

Public consultation on the Land Use Framework for England: Key information points for members of the Nature Friendly Farming Network

Introduction

Defra, the Department for food and rural affairs, is currently seeking views on a new Land Use Framework (LUF) for England. The formal consultation process includes more than 20 complex questions, relating to five broad themes. Defra has helpfully indicated that they are happy to receive points under these themes and this short document sets out the key points you may wish to raise under each.

What is the Land Use Framework?

The LUF, as described by Defra, will set out a vision for land use in England, and act as a tool to drive better decision-making on how land is used and managed, by farmers and landowners to local authorities and developers. It is not described as a framework that will impose land use change. Rather, it aims to bring together the best and most relevant information to inform decisions about how land is used, including land use change where appropriate, in order to maximise win-wins and avoid/mitigate competing demands on land in certain areas. It has a particular focus on the land use/management changes required to meet binding nature and climate targets.

Why engage in the consultation?

Siloed thinking about land use, which focuses on single objectives, has dominated the approach to land use in England to date and is both hugely inefficient and generally drives poor outcomes. A framework which supports better decision-making, bringing in all relevant data and stakeholders, is therefore much needed and long overdue. However, to be effective and inclusive it must be developed with the input of those who own and work the land.

The LUF is also being presented as an underpinning framework for a range of other Government strategies and plans in development, including a new, 25 Year Farming Roadmap and a Food Strategy. As the latter are anticipated to set out the detail of changes on policy and investment in the wider food and farming systems, it's imperative to influence the LUF positively.

Ways to get involved?

The consultation is open until 25 April and there are a number of ways to get involved:

- Attending Defra-facilitated workshops in different parts of the country
- Submitting thoughts and suggestions to Defra using the following email address: landuseconsultation@defra.gov.uk
- Completing the formal, [online consultation questions](#).

This briefing is designed to support your engagement with either the in-person workshops or by emailing the LUF team in Defra. When doing so, it's important that you make clear which of the LUF consultation's five focus areas your points relate to so Defra can capture them effectively. We strongly encourage you to include your own experiences as a farmer and land manager at appropriate points.

The Land Use Framework's five focus areas: Key points for consideration

1. LUF Principles and the scale of land use change indicated

Overview: Defra has proposed a set of principles to support strategic spatial planning and better targeting of land use/management incentives (such as ELM schemes, private carbon market incentives and regulatory requirements). Defra invites views on the principles themselves and how they could be made meaningful in practice.

The principles are:

- **Co-design:** Support for participation and leadership at the local and regional scale to develop and align spatial strategies and assess the fairness of land use changes.
- **Multifunctional land:** Enable multiple benefits on land, targeted according to opportunity, societal needs (such as the health benefits of co-locating new homes and nature), and environmental pressures (such as reducing pollution).
- **Playing to the strengths of the land:** Support and spatially target land use change to locations where benefits are greater and trade-offs are lower. Give priority to land uses that are more scarce or spatially sensitive (for example protecting land that is best suited for food production).
- **Decisions fit for the long-term:** Take a long-term view of changing land suitability, prioritising resilience (including to the impacts of climate change). This could include planning for new homes that are resilient to climate impacts, such as flooding and overheating.
- **Responsive by design:** Land use policy, including spatial prioritisation and targeting, needs to be responsive to new data, opportunities and pressures.

Defra have also provided details of the type, and amount, of land use change that their analysis suggests is needed by 2050 to meet binding nature and climate objectives, while broadly maintaining current agricultural production levels. These 'nature and climate' changes also seek to underpin long term food production capabilities as climate change and nature loss are, according to Defra's own national food security assessments, the greatest medium to long-term threat to global and domestic food production.

These projected land use changes are:

Categories of land use change / management change	Explainer and examples	Percentage of UAA required
Category 1: Land management change	Changes in the way the land is farmed, without introducing new habitats or planting trees. It falls outside of the scope of land use change. <i>Examples: Planting cover crops to reduce soil loss, or reducing</i>	n/a out of scope

Categories of land use change / management change	Explainer and examples	Percentage of UAA required
	<i>fertiliser use to prevent water pollution.</i>	
Category 2: Small changes maintaining the same agricultural land use	Introducing nature within fields, in margins and / or small portions, providing environmental and climate benefits alongside food production. <i>Examples: Arable field margins, riparian features such as river buffer strips.</i>	1% (50kha)
Category 3.1: Changes in agricultural land use, for both food and environmental / climate benefits	This is mainly about <i>incorporating more trees alongside food production.</i>	4% (370kha)
Category 3.2: Changes in agricultural land use, mainly for environmental and climate benefits with limited food production	The land is being farmed mainly for other benefits than food. <i>Examples: Creation / restoration of species-rich grassland habitats; responsible management of peat; planting of short rotation coppice.</i>	5% (430kha)
Category 4: Change away from agricultural land, for environmental and climate benefits	Land use becomes non-agricultural. Land is fully dedicated to delivering environmental and climate benefits. <i>Examples: Restoration and maintenance of peat-forming and peat dependent habitats; creation of woodland; creation / restoration of coastal and lowland heathland habitats.</i>	9% (760kha)

Things to welcome:

- The principles are positive, particularly the focus on the inherent multifunctionality of land. However, as recognised by Defra, for them to be meaningful, they must be integrated into decision-making processes and underpinned by the most appropriate data, tools and resources. We would welcome a clear cross-government duty (at all spatial scales) to apply these principles.

Things to question or suggest:

The projected land use change categories, and percentages, are problematic for a number of reasons -

- By defining a limited number of land use categories, the consultation ignores the reality that land use is a continuum, therefore undermining the earlier positive focus on multifunctionality.
- The projections are based, at least partially, on incomplete, missing or out of date data, including habitat extent and quality, soil carbon and shifting consumption patterns.

- The importance of healthy, well-managed soils for carbon sequestration, and its potential to sequester much more through changes to management, is significant. However, the LUF analysis disproportionately focuses on peat and tree planting. While the NFFN welcomes both peat restoration and more tree planting, this overt focus could drive both missed opportunities for multifunctional improvements on current UAA and perverse outcomes, such as the ‘wrong trees in the wrong places’.
- It is inappropriate that 80% of UAA is deemed as ‘out of scope’. In order to tackle the nature and climate crisis, and safeguard long term food production, significant land management shifts are needed across all UAA: to protect and improve soil health; to support wildlife recoveries (including ‘functional’ biodiversity such as pollinators and pest predators) and to increase resilience to climate change impacts.
- The LUF analysis appears to discount the acreage (whether domestic or outside the UK) associated with indoor livestock production units despite the significant footprint of such systems, particularly for feed. These ‘ghost acres’ must be fully taken into account.

2. Aligned incentives

Overview: Here ‘incentives’ apply to a broad range of payments and/or obligations that apply to land and significantly influence how it is used and managed. They include:

- Publicly funded payments e.g. ELM schemes
- Cultural and social influences e.g. shifting demands from customers, dietary shifts
- Market signals from the wider food system and economy e.g. shifting expectations from supply chain actors
- Private nature markets e.g. Government-mandated BNG (Biodiversity Net Gain) and private sector ‘green investment’
- Guidance and advice
- Regulation
- Tax reliefs

Things to welcome:

- Improved alignment of current and new incentives is urgently needed and offers great potential to drive positive land use and management shifts.
- We welcome the recognition of a greater role for private nature markets - current levels of investment are far too low and the private sector must play its part. However, government needs to play a leading role in shaping and managing emerging markets to ensure consistency of approach, fair returns and to protect against greenwash.
- Protecting land with the greatest long-term potential for food production from land use change will reduce the risk of displacing food production and associated environmental impacts abroad. However, as highlighted above, it’s imperative that all UAA land is managed to be multifunctional and it is producing what society needs as efficiently as possible (such as more land used for direct food consumption e.g. more fruit and vegetables and less land for feed).

Things to question or suggest:

- There is a risk that incentives could be aligned to drive 'land sparing', with nature and climate actions pushed up the hill and more agriculturally productive areas becoming even more intensively managed. Further intensification would represent a fundamental failure of public policy.
- Any over-targeting of nature and climate changes to upland areas also risks negative impacts on upland land managers and communities e.g. through the end of farm tenancies to enable large scale 'green investment' projects - a risk that is already playing out. Robust application of the LUF principles, particularly co-design, will be required.
- In order to incentivise more multifunctional land use and benefits, the government must consider:
 - Greater alignment of land use/management incentives from public and private sources
 - Sufficient investment in land management schemes, including the Arms Length Bodies (e.g. Natural England) who manage them. It is [estimated](#) that c£3.1bn a year, for at least 10 years, is required to deliver the current nature and climate commitments for England. This is considerably more than the current Defra budget.
 - Real coordination across government departments and recognition that land use benefits are directly relevant to non-Defra departments e.g. for climate and public health
 - Improved levels of Research and Development on nature and climate-sensitive alternatives to intensive farming practices, such as non-chemical pest and disease control.
 - More investment in advice and training for farmers and land managers, particularly peer to peer learning on nature-friendly and regenerative techniques which inherently drive more multifunctional land use.

3. Joined up decisions on land use change

Overview: To date, land use planning and decision-making can be characterised as highly siloed by relevant authorities, which leads to opportunities for win-wins to be missed and a higher risk of perverse or unintended consequences. To tackle this, the Government has stated it will introduce a universal system of strategic planning via Spatial Development Strategies (SDS), produced by combined authorities and partnerships of local authorities. Defra is also considering what the government can do better to encourage greater climate resilience in land use change/management decisions.

Things to welcome:

- More localised decision making, reflecting transparent information sharing and facilitation of consensus building, has real potential to drive improvements.

- The list of activities Defra has listed¹ as options to support greater climate adaptation are broadly very positive. It is important to ensure that farmers and land managers are equipped with information about future climate changes and options for mitigating and adapting to them. Information campaigns, translating Met office projections into accessible language, and providing information on the aligned incentives available, could be one route to driving positive change.

Things to question or suggest:

- Breaking down siloed analysis and decision-making, particularly within government (at whatever spatial scale) is no mean feat and will require significant investment, leadership and collaboration.
- As local government boundaries generally do not reflect natural boundaries, such as river catchments, there will need to be improved coordination between locally developed SDS.

4. Accessible and high quality data

Overview: In order to make better decisions around land use, particularly improving multifunctionality of land, access to high quality, up to date and accessible data is key. However, the data that exists for England's land spread across multiple organisations or Government departments, is of variable quality and is not joined up. Defra highlights a number of initiatives underway to improve data quality and accessibility (such as the Natural Capital and Ecosystem Assessment (NCEA) programme) as well as other datasets that would likely benefit from updating, such as the Agricultural Land Classification (ALC) system, which currently classifies land into five grades based on their yield productivity.

Things to welcome:

- Active consideration of making more data free to access, such as HM Land Registry.
- Recognition that certain data sets, such as ALC, warrant review and updating

Things to question or suggest:

- All publicly held sources of non-sensitive data should be freely available, to those making active land use decisions, whether through the planning system or not, and to improve targeting of incentives
- Government must play a leadership role to ensure private sources of data also contribute to improved land use decision making, whilst respecting data-sensitivity.
- The ability to measure the benefits of land management/use changes is entirely dependent on identifying what we have currently. Therefore updating or creating relevant datasets is of fundamental importance, e.g. for habitat extent and quality, soil types and quality.

¹ **Providing better information on local climate impacts to inform local decision making and strategies** (for example, translating UK Climate Projections into what these mean in terms of on-the-ground impacts on farming, buildings, communities and nature); **Providing improved tools and guidance for turning climate information into tangible actions** (for example, how to produce an adaptation plan for different sectors); **Developing and sharing clearer objectives and resilience standards** (for example, a clear picture and standards of good practice for each sector under a 2°C climate scenario); **Supporting the right actions in the right places in a changing climate** (for example, prioritising incentives for sustainable land uses where they will be most resilient to climate change)

5. The right skills in the right places

Overview: In order to drive multifunctional land management, and shifts in land use in parts of the country, new skills and knowledge will be required by those working the land. In order to facilitate the right skills in the right places, Defra has listed skills organisations (such as Skills England), industry providers (such as The Institute for Agriculture and Horticulture) levy boards, research institutes and the UK Agri-Tech Centre as key stakeholders.

Things to welcome:

- We welcome the explicit recognition that new skills and knowledge are urgently needed to support the transition in land use and management needed for nature, climate and the future of farming.

Things to question or suggest:

- Lots of advice and training available to farmers is still rooted in a 'productivist' mindset, focussing primarily on maximising yields of food, feed or fibre rather than approaches that would drive genuine multifunctional thinking and decision-making, including in further education. Tackling this inherent barrier to multifunctional land use is required.
- There is an associated tension between technology focussed 'efficiency improvements' in farming, including government funding streams that focus on productivity, and nature-friendly or regenerative techniques that reduce the need for expensive, bought-in inputs. It is the latter that will drive multifunctional land use at scale. Government can tackle this initially through its own suite of incentives, removing any contradictory signals currently given to farmers and land managers.
- Advice and training to support more innovative ways to approach multifunctionality e.g. through business stacking/share farming on the same farm is required e.g. for new entrants to nature-friendly and regenerative farming
- Peer to peer learning has an important role to play in improving skills in the land management sectors.