

ENVIRONMENTAL POLICY FORUM

c/o Society for the Environment
297 Euston Road, London, NW1 3AD

Response to the Land Use Consultation

April 2025

Introduction

The Environmental Policy Forum (EPF) is a coalition of 14 professional bodies and learned societies promoting environmental sustainability and resilience for the public benefit. Collectively we represent over 110,000 qualified professionals across a wide range of different specialised disciplines, often working in industry or the public sector and many running successful businesses. Our membership runs across natural, managed and peri-urban/ built land types.

As a network of professional bodies and learned societies, we are well positioned to be able to offer expertise, resources, access to training and collaboration with educators and policymakers, to ensure effective implementation of the Land Use Framework and associated principles. We are more than happy to discuss further and illustrate our arguments with more examples and case studies from our extensive network of environmental professionals.

Overarching points

The EPF welcomes the introduction of a Land Use Framework. In calling for a Land Use Framework within our [ten environmental priorities for Government](#), published in June 2024, we noted the urgent need for a coherent approach to land use: 'Competing land uses require a more holistic approach to secure all the potential benefits of land. Currently flood risk management, forestry policy, agricultural policy and environmental policy operate in competing silos, with different policies undermining each other and agri-food interests dominating politically. Only government can coordinate activity across these different land use policies to maximise opportunities and synergies, avoiding perpetual conflict between policies to no benefit to the stated environmental objectives.'

Competing land uses require a more holistic approach to secure all the potential benefits of land and water. Land use and water management must be aligned and decisions must reflect consideration of implications and outcomes for both. A Land Use Framework must work alongside the Water Framework Directive and in compliance with Environment Act targets, in order to reverse the worrying decline in aquatic and terrestrial biodiversity.

We welcome the draft framework's commitment to an evidence, data-based approach and acknowledgment of the need to align with Local Nature Recovery Strategies. The framework should also align with similar frameworks and strategies in the devolved nations and incorporate considerations around how much water we need and where we get it from.

Having a Land Use Framework means recognising the integrated nature of natural assets, from trees, woodlands, forests, soil, biodiversity, and freshwater and the linked challenges of climate change and biodiversity loss. In doing so, a Land Use Framework brings with it many benefits and opportunities, such as:

- Presenting a framework to navigate trade-offs across different land uses, for example so we can deliver economic growth and housing infrastructure without causing environmental degradation.
- Providing confidence for local authorities, businesses, and land managers to make meaningful decisions about land and boosting investment in the process through policy certainty and stability.
- Informing and facilitating coherent decision making across policy areas which increases the chance of effective policy delivery. A Land Use Framework can help to deliver on many of our national targets, including on housebuilding, Net Zero by 2025 and the targets sitting underneath the Environment Act.
- Boosting public health and access to nature through brownfield regeneration and integration of green infrastructure.

One key limitation in the proposed framework is the underrepresentation of forestry and woodlands in the assessment of land-use change, which risks undermining some of the benefits and opportunities noted above. The framework's current focus prioritises transitioning 19% of high-emission agricultural land to alternative uses to address climate and nature goals. While reducing agricultural emissions is important, this narrow focus risks overlooking the significant role forestry and woodlands play in delivering climate resilience, biodiversity gains, and rural economic development.

As professional bodies, we play a key role in facilitating good practice sharing and consultation with practitioners. The Land Use Framework will be delivered by practitioners and therefore there will be a need for Government to undertake ongoing dialogue and engagement with stakeholders, ensuring transparency. We welcome that the framework's publication will be accompanied by tools to support land managers in practice and will actively ensure that these tools are known to our members.

Response to individual questions

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.

Somewhat agree. Land use change is needed to meet our wide-ranging needs for land. It is very likely that larger change will be needed than what is covered in the percentages set out in this consultation and analytical annex. For example, the Climate Change Committee's advice to Government regarding the Seventh Carbon Budget suggested that by 2050, 19% of UK agricultural land will be required to deliver the land-based net zero measures they recommend. Where possible, land should meet different needs and uses simultaneously.

Globally, farming and forestry represent the primary economic uses of cultivated land. The current Framework's focus on tree planting, without acknowledging the broader role of forestry, is a significant gap.

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.

Agree. We largely welcome the principles for land use set out and applaud the welcome long-term approach, flexibility to new developments/ local context, recognition for land to provide multiple benefits (social, economic, environmental, health) and the commitment to evidence-based decisions, in order to use land in a way that brings most benefits and least trade-offs.

We do feel that these principles could be expanded upon to greater effect. Most notably:

- While the use of data is referred to as a key part of shaping decisions, there could be a dedicated 'evidence-based' principle, with a commitment to liaising with practitioners to ensure those who deliver the framework are consulted every step of the way.
- We would like to see an additional principle dedicated to 'coherence across policy areas'. There are clear consequences to the years in which distinct but interconnected areas of environmental policy have existed in silos within Government, resulting in perpetual conflict between policies to no benefit to the stated environmental objective. Without a clear commitment to coherence across policy areas, the effectiveness of the Land Use Framework – including the navigation of trade-offs across different land uses – and other associated policies are at risk.
- An emphasis on the application of nature-based solutions wherever possible, through a principle of 'working with nature', rather than against it. The principle on 'playing to the strengths of the land' should also account for the potential strengths of the land to build natural capital.
- The 'responsive by design' principle should be clearer to note the need for urgent action (where agreed by stakeholders) in response to the Climate Emergency and Biodiversity Crisis.

It is essential that these principles are carried across into an updated NPPF to ensure that they are given appropriate consideration, particularly in the development of strategic plans.

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)**

In addition to the decision-makers noted above, we would call for the water industry to be included as they are heavy water abstractors, waste producers and potential polluters.

National Park and National Landscape Authorities should integrate the Land Use Framework policies into their Management Plans, as the best way of delivering national and landscape scale policy objectives. These Management Plans should form the statutory framework for public investment into land management.

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?

Incentivising sustainable farming will be key, recognised by the Government having committed £5 billion over 2 years to sustainable farming and nature recovery. However, we have concerns around the closure of The Sustainable Farming Incentive (SFI), which has paid farmers to manage land in a way that protects soil, restores hedgerows and boosts nature recovery. Incentivising vertical farming should be considered to reduce the pressure on soils and to save water.

We need a National Soils and Stones Policy to set the framework for reforming and implementing regulation and legislation pertaining to soil health and the beneficial reuse of soils and stones. This should be underpinned by effective metrics for measuring soil health, which can then be used to support decisions made in agriculture.

A lot of agricultural land is quite unproductive. By improving soil health, including by adopting regenerative agriculture, the land that is reserved for agricultural purposes can be more productive and increase food security. Improving soil health also has a range of other benefits including improving water quality, reducing the risk of flooding and storing carbon.

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?

Notable ways Government can support land managers include providing the following relating to multifunctional land use:

- Guidance
- Educational and training programmes
- Financial and functional incentives

Policies should be articulated using the National Character Area (NCA) map as a framework, in order to integrate national policy and local needs.

As professional bodies we're well placed to assist with dissemination of guidance and training to practitioners.

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

It is important that there is national scope and a joined-up approach, but data could be effectively used to identify areas where investment may need to be particularly encouraged, for example in areas which have poor public transport connectivity.

The Government should always consider the impact of land use on sensitive biodiverse areas. Biodiversity can't be offset to another part of the country without negative local impacts, including ones related to health and wellbeing, and access to nature.

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?

Good quality data, resulting in evidence-based decisions.

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)

Clarity on what Government considers an appropriate level of food self-sufficiency to ensure food security would be helpful.

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

As we note in our ten environmental priorities for Government, policy certainty is essential for encouraging private investment. It should be made clear to investors that Government policy is evidence-based, underpinned by good quality data and developed with a view to the long-term and the impact across policy areas'.

There should be good financial governance for the voluntary offset markets, to allow real estate value to reflect soil quality and its carbon sequestration/ retention potential.

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 criteria
- Resources: such as funding or guidance for those managing Protected Landscapes for nature
- Other (please specify)

In addition to the changes cited above, rewilding and habitat restoration are essential. Improving soil management across sectors is also vital, including greater awareness of existing good practice based on professional standards. One example of a useful resource is the [SILoToSOIL tool](#), which highlights the wealth of existing soil related expertise, guidance, and publications available across different disciplines and locations.

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

The EPF has longstanding concerns regarding the stretched resources of local and combined authorities. With the introduction of Spatial Development Strategies (SDS), it's important to stress that effective delivery of SDS will only follow if there is sufficient resourcing.

At present, despite representation in the NPPF and the Green Infrastructure Framework, incorporation of Green Infrastructure is too often treated as an afterthought in urban planning and does not achieve optimum outcomes for nature, food production or the environment. The NPPF should be updated to better prioritise green infrastructure in urban planning, encouraging a Green Infrastructure led approach to development design. This could be secured by requiring relevant Authorities to prepare area-wide Landscape Master Plans and/or Green/Blue Infrastructure Plans.

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

We support the Edge Debate's call for a National Land Use Information Framework (NLUIF) to enable the sharing of robust and up to date land use data across stakeholders including policymakers and businesses. This data will help with timely identification of co-benefits to land use and to inform the negotiation of trade-offs, with stakeholders across SDS borders able to learn from one another. Government should consider whether evidence requirements could be standardised and/or streamlined to better enable the delivery of co-benefits and trade-offs.

An effective planning system is essential to securing sustainable outcomes for the environment. However recent changes to the NPPF have undermined the planning system and will not enable full and appropriate consideration to be made of wider land use outcomes in decision making process. This needs to be addressed.

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

Land use decisions should be taken with sustainable transport planning in mind, such as using land that has good public transport accessibility and if developments will increase private vehicle traffic and pollution, to ensure these effects are mitigated or refused by the planning system. Negative impacts of linear infrastructure developments should be mitigated.

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

Through the NLUIF (see answer to question 12) and alignment with Local Nature Recovery Strategies.

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]

Yes. Major landowners and land managers should be expected to contribute data. Good monitoring and measurement is key to identifying the necessary improvements in land use.

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)

Priorities should be identified based on the evidence. All of the above are important, as is the development of a National Soils and Stones Policy to help improve soil and land management, reducing the amount of soil sent to landfill and contributing towards a circular economy.

QUESTION 17: What changes to how Government's spatial data is presented or shared could increase its value in decision making and make it more accessible? • Updating existing Government tools, apps, portals or websites • Changes to support use through private sector tools, apps or websites • Bringing data from different sectors together into common portals or maps • Increasing consistency across spatial and land datasets • More explanation or support for using existing tools, apps or websites • Greater use of geospatial indicators such as Unique Property Reference Numbers (UPRNs) and INSPIRE IDs to allow data to be more easily displayed on a map • Other (please specify)

Spatial data is a key tool to achieving sustainable spatial change. The robustness, clarity and accessibility of data should be the biggest priorities. Notably, increasing consistency across spatial and land datasets is essential for land use to be considered effectively at a national level. Alignment with similar frameworks and strategies in the devolved nations can also help with this. The Government should set expectations in respect of what datasets should be made available by relevant providers and how they should be formatted. Ideally, the Government's spatial data should be available through a single portal to aid accessibility and user experience, with further support being given to increase digital skills to assist with data upload and analysis.

QUESTION 18: What improvements could be made to how spatial data is captured, managed, or used to support land use decisions in the following sectors? Please give any reasons for your answer or specific suggestions. • Development and planning: such as environmental survey data • Farming: such as supply chain data and carbon or nature baseline measurements • Environment and forestry: such as local and volunteer-collected environmental records • Recreation and access: such as accessible land and route data • Government-published land and agricultural statistics

A joined-up approach to spatial data is essential and this could be coordinated by a central authority. To this end, we support the Edge Debate's call for the creation of a National Land Use Authority to manage the NLUIF. This authority should be positioned in Government so that it can link and coordinate the work of different government departments. This would address challenges related to Government departments existing in silos, a point emphasised within our ten environmental priorities for Government.

QUESTION 19: What improvements are needed to the quality, availability and accessibility of ALC data to support effective land use decisions?

Put simply, ALC data isn't reliable as it relies on out of date climate data, including for lowland peatland areas where over 40% of England's crops are grown, and likely means that we are overestimating farmland quality. The ALC must be updated with current climate data and lowland peatlands re-surveyed, to ensure that we can make evidence-based decisions to protect our food security and soil health.

QUESTION 20: Which sources of spatial data should Government consider making free or easier to access, including via open licensing, to increase their potential benefit?

British Geological Survey data should be included, especially [groundwater vulnerability maps](#) for water quality assessments. Increasing access to the HM Land Register would also be helpful.

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)

There are existing skills gaps and shortages, as identified through [EPF research](#) among other sources, within disciplines crucial to the land use transition including landscape, agriculture and forestry.

With approximately 9 per cent of land potentially changing use by 2035, there needs to be widespread investment in vital skills to drive this transition. Notable roles that will prove vital in this transition include soil practitioners, natural capital accountants, landscape professionals and waste recovery professionals. As noted above, land use and water management must be aligned. It follows that terrestrial and freshwater ecology skills are required and should work together rather than in silos.

We offer the following suggestions to address the skills challenge:

- The introduction of the growth and skills levy has the ability to ensure skills are developed in a more flexible way. This needs to account for continued funding for specialist level 7 apprenticeships, such as Soil Scientist. The investment in developing these highly skilled programmes to address workforce needs, has grown industry confidence of the quality and relevance of apprenticeships. Removing Level 7 altogether would damage much of the progress done over recent years to bring parity to this educational route.
- Increased investment in technical education can address new or evolving skills needs, whilst supporting accessibility of opportunity and diversity within the workforce. This could be in the context of apprenticeships, T Levels and Higher Technical Qualifications. This investment can help expand the pipeline of applicants and reduce skills gaps.
- Targeted use of the Adult Skills Budget can enable transition of skills to meet the demands across sectors. With recent announcements of 6% cuts in this area, there is the risk that this could reduce the ability of delivering the skills that individuals need, and employers value, to enter the workforce for the relevant sectors.
- Continued investment from the National Skills Fund can enable regional Bootcamps to address shorter term skill needs. The addition of national Skills Bootcamps could help to address the wider skill needs which are needed to deliver the land use transition and are sometimes restricted by a regional approach.
- The challenge of variation of provision in the devolved nations makes navigating the skills sector complex, especially for employers in sectors that operate UK wide. There would be

great benefit to bring connections across these systems to support sector wide skills solutions and employer support (with full UK overview of the skills systems).

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

By ensuring that there is an effective coordinating body managing the best practice sharing. As noted in our response to question 18, we feel this should be through the establishment of a National Land Use Authority.

In addition, professional bodies and learned societies play a key role in facilitating good practice sharing amongst professionals at all levels. Such professionals possess the knowledge and experience of delivering on the ground and their best practice should be shared wherever possible to achieve widespread improvements.

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

The data on the NLUF should be updated continuously to ensure that decisions are made using the most up to date information. An overall review of the framework should then take place every five years.

QUESTION 24: To what extent do you agree or disagree with the proposed areas? Please include comments or suggestions with your answer. [Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / I don't know]

- A strategic oversight function to ensure the right information and policy is in place to enable delivery against a long-term land use vision;
- A cross-governmental spatial analysis function to produce evidence-based advice on strategic implications across different demands on land;
- Processes to embed land use considerations in strategic Government decisions;
- Open policy-making processes in collaboration with research organisations.

Agree. We welcome the plan for policy co-creation and the joined-up, evidence-based approach taken. We call for professional bodies and learned societies to be included in the open policy-making process, given our roles as knowledge disseminators and representing practitioners who will deliver the Land Use Framework in practice.

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Notes:

1. The Chartered Institute of Ecology and Environmental Management (CIEEM) is the leading professional membership body representing and supporting over 7,300 ecologists and environmental managers in the UK, Ireland and abroad. Their vision is of a society which values the natural environment and recognises the contribution of professional ecologists and environmental managers to its conservation. cieem.net

2. The Chartered Institution of Wastes Management (CIWM) is the leading professional body for the waste management sector representing over 5,500 individuals in the UK. Established in 1898, CIWM is a non-profit making organisation, dedicated to the promotion of professional competence amongst waste managers. CIWM seeks to raise standards for those working in and with the sector by producing best practice guidance, developing educational and training initiatives, and providing information on key waste-related issues. ciwm.co.uk
3. The Chartered Institution of Water and Environmental Management (CIWEM), is the leading independent Chartered professional body for water and environment professionals, promoting excellence within the sector. ciwem.org
4. The Institute of Chartered Foresters (ICF) is the Royal Chartered home for tree professionals across the UK. It is the only UK body to offer both Chartered Forester and Chartered Arboriculturist titles. As part of its ongoing strategic objectives, the Institute regulates standards of entry to the profession; supports members and provides guidance to professionals in other sectors; offers educational advice and training to both students and tree professionals seeking to develop their careers and works to foster a greater public awareness and understanding of forestry and arboriculture. charteredforesters.org
5. We are the Institute of Environmental Management and Assessment (IEMA). We are the global professional body for over 20,000 individuals and 300 organisations working, studying, or interested in the environment and sustainability. This is a growing and evolving profession, and we are committed to supporting, encouraging and improving the confidence and performance as well as the profile and recognition of all environment and sustainability professionals. iema.net
6. The Institute of Fisheries Management (IFM) is an international organisation of people whose aim is to support and promote sustainable fisheries management for the benefit of our members, fisheries, wildlife and society. ifm.org.uk
7. The Institution of Environmental Sciences (the IES) is at the forefront of uniting the environmental sciences around a shared goal: to work with speed, vision and expertise to solve the world's most pressing environmental challenges, together. As the global professional membership body for environmental scientists, we support a diverse network of professionals all over the world – and at every stage of their education and careers – to connect, develop, progress and inspire. the-ies.org
8. The Institution of Royal Engineers (InstRE) is a learned society of over 10,000 members that seeks to advance the art and science of military engineering by sharing experiences, best practice and emerging thinking. instre.org
9. The Landscape Institute (LI) is the chartered body for the landscape profession. It is an educational charity working to promote the art and science of landscape practice. The LI's aim, through the work of its members, is to protect, conserve and enhance the natural and built environment for the public benefit. The Landscape Institute provides a professional home for all landscape practitioners including landscape scientists, landscape planners, landscape architects, landscape managers and urban designers. landscapeinstitute.org

10. The Society for the Environment (SocEnv) defines the standards for professional competence in environmental practice, ensuring key decisions are made by verified professionals. Having received a Royal Charter in 2004, we license professional institutions to award the Chartered Environmentalist (CEnv), Registered Environmental Practitioner (REnvP) and Registered Environmental Technician (REnvTech) professional registrations. There are now over 8,000 registered environmental professionals, sharing a common vision of delivering a sustainable future shaped by environmental professionalism. socenv.org.uk