



The countryside charity
Hertfordshire

Land Use Consultation response from CPRE Hertfordshire

Introduction

CPRE Hertfordshire has reviewed the documents provided as part of the consultation and carefully considered the implications and our responses. We commend the principle of the need for an overhaul of how land use should be considered to take account of the demands on land, now and in the future.

Inevitably the real tests in our view will be the preparation of Land Use Frameworks at the appropriate strategic level and the commitments made within them to be implemented. In short, Land Use Frameworks need to have teeth and be integrated with the National Planning Policy Framework(NPPF) and with the National Significant Infrastructure Project(NSIP) regime to be meaningful.

Land use decisions have significant consequences and entail specific choices and priorities for potential activities and uses which need to be identified clearly. If these Frameworks are seen as just another set of rules to be circumvented by the drive for development they will fail in their purposes.

QUESTION 1: To what extent do you agree or disagree with our assessment of the scale and type of land use change needed, as set out in this consultation and the Analytical Annex?

[Strongly agree / Agree / Neither agree nor disagree / Disagree / **Strongly disagree** / I don't know]

Please explain your response, including your views on the potential scale of change and the type of change needed, including any specific types of change.

The use of percentages for specific land uses is profoundly misleading. In terms of the use of specific site areas for infrastructure installations, for example, it is easy to demonstrate that they show small totals of land used, misleading people into the view that such development can be achieved with little negative impact. This verges on the dishonest when it is clearly apparent that the impact of provision on the countryside is exponentially wider than the land covered by the development itself.

Just one example is the Sellafield nuclear plant in Cumbria which is visible from most of the western part of the Lake District National Park. It is crass and dishonest to suggest that only

site areas should be considered as basic assumptions regarding the analysis of the implications of national and other infrastructure.

Many other key factors are relevant in the consideration of the scale and type of change needed for an appropriate assessment of where such change should take places, particularly affecting agricultural land and the countryside:

- Increased impacts of flooding
- Increases in population needing more food
- Need to address current poverty levels through more home-grown food production
- Volatile global politics and international markets resulting in the UK needing to be more self-sufficient not less
- Damaging implications of the suggestion of greater efficiency leading to more intensive agriculture resulting in less care of habitats and environmental contexts
- Huge difference between loss of Grade 1, 2 and 3a land against lower categories effecting food production
- Ignorance of the role agricultural land plays in the Green Belt and beyond in separating urban areas and maintaining rural character
- Ignorance of the major impact of change on rural ways of life.

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

[Strongly agree / Agree / Neither agree nor disagree / Disagree / **Strongly disagree** / I don't know]

Please provide any reasons for your response including any changes you believe should be made.

Principles to support strategic spatial planning are self-evidently necessary to change how land use is considered with regard to economic and other forms of development. The five principles noted are however purely descriptive and generalised and essentially meaningless.

We are deeply concerned about the potential degree of change implied and the lack of consideration of the impact on the countryside and its value in multiple sectors. Indicating a change of 9% away from agriculture in addition to the implied 15% of land which is already urbanised is a massive change which would make the country unrecognisable.

This level of change requires much more robust protection of that which is valuable and highly valued and this is not reflected in the five principles outlined. Key protections need to be indicated at the outset, to form a firm foundation for policy and joint action. Initially these will include National Parks, National Landscapes and key protected areas in Local Plans including Green Belt.

We accept that innovation is needed in all aspects of land use and control but most attention should be focused on urban areas, transportation and using technology and innovation to assist with environmental challenges such as climate change and the loss of

biodiversity whose potential implications are uncertain. The principles identified indicate an unbalanced approach to spatial planning which will damage non-urban land to an unacceptable extent.

QUESTION 3: Beyond Government departments in England, which other decision makers do you think would benefit from applying these principles?

- **Combined and local authorities (including local planning authorities)**
- **Landowners and land managers (including environmental and heritage groups)**
- **Others (please specify)**

Clearly, a multi-agency approach is necessary to include all the institutions noted, as well as the wider participative mechanisms to ensure that there is the widest possible support from both urban and rural populations. Other organisations and institutions to be involved will include public and private bodies with large land holdings, including financial institutions, developers with land banks, foreign owners, trusts and interest groups which transcend “combined and local authorities” and “land-owners and land managers” however widely drawn.

QUESTION 4: What are the policies, incentives and other changes that are needed to support decision makers in the agricultural sector to deliver this scale of land use change, while considering the importance of food production?

The inadequacy of the treatment of the spatial principles outlined means that it is not possible to indicate the policies, incentives and other change necessary to support the level of change which is envisaged. It is necessary to establish at the very least a long-term framework that integrates food security, biodiversity recovery, carbon sequestration, and water management as a starting point.

Preventing prime farmland from being lost to non-agricultural developments that do not provide environmental benefits should be a guiding principle from the outset. Incentives will be needed to strengthen a wide variety of mechanisms, potentially including tax relief for the agricultural and non-urban sectors, to maintain and enhance environmental benefits alongside economic objectives.

We do not accept that the scale of land use change envisaged at this stage is either appropriate or necessary when the principles apparently guiding spatial planning in the future are so limited in scope.

QUESTION 5: How could Government support more land managers to implement multifunctional land uses that deliver a wider range of benefits, such as agroforestry systems with trees within pasture or arable fields?

This question is fundamentally misguided in seeking to identify local scale solutions in advance of the consideration of both the principles for spatial planning and issues such as financial incentives, policy support, research, and knowledge-sharing. Land managers may or may not be the most appropriate implementors of initiatives such as those suggested,

and specifying them at this stage is limiting the opportunities which may exist in the rural economy.

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

See response to QUESTION 8

QUESTION 7: What approach(es) could most effectively support land managers and the agricultural sector to steer land use changes to where they can deliver greater potential benefits and lower trade-offs?

See response to QUESTION 8

QUESTION 8: In addition to promoting multifunctional land uses and spatially targeting land use change incentives, what more could be done by Government or others to reduce the risk that we displace more food production and environmental impacts abroad? Please give details for your answer.

Monitoring land use change or production on agricultural land

- **Accounting for displaced food production impacts in project appraisals**
- **Protecting the best agricultural land from permanent land use changes**
- **Other (please specify)**

The Government should take full account of the need for the protection and enhancement of valuable and highly valued non-urban land as a primary spatial principle of land use change. The consideration of incentives should then follow the identification of the benefits which would be gained from preventing the transfer of food and environmental impacts abroad.

It is irrelevant to try and determine such incentives when it is assumed in advance that land use change is both necessary and beneficial. This is putting the cart before the horse and assumes that land use change is inevitable. Wherever innovation can protect land for agriculture and minimise the land loss for housing and renewables it should be incentivised, with tax breaks for example, and where such development is promoted lazily on good fertile land such schemes should be penalised.

The best way to provide land managers with certainty is for them to be required to adhere to the basic principles of maintaining BMV land for food production, rigorously maintaining the Green Belt and protected land. This would have the added benefit of encouraging development towards brownfield and previously developed land, as per Government policy.

Critical for the future of the countryside is to encourage farmers to farm and have the respect that they deserve for using their land and buildings efficiently for agriculture and rural land uses. So much currently acts against these objectives, including wildly fluctuating prices, and increasing incentives for alternative uses.

At the heart of the matter is the need to protect the best land for agriculture and by doing this linked to other planning issues including designated protected land including Green Belt. This will have the effect of encouraging farming, and maintaining the wide-ranging and well understood benefits of countryside adjoining our towns and cities

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

The introduction of the '30by30' concept in relation to this question, in the context of private investment in land use change, indicates the objectives of the Government with regard to the role and place of nature in the rural context. To note that 'nearly a quarter of England's land area' is "Protected Landscapes" is grossly to understate the significance of the countryside and leave most of it vulnerable to damaging land use changes.

Clearly we would support all initiatives to achieve the delivery of "objectives for nature, water, rural housing and climate in the Land Use Framework" if we knew what they were. These objectives are not specified and we are most concerned that their potential application appears to be limited to Protected Landscapes.

Government policy is focused on incentivising land use changes. Whilst some may be needed to meet housing and related demands and climate change and biodiversity objectives, much would need to change with Government incentives to commercial owners, for rooftop energy generation, for example, and the more efficient use of road and rail networks as is increasingly the case in mainland Europe

QUESTION 10: What changes are needed to accelerate 30by30 delivery, including by enabling Protected Landscapes to contribute more? Please provide any specific suggestions.

- **Strengthened Protected Landscapes legislation (around governance and regulations or duties on key actors) with a greater focus on nature**
- **Tools: such as greater alignment of existing Defra schemes with the 30by30 criteria²³**
- **Resources: such as funding or guidance for those managing Protected Landscapes for nature**
- **Other (please specify)**

We support fully the principle of maintaining and enhancing Protected Landscapes with a greater focus on nature, by which we mean the promotion of biodiversity and measures to tackle the deterioration of the countryside. This may be achieved by ensuring that all types of forestry and mixed land uses are properly rewarded within Sustainable Farming Incentives (SFI), Countryside Stewardship, and Landscape Recovery schemes.

A wide range of initiatives could provide significant benefits for land managers and farmers alike, and some are listed below:

- direct funding for planting trees in pasture and arable systems, ensuring financial viability.

- private-sector investment in carbon sequestration and habitat restoration within working farms.
- reduced tax burdens on land managers adopting agroforestry and regenerative agriculture
- encouragement of markets for sustainably produced timber, fruit, and livestock products from agroforestry systems.
- planning guidance recognising the benefits of agroforestry and mixed land-use models.
- Prevention of high-value farmland from being converted to single-use development where multifunctional benefits could be achieved
- recognition that tree-based farming systems can enhance productivity, soil health, and resilience to climate change.
- funding for trained advisors to support farmers in designing and implementing agroforestry systems.
- support for pilot projects and showcase successful case studies to build confidence among land managers.
- establishment of regional farmer clusters and knowledge-sharing groups to exchange practical insights.
- development of user-friendly digital tools and spatial mapping to help farmers integrate trees within their existing operations.
- reduction of bureaucratic hurdles in integrating trees within productive farmland.
- ensuring tenants have long-term security to invest in agroforestry without losing tenancy rights
- aligning forestry and farming regulations to remove conflicts that deter multifunctional land use adoption.

By implementing the above measures, the Government can create a more resilient, productive, and environmentally beneficial land use system that supports both food production and nature recovery.

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

A wide range of practical initiatives could promote and encourage nature and food production. These could include the following:

- Urban food forests: establishing edible landscapes with fruit and nut trees, perennial vegetables, and herbs in public parks and green spaces.
- Community orchards and gardens: encouraging local food production while enhancing biodiversity.
- Regenerative urban farming: using no-dig methods, composting, and companion planting to enhance soil health and productivity.
- Sustainable land management for recreational spaces and meadow creation in parks and golf courses: replacing intensively managed grass with wildflower meadows to improve biodiversity and reduce maintenance costs.
- Agroforestry in recreational areas: combining tree planting with food production and public access, creating diverse, productive landscapes.

- Natural flood management features: including wetland areas that provide biodiversity benefits while improving water quality and resilience to climate change.
- Planning incentives to include requiring or encouraging food-growing spaces in new developments.
- Community land trusts and partnerships: supporting long-term management of food-growing spaces with community involvement.

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

In resetting the principles for spatial planning for land use change which envisages a much broader context than appears to be being considered at present within this consultation, the Government should encourage the provision of benefits and manage trade-offs by the following provisions and actions:

- Tax relief, grants, or planning flexibility for developments that incorporate green roofs, urban food production, or sustainable drainage systems.
- Development of investment models (e.g. biodiversity credits, natural capital accounting) that reward developments delivering public and environmental benefits.
- Planning decisions to be informed by the long-term value of natural assets, factoring in carbon sequestration, flood mitigation, and health benefits.
- Ensuring that local planning authorities have access to GIS-based tools that identify high-value ecological areas, soil health zones, and optimal land use configurations to balance development with conservation.
- Developing a structured approach to assess economic, environmental, and social impacts when weighing competing land-use priorities.
- Bringing together stakeholders from housing, transport, agriculture, and conservation to coordinate planning and resolve conflicts early
- Developing clear reporting mechanisms where trade-offs between development and Strengthen Neighbourhood Planning and Local Nature Recovery Strategies, ensuring communities can shape land use in ways that deliver local and national benefits
- Extending the requirement beyond a 10% net gain to include broader environmental benefits like soil health, carbon sequestration, and water quality.
- Strengthening Environmental Impact Assessments (EIAs) and Strategic Environmental– Require developments to demonstrate how they maximize co-benefits and minimize trade-offs.
- Introducing a Land Use Mediation Framework; a formal mechanism to resolve conflicts between different land use priorities, ensuring balanced outcomes.

Embedding such strategies into spatial planning frameworks, would mean that the Government can ensure that infrastructure and development projects contribute positively to nature, climate resilience, and public well-being while managing unavoidable trade-offs effectively.

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

Key principles for transport planning should include the minimisation of land take for transport infrastructure of all kinds and how land adjoining road and rail provision can better meet wider land use and environmental objectives. When land is taken it is necessary to ensure that the benefits assessed include the environmental improvements in the areas that are relieved of damaging transport impacts.

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

Local Nature Recovery Strategies can be a crucial means of ensuring that objectives related to the protection of nature and the countryside are recognised. They need to be critical elements of policy relating to land use change in all areas but they are clearly not a sufficient response to enable coordination of all the sectors and outcomes which affect land use change at local and regional levels.

The adoption and monitoring of regional level plans incorporating all sectors of activity is necessary to establish more strategic planning objectives. These would give greater clarity in the competing demands for land uses, including specific guidelines for major land users such as solar installations and designated protected land, for example.

QUESTION 15: Would including additional major landowners and land managers in the Adaptation Reporting Power process (see above) support adaptation knowledge sharing? Please give any reasons or alternative suggestions

☒ **Yes** / No / I don't know]

Major landowners and manager should be included in all consideration of strategic planning and actions, not only with regard to planning for climate resilient land use change as is implied by this question. The biggest land-owners, for example the Crown Estate, can hold a big influence in some areas and including them in the process through regional strategic groups should achieve their buy in to a more logical use of their land and the implications of their decisions on others.

QUESTION 16: Below is a list of activities the Government could implement to support landowners, land managers, and communities to understand and prepare for the impacts of climate change. Please select the activities you think should be prioritised and give any reasons for your answer, or specific approaches you would like to see.

- Providing better information on local climate impacts to inform local decision making and strategies (for example, translating UK Climate Projections²⁹ into what these mean in terms of on-the-ground impacts on farming, buildings, communities and nature)
- Providing improved tools and guidance for turning climate information into tangible actions (for example, how to produce an adaptation plan for different sectors)
- Developing and sharing clearer objectives and resilience standards (for example, a clear picture and standards of good practice for each sector under a 2°C climate scenario³⁰)

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

Government should support all activities to prepare for the impacts of climate change.

Further actions should include:

- clear direction on restrictions of BMV agricultural land and critical Green Belt
- encouraging the greater and more intensive use of previously development land of all types
- incentivising innovation on location, for example, of solar solutions on buildings, car parks, etc to reduce unnecessary land take.

Questions 17 to 20 relating to data and information

CPRE Hertfordshire supports the most open access possible to all relevant sources of information relating to land use change, by land owners as well as all institutions and individuals controlling land.

QUESTION 21: What gaps in land management capacity or skills do you anticipate as part of the land use transition? Please include any suggestions to address these gaps.

- **Development and planning**
- **Farming**
- **Environment and forestry**
- **Recreation and access**
- **Other (please specify)**

In addition to the capacities and skills listed we would add the following:

- understanding the significance of geology
- understanding the economic impacts of land use change
- study of the impacts on flooding and water courses
- social impacts of developments with greater emphasis on wellbeing impacts.

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

The sharing of best practice needs to start at higher or further education levels to encourage farming as a rewarding career for young people. At present the perception is that it is either elitist or being constantly derided by Government.

Education in this area should including continuing professional learning as in other professions, including networking groups and an environment that encourages farmers to farm and maximise the environmental care of their land as part of the role.

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

- Yes, every 5 years
- Yes, every 3 years
- **Yes, another frequency or approach. Please provide details.**
- No
- I don't know

Given that a degree of certainty is needed, we would propose a light touch review every five years with a more major review every 10 years

QUESTION 24: To what extent do you agree or disagree with the proposed areas above? Please include comments or suggestions with your answer.

[Strongly agree / Agree / **Neither agree nor disagree** / Disagree / Strongly disagree / I don't know]

The extent of agreement or disagreement with the proposed four functional areas outlined will clearly depend on their content and effectiveness. Land use changes in the future should take full account of the value of the countryside in all its functions and characteristics.

Protection is necessary, particularly in, but not limited to, National Parks, National Landscapes and Green Belts which play vital roles in both urban and rural life. Recognition of the significance of protection should assist in the acceptance of necessary change within the countryside, taking account of its intrinsic value in the consideration of truly sustainable development.

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