

## **Paul Miner, Head of Policy and Planning, CPRE – Written Evidence (LUE0055)**

### **Introduction and summary**

1. CPRE, the countryside charity, strongly welcomes the House of Lords Select Committee on Land Use inquiry. We have long advocated, notably through our 2018 report [Land Lines](#), for an integrated government strategy that ties together policies on the environment, farming, land use planning and transport and clearly focuses them on addressing the key drivers of land use change: climate, nature, housing, energy and food production. England has the largest population density of any country in Europe and by 2047 is set to have the largest population, so questions of how land should best be used are of critical importance. We will increasingly need to achieve multifunctional land use – meaning multiple uses into the same spaces and consistently over time.
2. The introduction of a land use strategy should allow for more integrated policies and decision making, and better outcomes. It could also potentially be a key focal point for the public to become more involved in, and understand, how we meet the challenges of the demands placed on land. The government has made some progress in providing some of the information inputs for a land use strategy through indicators developed for the 25 Year Plan for the Environment, but there are still major gaps in these indicators which need to be filled, for example on the quality of protected landscapes. The outcome should be living more within environmental limits and being able to expand environmental capacity rather than continue to shrink it. In England there is also an important equity dimension to land use, as there is an increasingly urgent need to spread or ‘level up’ development and quality of life more fairly between the pressurised south of the country and the relatively neglected midland and northern regions.
3. In England central government has also taken some good steps through the 25 Year Plan for the Environment, to set out clear objectives and targets for land use, such as on air quality and public access to nature. CPRE identifies three major objectives that an integrated strategy for land use should address:
4. First, since the 2000s there has been a clear lack of integration with, or influence on, policies on new development brought forward through the planning system, which the 25 Year Plan has not addressed. This has led on the one hand to a seriously unbalanced and wasteful pattern of new housing development. In particular 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. This needs to be addressed by clear goals and objectives for sustainable development that have force in the planning process.

5. Second, major opportunities are not yet being taken to take a multifunctional approach to land use in peri-urban or urban fringe areas of England, including those designated as Green Belt.
6. Third, there is a need for a clearer direction of travel on nationally protected landscapes that achieves better management for nature, more dark skies and easier access for those social groups, including people of colour and people with disabilities, who are not benefiting now.
7. To address all these three challenges needs both a national land use strategy and a robust suite of supporting targets and indicators. But it also needs effective mechanisms for leadership, collaboration and policy development – both on farming and planning policy - at both the strategic level of individual landscapes or waterscapes, as well as at the local authority and neighbourhood levels.

## **Introduction**

CPRE is the countryside charity. Since our formation in 1926 we have had a consistent interest in both the overall spatial pattern of development in England and how the countryside is managed. This inquiry relates intimately to our charitable objects and we welcome the opportunity to submit evidence. We are particularly concerned about using land effectively for housing development so that we can protect and improve the countryside that we have, and also to encourage the use of public transport, walking and cycling in order to decrease dependence on the car and encourage healthier lifestyles.

## **Questions**

### **Pressures and challenges**

- 1) *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?*

Growing demand for natural resources (food production, water, energy and raw materials)

1. In the context of the climate and nature emergencies, there is a need to urgently move from linear to circular models of economic activity and resource use. For example in Finland, the government has made a commitment to hold natural resource consumption by 2050 at 2015 levels, which will not be enough to redress historical impacts but does represent a major commitment in terms of the impact of new development happening now. <sup>1</sup> Such a commitment can only be achieved by setting clear regulatory goals for resource efficiency, waste minimisation and circular economy across all sectors. The urgent need for a similar commitment in England is evidenced by the ongoing loss of agricultural land to built development, energy crops and now also to solar farms, without strategies to tackle food waste, to reduce demand for energy, or to reduce greenfield land-take for development. Land is a finite resource, and using it smartly and efficiently is vital.

#### Nature and our connection to it: compromised by policy silos

2. There are significant spatial inequalities of access to open space, as CPRE has recently shown<sup>2</sup>, and the dramatic decline in biodiversity is well-documented. These factors combine to deprive many communities of healthy natural systems and of an ability to connect with it for their mental and physical well-being.
3. Currently, each area of public policy tends to have its own headline targets that are not necessarily informed by the others. For example, whilst the planning system has a wide, sustainable development remit in theory, in practice it is driven primarily by housing delivery targets. CPRE's recent research on climate action in Local Plans<sup>3</sup> found that the overwhelming focus on housing delivery effectively squeezes out other issues, including climate, as policy drivers. Meanwhile, Defra is pursuing the implementation of biodiversity net gain regulations, but there is a risk that the focus on the application of the metric to individual planning applications masks the real question of how the state of nature can be enhanced at a place-based or landscape-based scale through the planning system. Nature Recovery Networks (NRNs) and Local Nature Recovery Strategies (LNRs) are crucial in this regard.
4. These issues are not limited to the main policy areas governing land use. The Department for Education has published a Sustainability and Climate Change Strategy <sup>4</sup> with hugely important objectives to improve learning opportunities in the natural environment. Research shows that urban areas with highly inter-connected street patterns and plenty of

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<sup>1</sup> [Finland's Circular Economy Programme sets targets to curb overconsumption of natural resources - Ministry of Economic Affairs and Employment \(tem.fi\)](#)

<sup>2</sup> [Feb-2022\\_CPRE\\_Local-Green-Spaces-full-report-1.pdf](#)

<sup>3</sup> [Climate emergency: time for planning to get on the case \(cpre.org.uk\)](#)

<sup>4</sup> [Sustainability and climate change: a strategy for the education and children's services systems - GOV.UK \(www.gov.uk\)](#)

ground-floor activity are experienced as the safest places to move through as a pedestrian<sup>5</sup>. Yet new developments regularly gain planning permission with cul-de-sac street patterns, inactive street frontages and a sparse public realm with limited access to nature.

5. This fragmented way in which policies affecting land use are current developed and measured limits the ability of our political system to define the long-term public interest in which land is used, and constitutes a key obstacle to multi-functionality. This point is not new: the government's own evidence identified it in the Land Use Futures report (2010)<sup>6</sup> and Making Space for Nature (2010)<sup>7</sup>. Progress since 2010 has been very disappointing.

### Defining and regulating for sustainable development

6. The National Planning Policy Framework (NPPF) purports to promote sustainable development, and indeed an integrated implementation of all NPPF's objectives should in theory deliver good outcomes. However, its impacts in practice are far from sustainable, as starkly evidenced by Transport for New Homes research<sup>8</sup> showing major schemes for new settlements and urban extensions which abjectly fail to fulfil their claims to sustainability, and instead generate neighbourhoods which are heavily car-dependent and have a poor public realm.
7. In our view, a crucial cause of these problems is how sustainable development is assessed. Policies and plans are deemed to promote sustainable development based solely on their stated intent, rather than on the likelihood of their outcome. A much more robust, outcome-orientated process to assess sustainability must be a key feature of all new strategic planning.
8. The government's default approach to incentivising a favoured form of development is to relax the planning regulations associated with it. This is deeply flawed thinking. The most notable recent example is the scrapping, in 2015, of the target for all new homes to be zero-carbon by 2016, was particularly egregious and has resulted in around 800,000 additional homes<sup>9</sup> being built so far, and still counting, that will require expensive retrofitting if we are to achieve net-zero targets. This is an example of government choosing to ignore a looming environmental limit in the interests of promoting development in the

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<sup>5</sup> [0807-cd.dvi \(shu.ac.uk\)](https://www.shu.ac.uk/0807-cd.dvi)

<sup>6</sup> [10-631-land-use-futures.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/10-631-land-use-futures.pdf)

<sup>7</sup> [Making Space for Nature: \(nationalarchives.gov.uk\)](https://nationalarchives.gov.uk/making-space-for-nature/)

<sup>8</sup> [garden-village-visions.pdf \(transportfornewhomes.org.uk\)](https://transportfornewhomes.org.uk/garden-village-visions.pdf)

<sup>9</sup> The Energy & Climate Intelligence Unit [Microsoft Word - ECIU Zero Carbon Homes .docx \(edcdn.com\)](https://www.edcdn.com/microsoft-word-eciu-zero-carbon-homes.docx) identifies over 700,000 homes built 2017-2020, and government live tables show 808,770 housing completions 2017-2021 [Live tables on housing supply: indicators of new supply - GOV.UK \(www.gov.uk\)](https://www.gov.uk/live-tables-on-housing-supply-indicators-of-new-supply).

short term. To achieve good outcomes, regulations must be exacting and consistent, and any new strategic planning initiatives must be precise as to the regulatory mechanisms needed to achieve their aims.

2) *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?*

#### Climate change mitigation and adaptation

9. Every piece of land has the potential to play a role in responding to the climate challenge. This should be an underpinning principle for a land use strategy. The role depends on its current use, its propensity for change and for 'stacking' additional uses through a multi-functional approach, whether this be for built uses, energy generation, water management, nature recovery and so on.
10. Particular multi-functional opportunities include:
  - reforming urban land-use – for example replacing surface car parking with buildings, public realm and solar roofs;
  - addressing the uneven distribution of important habitats – many sensitive habitats are in or near heavily populated areas, so built development must demonstrably work with and enhance nature;
  - targeting agricultural and forestry policies on more sustainable management of soils;
  - harnessing the multiple roles of trees - stabilising soils, boosting infiltration and reducing fast run-off of water and sediment;
  - integrating development and infrastructure with flood risk management (eg 'pocket parks' that can temporarily flood) and urban heat reduction (green spaces and trees).

#### Securing food supply

11. Maintaining agricultural capacity to deliver significant levels of domestic food production is critical. This must be achieved in the context of addressing and adapting to climate change, reversing the loss of nature and increasing demands on land for other purposes, not least built development, production of renewable materials and energy. Defra monitoring shows that the amount of land in agricultural use, and the proportion of the food we consume that is grown in this country, have broadly remained stable; however within this there has been a noticeable decline on both counts in recent years. Agricultural production must also become environmentally sustainable to reduce its impact on nature and climate.
12. It is essential to preserve the most productive land from long-term loss: 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. CPRE is currently analysing

recent rates of built development on Best and Most Versatile (grades 1, 2 and 3a) agricultural land and we will share our analysis with the Committee when it is finalised in the coming weeks.

13. While-ever we lack a strategic understanding of the land we will need to produce food and other public goods in future, the quantum of suitable land continues to be eroded. If we are to tackle the triple crises of climate change, nature recovery and secure supply of food then these considerations must be integrated in a strategic way into how land use is planned and managed.

#### Energy production and distribution

14. We will return to this topic in question 9, but it is already the case that both productive farmland and valued landscapes are under pressure from energy infrastructure. These pressures would be greatly reduced through an integrated, strategic approach which:
  - makes energy efficiency and demand management a top priority;
  - sets out a robust, effective basis for assessing individual and cumulative landscape impacts;
  - takes a multi-functional approach, optimising residential and commercial roof space for solar energy, and ensuring that renewable energy developments in the countryside provide genuine measures for combining with nature recovery and sustainable farming.

#### Enhancing landscapes

15. There is a need for a strategic approach to enhancing landscapes, especially to facilitate resilience to climate change. Ecosystem services and connected, landscape-scale approach to climate change adaptation can deliver multiple benefits. Tree and hedgerow planting, restoring peatlands and moving towards a more sustainable way of farming are all crucial.
16. The government has previously made welcome indications towards introducing targets and indicators for landscape quality through the 25 Year Environment Plan. However, nearly four years after the introduction of the Plan, the promised indicator on changes in landscape and waterscape character remains 'in development'<sup>10</sup>. Given the concerns raised by several organisations that currently protected landscapes are not managed in a way that they can be considered to contribute towards the government's 30 by 30 target for land and sea protected for nature conservation<sup>11</sup>, an indicator of desired landscape change and measurement of progress towards it is urgently needed.

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<sup>10</sup> <https://oifdata.defra.gov.uk/7/>, accessed 25 April 2022.

<sup>11</sup> See, for example, [https://www.britishecologicalsociety.org/wp-content/uploads/2022/04/BES\\_Protected\\_Areas\\_Report.pdf](https://www.britishecologicalsociety.org/wp-content/uploads/2022/04/BES_Protected_Areas_Report.pdf), published April 2022.

17. At present the planning system is configured in theory to limit landscape and visual impact, with greater protection for designated landscapes. But in practice this is not working well to protect landscapes from harmful impacts, in particular because:

- It is dependent on how up-to-date each individual local authority's landscape character assessment (LCA) is – for example we have seen solar farm applications which the LCA could not meaningfully appraise because it did not envisage schemes of the size now coming forward;
- The lack of robust arrangements for agreeing strategic policy approaches between local authorities; and
- Many land-use changes within agricultural functions do not require planning permission and are not subject to landscape impact assessment.

3) *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?*

18. Landscape is key. Strategies in National Parks offer a good indication of what might be achieved elsewhere. National Park Authorities have dual responsibilities for preparing land management and local plans/planning strategies, for example the 2015 Partnership Plan for the New Forest National Park.<sup>12</sup> On balance it appears to CPRE that the greater degree of integrated strategy-making (particularly between farming and planning policy) and delivery, with a clear role and influence for local authorities, results in better outcomes. We see no reason why other parts of the country should not enjoy the same benefits as National Parks already do.
19. By contrast, England's fourteen areas of Green Belt provide an example of where removal of coordination and integration is causing problems. The Green Belts' strategic function – to prevent urban sprawl by keeping land free of development– has become seriously undermined as each local planning authority attempts to reconcile its own housing target with defending its Green Belt in the absence of a regional strategy. This is now resulting in several Local Plans being delayed or withdrawn<sup>13</sup>. There is also a lack of integration of Green Belt policy with agricultural policies targeting areas of land for agri-environment schemes (see paragraph 60 below).
20. The National Forest<sup>14</sup> project shows how large-scale and positive approaches to landscape regeneration can provide return on investment by improving the environment, growing the economy and building resilient communities.
21. The London Urban Forest Plan<sup>15</sup> is an interesting example of a collaborative approach to tree planting in relation to climate change adaptation. The partnership comprises 25 organisations in the public and voluntary sectors, and because this includes the Mayor of London, Transport for London and the Environment Agency there is a direct relationship to the achievement of statutory responsibilities in key sectors.
22. South Pennines Park<sup>16</sup> is an example of a coordinated approach to planning a better future at a wider landscape scale. It is England's largest non-statutory upland landscape that is not designated as an AONB or National Park and is a collaboration led by The South

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<sup>12</sup> [Partnership-Plan-Draft-Consultation-Document.pdf \(newforestnpa.gov.uk\)](#)

<sup>13</sup> [Welwyn Hatfield Local Plan: Key housing sites dropped | Welwyn Hatfield Times \(whetimes.co.uk\)](#)

<sup>14</sup> [What we do | National Forest](#)

<sup>15</sup> [londonurbanforestplan\\_final.pdf](#)

<sup>16</sup> [HOME - The South Pennines Park](#)

Pennines Park organisation between public, private and third sector organisations.

23. These examples all suggest that the landscape scale is particularly useful for land-use strategy-making, and we will return to this in question 6.

#### Levelling Up and Devolution

24. The Levelling up agenda presents an opportunity for the government to develop a more integrated approach to land use. In particular, a greater focus is needed on revitalising peripheral areas and taking a more master-planned approach to urban planning. There is an urgent need to address spatial inequalities, and CPRE considers the highest levelling-up priorities to be genuinely affordable housing, integrated sustainable transport and equitable access to open space for all.
25. However, we are concerned that the levelling up narrative could merely translate into increased development pressure in the North whilst failing to harness the opportunity to develop an effective, integrated approach to strategic planning. The arbitrary 35% housing uplift for cities is a key example of our concerns here, as it is informed only by a desire to achieve numerical housing delivery rather than by an evidence-based approach to the type and scale of development needed in different areas.
26. Recent approaches to devolution within England have been deal-based, leading to wide variation in the powers and scope of sub-national decision-making from one area to another. London and Greater Manchester are so far the only areas with statutory spatial planning powers at sub-national level, and there is a key risk of 'lopsided devolution'<sup>17</sup> in towns and rural areas are left behind. A consistent non-deal-based approach, as previously seen through Regional Spatial Strategies, is likely to be needed if a land use strategy is to be successful in addressing levelling up.<sup>18</sup>

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<sup>17</sup> [RSA: English towns need levelling-up with cities on devolution - RSA \(thersa.org\)](https://www.thersa.org/)

<sup>18</sup> <http://www.countycouncilsnetwork.org.uk/download/4003/>

## **Farming and land management**

- 4) *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?*
27. Agriculture policy is changing from investment in production until the early 2000s to support for delivery mainly of environmental public goods. This transition to 2027-28 will drive change to practices. Much farming has become financially reliant on direct support. In this context, Environmental Land Management (ELM) incentives for specified actions will offer an income stream that is potentially more attractive for marginal farming areas often of higher nature value. ELM is unlikely to directly replace lost income from the Basic Payment Scheme (BPS) as it will entail greater costs to farmers to implement, compared to cross-compliance measures under the Common Agricultural Policy (CAP). Change to on-farm practices will be needed not only for ELM measures, but also to reduce input costs or to increase production to retain profitability. The extent of ELM-related changes will depend on multiple factors linked to scheme success (see Q5 below).
28. However, ELM remains voluntary so farmers will be free to opt out. On land with greater potential farmers may choose to intensify inputs to drive higher production if market returns make this the more viable or the preferred option. Considering environmental pressure from pesticides and nutrients, the regulatory regimes need tightening to ensure that increased production does not come at an environmental cost.
29. ELM is in its early developmental stages but it is likely to represent the most significant government delivery mechanism and funding for addressing the twin crises of climate change and nature recovery via shaping rural land use. Other policy may be required – such as a dedicated net zero strategy for agriculture – to drive further change specifically at the individual farm level. Land use change will no doubt occur through other public investment such as Nature for Climate<sup>19</sup> funding and policy such as biodiversity net gain. Growing private finance particularly for carbon offsetting but also for renewable energy production, potentially via solar farms, anaerobic digestion and bioenergy crops could take land out of food production. 'This may result in incumbent farmers shifting into management for carbon or energy but demand for land for these uses may drive up land prices and also prevent others from entering the sector or from expanding

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<sup>19</sup> [Nature for people, climate and wildlife - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/nature-for-people-climate-and-wildlife)

their holdings. Without strategic planning of such land use changes, renewable energy uses may take high quality cropping land because infrastructure needs are more powerful drivers for optimal location eg power connections or proximity of biofuel plants.

30. Food security is an emerging crisis. The competitive pressures of new or potential trade deals between the UK and major agricultural producers including Australia, New Zealand and Brazil could be influential. Land use planning and policy could change if, as we should, we begin to take seriously the need to plan positively for sustainable food production in the context of global insecurities and the need to address climate change and reverse biodiversity loss. At present there are major concerns that existing productive land is not being adequately protected. (see paragraph 12 above.)
31. Farming practices are a spectrum responding to widely varying soil types, aspect and other conditions. Farming will no doubt continue to vary from large-scale to small and from more technology driven high external input models reliant on precision engineering and chemistry to agroecological approaches which maximise natural systems. Chemical and biochemical approaches using synthetic fertilisers and shorter specialist rotations may well continue but with increasing use of precision equipment to reduce inputs, reduce environmental impacts and sustain or increase production.
32. Attitude changes, greater awareness of new approaches plus cost pressures might favour shift to regenerative and/or agroecological forms of farming and practices, for example greater uptake of low- and no-till. As ELM broadly supports some aspects of these approaches, it may accelerate take up. There is evidence already of significant support from farmer groups such as the Nature Friendly Farming Network (NFFN)<sup>20</sup> but also in growing interest in Groundswell, the regenerative farming event, and mainstreaming of these types of practices in media coverage ( eg in the Farmers' Weekly magazine).
33. These different approaches will alter how the land looks and should benefit diversity of crops, hedgerows and wetlands and restoration of nature both on farm margins but also across cropped and grazed fields as soils recover and regenerate. These practices would also reduce costs for farmers in terms of fuel, bought-in fertilisers, labour hours, pesticides and veterinary visits. Fewer bought-in inputs would cut environmental impacts from fuel and emissions, cut losses of nitrates to water bodies including groundwater, and should drive greater diversity in rotations and in-fields. There should be positive and multiple benefits from better soil health including natural soil fertility,

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<sup>20</sup> [Nature Friendly Farming Network - Sustainable Farming \(nffn.org.uk\)](http://nffn.org.uk)

soil biodiversity, carbon storage as well as improvements to soil structure and resilience to extreme weather, better water storage and infiltration and reduced risk of run-off. Above ground biodiversity should benefit from greater crop diversity in and between fields, better soils and reduced use of synthetic chemistry.

34. Other changes will emerge over the longer term. UK policy and targets to increase woodland planting will if successful see increased woodland planting rates contributing to a UK total of a target of 30,000ha per annum post 2025. England woodland cover is scheduled to increase from 10% currently to 12% or approximately 9000 ha pa to 2050. Private funding may drive greater planting with leasing or purchase of more marginal grasslands for carbon offsetting. How much of this new woodland will be native and biodiverse is moot. Plantations of fast growing non-native species could proliferate if carbon offsetting is the sole or main purpose.
35. Policy on peatland rewetting is emerging with increasing upland areas restored – initially 25,000 ha by 2025. Restoration and sustainable management of lowland peatland is necessary and should become more widespread under ELM schemes. Emissions from lowland arable cropland and drained intensive grassland are estimated at nearly 14 MtoCO<sub>2</sub>e pa. This is 59% of total UK peatland emissions (23 MtoCO<sub>2</sub>e pa) but from just 15% of the peatland area. Much of this lowland area is in the East Anglian Fens indicating the shift to wetter management is both urgent and imperative<sup>21</sup>. It will become even more urgent as carbon emissions budgets tighten when offsetting may need to focus on only unavoidable emissions. More extensive partial seasonal rewetting or full rewetting of lowland peatlands (eg The Fens) could occur, hosting water tolerant crops. This ‘paludiculture’ can be expected to develop over the longer term for edibles, ‘farmaceuticals’ and potentially crops for biomass, timber and green materials.
36. More extensive wilder tracts of land (grazed by large herbivores) are expected to emerge following examples from Knepp or WildEast estates<sup>22</sup> but will depend on ELM funding, carbon and other private payments and public appetite to visit and stay over in these areas to finance their business model. These could become new reservoirs of, and corridors for, biodiversity as well as areas for greater public access and more intense nature experiences.
37. Evidence of changing farming practices is yet to be collected, so evidence of change in farming practice is difficult to demonstrate. The annual Defra and devolved governments’ Agriculture in the UK report<sup>23</sup>

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<sup>21</sup> Evans, C et al. Implementation of an emission inventory for UK peatlands. Report to the Department for Business, Energy and Industrial Strategy, Centre for Ecology and Hydrology, 2017, p1.

<sup>22</sup> [WildEast - A Movement of People, For Nature, Forever In East Anglia](#)

gives information on structure of the sector, areas cropped and livestock numbers, on organic farming, fertiliser applications, pesticide use and other environmental indicators including agri-environment spend and agriculture-derived pollution of water and air bodies. However, there are glaring omissions in these reports on critical aspects of farming such as: tillage practices<sup>24</sup>, soil health, farm level greenhouse gas emissions and particularly the uptake of regenerative or agroecological practices on farm other than organic.

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<sup>23</sup> [Agriculture in the United Kingdom - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

<sup>24</sup> We have little up to date information on the arable areas managed under low or no tillage approaches from the UK Government, although there is an EU indicator which includes the UK in 2016 – this suggests around 4-45% in conventional tillage, 25-30% in conservation tillage and under 10% in no tillage. See [Agri-environmental indicator - tillage practices - Statistics Explained \(europa.eu\)](https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&plugin=1)

5) *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?*

38. The final design of ELM schemes will heavily influence their impact as will overall resource, rollout processes and uptake both in farmer numbers, area covered and the level of management change on any given piece of land. Other success factors will include ease of process for scheme applicants, levels of incentive for specified actions and long-term sustained funding commensurate with stated ambitions and need.
39. At this stage of their evolution it is difficult to assess their potential impacts. The recent ELM outcomes document<sup>25</sup> set out the following main aims to:
- Reduce agricultural GHG emissions by up to 6 MtCO<sub>2</sub>e pa in Carbon Budget 6 (2033-2037) in England
  - Put 60% of England's agricultural soil under sustainable management by 2030.
  - Contribute to the target of 30,000 ha new woodland planting pa in UK to 2030 and beyond
  - Restore and maintain up to 200,000 hectares of peatland in England by 2050
  - Create or restore up to 300,000 hectares of habitat by 2042 and bring over half of SSSIs into Favourable Condition by 2042 to support the new Nature Recovery Network and the target to protect 30% of land for nature by 2030.<sup>26</sup>
40. Questions remain on multiple counts, including on how these objectives fit with overarching environmental policy including achieving net zero and securing species abundance by 2030.
41. Currently, beyond pilots, the only scheme set to run this year is Sustainable Farming Incentive<sup>27</sup> (SFI) 2022. This is a limited set of standards - in modified form from those in the SFI pilot. If successful, this may increase take-up overall and help vulnerable farms to mitigate some of the losses to farm income from the early tapering down of BPS by 50% in 2024. The ambition and range of measures are limited and environmental organisations have been critical; though SFI

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<sup>25</sup> [Environmental land management schemes: outcomes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/environmental-land-management-schemes-outcomes)

<sup>26</sup> <https://www.gov.uk/government/publications/environmental-land-management-schemes-outcomes>

<sup>27</sup> [A summary of the SFI in 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/a-summary-of-the-sfi-in-2022)

2022 does set a useful direction of travel for SFI and signals the kinds of measures – and adjustments to practice needed – to attract ELM funding in future as the SFI scheme expands.

42. Key elements of the arable and horticultural soils and improved grassland standards reflect some of the regenerative trends we referred to above (Q4). They have an important focus on better management to improve soil health.
43. Future SFI standards set out early in 2022, albeit for now indicative, give hope that the range of actions supported and the level of ambition will grow. These include integrated pest and nutrient management, hedgerows, farmland biodiversity, an organic standard, farm woodland and agroforestry. Some or all of these would fit within agroecological/regenerative approaches so may well support existing good practice and, in time, reward those moving in this direction.
44. The design of the SFI has aimed, it seems, for simplicity and flexibility for farmers so that specified actions should be clear and easily understood. We hope this simplicity will increase attractiveness and uptake of the scheme, especially to those with little or no experience of previous agri-environment schemes. We also understand that Defra wish to ensure ELM schemes can stack – both SFI with current Countryside Stewardship currently but also SFI with LNR and Landscape Recovery subsequently - to simplify the offer to users who will see a package of options under ELM, albeit from different schemes.
45. ELM currently lacks detail leaving many farmers unable to plan how to change their business successfully for future years; at best this leaves farmer uncertain about their planning but, at worst with falling direct payment income as BPS is tapered down, feeling financially vulnerable with impacts on their wellbeing and mental health.
46. The kinds of actions funded under SFI – as set out in standards in the SFI pilot or in the 2022 SFI scheme - suggest a direction of travel towards more sustainable farming and food production. The range of standards which will grow and expected levels of engagement (introductory, intermediate and advanced) within each standard will do enable farmers to start with relatively low ambition and increase this over time as they adapt and adjust their practice to suit. However, the absence of a standard to support a whole farm or systemic approach is still needed, and this should increase coherence and enable measures to work systemically together to sustain production and mitigate damage. Ideally such a standard would support the kinds

of regenerative and agroecological approaches already being pioneered and which can harmonise environmental with agronomic objectives.

47. Linked to this, payment is currently limited to actions to meet specified standards. Success of the scheme will be assessed in outputs such as specified percentage of eligible farm areas under cover crop or herbal leys. It remains unclear how within these structures SFI will identify and support the best forms of management that can deliver multiple public as well as private benefits by combining practices which are complementary and can harness synergies. For example, conservation agriculture links avoiding bare ground, no tillage and crop diversity (both in-field and in the rotation) to drive improvements in soil health, which aids fertility, reduces run off, builds soil carbon and improves structure.<sup>28</sup>
48. A number of other elements are missing from the overall picture:
  - A clear indication of when and how the regulatory baseline will support higher standards;
  - An affordable package of advice for all farmers and at a farm scale – what measures can be taken and be supported under ELM schemes to enable them to become more financially and environmentally resilient;
  - Supply chain, processing and marketing support for the rural agrarian and food economy via targeted funding<sup>29</sup> - to underpin the wider agricultural transition to sustainable food production through adding value and better farmgate incomes;
  - Enforceable standards for food that will prevent imported foodstuffs from undercutting the sustainability of UK production and so unravelling potential environmental benefits in the countryside.

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<sup>28</sup> See CPRE, [Back to the land: rethinking our approach to soil](#), December 2018, pp20-22

<sup>29</sup> [UK Shared Prosperity Fund: prospectus - GOV.UK \(www.gov.uk\)](#)

## **Nature, landscape and biodiversity**

- 6) *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?*
49. CPRE considers that a landscape-based approach to strategic planning would have significant merit. As we identified in question 3, landscape-based initiatives have proved particularly successful, and we contend this is because they naturally engender multi-disciplinary and cross-boundary working. It is also very likely that key policy considerations, such as impact assessments, environmental limits and multi-functional solutions, would make sense with regard to landscape characteristics much more easily than to administrative boundaries. The National Character Areas (NCAs) mentioned below offer a robust starting point for this approach.
50. The impact of climate change is a key threat to nature and biodiversity over the short, medium and long term. Natural England's National Character Area (NCA) research found that the headline landscape effects of climate change are:<sup>30</sup>
- Changes in plant and animal species and community composition;
  - Increased fire risk affecting heathland and grassland habitats, and in turn leading to increased soil erosion and run-off;
  - Increase in storm damage affecting veteran and mature trees, designed landscapes and even aged plantations;
  - Drought leading to low flow in streams and rivers, drying of wetlands and peatland;
  - Intense rainfall events and increased winter rainfall resulting in flooding, erosion and damage to buildings and structures – including heritage assets;
  - Estuarine wetlands could be affected by sea level rise and erosion and 'squeezed' against flood defences (e.g. Humberhead Levels);
  - Coastal habitats, heritage assets and access routes are vulnerable to erosion, landslides and permanent inundation from sea level rise;
  - An increase in winter rainfall and more intense rain storms could lead to increased flood risk in urban areas. Greenspaces and river floodplains could play an increasingly important role in flood protection.
51. A land use policy must address the impact of climate change on landscapes, habitats, nature and biodiversity. In 2019, the Climate Change Committee published a new report outlining how the UK can end its contribution to the climate emergency<sup>31</sup>. Utilising nature to

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<sup>30</sup> Natural England. National Character Area profiles. 2014. [National Character Area profiles: data for local decision making - GOV.UK \(www.gov.uk\)](#)

<sup>31</sup> The Climate Change Committee. Net Zero: The UK's contribution to stopping global warming.

capture carbon emissions was an important part of the report, and one of the recommendations was to extend the UK's hedgerow network by 40% by the year 2050 (see also CPRE's research on hedgerows).

- 7) *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?*
52. We consider that public bodies should have a statutory duty to deliver nature recovery, and this should mandate local authorities to implement Local Nature Recovery Strategies (LNRSs) and Nature Recovery Networks (NRNs). LNRSs can have multiple benefits, such as alleviating flood risk and absorbing carbon dioxide emissions. NRNs have the potential to improve connectivity for wildlife between designated sites for nature and the wider countryside. This would also provide ecological resilience to climate change. Crucially, LNRSs and NRNs will be much more impactful if prepared and delivered across wider geographical areas, unencumbered by administrative geography, and for this reason they are ideal beneficiaries of a larger-than-local strategic approach.
53. The Committee is no doubt aware of growing controversy around the conversion of agricultural land to solar farms, and the potential impact this may have on both food security and biodiversity. In principle, solar applications will be subject to biodiversity net gain (BNG) requirements, and applicants are in many cases claiming BNG as benefit of their proposals. But there are also horror stories of solar farms liberally applying herbicides to the ground around under their arrays. In our view this highlights a point about BNG which should apply to all development, not only to solar farms: namely that all BNG contributions should be directed to the implementation of NRNs and LNRSs. Additional funding and expertise to develop and implement LNRS across England is required.
54. In our response to Defra's recent consultation on BNG regulations and implementation, we highlighted wider issues with BNG. Recent academic research<sup>32</sup> suggests that use of BNG so far is not delivering the intended outcomes: analysis of six early adopter councils found "a 34% reduction in the area of non-urban habitats, generally compensated by commitments to deliver smaller areas of higher-quality habitats years later in the development project cycle". In other words, quantitative loss now compensated by the promise of

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2019. [Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf](https://theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf) (theccc.org.uk)

<sup>32</sup> [The Society for Conservation Biology](https://www.societypublishers.com/journal/soecol/2019/01/01) (wiley.com)

qualitative gains well into the future. Further, the current metrics involved risk leading to a reduction in species.

55. We are also very concerned 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. Again, this points to much more robust baselining of ecological assets on an area-wide basis, compared to the current ringfenced approach where assets are measured for designated sites and for planning application sites during the application process.
56. In terms of implementing the government's 30% of land for nature by 2030 policy, we raise the following points:
  - There are significant opportunities to protect the last remnants of natural and semi-natural habitat in England, and restore degraded ecosystems. In particular we should extend the UK's hedgerow network by 40% by the year 2050, as called for by the Climate Change Committee in 2019.
  - Local and neighbourhood planning will play a crucial role in this, including through the use of Local Green Space designation (see CPRE's 2022 report).<sup>33</sup>
  - To date however, there are serious underestimation of efforts required to deliver this.

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<sup>33</sup> CPRE. Local Green Space: a tool for people and nature's wellbeing. 2022. [Feb-2022\\_CPRE\\_Local-Green-Spaces-full-report-1.pdf](#)

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

- 8) *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?*
57. Wider policies and actions set out in the 25YEP have a significant impact on land use and management of land, but do not appear joined up at a strategic national level. The expected revision to the 25YEP throughout 2022 is a significant opportunity to take a more strategic approach. Suggestions could include the creation of a national map to show where the revised 25YEP policies and actions will impact.
58. CPRE would also like to see targets set within the revised 25YEP (which will be an Environmental improvement Plan from January 2023) for strategic landscape enhancement, such as:
- a. target to increase the extent of hedgerows by 40% by 2050, to help achieve net zero<sup>34</sup>.
  - b. Improvements to the countryside around towns (including Green Belts), not just from hedgerow planting but also specific targets for woodland and wetland creation in these areas as recommended in 2015 by the Natural Capital Committee<sup>35</sup>.
59. The 25 Year Environment Plan refers to the need to improve the environment in 'peri-urban' areas (which are often designated Green Belt) in order to address deprivation and connect people in cities to the outdoors. No firm actions or targets are offered on how to achieve this although tree planting and the creation of a new planning designation are mentioned in connection. CPRE has analysed historic trends of spend in Green Belt and other urban fringe areas through agri-environment schemes. We will publish a report of our analysis in May 2022 which will show that Green Belt and other urban fringe land has had relatively little investment in environmental improvement through agri-environment, and has relatively poor levels of scheme coverage, even though the land contains important concentrations of environmental assets such as historic parks and public rights of way. Accordingly we recommend that there should be significant increases in investment and land coverage in Green Belt and other urban fringe areas through ELM, in order to improve the countryside environment close to where 30 million people live. We will share our analysis with the Committee as soon as it is finalised.
- 9) *How should land use pressures around energy and infrastructure be managed?*

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<sup>34</sup> [Hedge-fund.pdf \(cpre.org.uk\) https://www.cpre.org.uk/resources/hedge-fund-full-report/](https://www.cpre.org.uk/resources/hedge-fund-full-report/)

<sup>35</sup> [Advice to government on net environmental gain \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/424242/advice-to-government-on-net-environmental-gain.pdf)

60. CPRE believes that the planning system has a crucial role in delivering the net-zero and green energy transition equitably and effectively. The planning system needs to be re-purposed to deliver net zero carbon as a priority, based on a nuanced understanding of multi-purpose/multi-outcome use of land.
61. The planning system is currently not fit for purpose in terms of energy and infrastructure provision. The planning system for new energy supply is cumbersome, both locally and nationally, and does not promote effective public engagement or participation. Previous sub-national approaches, based on landscape capacity, set nuanced targets for different renewable energy technologies.<sup>36</sup> This approach has failed to migrate to either local or city-regional planning.
62. More worryingly, energy development planning is largely divorced from low carbon policy aspirations. In particular, despite a broad consensus that energy efficiency and demand reduction are pre-requisites for all other energy measures to be effective, the planning system is being geared to deliver developments for energy development and infrastructure but is doing very little to address demand reduction. Homes and commercial buildings continue to be built that will require costly retrofitting to become zero carbon, and there is no meaningful retrofitting strategy either for insulation or for on-site renewables such as solar roofs.
63. Thus far, most local planning authorities have not set policies and strategies consistent with meeting their statutory duty to help address climate change.<sup>37</sup> Lack of resources is a key issue as well as a lack of joined-up thinking. A return to sub-national strategic planning, based on a land use strategy, would integrate delivery and allow resources to be allocated more efficiently. For example, a current local authority will likely lack the expertise need to assess landscape capacity for low carbon energy, based on natural character areas or biodiversity constraints. Such work can better be done at a joint authority/regional/city-regional level.
64. The scale of the net zero challenge, highlighted locally by recent Tyndall Centre modelling studies<sup>38</sup>, necessitates a radical re-purposing of planning for climate change, with concomitant resourcing. Further devolved powers, strategies and plans at both city region (and equivalent) and neighbourhood tiers will be needed in addition to radically revised Local Plan policies.
65. Any strategic approach must be underpinned by the key principle to minimise landscape impact. Energy decisions that impact on land use, landscapes and rural communities must be informed by sustainable development principles and landscape character considerations,

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<sup>36</sup> For example [Microsoft Word - 110322 LGYH Part C final report Issued .docx \(ryedale.gov.uk\)](#)

<sup>37</sup> [Climate Challenge.qxd \(tcpa.org.uk\)](#)

<sup>38</sup> [OpenCLIM - Tyndall Centre for Climate Change Research](#)

flowing from the UK's commitments within the European Landscape Convention<sup>39</sup>.

66. Therefore we must devolve decision-making and funding for the energy transition, recognising the value of delivery by more democratically engaged bodies, particularly local authorities, city regions and other new devolved bodies. More detail on this is given next.
67. Renewable energy roll-out should follow a hierarchy of landscape capacity, following landscape character assessment, and carried out at an appropriate sub-national scale where National Character Areas can enable allocations to be rooted in sensitivity to change. Sensitivities in relation to biodiversity, cultural heritage and amenity must also be respected, along with nationally designated landscapes. Clearly urban and brownfield capacity should be prioritised, especially to reap the decentralisation benefits of locating low carbon generation close to where most energy is needed and consumed, i.e. the urban environment.
68. A strategic approach to planning renewables will be best led by emerging city regions, combined and county authorities. This should be complemented by a 'bottom-up' approach where communities are incentivised to come forward with local energy schemes, including additional resources for 'neighbourhood energy plans' to front load engagement.
69. The transition to zero carbon can be best enabled and delivered through a re-purposed land use planning system. However, this cannot happen without giving local authorities proper resourcing to plan for climate change.

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<sup>39</sup> [European Landscape Convention \(naturalengland.org.uk\)](https://naturalengland.org.uk)

## **Land use planning**

- 10) *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?*
70. The Committee will be aware that the government has consulted on major changes to the planning system and has yet to decide on the outcome to the consultation. CPRE leads the Better Planning Coalition which came together on a shared agenda of concern as well as to put forward constructive proposals for reform.
71. England has national planning policies but without any kind of underlying strategy. Any new formal spatial planning framework should be informed by a clear strategy and supporting indicators for making effective use of land, both for environmental outcomes and for social and economic ones such as providing necessary levels of new housing. Since the withering and eventual abolition of the 2005 UK Sustainable Development Strategy in 2010/11, the government has instead narrowed down the measurable commitments, targets and indicators for planning to a political target of building 300,000 houses every year across England. The 2005 Strategy gave important direction on how housebuilding could be harnessed towards sustainable development outcomes through the provision of specific indicators covering (i) reusing previously developed (brownfield) land and buildings; and (ii) using land for housing efficiently (as measured through average new build residential densities). Both were in order to minimise the loss of undeveloped habitats and valuable agricultural land.
72. There is little or no meaningful integration between the NPPF policies on boosting housing supply and the 25 Year Environment Plan targets, beyond pledges in the latter to strengthen policy on flood risk and consider the use of a new planning designation to support nature recovery in addition to existing national protective designations for landscape, nature conservation and Green Belts. Sustainable Development Indicators, which in some other cases were adapted into 25 Year Environment Plan targets, were revised in 2013 and avoid any references to land take for development because the then government argued that 'there is no clear favourable direction of travel'<sup>40</sup>.
73. The consequences of this disconnect can be seen in an increasingly wasteful use of land for new housing. The number of hectares of

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<sup>40</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/223992/0\\_SDIs\\_final\\_2\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/223992/0_SDIs_final_2_.pdf), p.8.

greenfield land being used for housing developments has increased from 1,490ha in 2006 to 3,689ha in 2017, an increase of 148%. But over the same period the overall number of housing completions has consistently remained at around 140,000 per annum<sup>41</sup>.

74. Projection-based calculations of need drive supply of market housing towards locations where it is most lucrative for landowners and developers to build. This makes housing less affordable in all regions, because:
- In higher-value locations, the profit motive creates a powerful incentive for developers to minimise affordable housing provision, and the definition of affordable at 80% of market price is still way out of reach of most people – especially younger people and key workers;
  - In lower-value locations, developers are only persuaded to build by agreeing very low affordable housing ratios, renegotiating S106 agreements and setting low or nil CIL charging rates;
  - In all locations, therefore, the supply of homes affordable to those who need them is catastrophically low.
75. Higher-skill, higher-value businesses are concentrated into a few major urban areas through their natural tendency to cluster. Meanwhile, the warehousing and logistics sector dominates the land supply allocations in most Local Plans. As a result, higher-value jobs continue to gravitate towards a few centres, and the rest of the country experiences conversion of land to logistics and warehousing on a vast scale, with no spatial strategy for how goods and services can best be distributed. The resulting developments are commonly poorly-located for public transport, have a public realm totally dominated by hard landscaping and car parking, and thereby entrench unsustainable development patterns for generations to come.
76. The level of public investment in road-building is at its highest ever level. This makes no rational sense in the context of the climate emergency: even with take-up of electric vehicles, significant reductions in total road vehicle mileage (at least 20% nationwide) are needed to achieve net-zero carbon targets<sup>42</sup>, and road-building always induces additional traffic. CPRE research<sup>43</sup> has shown that road-building fails to provide the promised economic benefits, and devastates the environment. CPRE, along with many other groups, wants to see road infrastructure budgets re-allocated to comprehensive public transport, active travel and traffic reduction measures.

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<sup>41</sup> CPRE, *Recycling our land: state of brownfield 2021*. November 2021, p.13.

<sup>42</sup> [Not going the extra mile.pdf \(green-alliance.org.uk\)](#)

<sup>43</sup> [0938 – CPRE End of the Road report v5.indd](#)

77. Road-building has a high land-take in itself, but this is greatly multiplied by the use of new and upgraded roads as land-use corridors for new development. As it is currently set out, the Housing Infrastructure Fund is predominantly being deployed to contribute to building more roads<sup>44</sup>.
78. The road-led land-use model produces a range of other negative consequences for communities<sup>45</sup>. These include:
- delivery of affordable housing is reduced, due to developer contributions to highway schemes reducing the viability of affordable provision;
  - the pattern of development becomes more dispersed, increasing car dependence and reducing the viability of public transport and local centres<sup>46</sup>;
  - greenfield land-take, loss of nature, impacts on landscape, tranquillity and pollution are all increased;
  - car dependence is locked in for further generations, with associated impacts on health, economy and well-being<sup>47</sup>.
79. The Welsh Government's decision in 2021 to freeze and review all road-building in Wales<sup>48</sup> shows that the inherent conflict between increasing road capacity and addressing environmental and social objectives can be dealt with at a government level, and we believe England should urgently follow suit.
80. Freight-heavy development – especially logistics uses which break bulk for local distribution – must be planned in a genuinely strategic way to make them efficient both in their land use and in their economic effectiveness.
81. For other forms of development, a reallocation of transport investment to public and active travel combined with much greater emphasis on compact urban form – particularly the 15/20 minute neighbourhood<sup>49</sup> – are crucial. Again, this is a form of multi-functionality, considering how development land, road space and public realm within and between neighbourhoods can work much more imaginatively to enable sustainable outcomes.
82. The combination of market processes in housing and employment sectors is having a devastating effect on the environment and on the countryside, because:

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<sup>44</sup> [Housing Infrastructure Fund - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

<sup>45</sup> [The Negative Consequences of Car Dependency \(strongtowns.org\)](https://strongtowns.org)

<sup>46</sup> [Planning for less car use - Friends of the Earth](https://www.friends-of-the-earth.org)

<sup>47</sup> [Are cars the new tobacco? | Journal of Public Health | Oxford Academic \(oup.com\)](https://www.oxfordacademic.com)

<sup>48</sup> [Welsh government suspends all future road-building plans | Wales | The Guardian](https://www.theguardian.com)

<sup>49</sup> [What is a 15-minute neighbourhood? | Healthy streets \(smarttransport.org.uk\)](https://www.smarttransport.org.uk)

- In higher-value locations, there is huge market pressure to make land available for private housing, normally at prices out of reach to those who need homes, and landowners have a powerful incentive to game the planning system to obtain planning permission on greenfield land, Green Belt land and locally valued green spaces, while minimising their contributions to affordability and to community infrastructure;
  - In lower-value locations, local planning authorities are driven to make development land available as easily as possible, especially for warehousing and logistics, and also to use New Homes Bonus and Housing Infrastructure Funds to subsidise infrastructure – and again these processes favour greenfield development over reuse of brownfield land;
  - It is easy for the development market in lower-value areas to shun brownfield sites on viability grounds, with result that many local authorities cannot deliver their brownfield land in a given plan period, and are therefore forced to allocate more greenfield land (often in Green Belt) when reviewing their local plans;
  - A pattern of development that is skewed towards greenfield sites is invariably dependent on new road infrastructure, such that the standard development model is to use a new or upgraded road to ‘unlock’ development land;
  - Rural dwellers do not experience development that is relevant to their needs, but instead are forced to move out or commute (on the new and upgraded roads) to access jobs and services elsewhere, while more affluent households move in from urban areas to which they commute (on the new and upgraded roads).
83. As a direct consequence, climate and natural systems suffer because:
- land is developed in ways which place ever-greater pressure on water resources and ecology;
  - greenfield land is taken out of its provisioning roles of public goods - food production, ecosystem function and people’s access to open space and nature;
  - the resulting development is causing harm to natural systems through species loss, carbon emissions, air and water pollution.
84. The previous Regional Spatial Strategies were abolished in 2012 following ongoing concerns being too large and remote from the electorate. This is clearly a matter which needs to be addressed head-on in determining the scope and accountability of any national or sub-national land use strategy.
85. This is crucial to any consideration of spatial frameworks because – as with the recent Oxford-Cambridge Arc Spatial Framework – they will not secure public support if their responsibilities are not democratically accountable.

86. A crucial problem with the Ox-Cam Spatial Framework is that it was proposed as an instrument of national planning and transport policy – an adjunct to NPPF – but it was unclear how any additional policy tools it provided should not also be provided to the rest of England<sup>50</sup>. In light of the levelling-up agenda, there is no justification for giving additional spatial planning functions to one of the most affluent areas of England, but not doing so for other areas in need of regeneration.
87. Those areas where large-than-local strategic planning has been put on a statutory footing – Greater London and Greater Manchester – indicate that better scrutiny and accountability should lead to better plans; although the withdrawal of Stockport from the Greater Manchester Spatial Framework (GMSF)<sup>51</sup> shows that there is some way to go before cross-boundary statutory planning becomes politically achievable.
88. Taking account of our earlier points about the benefits of a landscape-based approach to strategic planning, and these potentially difficult issues about the status and accountability of a national strategy, a pragmatic solution is needed which:
- retains key planning and development responsibilities and scrutiny at local authority level and ensures local authorities are properly resourced to do cross-boundary and multi-disciplinary work;
  - enables landscape-based strategies to emerge along the lines of National Park/National Park City models; and
  - guarantees that any formal larger-than-local planning strategies will be subject to proper democratic scrutiny.
100. All local and central government bodies need to share a clear mission for sustainable development, which would include:
- net-zero carbon;
  - resilience of the human habitat, of food and of natural resources in a changing climate;
  - recovery of nature and of people's connection to it;
  - integrated, sustainable movement of people and goods;
  - homes and commercial developments that are genuinely sustainable.

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<sup>50</sup> [CPRE-response-to-the-OxCam-Vision\\_consultation\\_Oct-2021.pdf](#)

<sup>51</sup> [Stockport votes to withdraw from Greater Manchester Spatial Framework | Planning Resource](#)

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

101. The Scottish Land Use Strategy is a requirement of the 2009 Climate Change (Scotland) Act.

102. The Welsh Government made a commitment to work towards 'One Planet' development over a decade ago and has enshrined this in legislation. This briefing paper<sup>52</sup> explains the duties of public bodies, and succinctly shows how housing, health, ecology and farming can be considered together on a cross-departmental basis.

103. As mentioned in question 1, Finland<sup>53</sup> has set cross-cutting targets to limit the consumption of natural resources to 2015 levels.

104. The Institute for European Environmental Policy IEEP has just published a report<sup>54</sup> on the relationship between environmental degradation and agricultural production, which highlights the need for action across the key emitting and polluting sectors in both urban and rural policy.

105. The policy outcome benefits of integration and cross-departmental, cross-sector action to tackle the combined emergencies of climate, nature, public health and energy – and very likely food security – are obvious and undeniable. In the context of the ongoing and deepening problem of housing affordability, spatial inequalities that operate at various geographical scales, and the urgent need to move away from road-led development models, there is a powerful case for a new approach spatial planning framework which is properly informed by sustainable development objectives.

106. In our view, the advantages of multi-disciplinary working across public bodies and across administrative boundaries are more crucial than any specific geographical basis on which spatial frameworks might operate, but they do need to be:

- transparent and democratically accountable, with full opportunity for public engagement;
- supported by clear, strong regulatory regimes;
- have implementation routes based on proper, consistent resourcing of public bodies, instead of relying on deal-based approaches where the capacity to implement is predicated on the capacity to bid.

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<sup>52</sup> [OPD-briefing \(theoneplanetlife.com\)](http://theoneplanetlife.com)

<sup>53</sup> [Finland's Circular Economy Programme sets targets to curb overconsumption of natural resources - Ministry of Economic Affairs and Employment \(tem.fi\)](http://tem.fi)

<sup>54</sup> [Environmental degradation: impacts on agricultural production \(ieep.eu\)](http://ieep.eu)

## **Conclusion**

12) *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?*

107. We take no position as to how functions and resources should be distributed within central government. However, we have set out in our evidence the need for proper integration across government departments, and the need for a shared mission to which all public bodies are committed (the Welsh 'One Planet' commitment is a good model for this).

108. Key policy documents such as the National Planning Policy Framework (NPPF) should be jointly owned by all relevant departments rather than just by one department (DHLUC in NPPF's case). This will mean that the targets and indicators within different policy documents can be integrated and jointly pursued; the much-needed multi-functional approach to land use should emerge much more easily from that type of policy integration.

109. Strategic groupings of local authorities should be encouraged and given genuine powers and resources, so long as there are suitable arrangements for their joint work to be democratically accountable.

**Paul Miner**  
**CPRE**  
**April 2022**