectively together.

#### *Developing the framework—scope and stakeholder engagement*

216. We were encouraged when we saw DEFRA's commitment to develop a land use framework by 2023. However, we are concerned that the proposal is too limited in scope. Then-DEFRA Secretary of State Rt. Hon. George Eustice MP told us that while he had accepted the case for a land use strategy, he saw the scope as being limited to tree planting, peatland restoration and food production.<sup>221</sup> He told us:

“There is a lot to be said for having something that is focused very much on agricultural land, while recognising that there will be read-across to other things where it is easy for us to get consents, and recognising that DLUHC and other government departments will have their own plans and will consult on them.”<sup>222</sup>

217. The then-Secretary of State also told us that he saw delivery of the framework being through the local nature recovery strategies and through future agriculture policy, including ELMS.<sup>223</sup>

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221 [Q 235](#) (George Eustice MP)

222 *Ibid.*

223 *Ibid.*

218. Such a limited scope stands in contrast to what many witnesses told us should be included in a land use framework. We heard that to effectively embed integration and break down silos, the scope of the framework needs to be sufficiently broad enough to encompass a wide range of land use pressures and drivers which would cross a range of Government departments.<sup>224</sup> Among those making this point was Alan Law from Natural England who called for a framework that would join up conflicting policy areas and integrate work being carried out by multiple departments and bodies.<sup>225</sup>
219. We also heard about the need for the land use framework to be developed in concert with a wide range of stakeholders. Witnesses emphasised that wide stakeholder engagement would serve to mitigate against the framework developing a solely top-down perspective, empower communities and landowners, encourage buy-in from those engaged in delivering the framework on the ground, and support a multifunctional approach.<sup>226</sup> The potential list of stakeholders suggested was broad.<sup>227</sup> UKRI, for example, identified “four main groups of stakeholders”—national policy makers and implementation agencies; NGOs, sectoral representative bodies and large businesses; landscape-level organisations including local government and national parks; and land managers including farmer groups and cooperatives, and local people and local businesses. It also emphasised bringing together biological, physical, environmental, economic and social processes expertise.<sup>228</sup> As key deliverers of land use changes, both the NALC and NFU made the case for local government, farmers and land-owners to be significantly involved in its development.<sup>229</sup>
220. *We believe that a thoughtfully designed land use framework, based on a multifunctional approach, will go a long way to tackle the multiple challenges currently impeding effective land use decision making. It will enable clearer identification of current and emerging challenges and opportunities in the short, medium and long term and provide clarity about the direction of travel for land use.*
221. *By design the framework should seek to break down silos and bring together multiple land use policy areas, embed integration and support delivery of a multifunctional approach. Delivery of the framework will primarily be at the regional and local level but development of the framework will need to be done at the national level too. With that in mind, developing the framework should include the following steps:*
- *Consultation with those directly affected, including farmers, land owners, land managers, environmental specialists,*

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224 See for example written evidence from the Manhood Peninsular Partnership ([LUE0019](#)), the Soil Association ([LUE0037](#)), the National Trust ([LUE0039](#)), [Q 80](#) (Dame Fiona Reynolds, Professor Mark Tewdwr-Jones ([LUE0030](#)), the Community Planning Alliance ([LUE0080](#)), the Community Support Agriculture Network UK ([LUE0062](#)), the Marine Management Organisation ([LUE0059](#)) and [Q 40](#) (Alan Law).

225 [Q 40](#) (Alan Law)

226 See for example written evidence from National Farmers Union ([LUE0049](#)), the CLA ([LUE0096](#)), Keith Kirby ([LUE0013](#)), Game and Wildlife Conservation Trust ([LUE0020](#)), National Trust ([LUE0039](#)), Community Land Trust Network ([LUE0010](#)), Institute of Chartered Foresters ([LUE0021](#)) and Save Newcastle Wildlife ([LUE0101](#)).

227 See for example [Q 72](#) (Dr Darren Moorcroft), written evidence from the NFU ([LUE0049](#)), National Trust ([LUE0039](#)) and Environmental Change Institute ([LUE0067](#)).

228 Written evidence from UKRI ([LUE0047](#))

229 Written evidence from the National Association of Local Councils ([LUE0081](#)) and NFU ([LUE0049](#))

*business, access groups, local and regional authorities, any other relevant public and private bodies, communities and the general public;*

- *Identifying opportunities for regular stakeholder engagement and feedback;*
- *Clarifying roles and responsibilities and identifying opportunities for cooperation;*
- *Identifying gaps in data and evidence, coordinating and overseeing improvements to data collection and distribution of data and evidence to relevant stakeholders; and*
- *Providing advice to national, regional and local government, relevant stakeholders and to the wider public via an open and transparent approach to information gathering and sharing.*

### Establishing a Land Use Commission

222. Having agreed on the need for a land use framework, we then considered where it should sit and who should have responsibility for it. Some suggested that responsibility could reside within an existing body and we heard support for the National Infrastructure Commission<sup>230</sup>, DEFRA and DLUHC. Some witnesses supported new institutional arrangements including a cross-departmental and cross-industrial sector Leadership Group, a Chief Spatial Planning Officer role in the Cabinet Office and a Land Use Commission.<sup>231</sup> We also note that witnesses who were less convinced about the need for a land use framework were also unconvinced about the need for new institutional arrangements and advocated instead for finding ways to make the existing institutional structures work better.<sup>232</sup>
223. While the various suggestions each held merit, including acknowledging the key role of departments such as DEFRA and DLUHC, we were drawn to the idea of a Land Use Commission and felt that this model was best suited to developing and delivering our vision of a land use framework. The TCPA was among those proposing a Land Use Commission and suggested that it could be based on the Scottish model but with some additional responsibilities including preparing and updating a land use framework, reviewing the effectiveness and impact of relevant laws and policies and making recommendations to government, and engaging with the public on priorities for land use.<sup>233</sup>
224. We also noted that a key role for the Land Use Commission will be its ability to monitor and evaluate progress on delivering the framework and its associated targets.<sup>234</sup> Smart Growth UK told us that success should be measured against

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230 Dr James Richardson, Chief Economist at the NIC did not agree that the NIC would be a suitable body to take on this role. See [Q 117](#) (Dr James Richardson).

231 Written evidence from CONFOR ([LUE0029](#)), Digital Task Force for Planning ([LUE0041](#)), TCPA ([LUE0031](#)), Professor Michael Alder ([LUE0008](#)), Dr Tim Marshall ([LUE0040](#)), Save Newcastle Wildlife ([LUE0101](#)) and Food, Farming and Countryside Commission ([LUE0088](#))

232 Written evidence from Keith Kirby ([LUE0013](#)) and CLA ([LUE0096](#))

233 Written evidence from Town and Country Planning Association ([LUE0045](#))

234 We note that there are already bodies with responsibility for monitoring environmental targets, not least of which is the Office for Environmental Protection. We would expect a Land Use Commission to work closely with this Office and others carrying out data collection, monitoring and evaluation in areas that will overlap with the Commission's remit.



an agreed set of regularly reviewed outcomes and independently assessed and that the monitoring and evaluation process involve input from a wide range of stakeholders.<sup>235</sup> As a potential system for monitoring and evaluation, both UKRI and DEFRA highlighted Wales' Monitoring and Modelling Programme, which includes "a rapid expert review of time-sensitive policy needs, and the building of an integrated community modelling platforms for scenario exploration of land use change for multiple outcomes."<sup>236</sup>

225. *We believe that a Land Use Commission should be set up as an independent, statutory arms-length public body under the Cabinet Office. It should have an independent Chair appointed by the Cabinet Office and independent commissioners as well as commissioners representing and appointed by:*

- *DEFRA—representing the interests of food, biodiversity and forestry;*
- *DLUHC—representing the interests of housing, local government and integration within the planning system;*
- *BEIS—representing the need for increased self-sufficiency in renewable energy;*
- *DCMS—representing the need for access to nature and tourism; and*
- *DfT—representing the need for transport infrastructure.*

226. *Looking at comparable bodies, the Scottish Land Commission and the Climate Change Commission, we see that they have annual budgets of around £1.5 million and £4.5 million a year respectively. Although we are not in a position to estimate the budget, we would expect that the annual budget for an English Land use Commission would be similar to those bodies.*

227. *Finally, we propose that the Commission's roles would be to:*

- *Prepare and update a land use framework for England to help optimise the multifunctional use of land for the benefit of all;*
- *Encourage the publication and use of accessible, open source land use data that is presented in an understandable and user-friendly way for use at national, regional and local level;*
- *Review the effectiveness and impact of laws and policies relating to land and to advise Government;*
- *Examine and highlight specific land use issues through a deep dive programme;*
- *Engage with stakeholders, landowners, managers and the public on land use issues;*

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235 Written evidence from Smart Growth UK ([LUE0084](#))

236 Written evidence from UKIR ([LUE0047](#)) and DEFRA ([LUE0103](#))

- *Work across government departments and in close cooperation with local authorities and relevant public bodies on land use issues to enable an integrated approach;*
- *Promulgate best practice at local and regional level; and*
- *Produce a triennial report on progress and on improving the effectiveness of the multifunctional land uses to be laid before Parliament for debate.*

## SUMMARY OF RECOMMENDATIONS

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1. We welcome that the Government is maintaining its commitment to publish a land use framework in 2023. We are, however, disappointed at the Government's suggestion that the framework will focus on matters solely within the remit of DEFRA. The Government should review its approach to developing the framework to ensure that it fully addresses wider aspects of land use and that its remit crosses departments as required, avoiding the siloed approaches that have blighted land use policy in the past. (Paragraph 13)
2. In accordance with this cross-departmental approach, other departments should also be involved in the development and implementation of the framework, as active participants and not just as consultees. (Paragraph 14)
3. New priorities for land use and management in England such as nature restoration and carbon sequestration mean that food production is experiencing new pressures. There is, however, no reason why our ability to achieve food security should be compromised by these new priorities. A multifunctional approach is key to ensuring this. (Paragraph 45)
4. Under Section 19 of the Agriculture Act 2020, the government has a statutory duty to lay before Parliament every three years a report relating to our national food security and to the resilience of the supply chain for food. This report should be informed by a wider framework for land use which balances the production of food with other emerging land use needs. Energy resilience, for instance, has grown considerably in importance. This framework should also assess the degree to which agricultural innovation can reduce land use pressures. (Paragraph 46)
5. It is important that the Government urgently provide clarity on the ELMS programme to give certainty and confidence to the farming community, and to ensure that much needed habitats are better promoted and managed across England to kickstart the essential recovery of our biodiversity. (Paragraph 62)
6. The Government should ensure that the Farming and Wildlife Advisory Group (FWAG) and other environmental advisers are well funded and equipped to deliver advice to all farmers on how best to incorporate environmental services within their day-to-day farming activities. It should also examine how it can best develop improved environmental management skills among all land managers. (Paragraph 63)
7. Local Nature Recovery Strategies are vital vehicles for ensuring that locally appropriate environmental initiatives are encouraged on the right land with input from their communities throughout every part of England. It is crucial that Government ensures that the local authorities work together and with other partners and that they are given the resources necessary to design, implement and monitor these strategies. The Government's commitment that it will "have firm guidance for local planning authorities to have regard to LNRS" is too weak. LNRS should have the necessary statutory status of being a material consideration within local authority development plans with policy wording robust enough to protect their integrity, including a commitment for LNRS to be protected and enhanced wherever possible. (Paragraph 69)
8. The status of LNRS in planning policy should also be recognised and reflected in National Planning Practice Guidance. Their explicit inclusion

in any successor to the duty to cooperate would be an important step forward in this regard. The strategies and the extent of their audited delivery should form an essential part of the Land Use Commission triennial reports. (Paragraph 70)

9. To better coordinate biodiversity gains and nature's recovery, the Government must ensure that BNG and LNRS are not marginalised within the planning system in favour of other requirements and obligations. This should include strengthening their status in planning policy and practice guidance so that greater regard is paid to them. (Paragraph 77)
10. Monitoring and enforcement of BNG will play a key role in its success. Local authorities need to be adequately staffed and resourced to undertake all tasks necessary for overseeing genuine BNG projects and should be given the authority to intervene before the end of a BNG project if it is clear that gains cannot be delivered. (Paragraph 78)
11. The Government must ensure that both BNG and NbS include sufficient funding to allow for effective monitoring and auditing of projects. Monitoring must pay particular attention to ensuring that the mitigation hierarchy is being adhered to and that compensation and off-setting are only used as measures of last resort so that the biodiversity gains are both genuine and long-lasting. A Land Use Commission would play an important oversight role in making sure that monitoring and evaluations are carried out to the highest standards. (Paragraph 86)
12. Afforestation, woodland management and wider tree planting are seen by many witnesses as playing a key and increasing role in future land use requirements. We heard that incentives and regulations are not always properly aligned to generate the best outcomes, and a land use framework will need to address this. (Paragraph 104)
13. Tree planting must always be seen in a multifunctional context and may not always be suitable in particular locations. It is important that the framework supports a balanced approach which takes factors such as biodiversity, the quality of the land for food production, and the suitability of land for tree planting into account. (Paragraph 105)
14. England currently has a number of targets for afforestation that are not being met. Attention needs to be paid to the development of incentives, support and regulations to improve progress in this regard. (Paragraph 106)
15. More support needs to be given for active woodland management and the development of skills, to ensure woodland can continue to enhance nature and recreation while providing sustainable income streams for landowners. (Paragraph 107)
16. Any future land use framework will need to carefully monitor the rollout of the Government's tree-planting programme. They must ensure that tree planting is delivering the required progress, happening on the right land with the right species, and ensure that it is in balance with other land use targets. (Paragraph 108)
17. Access to green and open spaces is important for health and wellbeing, as well as providing an important economic function through tourism. While the Government has made commitments to access in its 25 YEP and as part of ELMS, these do not have the same status as other land commitments.

This should be reviewed in the context of a land use framework and a clear prioritisation of access embodied within it, to emphasise its importance and reduce potential conflict with other important uses. It is particularly important to prioritise access near locations where people live, such as in and near urban and peri-urban areas. (Paragraph 120)

18. Although there are provisions within the NPPF to dissuade the development of solar farms on Best and Most Versatile land, from the evidence received we are concerned that too many exceptions are being made. We believe that a consistent policy toward encouraging the installation of solar panels on industrial, commercial and domestic buildings is needed and would negate the need for large-scale ground mounted solar farms. Alongside that, we would like to see stricter regulations put in place to prevent the development of solar farms on BMV land. We also believe onshore wind turbines still have a crucial role to play in achieving national energy self-sufficiency. (Paragraph 132)
19. Energy and other large-scale infrastructure projects should be incorporated into a land use framework. The Land Use Commission would be tasked with doing this in close cooperation with relevant bodies including the National Infrastructure Commission. (Paragraph 133)
20. It is not suggested, and we do not propose, that the land use framework sets any distinct housing development policy or replaces the planning system in any way. Nevertheless, the framework cannot ignore the interaction of housing with land use and so it must incorporate some acknowledgement of this. (Paragraph 154)
21. A Land Use Commission should assess the amount of new land used for housing and employment on a three-yearly basis, and also collate existing information on likely future demand to contribute to the data and evidence supporting the framework. (Paragraph 155)
22. A framework should also help better identify and define those areas where land should be optimised for priority uses other than housing—for example prime agricultural land or land which is essential for carbon sequestration and nature recovery. While some such measures are set out in national policy, they clearly lack the strength to be effective. A land use framework, supported by the Commission, could also advise on the reform and strengthening of policy and practice based on the available evidence. (Paragraph 156)
23. More must be done nationally and locally to increase the prevalence of green infrastructure and to make the most of the opportunities it offers. In particular, as well as supporting its protective aspects, there is unfulfilled potential for green infrastructure to deliver multifunctional land use benefits, for example through combining public health benefits with environmental enhancement. We welcome Natural England's development of a Green Infrastructure Framework and hope that it will fulfil its potential. Attention must also be given to integrating effectively green infrastructure networks with other policies such as Local Nature Recovery Strategies, Biodiversity Net Gain, and Green Belt. (Paragraph 164)
24. We believe that planning rules and accompanying National Planning Practice Guidance should be changed to stress the need both for sufficient green infrastructure provision and protection through new development and for maximum beneficial use to be made of that infrastructure, using a



multifunctional framework to deliver simultaneous benefits where possible. (Paragraph 165)

25. It is important that any land use framework works together with existing national, regional and local planning frameworks and guidance, and that they reflect and complement their priorities, as well as enabling closer cooperation on non-planning land use matters. LNRS provide a key opportunity for more coordinated and cohesive joint working to achieve wider and more strategic land use objectives. It is important that everything is done to ensure this opportunity is optimised. Government should therefore consult closely with local and regional authorities as well as landowners and managers on the implementation of these strategies, and ensure that they are established at an appropriate scale and that decisions are driven by local input. (Paragraph 181)
26. Among their other objectives, LNRS should also act as the local delivery arm for the nature and biodiversity agenda of the Land Use Commission, acting in conjunction with the delivery of biodiversity net gain and green infrastructure networks. It is important that LNRS are devised by groups consisting of all local relevant stakeholders, particularly those who might be responsible for implementing their priorities. While not proposing a standardised constitution or format for these groups, we would recommend that they cover as large an area of land as possible, such as countywide or larger where councils can cooperate, but without losing their sense of regionality. The Land Use Commission should be responsible for promulgating best practice. It is important that Local Authorities are properly funded to assist in the planning and delivery of LNRS. (Paragraph 182)
27. In bringing forward a replacement for the duty to cooperate, Government must ensure a more coherent and strategic approach to cross-border land use planning and incorporate the key wider land use issues we have discussed in this report within any such replacement. (Paragraph 183)
28. A land use framework should also be cognisant of housing and development needs in particular areas, as well as associated supporting infrastructure. The framework gives an opportunity to establish a clearer pattern of appropriate use, and to support (although not enforce) additional protections where necessary; for example, in areas adjacent to existing settlements which are in alternative beneficial use, or have the potential to be. (Paragraph 184)
29. A land use framework has particular potential to encourage better use of the Green Belt, which fulfils the purpose of preventing development but could deliver many wider benefits including enhanced support for nature, biodiversity, environmental objectives and access to the countryside, particularly for people in neighbouring urban areas who may have limited access to open space. Enhancement of the Green Belt for delivering these multifunctional benefits should be a central priority for the framework, and local authority 'Green Belt enablers' should be tasked with promoting positive Green Belt uses within their communities. The objective to support multifunctional enhancement of the Green Belt should, in the relevant locations, be integrated with the objectives we have set out for securing and enhancing green infrastructure networks. (Paragraph 185)
30. Although some changes are proposed within the Levelling Up and Regeneration Bill, there continues to be a lack of clarity available on plans for wider reforms to the planning system, and this presents a serious difficulty in developing a land use framework that takes account of development

and planning requirements and expectations. This uncertainty also has a negative impact on existing planning and development policies, including the production and submission of development plans. We call on the government to aid the development of the framework by providing clarity on plans for future reform beyond those set out in the current Bill. Reforms should include changes to chapter 11 of the National Planning Policy Framework, “Making effective use of land”, to help enable the delivery of effective land use through the proposed framework. (Paragraph 186)

31. In addition, Government is unlikely to achieve its objectives for delivering nature recovery and biodiversity restoration through the planning system if local authorities and planning departments are not adequately resourced for the task. Departments have had their staffing resources cut significantly in recent years. Urgent attention needs to be given to ensure that planning departments are properly resourced with the necessary staffing and skills, and local authorities should be encouraged to share expertise and work in clusters to help enable effective delivery of these priorities. (Paragraph 187)
32. A multifunctional land use framework should take account of debates over ‘land sharing and land sparing’, including the ‘three compartment model’ proposed in the Dimpleby Review. We believe that a multifunctional approach lends itself most clearly to a principle of land sharing, delivering multiple benefits simultaneously in the same location. We recognise that different locations are suited for different benefits and any decisions must be driven by local circumstances and priorities. A ‘three compartment’ model should only be considered if it is understood as a continuum of land use rather than a specification with rigid boundaries. (Paragraph 199)
33. A Land Use Commission should have a multifunctional, locally-driven approach based on the principle of land sharing at the forefront of its thinking when devising a framework, and Government should put this at the core of its remit. (Paragraph 200)
34. The concepts of integration and multifunctionality are key to any successful land use framework. At present, land use policy is often delivered in a siloed manner with conflicts and trade-offs not adequately explored or resolved. The aim of a framework should be to replace this with a deliberative and cooperative approach, and to make use of the opportunities and synergies it provides. This should also involve strengthening the role of existing tools such as sustainability and environmental assessments, or their replacements proposed within the Levelling Up and Regeneration Bill, which can help support such an approach. (Paragraph 201)
35. An effective and up to date evidence base is critical for the development of a successful land use framework, and accessible data can offer a wide range of benefits, including prompting discussion around land use opportunities, fostering collaboration and discussion. Ideally there should be structures to capture and update data in central and/or perhaps regional hubs with open access to all involved, to help transparency and accountability and show how the necessary trade-offs are identified and managed. This will also ensure that policies and decisions are based on evidence, not presumption. These data hubs also need provision for improved data to be fed in from the bottom up. Data must be accessible, understandable and user-friendly at all levels, particularly locally where decisions are made. (Paragraph 209)

36. A proposed Land Use Commission should ensure that existing sources of data are accessible, rigorous and updated frequently, and use the framework to consolidate data sources where appropriate. It should also support and invest in new sources of data and mapping which will both add to the rigour of a framework and ensure that it is usable in practice for land use practitioners. (Paragraph 210)
37. We believe that a thoughtfully designed land use framework, based on a multifunctional approach, will go a long way to tackle the multiple challenges currently impeding effective land use decision making. It will enable clearer identification of current and emerging challenges and opportunities in the short, medium and long term and provide clarity about the direction of travel for land use. (Paragraph 220)
38. By design the framework should seek to break down silos and bring together multiple land use policy areas, embed integration and support delivery of a multifunctional approach. Delivery of the framework will primarily be at the regional and local level but development of the framework will need to be done at the national level too. With that in mind, developing the framework should include the following steps:
  - Consultation with those directly affected, including farmers, land owners, land managers, environmental specialists, business, access groups, local and regional authorities, any other relevant public and private bodies, communities and the general public;
  - Identifying opportunities for regular stakeholder engagement and feedback;
  - Clarifying roles and responsibilities and identifying opportunities for cooperation;
  - Identifying gaps in data and evidence, coordinating and overseeing improvements to data collection and distribution of data and evidence to relevant stakeholders; and
  - Providing advice to national, regional and local government, relevant stakeholders and to the wider public via an open and transparent approach to information gathering and sharing. (Paragraph 221)
39. We believe that a Land Use Commission should be set up as an independent, statutory arms-length public body under the Cabinet Office. It should have an independent Chair appointed by the Cabinet Office and independent commissioners as well as commissioners representing and appointed by:
  - DEFRA—representing the interests of food, biodiversity and forestry;
  - DLUHC—representing the interests of housing, local government and integration within the planning system;
  - BEIS—representing the need for increased self-sufficiency in renewable energy;
  - DCMS—representing the need for access to nature and tourism; and
  - DfT—representing the need for transport infrastructure. (Paragraph 225)

40. Looking at comparable bodies, the Scottish Land Commission and the Climate Change Commission, we see that they have annual budgets of around £1.5 million and £4.5 million a year respectively. Although we are not in a position to estimate the budget, we would expect that the annual budget for an English Land use Commission would be similar to those bodies. (Paragraph 226)
41. Finally, we propose that the Commission's roles would be to:
  - Prepare and update a land use framework for England to help optimise the multifunctional use of land for the benefit of all;
  - Encourage the publication and use of accessible, open source land use data that is presented in an understandable and user-friendly way for use at national, regional and local level;
  - Review the effectiveness and impact of laws and policies relating to land and to advise Government;
  - Examine and highlight specific land use issues through a deep dive programme;
  - Engage with stakeholders, landowners, managers and the public on land use issues;
  - Work across government departments and in close cooperation with local authorities and relevant public bodies on land use issues to enable an integrated approach;
  - Promulgate best practice at local and regional level; and
  - Produce a triennial report on progress and on improving the effectiveness of the multifunctional land uses to be laid before Parliament for debate. (Paragraph 227)

## APPENDIX 1: LIST OF MEMBERS AND DECLARATIONS OF INTEREST

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### Members

Lord Cameron of Dillington  
 Baroness Bakewell of Hardinton Mandeville  
 Lord Borwick  
 Lord Curry of Kirkharle  
 Lord Goddard of Stockport  
 Lord Grantchester  
 Lord Harlech (until October 2022)  
 Lord Layard (until April 2022)  
 Lord Leicester  
 Baroness Mallalieu  
 Baroness Redfern  
 Baroness Young of Old Scone  
 Lord Watts (from May 2022)

### Declaration of interests

Lord Cameron of Dillington  
*Personal and Family involvement in rural landholdings with farming, woodland, housing and commercial property interests*  
*Chair, UK Centre for Ecology and Hydrology—Research Centre*  
*Director, ADT Ltd.—a Travel, Parking and Data Business*  
*President of the Royal Association of British Dairy Farmers*

Baroness Bakewell of Hardington Mandeville  
*Vice President, Local Government Association*  
*Patron, Community Land Trust Network*

Lord Borwick  
*Director, Mayfield Market Towns Ltd—with options to buy Land in Sussex*  
*Director, Federated Investments LLP—owns shares*  
*Director, Countryside Properties (Bicester) Ltd—Finishing development of housing land in Bicester*  
*Director, Bicester Lane Ltd—owns shares and interest in Land in Scotland with permission for development of rail related warehouses and houses.*

Lord Curry of Kirkharle  
*Trustee, Clinton Devon Estates*  
*Chair, The Rural Design Centre*  
*President, Community Action Northumberland*  
*Member, NFU*  
*Member, CLA*

Lord Goddard of Stockport  
*No relevant interests to declare*

Lord Grantchester  
*Glen Trool Estates Limited*  
*Glen Trool Estates Ltd (holiday home in Dumfries and Galloway)*  
*Tom Loftus Inc (John Deere tractors dealership)*  
*Land and property in Cheshire, including dairy farm in receipt of payments through Rural Payments Agency*  
*Land and property in Dumfries and Galloway*



*Property in Westminster, London*  
*Director, Glen Trool Estates Limited*

Lord Harlech (until October 2022)

*Land and Property owner in England and Wales*  
*Member, The Country Land and Business Association*  
*Committee Member, Historic Homes Wales*  
*Member, GWCT*  
*Member, Countryside Alliance*  
*Member, APPG on Game & Wildlife Conservation*

Lord Layard (until April 2022)

*No relevant interest to declare*

Lord Leicester

*Trustee, Burnham Overy Harbour Trust*  
*President, Great Yarmouth Preservation Trust*  
*President, Visit East of England*  
*President, Caravan & Motorhome Club*  
*NFU Member*  
*CLA Member*  
*Chairman, Wildlife Estates England*  
*Coke Estates Limited (Property Management)*  
*The Holkham Estates Company Limited (Property Management)*  
*Holkham Farming Company Limited (Agriculture)*  
*Holkham Holiday Parks Limited*  
*Holkham Property Company Limited (Property Management)*  
*Holkham Tearers Limited (Agriculture)*  
*Holkham Emerald Limited (Agriculture)*  
*Holkham Innovations Limited (Power production)*  
*Holkham Nature Reserve Limited (Agriculture)*  
*Chalk Hill Farm Barns (Management) Limited (Property Management)*

Baroness Mallalieu

*Owner of a small livestock farm in Exmoor National Park.*  
*In receipt of agricultural payments for the above farm.*  
*President, Countryside Alliance*

Baroness Redfern

*No relevant interests to declare*

Baroness Young of Old Scone

*Chair, Woodland Trust*  
*Chair, Royal Veterinary College*  
*Vice-president, RSPB*  
*Member of the Steering Group for the Royal Society investigation into multi-functional landscapes.*  
*Campaigner for Keep North Beds Green, in the Oxford-Cambridge Arc*  
*Member of the Commission on Food, Farming and the Countryside*

Lord Watt (from May 2022)

*No relevant interests to declare*

## APPENDIX 2: LIST OF WITNESSES

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Evidence is published online at <https://committees.parliament.uk/committee/583/land-use-in-england-committee/publications/> and available for inspection at the Parliamentary Archives (020 7219 3074).

Evidence received by the Committee is listed below in chronological order of oral evidence session, and then in alphabetical order. Those witnesses marked with \*\* gave both oral evidence and written evidence. Those marked with \* gave oral evidence and did not submit any written evidence. All other witnesses submitted written evidence only.

### Oral evidence in chronological order

**	Joanna Averley, Planning Director, Department for Levelling Up, Housing and Communities	<a href="#">QQ 1–14</a>
*	Rachel Fisher, Deputy Director of Land Use Policy, Department for Environment Food and Rural Affairs	
*	Jonathan Baker, Deputy Director, Food, Farming and Countryside Programme, Department for Environment Food and Rural Affairs	
*	Susan Twining, Chief Land Use Policy Adviser, The Country Land and Business Association (CLA)	<a href="#">QQ 15–27</a>
*	Dr Andrew Clark, Director of Policy, National Farmers Union (NFU)	<a href="#">QQ 28–38</a>
**	Kevin Austin, Deputy Director, Agriculture, Fisheries and the Natural Environment, Environment Agency	<a href="#">QQ 39–46</a>
*	Alan Law, Deputy Chief Executive, Natural England	
*	David Butterworth, Chief Executive, Yorkshire Dales National Park, and Lead Chief Executive for National Parks England	<a href="#">QQ 47–54</a>
*	John Watkins, Chief Executive, National Association for Areas of Outstanding Natural Beauty	
**	Sir William Worsley, Chair, Forestry Commission	<a href="#">QQ 55–73</a>
**	Stephanie Rhodes, Delivery Director for the England Tree Planting Programme, Forestry Commission	
**	Darren Moorcroft, Chief Executive, Woodland Trust	
**	Caroline Ayre, National Manager, Confor	
**	Dame Fiona Reynolds, Commissioner and Trustee, Food, Farming and Countryside Commission	<a href="#">QQ 74–86</a>
**	Sue Pritchard, Chief Executive, Food, Farming and Countryside Commission	
**	Dr Alison Caffyn, Senior Researcher, Food, Farming and Countryside Commission	
*	Tom Lancaster, Head of Land, Sea and Climate Policy, RSPB	<a href="#">QQ 87–96</a>

- ★ Elliot ChapmanJones, Head of Public Affairs, The Wildlife Trusts
- ★ Alec Taylor, Head of Land-Use Climate Programme, WWF UK
- ★ Ben Kite, Chair-elect, Strategic Policy Panel, Chartered Institute of Ecology and Environmental Management [QQ 97–111](#)
- ★ Benet Northcote, Chair, Nature Positive Innovation Commission
- ★ Sarah Mukherjee MBE, Chief Executive Officer, Institute of Environmental Management and Assessment (IEMA)
- ★ Katherine Willis CBE, Professor of Biodiversity, Department of Zoology, University of Oxford
- ★ Dr James Richardson, Chief Economist, National Infrastructure Commission [QQ 112–118](#)
- ★ Jane Healey Brown, Town Planning Skills Leader for the UK, India, Middle East and Africa, Arup
- ★ Adam Berman, Deputy Director, Policy, Energy UK [QQ 119–126](#)
- ★ Rob Gross, Director, UK Energy Research Centre
- ★★ Rich Cooke, Principal Spatial Planner, Planning Service, Essex County Council [QQ 127–136](#)
- ★ Maria Dunn, Head of Planning Policy, Birmingham City Council;
- ★ Tim Slaney, Director of Planning, South Downs National Park Authority
- ★★ Richard Blyth, Head of Policy Practice and Research, Royal Town Planning Institute [QQ 139–145](#)
- ★★ Dr Hugh Ellis, Policy Director, Town and Country Planning Association
- ★ Paul Miner, Head of Land Use and Planning, Countryside Charity (CPRE)
- ★ David Robertson, Director of Investment and Business Development, Scottish Woodlands Ltd [QQ 146–157](#)
- ★ Andrew Sowerby, Regional Manager West, Pryor & Rickett Silviculture
- ★★ David Young, Senior Fellow, Broadway Initiative.
- ★★ Matt Chlebek, Founder and Chief Agronomist, Harvest Farms [QQ 158–168](#)
- ★ Russ Tucker, Founder, Ivy Farms
- ★ James Woodward, Sustainable Farming Officer, Sustain

★	Hamish Trench, Chief Executive, Scottish Land Commission	<a href="#">QQ 169–177</a>
★	Max Hislop, Director, Clyde Climate Forest	
★	David Miller, Knowledge Exchange Coordinator, James Hutton Institute	
★	Kathryn Monk, Chair, Collaboration for Environmental Evidence, Swansea University	<a href="#">QQ 178–189</a>
★	Roisin Willmott, Director, RTPI Wales	
★	Henry Dimpleby, Lead, National Food Strategy	<a href="#">QQ 190–203</a>
★	Dr David Evers, Senior Researcher, PBL Netherlands Environmental Assessment Agency	<a href="#">QQ 204–211</a>
★	Kate Ashbrook, General Secretary, Open Spaces Society	<a href="#">QQ 212–221</a>
★★	Tompion Platt, Director of Operations and Advocacy, The Ramblers	
★★	Dr Richard Denman, Consultant, The Tourism Company	<a href="#">QQ 222–233</a>
★	The Rt. Hon George Eustice MP, Secretary of State for Environment, Food and Rural Affairs	<a href="#">QQ 234–242</a>
★	David Kennedy, Director-General for Food, Farming and Biosecurity, Department for Environment, Food and Rural Affairs.	
★	Professor Mark Scott, Planning and Dean of Architecture, Landscape Architecture, Planning & Environmental Policy, University College Dublin	<a href="#">QQ 243–253</a>

### Alphabetical list of witnesses

	Professor Michael Alder	<a href="#">LUE0008</a>
	Association of Drainage Authorities	<a href="#">LUE0075</a>
	Sam Awdry	<a href="#">LUE0054</a>
	Tony Ballard	<a href="#">LUE0091</a>
	James Beamish	<a href="#">LUE0060</a>
	Jenny Bentall	<a href="#">LUE0086</a>
	Black Environment Network	<a href="#">LUE0032</a>
	Andii Bowsher	<a href="#">LUE0089</a>
	M Boyle	<a href="#">LUE0026</a>
★★	Broadway Initiative ( <a href="#">QQ 146–157</a> )	<a href="#">LUE0068</a>
	Ian Brown	<a href="#">LUE0061</a>
	Building with Nature	<a href="#">LUE0051</a>
	Campaign for National Parks	<a href="#">LUE0048</a>

	Care Suffolk	<a href="#">LUE0100</a>
	Professor Paul Charles Cheshire	<a href="#">LUE0012</a>
	Chester Zoo	<a href="#">LUE0102</a>
	Community Land Trust	<a href="#">LUE0010</a>
	Community Planning Alliance	<a href="#">LUE0080</a>
	Community Supported Agriculture Network UK	<a href="#">LUE0062</a>
**	Caroline Ayre, National Manager, Confor ( <a href="#">QQ 55–73</a> )	<a href="#">LUE0029</a>
**	Country Land and Business Association (CLA) ( <a href="#">QQ 15–27</a> )	<a href="#">LUE0096</a>
	Countryside and Community Research Institute, University of Gloucestershire	<a href="#">LUE0071</a>
	County Councils Network	<a href="#">LUE0090</a>
**	Paul Miner, Head of Land Use and Planning, CPRE The Countryside Charity ( <a href="#">QQ 139–145</a> )	<a href="#">LUE0055</a>
	Tony Crook	<a href="#">LUE0046</a>
	Alistair Crowle	<a href="#">LUE0044</a>
*	Department of Environment, Food and Rural Affairs	<a href="#">LUE0103</a>
	Dr Gemma Delafield	<a href="#">LUE0036</a>
	Digital Task Force for Planning	<a href="#">LUE0041</a>
**	Kevin Austin, Deputy Director, Agriculture, Fisheries and the Natural Environment, Environment Agency ( <a href="#">QQ 39–46</a> )	<a href="#">LUE0016</a>
*	Zac Lamdin, Senior Government Relations Adviser, Environment Agency	<a href="#">LUE0073</a>
	Environmental Change Institute, University of Oxford	<a href="#">LUE0067</a>
	Rich Cooke, Principle Spatial Planner (Planning Services), Essex County Council	<a href="#">LUE0106</a>
	Jake Fiennes	<a href="#">LUE0063</a>
	Floodplain Meadows Partnership	<a href="#">LUE0043</a>
**	Dr Alison Caffyn, Senior Researcher, Food, Farming and Countryside Commission ( <a href="#">QQ 74–86</a> )	<a href="#">LUE0088</a>
**	Forestry Commission ( <a href="#">QQ 55–73</a> )	<a href="#">LUE0098</a>
	John Foster	<a href="#">LUE0052</a>
	Friends of Carrington Moss	<a href="#">LUE0023</a>
	Future Economic Rural Network (FERN)	<a href="#">LUE0034</a>
	Game and Wildlife Conservation Trust	<a href="#">LUE0020</a>
	Geospatial Commission	<a href="#">LUE0087</a>
	Global Peace Community Interest Company	<a href="#">LUE0007</a>
		<a href="#">LUE0017</a>



	Bill Grayson	<a href="#">LUE0093</a>
	Green Alliance	<a href="#">LUE0095</a>
	Carsten Jahn Hansen	<a href="#">LUE0110</a>
**	Matt Chlebek, Founder and Chief Agronomist, Harvest Farms ( <a href="#">QQ 158–168</a> )	<a href="#">LUE0053</a>
	Nicholas Harvey	<a href="#">LUE0022</a>
	Richard Haynes	<a href="#">LUE0015</a>
	Highbury Group on Housing Delivery	<a href="#">LUE0085</a>
	Philip C Hills	<a href="#">LUE0004</a>
	Professor Ian Hodge	<a href="#">LUE0033</a>
	Gareth Howell	<a href="#">LUE0011</a>
	Institute of Chartered Foresters	<a href="#">LUE0021</a>
	Susan Kelly	<a href="#">LUE0024</a>
	Dr Keith Kirby	<a href="#">LUE0013</a>
	Matthew Kirby	<a href="#">LUE0042</a>
	Barnaby Lawrence	<a href="#">LUE0001</a>
	Shaun Leavey	<a href="#">LUE0005</a>
**	Joanna Averley, Planning Director, Department for Levelling Up, Housing and Communities ( <a href="#">QQ 1–14</a> )	<a href="#">LUE0003</a>
	Lightsource bp	<a href="#">LUE0076</a>
	Manhood Peninsula Partnership	<a href="#">LUE0019</a>
	Marine Management Organisation	<a href="#">LUE0059</a>
	Dr Tim Marshall	<a href="#">LUE0040</a>
	National Allotment Society	<a href="#">LUE0069</a>
	National Association of Local Councils	<a href="#">LUE0081</a>
**	National Farmers Union of England and Wales (NFU) ( <a href="#">QQ 28–38</a> )	<a href="#">LUE0049</a>
	National Trust	<a href="#">LUE0039</a>
*	Dr Tony Juniper, Chair, Natural England	<a href="#">LUE0107</a>
	Dr Ruth Waters, Director of Evidence, Natural England	<a href="#">LUE0104</a>
	Michael Watson, Principle Advisor Legal and Governance, Natural England	<a href="#">LUE0074</a>
	Ockham Parish Council	<a href="#">LUE0025</a>
	Iona Parker	<a href="#">LUE0066</a>
	Nigel Pearce	<a href="#">LUE0006</a>
	Lisa Phipps	<a href="#">LUE0002</a>
	Prince's Countryside Fund	<a href="#">LUE0065</a>

**	Ramblers ( <a href="#">QQ 212–221</a> )	<a href="#">LUE0092</a>
		<a href="#">LUE0109</a>
	Catriona Riddell	<a href="#">LUE0035</a>
	Rothamsted Research	<a href="#">LUE0079</a>
	Royal Institute of Chartered Surveyors	<a href="#">LUE0072</a>
	Royal Society	<a href="#">LUE0111</a>
**	Richard Blyth, Head of Policy Practice and Research, Royal Town Planning Institute ( <a href="#">QQ 139–145</a> )	<a href="#">LUE0031</a>
	Save Newcastle Wildlife	<a href="#">LUE0101</a>
	Save Our South Coast Alliance	<a href="#">LUE0083</a>
	Say No to Sunnica Community Action Group	<a href="#">LUE0056</a>
	Guy Shrubsole	<a href="#">LUE0027</a>
	Smart Growth UK	<a href="#">LUE0084</a>
	Soil Association	<a href="#">LUE0037</a>
	Solar Energy UK	<a href="#">LUE0064</a>
	Emma Sturdy	<a href="#">LUE0057</a>
	Sustainable Soils Alliance	<a href="#">LUE0070</a>
	Tenant Farmers Association	<a href="#">LUE0099</a>
	Professor Mark Tewdwr-Jones	<a href="#">LUE0030</a>
	Thames Crossing Action Group	<a href="#">LUE0018</a>
	The Edge	<a href="#">LUE0058</a>
**	Dr Richard Denman, Consultant, The Tourism Company ( <a href="#">QQ 222–233</a> )	<a href="#">LUE0105</a>
	Thriving Natural Capital Centre, Scotland's Rural College (SRUC)	<a href="#">LUE0014</a>
**	Dr Hugh Ellis, Policy Director, Town and Country Planning Association ( <a href="#">QQ 139–145</a> )	<a href="#">LUE0045</a>
	Trees and Design Action Group	<a href="#">LUE0082</a>
	UK Centre for Ecology and Hydrology	<a href="#">LUE0078</a>
	UK Research and Innovation	<a href="#">LUE0047</a>
	Neil Hemington, Chief Planner, Welsh Government	<a href="#">LUE0108</a>
	Wildlife and Countryside Link	<a href="#">LUE0094</a>
	Wildlife Trust	<a href="#">LUE0077</a>
	Professor Michael Winter	<a href="#">LUE0038</a>
**	Woodland Trust ( <a href="#">QQ 55–73</a> )	<a href="#">LUE0097</a>

## APPENDIX 3: CALL FOR EVIDENCE

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The House of Lords Select Committee on Land Use in England was appointed in January 2022. It is chaired by Lord Cameron of Dillington. The Committee is required to agree its report by the end of November 2022.

Over the course of its inquiry, the Committee will be undertaking a wide-ranging study of all aspects of land use in England, the policies which govern them, the short and longer-term outlook for how land use may change and may need to change, and the most appropriate response to these changes. Within this study we will be considering the role of the key drivers of land use change including climate change, biodiversity decline, population and economic growth, and the extent of their influence.

Most importantly, the Committee will be looking at how the Government can best develop a strategy to plan for these changes, and is also keen to hear proposed solutions to current and emerging challenges. The Committee has a particular focus on integration of policies and on planning for multifunctional land use, and would especially welcome contributions on these themes.

This is a public call for written evidence to be submitted to the Committee. The deadline is 4.00pm on Tuesday 26 April 2022. You can follow the progress of the inquiry on Twitter @LordsLandCom.

All are welcome to respond to the Call for Evidence and there are no barriers to making a submission. Respondents are not obliged to respond to every question listed, and so may confine their response to their particular areas of interest or expertise as they find appropriate.

Diversity comes in many forms and hearing a range of different perspectives means that committees are better informed and can more effectively scrutinise public policy and legislation. Committees can undertake their role most effectively when they hear from a wide range of individuals, sectors or groups in society affected by a particular policy or piece of legislation. We encourage anyone with experience or expertise of an issue under investigation by a select committee to share their views with the committee, with the full knowledge that their views have value and are welcome.

### Questions

The Committee is happy to receive submissions on any issues related to the subject of the inquiry but would particularly welcome submissions on the questions listed below. You do not need to address every question. Respondents may interpret the questions broadly and provide as much information as possible. Instructions on how to submit evidence are set out at the end of this document.

#### *Pressures and challenges*

What do you see as the most notable current challenges in relation to land use in England? How might these challenges best be tackled? How do you foresee land use in England changing over the long term? How should competing priorities for land use be managed?

What are the key drivers of land use change which need to be planned for, and how should they be planned for? What is the role of multifunctional land use strategies in implementing these plans?

How might we achieve greater and more effective coordination, integration and delivery of land use policy and management at a central, regional, local and landscape level?

### *Farming and land management*

What impacts are changes to farming and agricultural practices, including food production, likely to have on land use in England? What is the role of new technology and changing standards of land management?

What impact are the forthcoming environmental land management schemes likely to have on agriculture, biodiversity and wellbeing? What do you see as their merits and disadvantages?

### *Nature, landscape and biodiversity*

What do you see as the key threats to nature and biodiversity in England in the short and longer term, and what role should land use policy have in tackling these?

What are the merits and challenges of emerging policies such as nature-based solutions (including eco-system and carbon markets), local nature recovery strategies and the biodiversity net gain requirement? Are these policies compatible, and how can we ensure they support one another, and that they deliver effective benefits for nature?

### *Environment, climate change, energy and infrastructure*

How will commitments such as the 25 YEP and the net zero target require changes to land use in England, and what other impacts might these changes have?

How should land use pressures around energy and infrastructure be managed?

### *Land use planning*

What do you see as the advantages and disadvantages of the existing land use planning system and associated frameworks in England? How effectively does the system manage competing demands on land, including the Government's housing and development objectives? What would be the merits of introducing a formal spatial planning framework or frameworks, and how might it be implemented?

What lessons may be learned from land use planning frameworks in the devolved nations and abroad, and how might these lessons apply to England?

### *Conclusion*

Which organisations would be best placed to plan and decide on the allocation of land for the various competing agendas for land use in England, and how should they set about doing so?

## APPENDIX 4: NOTE OF VISIT TO LICKEY HILLS AND SAPPERTON WILDER

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Members of the Select Committee on Land Use in England undertook a visit in June 2022 to understand issues relating to land use on the ground. The first part of the visit took place in Lickey Hills, an open space adjacent to the city of Birmingham where the National Trust and other stakeholders were involved in developing a project known as ‘8 Hills’ to support a range of land uses with a particular focus on access and recreation.

The second part of the visit took place at Sapperton Wilder, Gloucestershire, where the Committee visited three open spaces within a large site which was being repurposed for different uses to support nature, conservation and biodiversity.

### Attendees

#### *Committee members*

- Lord Cameron of Dillington (Chair)
- Lord Harlech
- Lord Grantchester
- Baroness Mallalieu
- Baroness Young of Old Scone

#### *Staff*

- Simon Keal (Clerk)
- Stephen Reed (Committee Operations Officer)

### Morning visit—Lickey Hills, Birmingham

#### Attendees:

##### *National Trust*

- Helen Armstrong, 8 Hills Project Manager
- Matt Doran, Head of Innovation and Partnership Team
- Georgina Holmes-Skelton, Head of Government Affairs
- Chris Lambart, Planning Adviser

##### *Birmingham City Council*

- Cllr Majid Mahmood—Cabinet Member for Environment
- Finn O’Donoghue—City of Nature officer
- Humera Sultan—Consultant in Public Health and Future Parks Accelerator Director

##### *Bromsgrove District Council*

- Mike Dunphy, Strategic Planning and Conservation Manager



### *Introductory presentation*

Georgina Holmes-Skelton introduced the National Trust and its approach to land use issues. She noted that it owns approximately 780 miles of coastline and is the largest farm owner in the country with around 1,500 farming tenants in England, Wales and Northern Ireland. The Trust owns approximately 25,000 hectares of land, as well as 500 historic houses, as well as castles, historic monuments, gardens and parks. The Trust's purpose is to care for those places of historic and natural beauty so that people can enjoy them. They are concerned with nature and the need to address the biodiversity crisis, and have strong ambitions to create and enhance habitat. The Trust is looking to create or restore around 250,000 hectares of nature rich habitat. They are also interested in heritage and landscape and in making the most from those historic sites, for now and future generations.

She added that since its founding the Trust has had a focus on promoting access to green space and on encouraging more people to have access to the countryside and green spaces so that they can gain the benefits of it. This is still of real importance to the Trust and is particularly relevant on the Clent Hills site because of its proximity to Birmingham. They are looking to achieve a sustainable balance between different types of land use and the different outcomes that can be achieved through them. The Trust has a goal to reach net zero by 2030 and the size of its estate means they are interested in what they can do for carbon sequestration as well as for nature.

She said that a lot of National Trust land is managed by agricultural tenants and she argued that food production is something we all need to think about especially in the context of Ukraine and cost of living challenges. They are looking to support both food and nature simultaneously. They are not trying to impose NT's view; they want to work together with our farmers and learn from them and produce high quality food which supports nature, cares for historic landscapes as well. ELMS will be key to delivering for farmers and nature in the future. NT has a strong history of interest in the planning system and has its own planning projects, so has first hand experiences of the importance of getting it right.

Matt Doran then introduced himself and explained the NT's role at Lickey Hills. He told the Committee that his role was to consider how the NT can serve its charitable purpose outside of running its properties. He noted that Lickey Hills sat outside the city of Birmingham, and that it had many good green spaces but with a need for more. Bromsgrove, where the site lies, has its own issues and a different relationship with Birmingham, although the site itself is owned by the City Council. And neither authority can directly affect what farmers choose to do on their land, and what access they are allowed to grant. 8 Hills is trying to focus strongly on access and how land can deliver as much public benefit as possible. The attempt is to create something called a regional park although this is not a formal designation. There is a "top down" element and a "bottom up" element. The "top down" is ensuring that the Bromsgrove policy environment is as conducive as possible to creation of 8 Hills as a park and more space for people, biodiversity and water.

The difficult part is incentivisation for landowners. The NT are trying to incentivise them to deliver as much public benefit as possible, by gathering together as many different sources of funding as possible to create a "one stop shop" of consolidated 'portfolio' of funds for different land use. It is important to "stack" the funds together, as realistically any single fund may not be enough for farmers. They are trying to create a new kind of access fund and to add it to carbon, biodiversity

and water funds. At present there is no meaningful financial incentive for farmers to provide access: if anything it is only a cost for farmers. And a lot of benefits for access are to do with health. The NT is looking to set up a scheme called “GAPS”—greenspace access payment system. It would be a payment by results system so landowners would get a micropayment for every person that accesses their green space, measured by mobile phone location data. If you attach a fund to this data, you have a market for providing access to green space.

### *Question and answer session*

Lord Grantchester asked what progress NT had made to date in relation to its development of GAPS. Matt Doran said that the technological aspect already existed and a pilot was underway to check numbers using the system at NT sites where NT knew the number of people coming in, to compare the numbers for accuracy. They also wanted to establish whether there was a lower threshold for counting numbers. They are particularly interested in those who may not usually go to the countryside and who have poorer health outcomes. GAPS could incentivise farmers to increase access to people from such backgrounds by giving more money when people access the site from specific postcode locations.

They have yet to consult with farmers on the process but have looked through some of the ELMS data and trials DEFRA had done where farmers said they were interested in providing further access, with some caveats around levels of incentive. They think GAPS “hits the sweet spot” in terms of incentives because if it doesn’t deliver benefits they don’t pay for anything, so it is an “easy way in” for funders to start supporting the provision of new access.

Lord Cameron asked if there was any relation to the planning system such as setting up facilities to sell goods which will encourage people to attend. Matt Doran said there may be implications if farmers want to capitalise on the increased footfall, but the basic idea of incentivising farmers to encourage people to access the land is important because farmers are extremely entrepreneurial and may be encouraged to improve their land or provide simple amenities such as benches or natural play spaces to encourage people to use it if there is a financial incentive.

Cllr Majid Mahmood said that transport connectivity is a challenge for accessing the park. It is easier to get here in car or taxi. If you want to incentivise farmers to attract people from different backgrounds these are the issues. In Birmingham they have declared a city of nature with the aim to create an additional 400 green spaces. He expressed concern that access funding may not be enough to offset against the fact food prices are rocketing and they might be better off just growing food or even selling off the land to developers; he stressed that there needs to be a joined up approach.

In relation to transport, Helen Armstrong said that NT had been talking to Midlands Connect which is the hub for the area and a rural mobility competition is currently underway—they have been trialling demand responsive buses which might have potential for areas like this. In Derbyshire they are also looking at rural mobility hubs. There are opportunities to talk to organisations and bring them together and bang the drum for 8 Hills. Humera Sultan said that we struggle so much with getting people around with public transport in Birmingham—“we are a car city unfortunately”. She added that the health inequalities issue is massive in Birmingham and limited green spaces in many parts of the city.

The Earl of Leicester mentioned the gap in life expectancy between most and least wealthy wards. Humera Sultan said this was right and they want to incentivise

landowners in central areas to support the creation of open space in those areas, but it competes with other development needs. She said that it would be a good start to get people to use open spaces in the inner city even before we support them going out to Lickey Hills. She added that until we get the transport sorted it will be a challenge.

Matt Doran noted that there were challenges in relation to supporting maintenance of the green spaces once developed—after a certain period of time maintenance becomes the responsibility of the council and there is no revenue stream, so it is a pure cost.

Mike Dunphy noted that from the perspective of Lickey Hills Birmingham looks very green but further into the city it was a very dense urban area. He noted that housing need numbers were very large and, while he supported the principle of brownfield first, the numbers are huge and it will never be enough to get close to the actual need if the need figures are right. The mixed message about what the planning system is intended to deliver makes it quite difficult. Protection of land in the green belt is relatively easy but by implication makes it harder to do other development activities. We need to try and find a good balance. The key aspect is delivery: if it will cost money and we want developers to fund it, the developments in Bromsgrove are unlikely to be able to fully support it—how can we get the money from elsewhere to here to help fund something in one district? The council is committed to the principle, but is keen to understand the detail.

Lord Cameron asked what sort of partnership arrangements there were with neighbouring local authorities. Mike Dunphy said at the moment there is the combined authority, although Bromsgrove is not in it. There is an officer group although this is mainly focused on housing shortfall and how to distribute it. He argued that the duty to cooperate hasn't worked. Bromsgrove was also in two LEPs, the Greater Birmingham and the Worcestershire one. The geography is complicated. LEPs are mainly focused on the economic side, not on housing.

Matt Doran was asked about the number of landowners in 8 Hills and estimated that it was in the region of 2–300. He added that within that there were very small farms and Birmingham City Council owned a very large chunk. He said that Birmingham could talk to its tenant farmers and the “institutional” owners have a good chunk of the land. 8 Hills is very typical of the urban edge: there are big landowners and smaller farmers with small and average size farms, and their decision making will drive future outcomes. They are looking to encourage “peer dialogue” to discuss the aims of the project, working initially through existing forums.

Lord Harlech asked about maintenance of green space and noted that the Committee had heard that a lot of green spaces aren't managed and don't do what they are thought to do in terms of biodiversity—they are green but they are “dead”, so people are not visiting them and getting outside enrichment and access. There are so many competing issues for land use and England is a comparatively small country. Baroness Young also asked about the possibility of the council facilitating residents to grow their own fruit and vegetables.

The Birmingham City Council representative said they were looking at growth spaces through the city of nature and are also working with local community groups looking at areas within a park to set up raised beds. That will be relatively new for Birmingham. In Rugby borough this has been done for five years. Cllr Mahmood said that the ambition for the city of nature was a 40 year ambition

and a positive initiative but the reality was that resources are limited with over 600 parks and green spaces for only 36 rangers. Some strategic parks get more resources and the smaller parks in the inner cities need support too.

Lord Cameron asked whether there were any partnerships with NGOs to support biodiversity on the site. Lord Leicester added that access would inevitably come at a cost to biodiversity.

Matt Doran said they were certainly looking to support biodiversity and support prioritisation. Certain species are disturbed by people and dogs but others—the less well seen ones—are not necessarily. A lot of what is being discussed in 8 Hills in relation to access are relatively small patches of land—for example 50 metre stretches on the edge of a field. It doesn't prevent farmers growing what they want to grow, just helps support access. He added that he was hopeful that land on the edge of fields can deliver “lots and lots” of agendas and therefore a lot of money for the farmer, making it worthwhile.

Georgina Holmes Skelton said that at a landscape scale there were opportunities to consider the outcomes that can be delivered by a place such as biodiversity, water quality, and access. This is easier when there is a single landowner and there are places where the NT as a landowner has done this at a landscape level. It is more difficult when there is a patchwork of landowners. A lot of this comes down to the effectiveness of ELMS schemes and how effectively they enable farmers and landowners to get the income from different interventions, including different outcomes on the same site.

Matt Doran added that there are some areas of wildflower that were particularly important in the 8 Hills but that it was not particularly ‘special’ in terms of the biodiversity. But this is what makes it a very important test case in terms of what you can do on the edge of every city or most cities. Most of the land doesn't have a specific protective designation so that is why 8 Hills is an interesting test case.

Baroness Young asked about how BNG and LNRS was working at a local level. Mike Dunphy said that on the ground in terms of planning applications it is not required yet. From a local plan point of view, Bromsgrove is working with Worcestershire to come up with a local policy that will be tested over the consultation on BNG. They are not directly involved in LNRS as that is the responsibility of Worcestershire. Chris Lambart said that they had consulted with Worcestershire, but the responsibility had not yet been allocated yet. They are also consulting with WMCA although it is not yet clear who will be the responsible authority for LNRS.

### *Roundtable discussion*

Cllr Mahmood opened the roundtable discussion by saying that everyone in attendance had a similar vision and perspective. He noted that Birmingham has a young population and massive health inequalities and he found the 8 Hills proposition very attractive.

Alister Scott asked what a good land use framework might do to help people achieve their aspirations and policies. Cllr Mahmood said that they had a vision for 400 new green spaces but they also have an issue with supporting maintenance of spaces. They really need to reduce the health inequalities and COVID had highlighted the importance of green spaces for physical activity and mental wellbeing. A land use framework should be based on exhausting brownfield sites before greenfield.

Baroness Young asked how much of the drive came from the local authority and whether any attention was paid to the 25 YEP and net zero. Humera Sultan said that the City of Nature plan is based on the 25 year plan because the Council knows it will need to deliver against it at some point.

Lord Cameron discussed some of the Committee's areas of interest and focus, noting that the government had promised a million acres of new forestry, a million acres of new biodiversity land, 1.2 million acres of new access, national parks and AONBs, 300,000 new houses a year and there is no plan for integrating all of this. He asked for attendees' views on the possibility of a new body to support the creation of a land use framework.

Matt Doran said we should think less about a body, duty or framework and instead think about how you could differentiate the incentives that landowners have. Landowners that are right on the edge of Birmingham have exactly the same financial incentives as a landowner in the middle of nowhere, which does not seem sensible. You could tackle that through a body that sets a framework or you could have a range of different financial incentives—so for example if you were within the sort of periurban zone on the edge of the city you get a greater incentive to provide access than if you were in the middle of nowhere. The rewiring of the finances is important.

Baroness Young asked why ELMS was not part of the NT's approach to financial incentives in the area. Matt Doran said that whilst DEFRA had shown some interest initially, it appeared that access wasn't a priority.

Lord Grantchester noted that he had previously been involved with the RDA in the north west and had experienced frustrations with coordination. He said that Cheshire would often make suggestions which would be rejected by Manchester only for them to adopt them a year later. He asked if there was a similar "big brother" tendency around Birmingham. Matt Doran said that while he was not qualified to comment on the specific point, there is certainly a tension with a massive city of over a million people and all the associated pressures, compared to Bromsgrove which is in a completely different position.

Mike Dunphy noted that when there were regional structures, they were not perfect but there was something there in Bromsgrove and there are various geographies including the local authority and the Worcestershire boundaries, the housing market area boundary which is different, the two LEP geographies and the different combined authority geography, and then there is West Midlands Connect which is different again. Many of the relevant issues will only be covered in the context of local plan inquiries and they will not incorporate all of the relevant factors in the way the regional planning system used to operate.

Lord Cameron asked about mechanisms for implementing a land use framework. Humera Sultan said that health might be an opportunity for implementation. Everything we are talking about lends itself to a health focus. It's not obviously within that category but it is very relevant. Mike Dunphy noted, however, that health priorities still fall within planning. Matt Doran said the health system and health funding is not very geared to investing in green spaces. The recognition of the value of green space is there now but it's very difficult to get funding.

There was some discussion about the replacement for the duty to cooperate and the future of collaborative working across authorities. Mike Dunphy said indications have been that the duty will be softened and that many authorities may take this



opportunity not to talk because they won't want to take growth from other areas. This might make the local plan easier but coherent development will be made much more difficult.

Georgina Holmes-Skelton said that in its written evidence the NT didn't give a clear answer on a framework because no perfect solution exists. There is vacuum at the below national but above local level which the NT has observed. It's not just a case of planning process, as part of the ELMS scheme, for example, there is the landscape recovery scheme which should in theory incentivise farmers and landowners working at a wider landscape or even regional level to think about changes for nature or climate. That clarity about what exactly this scheme is aimed at delivering in terms of overall change on the ground is needed at a national level.

She added that there are opportunities through planning changes that can be delivered through the Levelling Up and Regeneration Bill which can go some of the way—for example national development management plans—and there are opportunities through urban green infrastructure and climate policies to set some more refined national policies which could set a baseline ambition to help support delivery at a local level. There could also be a subset of regional policies on urban green space, access, and biodiversity which bring together local authorities to deliver solutions which aren't being delivered by DTC.

Lord Cameron asked how a regional body might be set up to deliver these policies. Georgina Holmes-Skelton said that there are opportunities through LNRS, but there will need to be some kind of structure to put those plans together and it would make sense to consider other land use outcomes at the same time.

When asked if LNRS was currently on the radar, Mike Dunphy said it was not really at the moment. They will liaise with the county as to the policy they want and put it into the Bromsgrove local plan, which will be about as much as Bromsgrove does. They would also work with Worcestershire on implementation of BNG.

Matt Doran said that planning can avoid development happening in important areas but it can't incentivise landowners to do anything different—so it is only one mechanism. Unless the schemes have some incentive and mechanism behind them it will be a case of rhetoric not backed up by action.

Chris Lambart said that it would be possible to get on-site benefits from BNG, but it will not apply in every case: for example, there would be no benefit from permitted development where BNG rules do not apply. The Secretary of State can also exempt other developments. Mike Dunphy added onsite BNG may not be very good quality.

Georgina Holmes-Skelton added that resourcing and capacity within LAs and planning teams to deliver BNG and LNRS is difficult. The NT is very clear that local authorities need more officers and skills. With new reforms in levelling up that also creates demands. None of it will happen without more resource.

Baroness Young asked what should be done differently in relation to BNG. The Birmingham representative said that they would “go for quantity over quality”. It is easy for the developer to plant some trees and walk away, but they need to get some money for the open space so that they can manage it when it comes in. They ask for 15 years commuted sums to manage open space but there is no money after that so it needs to be managed within existing budgets. Funding needs to be sustainable.

The roundtable and morning session at Lickey Hills concluded. Lord Cameron thanks participants for their time and contributions to the morning.

### **Afternoon visit—Sapperton Wilder, Gloucestershire**

The afternoon visit was based around three sites on the Sapperton Wilder estate, concluding with a roundtable discussion in Sapperton village.

#### **Attendees:**

##### *Sapperton Nature Recovery Project*

- Andrew Donnelly, Project Manager
- Jonathan Milner, Landowner

##### *Stroud District Council*

- Chris Uttley

##### *Gloucestershire Local Nature Partnership*

- Matt Whitney, Partnership Manager, Gloucestershire Local Nature Partnership
- Gareth Parry, Director for Nature's Recovery, Gloucestershire Wildlife Trust

##### *University of Gloucestershire—Countryside and Community Research Institute (CCRI)*

- Charlotte Chivers
- Theo Lenormand
- Aimee Morse
- Chris Short
- Professor Janet Dwyer (roundtable only)
- Professor Julie Ingram (roundtable only)

### **Location 1: southern block**

Chris Short of CCRI gave an introduction to the afternoon for members and noted that they would be visiting three locations on the estate.

Andy Donnelly of Sapperton Wilder introduced the project on behalf of the landowner Jonathan Milner. Jonathan bought the land in 2020 and is a Cambridge based biotech entrepreneur who is originally from the area and is moving back. He bought it with a view to helping the debate around land use for conservation. The original plan was to rewild the 380 acres. He said that this location was known as the southern block. A consultation found that if the land was just rewilded they would be missing an opportunity. It was previously low productivity marginal land. The southern block is about a quarter of the total land. After consultation, they asked whether they could produce food and improve the social impact while also supporting biodiversity. They have been trying to understand metrics and measurements before they begin work.

In the southern block they are taking a “regenerative farming” approach and a no input rotation system, and are attempting to measure everything they can. The

central block will be largely agroforestry and the northern block is going to focus on biodiversity. There will therefore be a gradient of biodiversity management through to production management. Gareth Parry of Gloucestershire Wildlife Trust said that the county needs 30,000 additional hectares of land to be made available to meet environment plan targets. He said that this was not possible unless we think about biodiversity and food production happening together. Regenerative farming is important for that reason. About a quarter of what lives in any area is below the soil and traditional farming has a devastating unseen impact on that. He said that a big challenge is that grassland payments through ELMS are too low—it takes a time for soils to be restored so lacks incentive for farm owners. Interim payments can help bridge that gap but they have to be big enough.

Aimee Morse at CCRI said there has been recognition over the past decade that we need collective action. She has been looking at potential for collaboration for peer to peer learning and landscape scale outcomes. There is great potential but also significant behavioural and financial barriers. She argued that they need schemes to be flexible and for trial and error to take place. Farmers and landowners are keen to find out what will work best for nature and food production, and need to be given time to develop trust and develop norms to support regenerative farming.

Chris Short described the appearance of the “southern block” as what happens when you leave the land alone. The last harvest was September 2021 so nothing has been done to that land since that point. There is no strategic land use discussion so AONB is not setting any objectives. It is “ad hoc” land use, so in terms of strategic change, nothing is coming from the local authority or government to help that transition in a coherent way. Skills, advice and support are needed: Jonathan wants to be open so what happens can be examined by other landowners. There needs to be support for a transition and for it to be assessed economically from a transition point of view. It is not clear that the current support available will enable this.

### *Questions from members*

The Earl of Leicester asked when budgets would show a profit.

Andy Donnelly said they did not know that yet but scenarios depend on decisions that are made about what they put in, and the Soil Association is providing assistance in this respect. They can't assess profits until they have that information, which may be some time.

Lady Mallalieu asked what we might see here in three years' time. Andy Donnelly said that he would hope that some of the fields would be under herbal leys and would have some high value cash crop that would go on a short supply chain to local bakers. There would also be well established headlines and margins mixed in. There would also be some grazing hopefully with native breeds—initially ponies and then move to some sheep. The ultimate aim is to do hardy breed cattle across each of the three blocks.

The Earl of Leicester asked about the objective to move towards organic farming. Andy Donnelly said this might be true in this area. In the central block that is going to be more experimental. They are trying to go for no input—whether they can do that depends on other factors.

Lord Harlech asked if this area was in ELMS or LNRS. Andy Donnelly said that they don't know yet, but they are going into a stewardship scheme for this area at

least. They are asking where agroforestry fits into ELMS and nature recovery, and like everybody else are waiting to see.

Lord Harlech also asked if they had done a natural capital audit after the land was acquired. Andy said they had done this but not quite rigorously enough and they would seek to intensify this but it was an expensive process. Using a partnership approach is important and they are looking to bring in expertise to support this. He said they were aiming to restore nature while doing profitable farming, and trying to measure as much as they possibly can and to document where they are facing challenges and where support is needed. They are also looking to explore and document economic opportunities in the village which could be supported by the land.

Alister Scott noted that the grassland payment on ELMS may not be sufficient and asked what would be a sufficient incentive.

Chris Short said that at the moment they are not sure of the scope of ELMS in this area. You would count this as arable reversion and the better payments come in the initial year and then at the end of that time it reverts to lower input. It is very difficult to get a species rich grassland in ten years. A land manager would ask why they would do that. The arable reversion review summary found that in many cases land was rented for ten years but could not be sustained at a lower rate, so it was ploughed up and returned to the system. If only looked at from biodiversity point of view, it may not have succeeded but at end of ten years it also has carbon and amenity value greater than its biodiversity value. The ambition of ELMS to “stack” would give it significant net value at outset. The sustainable farming incentive is about soils so there would also be some support from that, but it is less than what would have been given from the basic payments scheme.

Gareth Parry said that there were various studies indicating that it is possible to get reasonable quality in five years but priority habitat grassland is 30 year minimum. Even for soil restoration for regenerative farming, 10 years might be long enough but whether you can make enough income is a challenge. They are also trying not to lose some benefits such as species which need arable habitats; they have a nature recovery network in Gloucestershire, one of the first counties in Britain to have one, and part of that is an arable network.

Matt Whitney said the Local Nature Partnership has also delivered some natural capital or ecosystem service mapping; using the same baseline, they build up a picture of what the baseline is for ecosystem service provision across the county. They then look at where need is for ecosystem services and where the opportunities are. This means they have natural capital opportunity mapping, albeit without detailed soil analysis data, but it gives a broad picture of the county, and where priority areas are to complement priority areas of the Nature Recovery Network from a biodiversity standpoint. He added the local nature partnership has been at heart of LNRS. The Gloucestershire NRN mapping has been of a high quality, but in other cases government provided mapping may be too “top level” to provide a complex and nuanced picture and may produce cruder outcomes.

Gareth Parry added that in some areas there can be a focus on increasing permeability for biodiversity. There might be lots of areas in between where focus is more on food, but permeability is a different approach, with different lead priorities in different areas but nowhere being abandoned altogether.

## Location 2: centre block

Chris Short introduced the location by describing it as the “agroforestry” block, which is the biggest of the three blocks to be visited by the Committee. At this stage attendees were joined by the landowner, Jonathan Milner.

Andy Donnelly said that as well as the agroforestry focus for this block, they also want it to have the most access. There is an opportunity here to get “a whole army of citizen scientists to help with monitoring and education”, potentially with some permanent field station within the block. The idea is to run a series of visits including corporate teams, starting with high value facilitated groups, but also supporting funding for schools and more open access for the village. He said that they had consulted with the village extensively and giving them a sense of ownership is central to success. In particular they hope to establish “climate trails”, deriving from the Woodland Trust programme Nature’s Calendar. This will involve people going onto the land to monitor a species and its response to climate. They want to adapt this to a series of trails that can help people indicate the status of particular species, supported by 200+ years of Woodland Trust data.

Chris Uttley of Stroud District Council introduced himself. He said that he was a flood risk manager and specialised in nature based approaches to flood risk. This was based on “a whole catchment hydrology” looking at how influence of land management and different farm management techniques would influence high flows. He said that attendees were currently standing on the cusp of the two watersheds between Severn and Thames. As climate change starts to hit, there is the “double jeopardy” of increased intensity of rainfall and frequency of storms. This means we have higher peak flows when we don’t want them, and lower low flows so tending towards a flood/drought situation. He said that he works with farmers and landowners to encourage them to think about changing farming systems although it is not his area of expertise—he talks more about drainage and interventions.

Chris Uttley also said that he spent three and a half years working on a development of the water elements to ELMS with the Environment Agency. A key issue is that water based payments tend to be capital only. There are good single capital grants for building things, but once you have built something it needs to be looked after and there needs to be a revenue payment. The hope with LNRS is that payments for management providing water benefits will be revenue as well as capital based. This will encourage land management for water-based ecosystem services.

Charlotte Chivers then introduced herself. She said that she was working on a test and trial for landscape recovery and the potential for long term agreements of periods over 30 years. Landscape recovery can take 10 years or more and she is speaking to farmers and stakeholders about their initial perceptions towards long term agreements. There are lots of potential enablers—farmers they have spoken with like the idea of guaranteed income, but there might need to be some modifications and to build in flexibilities. There is the question over whether Government would be willing to fund such an initiative in the long term. They are also looking at blended finance options.

She said they were working in quite different landscapes for test and trial, for example at lowland productive landscapes in Hampshire and West Sussex. They are also looking at land ownership. With landscape recovery there is a big risk that it will only become suitable for large landowners and they want to get farmers working together for large landscapes—in this context there is need to work with



existing farmer clusters, who may need to form a single delivery entity. That has a lot of challenges but also a lot of opportunities—you need a lot of social capital and a lot of trust. It would not be possible to form a new cluster group and expect them to form an entity. She said they were doing as much co-design as they can—looking at scenarios where they can pin long term agreements. The most popular approach is a holistic one, to put in several multi-faceted measures that provide multiple benefits. It is all ongoing but they have identified lots of enablers, barriers and opportunities—it is an exciting time as the long term agreements have real potential under landscape recovery.

The Earl of Leicester asked who the farmer is making the long term agreement with. Charlotte said that this would be with the Government, so a landscape recovery scheme would include a long term agreement. If it is blended finance, the Government would fund certain aspects and private companies such as water companies would do others. But there is a need to be careful with offsetting to avoid private companies coming in to offset bad behaviour.

Matt Whitney of the LNP said that private finance is a massive opportunity for nature recovery, and that to work successfully it needs to work well with public money. There is not currently guidance from Government on how it can work. Areas which have strong local nature partnerships are better at leveraging finance such as BNG, carbon money and private investment through a central vehicle. But not all areas have an LNP, such as Wiltshire.

Matt Whitney added that in Gloucestershire, the Gloucestershire nature and climate fund was being set up. This was a vehicle to manage off site BNG payments on behalf of local authorities and housing developers, and also developing a carbon market for county. By doing it locally in a not-for-profit organisation, they can make sure the money stays in county, making sure delivery is aligned to strategic priorities. A very small amount of Government seed funding for LNPs could help private finance to flow through in accordance with where high priorities are. At present there is no guidance on how private finance can blend with public finance. That is a massive problem as people are delivering projects without that knowledge. Until that clarity exists landowners are unclear with what direction to go in. That risk leads to inaction in many cases.

Chris Uttley said it is difficult to blend different parcels of government finance. For example, nominally there is a £5.2 billion flood management budget, but making that work within and alongside an agro-environment system will be very difficult.

Jonathan Milner, the landowner, then introduced himself. He said that he bought this site to achieve nature recovery and carbon capture and for the benefit of local people. He said he was using this land to as a test bed for other landowners, to indicate that they can put their land to good use for nature recovery, and other positives and it would make financial sense. The intention is to make it look attractive so more landowners and philanthropists take part. Accessing the right public funds and securing the partnership between private and public funds so that it “washes its face” is very important. He said they are talking to other landowners and there was a lot of interest. In response to questions about limited profits being a disincentive for farmers, he said that a lot of people were watching what they were doing to understand how they could mitigate risk when exploring different options.

Attendees discussed the possibility of stacking. It was noted that carbon income was likely to be limited for many years to come and this demonstrated the need to stack carbon with other benefits. However, Matt Whitney said there was not yet a clear concept of how to stack.

Attendees then discussed further the issues with blending finance. Chris Uttley said that, for example, flood risk management funding comes with a rule that you must demonstrate a benefit to reduce flood risk. Accessing the funding is predicated upon a short term benefit that you can generate quickly with a concrete wall approach. Cumulative benefit being added up is difficult if you are trying to attract a single pot of money. If this was combined with other streams like ELMS, making two lots of uncertainty work together is too difficult.

The partnership structures for the nature partnership were then discussed. Matt Whitney said that his role is funded by lots of different organisations, and an even wider range of organisations sit on the board and are partnership members. It incorporates all the local authorities and the local enterprise partnership—it is not just in the realm of nature or wildlife. They have tried to take a natural capital approach and consider the nature impact on a range of matters, including flooding, housing, health and wellbeing. It is a wide partnership which is why we can focus on BNG to help solve housing blockages. Some “pure conservation” people might say “nature for nature’s sake only” but by moving it into other policy spheres they can achieve wider benefits—for example by seeing nature as an enabler at the start of the conversation about housing, it avoids it being seen as a block on progress.

Lord Cameron asked what the field going to look like in 10 years time.

Andy Donnelly said that next year it would be predominantly herbal leys. The idea is to do mixed nuts, some traditional orchard fruits, walnuts, chestnuts, with a view to climate proofing. Decisions around root stock and size are to be made.

### **Location 3: northern block**

Attendees then travelled to the final location within the Sapperton Wilder site, known as the northern block.

Chris Short said that the northern block is low-intervention, nature first approach in a very nature rich area.

Gareth Parry said that Gloucestershire Wildlife Trust has moved away from nature reserve based conservation towards larger areas. They now do a lot more work with farmers and landowners, and have established ten nature recovery zones. They know pretty much every landowner going from daneway banks into Stroud, so instead of managing 60 hectares of nature reserves they are looking at over 3000 hectares of land and working with others. Rewilding can cause tensions in farming communities. In terms of outcomes they are asking if ecosystems are being restored and whether they are getting insect abundance, soil health, and nutrient functions. They are focusing on ecosystem function rather than strict measuring of species. The future of biodiversity is complexity. Complexity is best way of saving biodiversity as well as increasing and protecting natural capital and ecosystem services. It is not a very outcome led approach—it is about fixing processes. ELMS et al are really about fixing outcomes, and so this sort of thing is difficult to fit into schemes.

Aimee Morse said that the theme running through is that change can't happen without people and people curating those relationships. In the case of the countryside stewardship facilitation fund, skilled and trusted facilitators have created space for farmers and land managers to discuss their collective vision for a catchment or another specific landscape area and giving them an opportunity for their view on what should happen in their area. Groups of people might have different ideas but this helps create a space where people have an opportunity to discuss and build relationships. People will base decisions on who they work with and trust. It is important to give people time to get to know one another in an area to help drive the change collectively.

Jonathan said that he was pleasantly surprised because when he bought the land and spoke to the tenant farmers and adjacent farm owners, he thought they would attack him for taking land out of productive arable farming use but it was actually the opposite. They said that there was only a few years left in the land anyway and the soil is shot to pieces, so the only way to get crops is to pour on fertilisers. The farmers know you can't keep putting fertilisers onto the land.

Aimee Morse said that facilitation had an important role in making connections between landowners and tenants. Where farmers can get out onto another farm and see practices working and turning a profit they are more likely to go away and think about implementing those things themselves.

Charlotte Chivers also said that the advice element needed consideration. Her PhD was looking at efficacy of agricultural advice—there is such a pluralistic landscape of advisors that farmers don't know who to turn to. Farmers have said 15 or 16 different organisations have come to them offering advice and it is too confusing—they find it overwhelming. In other areas farmers have never received advice from anyone. There are amazing partnership approaches happening such as the catchment based approach partnership. It would be positive if there was more coming together of advisory organisations in the common good, even if they only liaised on the farms they were visiting to reduce confusion.

Alister asked about skills gaps in advisory organisations such as Natural England. Chris Short said that you need specialists but you need integrators too. A lot of those organisations are moving from one to the other. He added that we are moving to the systems approach and we are not that well set out for a systems approach.

Charlotte Chivers said that her main focus was catchment sensitive farming (CSF) under natural England. It ended up turning into an Environment Agency discussion because some farmers confuse CSF with the environment agency. CSF has a role as a “carrot”, whereas the EA is in the background as a regulator. The two seem not to interact enough or engage enough—she had too many CSF officers and EA officers saying “we really wish we could collaborate more”. There is not as much interaction between them as there potentially should be. Whether their officers are receiving enough training she does not know—they have a high turnover. Natural England employs them and there doesn't seem to be enough integration between the government departments themselves, let alone with outside advisers.

Matt Whitney said that this speaks to a wider point about a shortage of green skills across our entire economy. The whole sector is growing at such a pace because of 25 YEP and national profile, but it's really difficult to recruit at the moment—it's a massive problem. They all know of the urgency of the challenge but there aren't

enough practitioners—that will continue to be a challenge until the emerging graduates in the field have got that experience.

### *Roundtable discussion*

Following the conclusion of the visit to Sapperton Wilder, a concluding roundtable discussion was held in Sapperton village. Attendees were joined by Professor Janet Dwyer and Professor Julie Ingram of CCRI.

Janet Dwyer said it was an exciting prospect to think about creating a new cultural landscape. It is sensible to have a view at a national level of a survey of national priorities and what demands that there might be on land, but it is also important to retain local power to take decisions. The scope for local meaning, local knowledge, enterprise and experiment is going to be really important. Chris Short said that Gloucestershire has very good local partnerships but they know that that doesn't exist everywhere.

When asked who at a national level would set priorities, Janet Dwyer said there would need to be a new kind of structure that would bring together sectoral expertise. It would need to be something that is cross cutting across the remits of government ministers from DLUHC, DEFRA and others. She said there is a parallel experience in the rest of Europe with LEADER of bottom up local development. It takes a while but isn't impossible to do and the best pull up the rest. There are bodies that could take that role and reach out to others. It should be possible to have local supported by national.

Janet Dwyer also said that she was optimistic if the right systems are created. There is also a need for a long term approach: it takes three or four years of initiative, with a year to get organised and then two years doing things, then a year evaluating.

Chris Uttley asked her whether, given that the top tier local authorities are responsible for LNRs, and the importance of strategies in ELMS targeting and BNG, whether there was an enhanced or changing role for local authorities in rural development.

She replied that the potential is there. The county councils were really pretty good on some of these things but their role, funding and ethos had changed. The ability to have the room for thinking strategically about these types of issues has been compromised by the changes that have happened. A lot of them administered capital grants schemes for hedgerows but there are fewer staff now. Counties are rather different in scale and there may need to be cooperation around county boundaries.

Baroness Young asked attendees whether there was scope for a middle or regional scale to have a role or whether outcomes could be achieved by a national framework and local collaborations.

Janet Dwyer said that for decarbonising targets you might need to think regionally. Zero carbon is done on a much bigger scale. Gareth Parry said that there are bio-regions currently, while Matt Ridley noted that the Oxford-Cambridge arc has a primary focus on housing, but exists. Regional structures are a little bit ad hoc. Gareth Parry said that the evidence base across boundaries is either very patchy or isn't there. Some counties have no evidence base so it is unfortunately not possible to construct a shared strategy or vision.

Baroness Mallalieu heard evidence that people have data and are sitting on it. She asked what body there was which could bring data together. Janet Dwyer said that they had spoken to DEFRA to talk about getting data together at a national level, but funding mechanisms for a lot of the data providing bodies depend on their ability to charge. There are also issues about who gives permission to share and utilise data.

Julie Ingram also added that there was a need to make sure there is a critical mass of users and that it goes on for long enough, otherwise people see it as just another project that is going to finish in three years. Gareth Parry said that the Environmental Record Centre is willing to share its data, but it all has to be used for commercial income now. There needs to be some kind of funding framework to take away the commercial loss. Janet Dwyer suggested that there needed to be some form of national facilitation or network which would have responsibility to oversee, animate, encourage and help exchange information. She added that it was important to think about how to make it user friendly and help people to find what they need.

Julie Ingram added that there was a focus in Europe on disrupting policy regimes that stop them from fulfilling their objectives—they sought to make policies synergistic. Janet Dwyer added that here you could bring things together which you couldn't do in EU, because EU doesn't always have the relevant competence.

Discussion then moved on to how a Land Use Commission and framework might operate in practice.

Janet Dwyer added that experimental powers established in the 1968 act still exist. Haskins' view that agencies should not make policy was a disaster and we should be looking beyond that. Central government people change too quickly to develop good policies. There needs to be slightly arm's-length bodies that can build up expertise and knowledge and make things work.

Chris Uttley raised the question of governance models. There were different funding models available, for example some positions being funded by a local levy across councils and given to specific projects. Janet Dwyer said the approach could be close to that of national parks and AONBs. This would provide a link with democratic accountability and the ethos of local delivery. Julie Ingram added that there was a need to start with bringing together a vision: mission oriented approaches where grand challenges are addressed.

Janet Dwyer said there had been a lot of discussion about blended finance, bringing together public funding with other sources. She said that we need to have the ability to look ahead 20–30 years. You don't need a lot of resources to enable facilitation but you do need long term commitments.

Chris Uttley said that there was a problem with trying to do things on the cheap. The number of people working on small local authorities on planning is comparable to people working across the region on environment. It is very difficult to do natural capital and ecosystem services planning with a handful of people in disparate organisations and with different agendas—doesn't work in an integrated way in the way planning does.

Jonathan Milner said that they spoke to local farmers about their initiative and they said at the end of the day it's economics. They sow barley in their fields to get the subsidy and then let it rot. He said that he didn't know where to start when responding to this—it was so bad on so many levels.



Baroness Mallalieu said that organisations seem to be working in silos and duplicating, and it was so much more powerful if you have one particular sector speaking with one voice. Janet Dwyer said that this to her made the case for a devolved approach. Where things integrate is at the local level, so there is then a more unified vision which feeds up to the higher level.

Alister Scott asked about the potential for improved communication of new ideas.

Julie Ingram said that people have different agendas and some powerful people find it easier to get their agendas across. Janet Dwyer said that finding ways to make things accessible is very important. Charlotte Chivers said that the key is to use a range of approaches with everyone learning in different ways—different things appeal to different people.

The roundtable discussion concluded. The Chair thanked all in attendance for their participation and contributions to the afternoon in Sapperton.

## APPENDIX 5: GLOSSARY

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25 YEP	25 Year Environment Plan
AONBs	Areas of Outstanding Natural Beauty
BEIS	Department for Business Energy and Industrial Strategy
BMV	Best and Most Versatile Land
BNG	Biodiversity Net Gain
CCRI	Countryside and Community Research Institute
CLA	Country Land and Business Association
DCMS	Department for Digital, Culture, Media, and Sport
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DLUHC	Department for Levelling Up, Housing, and Communities
EIAs	Environmental Impact Assessments
EIP	Environment Improvement Plan
ELMS	Environmental Land Management Schemes
FFCC	Food, Farming and Countryside Commission
GLA	Greater London Authority
HELAA	Housing and Economic Land Availability Assessment
LNRS	Local Nature Recovery Strategies
LPAs	Local Planning Authorities
LSE	London School of Economics
NALC	National Association of Local Councils
NbS	Nature Based Solutions
NFU	National Farmers' Union
NGOs	Non-Governmental Organisation
NMDC	National Model Design Code
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NRNs	Nature Recovery Networks
NSIPs	Nationally Significant Infrastructure Projects
ONS	Office for National Statistics
RICS	Royal Institute of Chartered Surveyors
RSPB	Royal Society for the Protection of Birds
RTPI	Royal Town Planning Institute
SACs	Special Areas of Conservation
SDNPA	South Downs National Park Authority

SEAs	Strategic Environmental Assessments
SFI	Sustainable Farming Incentives
SPAs	Special Protection Areas
SUDS	Sustainable Drainage Systems
TCPA	Town and Country Planning Association
UKCEH	UK Centre for Ecology and Hydrology
UKRI	UK Research and Innovation
WWF	World Wildlife Fund