

Question One: 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 [Annex A]?

Our response to Question One: We neither agree nor disagree

We are mostly content with the scale and type of land use change needed. However, we have areas of concern which are detailed below.

We encourage greater change of use of land for mitigation of flood and coastal erosion but understand the need for pragmatism. Although the proposals appear to include flood and coastal protection measures which are integrated into broader land use strategies, greater detail is needed.

The creation/restoration of coastal and lowland heathland habitats may require grazing to achieve best outcomes. The assessment seems to increase space for more nature-rich habitats and delivering ecosystem services without proposing too drastic reduction in agricultural land. However, we are concerned that there is no reference to local nature recovery strategy work.

The following are areas which are not clear from a climate perspective:

- What extent land use change driven by reductions in livestock is accounted for.
- Whether the analysis is adequate for the need for land for adaptation and the potential loss of land due to climate impacts.
- What extent the analysis reflects government's targets for ELMs uptake.

It unclear whether the scale of change identified is appropriate as the methodology is not clear:

- Estimates of scale should be scenario-based rather than absolute projections.
- Estimates appear to be potentially lower than those made by the CCC for climate change.

Question Two: Do you agree or disagree with the land use principles proposed? [Annex B]

Our response to Question Two: We neither agree nor disagree

A fair and just transition should be at the heart of the framework. It should be supported by a robust socio-economic impact assessment with emphasis on the considerations for rural communities and economies, recognising the urgent land use-related questions of fairness in drivers of land use change.

Principle One should note the importance of local visions for land use and ensuring participation from local stakeholders.

Principle Two should note it will facilitate clarification of the land-demand implications of new policy and targets and any identified gaps.

Principle Five should note the importance to how LUC measures are spatially distributed as an aspect of resilience.

More detail is required and reference to erosion and flooding as this will pose a risk to coastal communities. Under Category 4 land use, there appears to be no mention of using geological features for environmental purposes. Some of the principles feel similar to the Local Nature Recovery Strategy (LNRS) statutory guidance, and we wonder whether this could cause confusion.

Principles Four and Five likely need guidance on which data to use taking consideration of the long-term, with clear system for notifying when new data is available.

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

Our response to Question Three:

- Combined and local authorities (including local planning authorities)
- Landowners and land managers (including environmental and heritage groups)
- Specific functions within local authorities (local planning authorities, local transport authorities, etc...)
- Environment Agency
- Natural England
- National Landscapes, LNPs and conservation bodies
- Utilities companies
- Downstream food system processors and wholesale/retail procurers
- Housing and infrastructure developers
- Investors in land-based interventions, particularly nature-based solutions
- Community groups (community energy groups, etc...)
- Agricultural or land-based colleges and universities

Question Four: 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?

Our response to Question Four: Certainty on strategic direction through the framework and attendant farming roadmap, which should clarify spatial priorities and give confidence in consistency of delivery incentives and promotes the importance of combining land sharing sparing interventions.

Incentives for food security/production should include using agritech to increase the productivity of food production by targeted technology use. There should be strategic resourcing and support for research to develop climate-resilient crops, innovative farming techniques and provision of training to deliver peer support to share best practices and further integration of landowners within non-agricultural interventions and strengthening matchmaking between farmers and energy local clubs. The use of Local Nature Recovery Strategies to evidence good practice and a joined-up approach between work on farming roadmap and food strategy and local work with farmers on LNRS is recommended. A national Food Strategy with clear spatial prioritisation ensuring a combination of land sharing and sparing. Robust demand-side measures will be important for this work. Additionally, a monitoring regime that ensures, KPIs which measure progress for non-food outcomes relative to food output.

Question Five: 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?

Our response to Question Five: The Government could support through consistency, joining up government initiatives where connected with similar purposes. Disconnected initiatives which are similar but not connected at a government level can cause confusion for landowners – which results in a lack of trust at a local level. For example, changes to Environmental Land Management impacts farmer trust, causes confusion and reduced confidence in change-making if there is a perceived risk that funding may be withdrawn.

We would welcome robust opportunities assessments at the farm scale accompanied by quantified business model options. facilitating through national tools/services or financed through ELMs with requisite consideration of standards sufficient to provide trust, and the capacity of the advice sector and suitable provision for stacking and bundling within financial incentives.

Question Six: What should the Government consider in identifying suitable locations for spatially targeted incentives?

Our response to Question Six: The Government should consider the use of Local Nature Recovery Strategies (LNRS) to identify whether individuals and organisations are doing work with aligns with the written strategy.

Locational factors that should be considered in spatial targeting of incentives include:

- Relevant local plans and policies (Local Plans, LTPs, LNRS, LAEPs etc.)
- Agricultural grade
- Geophysical conditions (soil, topography, local climate, geomorphology, hydrology)
- Historic use and heritage value
- Landscape character
- Current and future (to 2100) climate resilience risks
- Current and potential sequestration potential
- Current and potential biodiversity value (e.g. defragmentation potential)
- Current and potential socio-economic value (including jobs and GVA potential, health and amenity services)
- Development potential (including linked factors like connectivity and grid constraints)
- Land-owner/tenant attitudes
- Community attitudes
- Non-local impacts of land use change
- Mitigation hierarchies
- Polluter pays and precautionary principles

Question Seven: 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?

Our response to Question Seven: We consider that particular emphasis should be given to:

- Integration with sub-national spatial plans as this is key to giving consistent steer on locations;
- Clear guidance on best practice, particularly peer-to-peer;
- Understanding geological features and the greater picture, such as infrastructure requirements;
- Greater collaboration with farm clusters;
- Robust and low-cost farm/-scale tools for farm-scale assessment and clear guidance on best practice, particularly peer-to-peer;
- Build on or combine with resourcing the LNRS processes.

To note also that although some land uses are out of scope often land managers have wanted to facilitate conversations around these. This means there may be potential to broaden the scope of engagement, even if the outputs feed into slightly different strategies and spatial planning tools.

Question Eight: 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.

Our response to Question Eight: 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.

All three areas suggested are important. Additionally, a Food Strategy with clear spatial prioritisation for food production by agricultural commodity, ensuring a suitable combination of land sharing and land sparing with a clear place for sustainable intensification and robust action on demand-side interventions. Additionally, farm productivity incentives in FIF should be clearly aligned and monitored.

The monitoring regime must ensure, wherever possible, that KPIs measure progress for non-food outcomes relative to food output.

Border adjustment mechanisms, particularly for carbon, should be implemented. Suitably high standards should be embedded within future trade deals to ensure domestic farmers are not disadvantaged.

Through monitoring land use change or production on agricultural land within the LNRS engagement process, we have identified many local farmers feel they report on what they are doing, but that this stays with the RPA. LNRS responsible authorities could have a role in coordinating this information locally, utilising the categories of land use change proposed in this framework and 30x30 criteria. This would mean that measurements were consistent nationally and focused locally.

Question Nine: What should Government consider in increasing private investment towards appropriate land use changes?

Our response to Question Nine: Varying needs and interests impose varying requirements on conditionality/additionality/permanence/ regulatory demands. This, and the difficulty of individuating some ecosystem services, could make stacking and bundling hard and risks piecemeal agreements - it may take a strategic intermediary to facilitate this, but also require further clarity on regulations. Other specific examples include:

- Clarity on how emerging nature markets work both for those investing and wishing to access the market. Private investors encouraged to use spatial data to decide projects to invest in.
- Productivity improvements and agricultural climate resilience should be more clearly recognised as a service that benefits downstream food industry businesses, and mechanisms developed to strengthen their investment
- Opportunities for strengthening regulatory-driven investment, particularly through Ofwat and Ofgem price review processes
- Local strategic facilitation of delivery through brokerage services and pre-emptive supply
- Strategic facilitation of carbon offsetting for residual emissions from hard-to-decarbonise sectors, supported by clear national policy on where responsibility for financing offsetting lies
- Clear frameworks for land acquisition, leasing and mechanisms for the preferential retention of local and community ownership

A simple and clear upfront payment for delivery, with minimal further involvement if there was sufficient assurance about delivery and clarity and certainty on costs for early stage of works

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

Our response to Question Ten:

- 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)

Dorset's vision is for a carbon neutral, nature positive and resilient Dorset achieved through clean, green and fair transition that generates prosperous, stronger and healthier communities. PLs should not be a barrier to growth that is nature and climate positive but should act as an additional brake on development which is harmful to nature and climate. To achieve 30x30 and the apex goal of living in harmony with nature, PL organisations are uniquely placed to trial innovative approaches and find solutions. To achieve this, they require (in order of priority):

- Long-term stability in core and activity funds
- To be considered the priority areas for investment in land use change via ELMS
- Strong statutory guidance for the implementation of CROW Act s85 by all relevant authorities

As a county with 2 Protected Landscapes, it is important for Dorset that any growth through PLs is nature and climate positive and supports 30x30. We would also suggest that LNRS review and measurement could be based on the 30x30 criteria to ensure consistency. Long term funding of both core and grant funding is required for convenors and those delivering on the ground nature recovery.

Planning can help balance economic growth and the preservation of protected landscapes, allowing both to coexist harmoniously. Additional restrictive legislation or planning constraints in protected landscapes may not be necessary. Support and funding to promote rural exceptions sites and community led housing projects is vital to providing affordable accommodation in these rural areas.

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

Our response to Question Eleven: The use and provision of community gardens and orchards. As well as this, development should be prioritised on brownfield sites, not open land or green belt. Development opportunities on brownfield sites may be limited. Brownfield sites can be more complex to bring forward and will also be subject to environmental surveys.

Initiatives like wilder parks initiatives are beneficial and an increase in nature-based solutions in development. Some examples of this include Sustainable Urban Drainage systems (SUDS) and green infrastructure embedded in new development.

We would also emphasise that the use of diverse sown mixes for amenity grassland and a no-fertiliser, no pesticide regime will support nature recovery even in the most hard-used areas. An example of good practice of this is the Poundbury Great Field project.

We would recommend a funding pot for small projects which fall outside of ELMs, BNG, protected landscape area, etc but still enable space for nature. This would showcase that all sectors are contributing to nature recovery, motivating further action.

We would also welcome additional funding for the nature town and cities fund. Longer lead times would be desirable to prepare applications. For community growing projects, a small amount of funding is also needed for some staff time to embed the project and ensure its long-term success

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

Our response to Question Twelve: This will involve a mix of stronger guidance, analytical tools, regulation, incentives and policy & standards that support things like stacking and bundling. The Spatial Development Strategies seems a positive step for ensuring a sub-national tier of land use change planning.

Government should as a priority be considering the opportunities to formalise carbon offset requirements through systems aligned to BNG, through appropriate stacking and bundling rules and to suitable offset standards, as part of a national offset strategy.

Examples of using energy infrastructure development to fund co-benefits include Alaska Wind Farm in Dorset. Ongoing work on community benefits for energy infrastructure is critical. Government should ensure broader scope of this to other forms of infrastructure, very carefully consider the balance of financing costs through regulator's price control mechanisms, ensure flexibility to local context in the design and delivery of benefits and enable community ownership to be integrated into initiatives. The integration of the framework within the emerging RESPs will be critical for realising co-benefits and mitigating barriers to synergy maximisation inherent in locational choices by grid constraints.

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

Our response to Question Thirteen: It makes sense for new settlements to be located along strategic or upgraded transport routes.

Transport link upgrades should also be nature-positive in themselves – verge treatments such as Weymouth Relief Road should be standard.

We would also recommend referencing the local nature recovery strategy and maps.

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

Our response to Question Fourteen: Funding a post to coordinate between the different teams and organisations responsible for different plans and strategies.

Integration will require giving the framework statutory weight, with clear statutory duties for relevant stakeholders. A LUF is needed, but some principles and guidelines and a few tools will not solve the problems a LUF is needed to solve. A robust framework integrated across scales and with other policy and strategy is essential.

As there are many existing sub-national spatial plans/strategies which will need to be coordinated a single map of these would help, as well as embedding instruction to ensure their alignment within any statutory guidance. It should be considered how the work to develop these plans could be aligned. This could enable learning and non-duplication from the data-gathering and stakeholder engagement efforts involved in existing strategies.

There is also a fundamental analytical gap, resolution of which would be the most effective way to resolve the coordination challenge operationalising the framework by developing a consolidated options analysis tool enabling holistic spatial modelling, comparisons and scoring of areas/interventions to inform decision-making.

Question Fifteen: 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

Our response to Question Fifteen: Yes

- It would likely catalyse more risk identification and adaptation action in critical areas, particularly for the food system, development, and offset planning.
- It would enable more consistent methodological assumptions in underlying risk assessments (particularly in the choice of RCPs/GWLs, dates, and choice of underlying climate projection datasets).
- That consistency would also support easier input of landowner/manager input into county-scale adaptation assessments, strategies and governance/partnerships – supporting understanding of both localized system interactions and cascade risks, and more joined-up action at the local scale.

Critically, it could also serve to foster bottom-up identification of land loss risks, thereby helping to better plan the resilience of the UK's land use ambitions in aggregate.

Question Sixteen: 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.

Our response to Question Sixteen:

- 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)

Information provision

- Data on potential climate change impacts on habitats/land would be helpful when mapping potential for habitat to improve carbon sequestration in LNRS and provision of accessible representation of UKCP at local scales. As well as translation of UKCP hazards variables into scenario-relative likelihoods and standard sector-specific impact typologies.

Tools and guidance

- Common risk templates with standardised choices of hazard type and strategy/action plan templates including standard sector-specific typologies of actions. A government review wider of relevant policy ensuring integration with ELMs and guidance on areas of uncertainty pertinent to interpretation.

Supporting the right actions

- Clearer sector- and scenario-specific objectives/standards with emphasis on mitigation practices for risk areas which could have a significant impact on land use patterns.
- Prioritisation based on resilience should be carefully implemented. The framework should integrate with the NAP.
- Spatial prioritisation of incentives based on climate resilience to carefully involve iterative ranking, climate resilience can be improved through adaptation interventions, the costs may be preferable to outcomes attainable in other locations.

Question Seventeen: What changes to how Government's spatial data is presented or shared could increase its value in decision making and make it more accessible?

Our response to Question Seventeen:

Changes to support use through private sector tools, apps or websites

- Bring data from different sectors together
- Increase consistency across spatial and land datasets
- More explanation or support for use

Bringing data from different sectors together into common portals or maps

- LNRS data viewer is an admirable attempt to bring together various data sets into one place, it would be useful for this to be accessed by all
- Locally, the LNRS attempts to use different data to identify high opportunities – we would like to signpost people to other data sets they may find useful
- Several different projects and tools which can be used to create opportunity mapping. Whilst this may be beneficial for different purposes or learning best methods it can be unclear how they all fit together.
- Government should create a single portal with layers pulled from APIs to show all these layers in one place. Additionally, greater use of not just UPRNs, but USRNs, TOIDs and other indicators would be very helpful, with any further common indicators included within OS's Open Linked Identifiers product.

Question Eighteen: 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.

Our response to Question Eighteen:

- 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

Supporting LAs updating LNRS maps, displaying with other spatial data and more data on public attitudes/issues around land ownership. Grant permission to share ELMs info with LAs for LNRS reporting to avoid duplication. Funding for species/habitat surveys as part of ELMs and support local environmental records centres as well as consolidate learning from citizen science pilots.

Develop options analysis tool that enables spatial modelling/comparisons and scoring of areas/interventions to inform decision-making. The tool could encode guidance on optimal scenario-relative land use allocations at subnational scales to align with national targets. Foster long-term investment/resource planning, embedding a monetary costing facility using transparent/locally adjustable discount rates and monitoring of delivery against the LUF using locally-uploaded data to support integrated national monitoring.

Ensure non-local impacts and national spatial fairness questions are modelled/monitored. The methodological consistency in a single national tool could help to ensure multi-scale and cross-border coherence, interoperability, integration and commensurability – by facilitating standardised data repositories and modelling assumptions.

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

Our response to Question Nineteen: We would recommend continuing the Cranfield university project to create a new Predictive ALC map for England and work on improving data/map of all land - not just ALC near the urban fringe.

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

Our response to Question Twenty:

- Supporting wider access and use of DNO geospatial datasets on constraints and for DFES projections (recognizing the significant progress on this in recent years)
- Free access to OS network layers.
- Wider access to modelled layers on low carbon tech opportunities that have been created by Advanced Infrastructure for the LAEP+ tool.

Question Twenty-One: 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.

Our response to Question Twenty-One: Actions relating to skills and capacity which were identified from Dorset LNRS stakeholder engagement

- Working with architects, builders and roofers to raise awareness of the potential impacts of development on wildlife and benefits of seeking ecological advice early on
- Guidance for developers to consider SuDs at an early stage of design/planning
- Training to landscape architects/grounds maintenance teams on wildlife-friendly gardening practices
- Hosting farmer/forester-led events to enable learning about sustainable practices
- Include sustainable farming/sustainable forestry and land manage/conservation courses in local college curriculum
- Support rural skills development/rural workers to strengthen the nature-based local economy
- Sharing advice to help develop and implement a land management plan
- We are using the Nature Recovery Dorset network to provide a space to showcase individual practice and facilitate learning between neighbours.

Question Twenty-Two: How could the sharing of best practice in innovative land use practices and management be improved?

Our response to Question Twenty-Two: Sharing of best practice could be aligned with the LNRS review period – we are unclear what this is as government undecided but understand this to be 3-10 years. Aligning them if possible could avoid too much expectation on people's time to be part of co-production and consultation fatigue. This would also usefully link the two things together.

Other improvements could include strengthening capability and capacity in this regard for third-party advisors (e.g. land agents), peer-networks, and landscape-scale entities (e.g. National Landscapes or farm clusters).

Question Twenty-Three: Should a Land Use Framework for England be updated periodically, and if so, how frequently should this occur?

Our response to Question Twenty-Three: Yes, another frequency or approach

Data refreshes should be live or updated as regularly as possible. The Framework itself should be updated on a timeframe optimized to other spatial strategies. The fundamental problem is that spatial strategies are not in phase – so most importantly, the creation of a framework is a critical opportunity to establish a more coherent periodicity for the plurality of national and local spatial strategies.

Question Twenty-Four: To what extent do you agree or disagree with the proposed areas above? Please include comments or suggestions with your answer. [Annex C]

Our response to Question Twenty-Four: Agree

- The scope of these functions and processes should extend to arms-length bodies like Natural England and NESO, or have clear mechanisms for interacting with and appraising them
- An independent critical monitoring entity should be appointed (akin to the CCC or OEP)
- These functions should have clear channels for periodic ongoing feedback and info-sharing with subnational scales, including at least upper-tier local authorities. Government might also consider the establishment of sub-national land use change governance/partnerships (akin to the emerging RESPs), and help use these to coordinate subnational efforts, support bottom-up monitoring, share good practice, set area-based visions, targets and action plans that align to the national targets, and facilitate dispute resolution. These could learn from the FFCC pilots and be supported by appropriate facilitation tools. The new burdens implications of such should be appropriately addressed
- The remit of the strategic oversight function should have a strong remit to assess policy related to all major indirect drivers of land use change and land use demand (e.g. diets and food waste, planning policy on rooftop solar)
- A cross-governmental spatial analysis function to produce evidence-based advice on strategic implications across different demands on land.

Annex A: Analytical Index

Analytical Index

Annex B: Proposed land use principles

1. Co-design: Support for participation and leadership at the local and regional scale to develop and align spatial strategies and assess the fairness of changes in land use.
2. Multifunctional land: Enable multiple benefits on land, targeted according to opportunity, societal needs (such as the health benefits of co-locating new homes and nature), and environmental pressures (such as reducing pollution).
3. Playing to the strengths of the land¹⁸: Support and spatially target land use change to locations where benefits are greater and trade-offs are lower. Give priority to land uses that are more scarce or spatially sensitive (for example grid capacity places restrictions on new renewable generation sites or protecting land that is best suited for food production).
4. Decisions fit for the long-term: Take a long-term view of changing land suitability, prioritising resilience (including to the impacts of climate change). This could include planning for new homes that are resilient to climate impacts, such as flooding and overheating.
5. Responsive by design: Land use policy, including spatial prioritisation and targeting, needs to be responsive to new data, opportunities and pressures.

Annex C: Proposed broader changes to land-use policies

For this process to be meaningful, we know that Government will need to speak with one voice on land use and clarify how its different policy objectives interact spatially. Implementing the principles in this consultation (page 18) would support this, but broader changes to how the Government coordinates land-related policies across departments may also be required. Government will consider how best to co-ordinate and provide:

- 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.