

Scott Pepe, External Affairs Manager, National Farmers Union (England and Wales) – Written Evidence (LUE0049)

Summary

1. The NFU represents 55,000 members across England and Wales. In addition, we have 20,000 NFU Countryside members with an interest in farming and rural life. Our purpose is to champion British agriculture and horticulture, to campaign for a stable and sustainable future for British farmers. Creating the right conditions for a thriving British farming sector includes promoting the health, safety, and wellbeing of our members.
2. The NFU welcomes the appointment of the House of Lords Land Use Committee. This is an extremely timely piece of work. Seen from the air, **our countryside is a farmed landscape**. It is recognised for its dense patterns of interlocking fields, hedges and small woods. The character of the countryside is shaped and maintained by the actions of farmers, whether they are growing crops, keeping livestock, or engaged in other types of land management. However, the creation of a new post-CAP domestic agricultural policy, combined with the pressing challenges of climate change, emergence of new environmental markets and geopolitical instability, all combine to create **the potential for the most significant changes in food production and land use seen for a generation**.
3. The NFU shares the Government's aim of designing an ambitious post-Brexit agricultural policy which delivers incentives that build farming's sustainability, competitiveness, and resilience within the macro-economic, trade and regulatory context. We know that the public hugely value the high standards of animal welfare, environmental protection and climate ambition that British farmers follow. The NFU is clear that these expectations and **the Government's environmental ambitions, must go hand in hand with sustainable domestic food production**.
4. Farmers will continue to play a pivotal role in maintaining and enhancing our dynamic landscapes for future generations and we want to work with Government and other stakeholders to create a policy environment which enables them to do this. However, farmers and growers are currently overwhelmed by the plethora of **competing and**

sometimes directly conflicting demands on their land being proposed by Government targets, single issue group agendas and market forces.

5. For the NFU, the challenge is how these various land-use demands co-exist, if indeed they are able to, alongside the primary objective of our members' businesses to produce food, fuel and fibre for the nation and beyond. Given the finite land area of the UK, and the importance of UK food security in volatile times, it is **important that our countryside remains a multifunctional and dynamic space.** Therefore, it is concerning to us that many Government proposals appear to conflict with food production requiring a long-term or irreversible change to the productive capacity of farmland, such as tree planting, re-wetting and re-wilding. These proposals are particularly challenging to the tenanted sector who are land managers but not landowners.
6. A priority is for Government to **ensure that its proposed new Environmental Land Management schemes (ELMs) are both practical and offer sufficient economic incentives** to support British farmers as part of a sustainable economic model for the sector. If the Government doesn't get this future environment policy right, the irony is, as the recent Public Accounts Committee report highlights, we could simply end up increasing imports of food produced to lower environmental standards.
7. Like everyone, we are watching in absolute horror at what is happening to the people of Ukraine. It is right the Government is directing its immediate efforts to responding to the invasion. There are some clear short and long-term actions that government can take to maintain confidence and stability across the UK's food producing businesses. Many countries will be facing similar economy-wide disruption that could last for many years, including to our food output, our food supply chains and the availability and affordability of food to consumers. **It is vital that British farmers play their part in a global network of food producers at this critical time,** helping to feed both ourselves and other parts of the world who will face serious struggles in the months ahead, and reflecting your Government's role as a global leader in responding to this crisis.

8. As an island nation, being able to grow enough food to feed a substantial proportion of our population is a key measure of food security and national resilience. Even as a global trading nation, shocks can expose fragilities in any reliance on imports. We all experienced the impact of this during the Covid pandemic and we are beginning to experience it again. To maintain our position as global leaders in climate-friendly food, the Government should commit to at least retaining current levels of self-sufficiency, while achieving the UK's climate goals. This means looking to maintain and increase domestic food production to help sustainably feed the world's growing population so avoiding undue pressure on more vulnerable nations and environments.

Pressures and challenges

Q1: What do you see as the most notable current challenges in relation to land use in England?

9. As the UK transitions to a net zero economy up to 2050 and beyond, we anticipate that farming landscapes in England will change, but they will retain their predominantly agricultural character as visually interesting, pleasing, working landscapes that sustain a vibrant rural economy as we set out in our recent NFU Landscape and Access Report¹

10. The NFU believes **the key challenge lies in reconciling multiple and potentially competing demands on land use**, both in the present and in the future, given projected changes in population, awareness of a variety of anthropogenic environmental impacts and the key role of land in sustainable development.

How might these challenges best be tackled?

11. The apparent land use challenge is created by policies in progress as well as political ambitions and statutory targets. Some challenges, like the Government's 2021 commitment to protect 30% of the UK's land by 2030 (also referred to as the 30x30 target) remain more aspirational at this point than others - and it is unclear how these 'fit' with similarly voiced ambitions (such as the "Nature Recovery

¹ [nfu-landscape-and-access-report.pdf \(nfuonline.com\)](https://www.nfuonline.com/nfu-landscape-and-access-report.pdf)

Network"). While these targets and aspirations do at least provide some indication of the present Government's general direction of travel, **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 and their impact on food and energy security;** land is after all a finite resource, and land use is constantly driven to change over time in response to policies and markets.

12. To tackle this challenge from an agricultural perspective, there is merit in creating a coherent strategy for the future of land use that manages the apparent risk of significant competition between land use categories. These competing demands being placed on land by a growing and ageing² post-pandemic population include: the needs of agriculture to provide a secure supply of food and fibre; for leisure and recreation; requirements for biodiversity net gain, protected landscapes; and the need for economic and residential development alongside national strategic infrastructure.

13. However, **we do not support a land use strategy which is then used to dictate an exclusively top-down and rigid approach to land use planning.** Rather, we would advocate the development of capability mapping tools used to help individual farmers assess their potential to deliver public goods alongside the production of food, fibre and energy.

How do you foresee land use in England changing over the long term?

14. Agricultural land of all grades consists of around 8.3 million hectares in England. It is assumed that current established settlements will continue in situ and any subsequent development will take place beyond the settlement boundary. Except for a small percentage of brownfield land, most of the development will take place on agricultural land in the peri-urban and rural locations surrounding urban areas.

² An ageing population and subsequent changing demographic has been predicted to impact on demand and location of for single occupancy dwellings and housing and services [10-634-land-use-futures-summary.pdf \(publishing.service.gov.uk\)](#)

15. NFU research³ suggests that housing, employment, travel, communications and water infrastructure development up to 2050 may require around 2% or 170,000 hectares of this land. By contrast land take for renewable energy production and for nature-based recovery could be far more significant, taking up as much as 1.97 million hectares or 19% of existing farmland, in the absence of multifunctional land use. While agricultural systems are defining land use character of existing National Parks and AONB's (so the NFU assumes highly likely that food production will continue with a stronger emphasis on nature recovery) it is unclear to what extent 'nature recovery' would curtail farmland productive capacity in, and beyond, these designations.
16. The human population is likely to be heavily impacted by anthropogenic climate change within the mid to long term future. Within 50-100 years scientists at [Climate Central](#)⁴ estimate that large areas (up to 20%) of England's grade 1 agricultural land will be permanently lost to rising sea levels, without action to raise sea defences – a threat that also applies to many other productive areas around the globe on which the UK relies for food supply, such as the Netherlands. Agricultural production will be displaced either to lower grade agricultural land or offshore leading to a greater reliance on imports.

How should competing priorities for land use be managed?

17. A system of land use planning has been in place in England since 1947. The system is plan led and can be scaled down to the neighbourhood level. However, it lacks an upward component such as a national development framework that deliberately zones land use, and instead relies on a mixture of primary and secondary legislation, plan making policy statements and practice guidance. In contrast "Future Wales" is a highly successful example of an integrated approach to national planning. Sub-regional development frameworks such as the proposed Oxford Cambridge Arc, for instance, could also usefully be employed to mediate competing priorities for land use. However, any such frameworks need to be based on robust scientific evidence and must be developed in consultation with land managers from the very beginning of the process to ensure these are

³ NFU internal briefing paper, 17 Feb 2022

⁴ [Sea level rise and coastal flood risk maps -- a global screening tool by Climate Central](#)

an accurate representation of what is on the ground, or what could be achieved.

Q2: 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?

18. Recent economic impacts of the Ukraine conflict have shown the need to balance the key drivers of food security and energy security with tackling the twin challenges of climate change and biodiversity loss. The NFU recognises that some land use change is 'hard', permanent and effectively irreversible (e.g. urban sprawl, conversion of farmland to forestry, re-wetting of previously drained land); whereas other changes may be considered 'soft' and reversible (e.g. perennial energy crops, solar farms, or even well-restored mineral extraction). Previous reports on optimising rural land use have shown **the need to consider multifunctionality or overlapping land uses rather than treating different uses as mutually exclusive**⁵;

19. A more complete list of 'hard' pressures for land use change includes:

- anticipated new woodland planting by 2050 (UK-wide) of 900,000 hectares⁶
- increased land protected for nature by 2030 (England) – 400,000 ha⁷
- land for water resources including wastewater, nutrient neutrality solutions and water storage infrastructure.
- housing and commercial buildings, transport and communications infrastructure
- land committed to 'carbon banking' and other nature-based solutions, including rewilding

20. Examples of 'soft' land use change pressures include:

- area of perennial energy crops recommended by Climate Change Committee in 2050 (UK-wide) – 700,000 ha⁸

⁵ University of Cambridge Institute for Sustainability Leadership (2014) *The Best Use of Agricultural Land*; Royal Society Living Landscapes project (ongoing) <https://royalsociety.org/topics-policy/projects/living-landscapes/>

⁶ Climate Change Committee (2020) *The Sixth Carbon Budget - the UK's path to Net Zero*; the Government's stated aim is to create 30,000 hectares of new woodland every year in the UK by 2025.

⁷ Prime Minister's Office statement, 28 Sep 2020

- anticipated future extent of solar farms, new and existing (UK) – 36,000 ha⁹
- agricultural land used for quarrying and thereafter restored

What is the role of multifunctional land use strategies in implementing these plans?

21. In principle the development of multifunctional land use strategies could play an important role in overlaying current and potential land use and identifying conflict and best fit scenarios. However, the **NFU is doubtful that there exist bodies, especially at a local level, that have the necessary range of expertise to develop such land use strategies and plans.** In the absence of such expertise, there is a real risk that land use allocation becomes a case of what is most familiar or skills that are readily available, rather than an objective assessment of land capability and optimal outcome locally and at national levels. If such strategies were subject to local democratic challenge (as one assumes they would be, as are Local Development Frameworks) then again the outcome of this exercise would be at best unpredictable.

Q3: 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?

22. Regardless of scale, the NFU would prefer to see, **instead of an exclusively top-down approach to land use planning, the use of land capability mapping tools (such as more finely-scaled and up to date Agricultural Land Classification) to help individual farmers assess their potential to deliver public goods alongside the production of food, fibre and energy.** Our role is to offer guidance to our farmer and grower members, but not to direct land use change towards specific regions or sectors. We also firmly believe that land use strategies should be developed in consultation with land management from the very beginning of the process to ensure these are an accurate representation of what is on the ground, or what could be achieved

Farming and land management

⁸ Climate Change Committee (2020) *The Sixth Carbon Budget - the UK's path to Net Zero*

⁹ NFU estimate

Q4: 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?

23. As agricultural land is inevitably lost to alternative uses such as housing and employment, the remaining land will come under dynamic pressure. The preliminary findings of research currently being carried out by the NFU suggests that by 2050 up to 26% or 2.1 million hectares of the current agricultural landscape in England could be required to meet alternative non-agricultural uses (some of which in form of permanent change of use, other uses that may 'stack' with exiting land use).

24. **Some of the pressures on agricultural land will be the result of direct land take, others include the indirect consequence of providing mitigation for developments** as a requirement of the Habitats Directive. One well documented example is that of the requirement to achieve nutrient neutrality in certain areas of the country for any housing development (as a result of the Dutch Nitrogen case) which is leading to land use change away from agricultural use as a preferred solution by developers to enable such projects to proceed. The most notable case to date is in the Solent, although the latest Nutrient Neutrality guidance issued by Defra in March 2022¹⁰, 74 local authority areas are now impacted. It is imperative that alternative solutions are found to allow agriculture to help mitigate or provide mitigation for development in a way that does not lead to agricultural land permanently being taken out of production in this way. The NFU would like nutrient reductions achieved by farmers, alongside their farming activities, to be recognised and accounted for, rather than taken out of production.

25. Recent and current global events have reminded us of the importance of building a resilient capacity to produce food domestically. If the Government adopted a policy of retaining the current level (at around 60%) of self-sufficiency in food, then to prevent a further decline **the industry must react by both improving the resource use efficiency of existing current methods of production as well as by introducing new methodologies to improve output.** In both our report *Future of Food 2040*¹¹ and our 2040 net zero ambition¹² for

¹⁰ [Nutrient pollution: reducing the impact on protected sites - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/nutrient-pollution-reducing-the-impact-on-protected-sites)

the agricultural sector, the NFU identifies those changes in agricultural policy support towards payment for public goods, together with advances in agricultural technology and resource use efficiency, that can help to increase farm productivity. Notably the Committee for Climate Change has also made similar recommendations, retaining and boosting farm productivity, while diverting less productive land. Such resource use efficiency gains thereby facilitating both 'land sharing' – the delivery of multiple outputs and benefits from the same land parcel – as well as (in the case of unproductive areas) 'land sparing', the re-purposing of farmland to deliver new outcomes. We note that land sparing/sharing can be applied appropriately at different scales, from the national to the regional or even local layout of a farm holding. So for example, field margins or removal of unproductive field corners may be considered as land-sparing at a field-level scale, however we see that as compatible with the concept of land-sharing at an individual farm enterprise scale.

26. **Such improvements in productivity will require both swift and strategic investment in new buildings and infrastructure ^{13a} alongside the development of new agricultural practices that will centre around scale and automation.** Farmer/growers and early adopters of this approach have been faced with a significant, sustained and well financed legal challenge using established planning policy and legislation often leading to the proposal being withdrawn or so severely redacted that it offers little or no economic or environmental benefit.
27. **Both planning policy and practice in rural England must be strengthened to enable this type of development to take place** at pace and the NFU would welcome a strategic review of Schedule 2, Part 6 of the GPDO 2015. The insertion of a new section into the planning practice guidance covering agriculture and the rural economy and an expanded section in the National Planning Policy Framework (NPPF) seeking to re-establish the position and importance of agriculture in the national economy.

¹¹ [the-future-of-food-2040.pdf \(nfuonline.com\)](#)

¹² [our-journey-to-net-zero-2021.pdf \(nfuonline.com\)](#)

¹³ Defra's ATP programme specifically Farm Infrastructure Funds and Government fiscal policy both have critical roles to play in maximising resource and land use efficiency.

Q5: 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?

28. The Environment Land Management scheme (ELMs) needs to recognise that nature and biodiversity is already present across the countryside and will need to support a range of interventions from those that occur in symbiosis with wider agricultural activity, through to interventions that change land use creating new areas for nature. ELMs is still in development, and is not due to be fully rolled out until 2024. Defra has not detailed the extent to which ELMs will contribute to its environmental targets.

29. To deliver the government's biodiversity and the broad range of 25 Year Environment Plan targets, ELMs has to be adopted across the wider countryside. **To secure the high levels of engagement required to have the broad impact ELMs must be simple, deliverable and offer fair reward to the farmers managing the countryside.** The majority of farmers are more likely to engage in ELMs where it works with the farming systems and complementing food production e.g. improving soil health. However, even that can come with its own complications. A single set of national rules, as is the requirement of the first iteration of the Sustainable Farming Incentive scheme (or SFI), will not deliver for all soil types.

30. Defra aspires to 70% of farmland to be in the ELM SFI scheme by 2028. This scheme should support farming activities that contribute to environmental outcomes like clean water, clean air, biodiversity and climate change. These should benefit agriculture, biodiversity and wider public wellbeing. The NFU would welcome support for provision of access to the countryside to be included within ELMs, but there is little evidence of this type of support being within ELMs at present. In addition, the NFU's own assessment commissioned from the Andersons Centre of the early roll out of the SFI on farm profitability and productivity indicates that it **currently provides a very limited financial incentive for farmers and growers to engage with it.**

31. **Where the ELM activity leads to more permanent land use change, the business considerations are significantly different.** As land is their capital asset, individuals will look at the long-term funding, beyond the length of the ELM agreement. They will consider

the impact on future generations. This makes land use change less appealing. Government's historic behaviour will also be taken into account. Upland farmers have already been delivering public goods for many years through successive Government-funded agri-environment schemes. As a consequence of their engagement with such schemes they have seen their land tied into management for environmental outcomes and wider public goods through legislation, for example, EIA regulations or SSSI management requirements. Currently, they are having government support withdrawn (BPS) without the means to attract new income as the environmental requirements, including the agri-environment scheme, prevent them from improving agricultural productivity. This does not incentivise land use change based on government support.

32. In designing ELM schemes, the **government needs to use an engaging narrative**. Farmers have been involved in environment schemes for many years and maintain the majority of our important habitats designated as SSSIs. The management of these SSSIs has been prescribed by successive conservation regulators since their designation, hence the narrative of 'nature recovery' risks disenfranchising the very farmers who have already been delivering on those government policies for nature.

Nature, landscape and biodiversity

Q6: 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?

33. Farmers will continue to play a pivotal role in improving biodiversity in the short and long term by providing and maintaining habitats and food sources for wildlife. Biodiversity underpins the economic success of agriculture with pollinators, microbial communities and beneficial insects playing a central role in driving productivity whilst pests, weeds and disease undermine such productivity. **Due to farming's close relationship with the natural environment, farmers and growers are continuously required to find the balance between promoting biodiversity whilst controlling for detrimental effects on food production.** To enable farmers to maintain and enhance this work it is important that the work they do is recognised in future land use policies.

34. The effects caused by **climate change, including changing weather patterns and increases in temperature, will pose a challenge for biodiversity and habitats**, with both beneficial but also unfavourable impacts possible. We need to get better at predicting and assessing impacts of climate change on our biodiversity.

35. As set out in answer to question 5, **ELMs has a key role to play and to maintain and improve biodiversity**, it must recognise that biodiversity is delivered across the productive landscape. So, to be successful it requires:

- **High uptake** across farmland. This will help deliver a '*bigger better and more joined up*' approach, as per the principles set out by Lawton¹⁴.
- Financial support for **environmental maintenance and not just creation**. For example, hedge maintenance comes at a cost to the farmer but delivers for net zero and the wider environment, providing wildlife corridors and supporting pollinators.
- **Fair reward**. Payments need to offer a fair reward and an incentive for participation, going beyond the current 'income foregone' calculation.
- Recognition that farms are dynamic businesses and **needs to reflect those different structures and tenures to ensure inclusivity**. With around 30% of farmland in some form of tenancy and an average tenancy length of 3 – 4 years, land tenure arrangements can be a barrier to participation in environmental schemes, particularly where the scheme is multiannual.

36. The characteristics of successful previous schemes have included clear, straightforward implementation on farm, clarity on how the scheme contributes to the environmental objectives and actions that complement the wider farm business.

Q7: 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

¹⁴ Making Space for Nature: A review of England's Wildlife Sites and Ecological Network 2010 [[ARCHIVED CONTENT](https://www.nationalarchives.gov.uk/content/)] ([nationalarchives.gov.uk](https://www.nationalarchives.gov.uk))

ensure they support one another, and that they deliver effective benefits for nature?

37. **Widespread involvement of farmers and growers should be fundamental for the successful delivery of many of these new policies such as nature-based solutions, local nature recovery strategies (LNRSs) and biodiversity net gain.** Yet, there is a lot of work to be done to ensure key stakeholders and farmers understand the relationship and interaction of these to deliver for biodiversity alongside side mechanisms like ELMs. The current consultation on the Nature Recovery Green Paper attempts to start fleshing out a framework but as the policy landscape is extremely complex much more needs to be done to aid understanding.

38. **Our vision for nature improvement and addressing climate change is based on a preference for land sharing, not land sparing and must represent viable business propositions, in harmony with food production.** They should also not be pursued in isolation: optimal environmental outcomes should seek to enhance air and water quality and build soil health. Therefore, for these policies to complement one another:

- In fitting with our comments in response to question 3 about the use of land capability tools to help individual farmers assess their potential to deliver public goods alongside the production of food, fibre and energy, **LNRSs must be developed in consultation with land managers from the very beginning of the process to ensure these are an accurate representation of what is on the ground, or what could be achieved;** there must be a simple mechanism to challenge inaccuracies of any LNRS, particularly where it is used to target ELMs funding, and ELMs funding should be open to land managers outside of priority areas.
- Nature based solutions can be varied but must include the maintenance, as well as enhancement, of existing carbon stocks in vegetation and soils. **To enable private market investment, clear rules and standards are needed to allow farmers and buyers to participate with confidence and markets should be accessible across a range of farm types.** On the latter, particular consideration must also be given to the tenanted sector to enable involvement by farm tenants. Most tenant farmers have clauses within tenancy agreements restricting the participation in long-term agreements without explicit agreement from their

landlord. ELMs must also be designed in a way to promote compatibility with private funding and additionality requirements.

- On biodiversity net gain, government must balance any future net gain policy with the use of land, a limited resource, for food production.

39. As we state in our response to Question 4, we would add that **we have concerns where the types of mitigation being considered to allow 'nutrient neutral' housing developments to continue in the Solent, and other areas, involve taking land out of productive agricultural use.** Whilst this type of mitigation has a key role in unlocking development and we recognise that this may be an opportunity for some farmers, our view is that this is not the most sustainable route given that our productive agricultural land is a limited resource. Instead, **we would like to explore opportunities for local authorities to work in partnership with farmers to deliver public benefit and where land management options can work to deliver for nature and the environment alongside, rather than to displace productive farming.**

Environment, climate change, energy and infrastructure

Q8: How will commitments such as the 25-year environment plan and the net zero target require changes to land use in England, and what other impacts might these changes have?

40. Within the 25-year Environment Plan (25YEP), the NFU agrees that the following high-level goals are also compatible with our 2040 net zero ambition and the wider 2050 national net zero target:

- ensuring that food is produced sustainably and profitably
- increasing timber supplies

41. However, it may be more challenging to find common ground on some of the other top-down 25YEP goals:

- increasing woodland in England in line with the aspiration of 12% cover by 2060, i.e. planting an extra 180,000 hectares by 2042
- creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network

42. We believe that individual farmers and land managers need to see the business case for land sharing/sparing, and that both Defra (and

Natural England, Forestry Commission, Rural Payments Agency) as well as other stakeholders (environmental NGOs, rewilding advocates) **must move away from single function thinking about land use.**

Q9: How should land use pressures around energy and infrastructure be managed?

43. The NFU anticipates further land use change both for climate mitigation (e.g. solar farms, perennial energy crops) and climate adaptation (e.g. public reservoirs, farm reservoirs). Our view is that the **new planning requirements for biodiversity net gain (BNG) are a potential opportunity to drive multi-functional land use**, e.g. the delivery of BNG around the margins and within the curtilage of solar farms and perennial energy crops. Other examples of such multi-functionality include wind farms with arable crops and/or grazing (subject to certain machinery limitations, as for power lines); sheep grazing in solar farms; and minimally-disturbed perennial energy crops harbouring wildlife, providing flood-tolerant/flood mitigation land cover on a floodplain – and also (in the case of willow) a source of early-season pollen. Buildings should also be used imaginatively – large roof areas used to locate solar and micro-wind generation. Remote sensing/aerial photography, land manager-led monitoring and government-led monitoring all have a role to play in the delivery of such multi-functional land use, as well as modelling of proxy indicators of land functions such as soil carbon storage.

Land use planning

Q10: 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?

44. The current system has been at the heart of the development sector for 75 years. It is designed to control development in the public interest and is the only function that links people directly with the

landscape in which they live, and which gives them a voice regarding the direction of travel for their entire community.

45. While the planning system is often held up as being overly bureaucratic obstructing economic growth and contributing to the housing crisis, this is overstated. 85% of all planning applications are decided within the statutory timescale and a large proportion of agricultural development does not need planning approval at all. However, both **plan development and planning decisions are contentious and can be a slow and expensive process, particularly within or adjacent to protected landscapes, or in open countryside in close proximity to housing and access land.** This has led to an unintended consequence of planning decisions by appeal and legal challenge up to the Court of Appeal to decide complex and contentious applications.

46. The NFU believes that:

- **The planning system needs to be properly funded** so that local authorities can attract and retain properly qualified and experienced staff to make difficult decisions confidently and without recourse to the appeals process.
- Government should also work quickly to **digitise what it can of the planning system, particularly the plan making process, so that more people can interact with and understand the process.**
- The **local plan making process should adhere to a strict timetable** with resources and independent support (LGA or POS for instance) for local authorities where it seems likely that they will or have already missed deadlines. The process should resist party politics and should reflect the aspirations of the community that the plan serves.
- Democratic **accountability at each stage of the planning process should be ensured.** This includes the development of Neighbourhood Plans, Local Plans, Sub-regional strategies, and the National Framework.

How effectively does the system manage competing demands on land, including the Government's housing and development objectives?

47. 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.

What would be the merits of introducing a formal spatial planning framework or frameworks, and how might it be implemented?

48. Any formal spatial planning framework must have a pro-active 360° review process in place to take into the account the requirements of the agricultural sector and the wider rural economy through all levels of the planning strata. It must not become a situation whereby those with the loudest voice or deepest pocket can set the agenda risking imposing national urban centric aspirations and arbitrary targets on the local and neighbourhood planning systems. Instead, it should find a way to set realistic and workable targets for food, housing, employment, energy and nature-based recovery strategies.

Q11: What lessons may be learned from land use planning frameworks in the devolved nations and abroad, and how might these lessons apply to England?

49. Valuable lessons can be learned from the success that the National Plan for Wales is having in delivering clarity and purpose to the development sector in Wales. The plan sets out a direction of travel which is underpinned by a process of integrated impact assessments which exhaustively identifies and incorporates every piece of associated policy and legislation from the national right down to the neighbourhood level.

Q12: 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?

50. 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. It is important to the NFU that our countryside remains a multifunctional and dynamic space. Although we see that there is merit in creating a coherent national strategy for the future of land use that recognises the significant competition between land use categories, we do not support a land use strategy which is then used to dictate an exclusively top-down and rigid approach to land use planning. Rather, we would advocate the development of capability mapping tools used to help individual farmers assess their potential to deliver public goods alongside the production of food, fibre and energy. Any such development of strategic frameworks for land use should formally involve those who manage the land and their representative organisations as consultees.

Scott Pepe

National Farmers Union (England and Wales)

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