CONSULTATION

Response Document

Land Use Consultation - Defra

Closes on the 25 April 2025

1. Introduction

1.1 About CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM) is the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland.

CIEEM was established in 1991 and has over 8,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. It therefore has a considerable breadth and depth of professional expertise from which to draw upon, when for example, responding to Government consultations such as the one currently circulating.

CIEEM has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines. CIEEM was instrumental in helping to form and inaugurate the All-Party Parliamentary Group for Nature in 2019 which existed until 2023; its remit has now been incorporated into the APPG for the Environment which CIEEM is actively supporting.

CIEEM is a member of the following organisations/collaborative initiatives:

- Scottish Environment Link
- Wildlife and Countryside Link
- Northern Ireland Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

1.2 Forward

The Government has launched a ‘national conversation’ about land use, with the aims to minimise trade-offs and optimise land use. The consultation explores the land use changes implied by commitments to restore nature, support food production, improve climate resilience and deliver new housing and infrastructure.

It seeks views on the type and scale of land use changes that might be needed, as well as the actions the government could take to support this.

2. Consultation 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**
- ☐ **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: (1250 character limit)

- Framework is incomplete, with evidence gaps and flawed assumptions
- Underestimates the scale of land-use change needed to meet environmental, climate, and societal targets
- More strategic approach needed to identify high-value areas and enhance land use based on ecological and social strengths
- Framework too focused on agriculture and food, neglects soil health, water resources, nature, and climate resilience

- It risks failing to meet government targets like 30x30, species recovery, water quality, and net zero
- Needs clear assessment of Environment Act targets and habitat needs
- Aquatic ecosystems are overlooked; riparian buffers play a key role in habitat creation and water quality improvement
- Wetlands, saltmarshes, and floodplain meadows are underrepresented despite their ecological and productive value
- The framework lacks analysis of access to nature and risks reducing public access
- Climate vulnerability factors are not integrated into land use planning
- Categories 1 and 2 land are excluded from transformation strategy despite their suitability for agroecology and sustainable systems
- Nutrient management strategies are missing, with no support for circular approaches or regulation of harmful contaminants
- Housing land use change is oversimplified, ignoring infrastructure needs, cumulative impacts, and alternatives like brownfield sites
- Ignores international trends and trade (e.g. Ukraine's grain export capacity).

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

☐ **Strongly agree**

☐ **Agree**

☐ **Neither agree nor disagree**

☑ **Disagree**

☐ **Strongly disagree**

☐ **Don't know**

Please provide any reasons for your response including any changes you believe should be made: (1250 character limit)

Recommend additional principle:

““Respecting ecological integrity: ensure decisions contribute to the maintenance and enhancement of critical natural infrastructure and natural capital. This should include prioritising land uses that connect, buffer, enhance and expand important habitats and species populations to create thriving and resilient ecological networks that support biodiversity and associated social benefits, and economic resilience.”

- Principles need to be integrated into Local Nature Recovery Strategies and 30x30.
- Critical gaps remain: need explicit commitment to avoiding harm to nature and stronger protections for designated and irreplaceable habitats.
- Multifunctional land use must not justify degradation of high-nature-value areas; restoration and sustainability must be priorities.
- Ecological connectivity must be explicitly addressed to prevent fragmentation and support viable wildlife populations.
- Concern with Principle 2: focus should be on meeting environmental targets, not vague “co-location” of housing and nature.
- Overprotection of “prime farmland” risks harming ecologically rich areas; safeguards are needed.
- Framework must align with broader strategies (Farming, Food, Animal Welfare, Planning, Flood Management).
- Acknowledge need for food system change, including reduced meat consumption to free land for nature-positive farming.

- Principles must drive nature recovery, climate resilience, and sustainable food systems.

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

Please provide additional detail in the text box provided. (1250 character limit per category)

☑ Combined and local authorities (including local planning authorities)

☑ Landowners and Land managers (including environmental heritage groups)

☑ Other (please specify)

All of the above.

- Introduce statutory duties for authorities to support Climate and Environment Act targets via the Land Use Framework (LUF).
- Local Planning Authorities (LPAs) critical; must embed LUF principles in plans, policies, site allocation, and LNRS delivery.
- Support training, funding, and monitoring and enforcement resources for local authority staff.
- Align LNRSs with national environmental targets and LUF land use change.
- Combined and local authorities must use LUF to guide land use decisions, considering trade-offs and benefits.
- Stronger duties needed for LPAs to align with LNRSs and environmental targets.
- Highways Authorities should apply LUF in Rights of Way planning, enhancing access to green/blue spaces.
- Local authorities should use public land to deliver biodiversity, climate, and wellbeing outcomes (e.g. reduced mowing, wildflower verges).
- Extend principles to council-owned farms, Crown Estate, institutional land.
- Strategic Development Strategies must reflect LUF policies and land use change.
- Landowners/managers (e.g. NT, Wildlife Trusts) should apply LUF evidence to guide decisions, supported by fiscal incentives.
- Public bodies (e.g. Forestry Commission, water companies) should align with LUF—consider statutory nature duties.
- Catchment partnerships should use LUF for place-based planning.

- Include investors, banks, credit providers, military, church, Crown land—all influencing land use.

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? (1250 character limit)

- Incentivisation must avoid promoting inappropriate land use change; quality over quantity.
- Schemes diluted to hit targets; reduces environmental benefit.
- Farmers need certainty: mid/long-term funding, agri-environment schemes, BNG, habitat creation, innovation for sustainable food production, stacking/bundling schemes.
- Financial support must be flexible, area-specific, and integrated across departments.
- Ensure tax regimes, regulation, and enforcement discourage harmful practices.
- LUF lacks clarity on mechanisms to drive land use change and linkages with overlapping strategies (e.g., Food Strategy, Farming Roadmap, EIP, CCC targets).
- ELM funding must increase; especially for high-ambition tiers like Landscape Recovery.
- Avoid perverse incentives (e.g., SFI herbal leys replacing rare grasslands).
- Private finance: supplementary, not a replacement.
- Propose Nature Recovery Obligation for polluters, combining disclosure, planning, and statutory investment.
- Support ecosystem service markets, blended finance models, and scalable, de-risked investment projects.
- Develop nature investment zones, deliver on £1 billion/year target by 2030.
- Emphasize regional coordination, catchment-level delivery, and empowering local actors.

Question 5: How could the 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? (1250 character limit)

- Agroforestry has had limited uptake in the UK due to practical constraints and low industry traction.
- Multifunctional land use should be supported through targeted, place-based incentives based on geography, soil, and ecosystem service potential.
- Change requires more than agroforestry—farm clusters, demonstration farms, ongoing ecological advice, and funding are essential.
- Break down silos between forestry and agriculture; diversify systems beyond food production focus.
- Category 2 land should be applied more broadly, with clearer integration of BNG and nutrient neutrality.
- Demonstration sites (e.g. Durrell) should highlight ecological and farming benefits; align with future-proofing policies.
- Include renewable energy (e.g. solar farms) as part of multifunctional land use strategies.
- Government must recognise a wider range of multifunctional systems like organic farming, which also supports biodiversity.
- Only 4% targeted for agroforestry vs. 9% full transition from agriculture—missed integration opportunities.
- Conditions should support animal welfare (e.g. shade trees) and public access to green space.
- Disruptions to SFI threaten delivery—stable incentives and advisory services are key.
- Safeguards needed to prevent uptake of easy, less beneficial options (e.g. herbal leys replacing rare grasslands), ensuring better ELM outcomes.

Question 6: What should the Government consider in identifying suitable locations for spatially targeted incentives? (1250 character limit)

- Focus incentives through Local Nature Recovery Strategies (LNRS) to maximise ecological return.

- Integrate EIP, climate models, development plans; LNRS species mapping can guide effective targeting.
- Use catchment-based planning to improve water quality, coordinate with CaBA partnerships.
- Balance financial incentives with regulation; tailor to ecological needs.
- Clarify approach to multifunctionality and agroecology to avoid harmful intensification.
- Spatial incentives should deliver outcomes on flood mitigation, biodiversity, carbon, and access.
- Underpin with a National Nature Recovery Network; guide cohesive and resilient restoration.
- Support Natural Investment Zones (NIZs) to blend public and private funding for nature.
- Include buffers for protected habitats; embed public access protections.
- Align planning reforms and LUF, embed Wildbelt designations, link with EDPs and Strategic Development Strategies.
- Integrate Green Infrastructure Standards, protect public access to nature.
- Establish a National Environmental Data Hub to support adaptive, evidence-led decisions.
- Prioritise areas for flood resilience and wetland restoration, using dynamic datasets.
- Consider species recovery, ecological water status, and catchment action plans in spatial targeting.

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? (1250 character limit)

- Financial incentives remain key to scheme uptake; funding must be long-term, strategic, and accessible.

- Success depends equally on high-quality, trusted advisory service. CIEEM continues to contribute to upskilling advisors through training provision.
- Information, funding, and skilled support must align to achieve LUF outcomes.
- Require clear integration of local and national planning with public/private incentives, regulatory reform, and stakeholder engagement.
- Need a national process to define decision-making geographies—National Character Areas (NCAs) offer a strong basis.
- Use Statements of Environmental Opportunity in NCAs to guide enhancement (e.g. hedgerows, peatlands).
- Local guidance critical in sensitive landscapes—e.g. reduce peatland degradation, manage runoff from floodplains.
- Floodplain meadows and steep soils need tailored support through SFI, CS Higher Tier, LNRS, and Landscape Recovery.
- Avoid “one size fits all” approaches; incentives must be tailored and ecologically informed.
- Eliminate perverse incentives (e.g. herbal leys harming priority habitats).
- Support peer learning and demo farms to build farmer confidence.
- Maintain and better target public funding; explore natural capital taxes.
- Strengthen regulation and enforcement; ensure cross-departmental coherence.

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? (1250 character limit)

Please select all that apply and give details for your answer(s).

☐ Monitoring land use change or production on agricultural land (limit of 1250 characters)

☐ Accounting for displaced food production impacts in project appraisals (limit of 1250 characters)

☐ Protecting the best agricultural land from permanent land use changes (limit of 1250 characters)

☐ Other (please specify) (limit of 1250 characters)

- Reduce displacement of harmful food production overseas via demand-side action, efficient land use, and trade policies.
- Protect grades 1–3a farmland from development and bioenergy crops; prioritise brownfield sites.
- Monitor high-grade land loss regularly; include ELM-linked cropping and land use data.
- Reform diets: less meat, more plant-based foods; supports CCC 7th Carbon Budget.
- Avoid inappropriate intensification; industrial livestock harms welfare, water, and imports soy driving deforestation.
- Promote nutritional security—shift away from unhealthy, environmentally damaging foods.
- Invest in research & circular food systems to increase productivity and nutrient recycling.
- Implement climate-resilient horticulture strategy to secure future veg production.
- Flood-prone high-grade land and peatland need rewetting or protection; shift production to mineral soils.
- Strengthen trade policies with core environmental and welfare standards for imports.
- Discourage solar on productive grade 3 land; use roofs/brownfields instead.
- Ensure land use change is monitored, evaluated, and linked to net zero goals.
- Reduce food waste and encourage dietary shifts (e.g. reduced meat consumption).
- Encourage seasonal/local food consumption and align land use with consumer changes.

Question 9. What should Government consider in increasing private investment towards appropriate land use changes?

- Lack of clarity threatens private investment in nature-positive land use.
- Need policy certainty, streamlined systems, and qualified ecologists to deliver change.
- Stronger regulations and safeguards needed to avoid a “wild west” of unregulated projects.
- Clarify tax treatment of BNG/conservation covenants and IHT to reduce investment barriers.
- Back Green Incentives, with caps and oversight on private investment routes.
- A national spatial plan is critical for strategic land use alignment and coordinated action.
- The Land Use Framework (LUF) must go beyond data—informing real-world policy levers.
- Create a Climate Peatlands Fund for cost-effective carbon and biodiversity gains.
- Ensure long-term policy stability to foster investor confidence in nature recovery markets.
- Scale early-stage funding tools like NERF/FERNS to attract institutional capital.
- Develop Natural Investment Zones (NIZs) to align finance and land priorities.
- Government must de-risk stranded assets, especially where land use change won’t generate profit.
- Reinstate nature into the National Wealth Fund to integrate environmental priorities.
- Strengthen monitoring, compliance, and enforcement for schemes like Biodiversity Net Gain.

Question 10. What changes are needed to accelerate 30x30 delivery, including by enabling Protected Landscapes to contribute more?

☑ 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 30x30 criteria (for 30x30 criteria and next steps see:

https://www.gov.uk/government/publications/criteria-for-30by30-on-land-in-england/30by30-on-land-in-england-confirmed-criteria-and-next-steps)

☑ Resources: such as funding or guidance for those managing Protected Landscapes for nature

☐ Other (please specify)

- Align Land Use Framework (LUF) with National Parks (NPs), National Landscapes (NLs), and their policies to avoid conflicting incentives.
- Strengthen Protected Landscape governance; give NLs more weight in planning decisions and biodiversity gains.
- Introduce clear statutory duties for public bodies to support Environment and Climate Act targets via the LUF.
- Use LUF to identify land with highest potential impact for 30x30; provide spatial guidance and targeted incentives.
- Accelerate land designation and restoration efforts to meet 2030 goals.
- Expand and improve protected sites, ensuring they reach favourable condition.
- Ensure Natural England and others have capacity to implement and monitor changes.
- Align LNRSs and Protected Landscapes with 30x30 delivery.
- Ensure planning reforms (e.g. P&I Bill) do not undermine biodiversity protections.
- Continue and expand Farming in Protected Landscapes (FiPL); funding certainty is key.
- Prioritise action via Landscape Recovery and ELMS; support OECMs and nature-positive Green Belt use.
- Mandate biodiversity support from water companies and public landowners.
- Embed 30x30 across land use, permitting, and planning systems.
- Integrate nature-friendly land use across the full 100%, not just 30%.

11. What approaches could cost-effectively support nature and food production in urban landscapes and on land managed for recreation? (limit of 1250 characters)

12. How can Government ensure that development and infrastructure spatial plans take advantage of potential co-benefits and manage trade-offs? (limit of 1250 characters)

- Coordinate LNRS input nationally to balance trade-offs.
- Align spatial plans with Environment Act & Global Biodiversity Framework.
- Integrate LUF with ELMs, EIP targets, Farming Roadmap
- Embed Natural England's GI Standards in planning to enhance greenspace.
- Ensure land-sea planning links to avoid estuarine/marine degradation.
- Include coastal land use (to low-water mark) in LUF.
- Restore habitats like saltmarsh/seagrass by integrating land/sea licensing.
- Strengthen Catchment Partnerships to support spatially funded delivery.
- Elevate LNRS weight in planning; improve resourcing for implementation.
- Embed LUF in planning reforms, devolution, and investment strategies.
- Ensure LUF drives nature recovery alongside development.
- Develop a National Spatial Framework for England (as in Wales).
- Use the Framework to align infrastructure with environmental goals.
- Embed biodiversity/climate resilience in all land-use decisions.
- Accelerate 30x30 with spatial guidance and LNRS alignment.
- Build Natural England capacity; address agency resource gaps.
- Protect biodiversity from undermining by Planning & Infrastructure Bill.

13. How can local authorities and Government better take account of land use opportunities in transport planning? (limit of 1250 characters)

14. How can Government support closer coordination across plans and strategies for different sectors and outcomes at the local and regional level? (limit of 1250 characters)

15. Would including additional major landowners and land managers in the Adaptation Reporting Power process (see above) support adaptation knowledge sharing?

☑ **Yes**

☐ **No**

Please give any reasons or alternative suggestions in the text box below (limit of 1250

- Include major landowners and managers (e.g. Crown Estate, Military) in the Adaptation Reporting Power process to enhance climate adaptation knowledge sharing.
- Expand reporting to farming bodies with care to avoid undue influence from vested interests.
- Participation must come with clear incentives—funding and support—not just mandates.
- On-the-ground insights from landowners are vital to refining practical adaptation strategies.
- Implement the National Adaptation Plan via integrated, funded advisory services (e.g., a national farm advisory service).
- ELMS is helpful but insufficient alone—needs to address gaps like precision breeding and water infrastructure.
- Biological monitoring and long-term research are critical to understand species' responses to climate change.
- Adaptation requires a broader suite of measures than current frameworks offer.
- Success depends on collaboration and buy-in from all stakeholders, especially “harder to reach” landowners.
- Ensure funding and support for those implementing adaptation, or risk undermining participation and outcomes.

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 Projections into what these mean in terms of on-the-ground impacts on farming, buildings, communities and nature) (Met Office UK Climate Projections available at https://www.metoffice.gov.uk/research/approach/collaboration/ukcp)

☑ 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 scenario: the climate changes we will experience if there is 2°C of global average temperature increase above pre-industrial baselines by 2100)

☑ 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) (limit of 1250 characters).

- All of the above.

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?

Please select all that apply and provide reasons for your answer(s). (1250 character limits for each)

☑ 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)

- Data is hugely important, but it must be reliable and accessible, with long term funding allocated to ensure it remains as such.
- Improve access to high-quality, ecological spatial data to inform land use planning.
- Invest strategically in remote sensing and open-access platforms for biodiversity monitoring.
- Centralize spatial data via a National Environmental Observatory to guide decision-making.
- Standardize geospatial indicators (e.g., UPRNs, INSPIRE IDs) for better data integration.
- Expand access to costly datasets (e.g., OS maps, LERCs) through collaborative licensing.
- Promote JNCC's WMS and ARD products to enable real-time habitat and species analysis.
- Integrate local datasets (e.g., LNRS, NCA profiles) to reflect place-based needs and opportunities.
- Update the Agricultural Land Classification (ALC) system using current climate data.
- Ensure high-resolution ALC maps are freely accessible and used in planning tools.

- Embed ALC and ecological data into Land Use Framework digital platforms for real-time planning.
- Use spatial modelling to identify national and regional priority areas for protection or restoration.
- Support baseline ecological monitoring and species data collection to underpin decisions.
- Ensure digital systems are user-friendly and widely available across sectors.
- Commit to regular updates of classification and spatial datasets to reflect environmental change.

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 (1250 character limits for each).

☑ 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

19. What improvements are needed to the quality, availability and accessibility of ALC data to support effective land use decisions? (1250 character limits)

20. Which sources of spatial data should Government consider making free or easier to access, including via open licensing, to increase their potential benefit? (1250 character limit)

21. What gaps in land management capacity or skills do you anticipate as part of the land use transition? (1250 character limits)

Please include any suggestions to address these gaps.

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

Natural England's 4% budget cut threatens 200 jobs, impacting regulatory delivery. In 2023–24, 68% of Natural England's missed planning deadlines were due to resourcing issues.

The ecology sector has a capacity crisis, with severe difficulties recruiting and retaining enough people with the skills and experience that it needs. This problem is now in sharper relief as we look to restore peatlands, plant new woodlands, and green our towns and cities in response to climate change. Local authority planning teams face major funding and staffing shortfalls. Skills gaps are acute in botany, mycology, aquatic ecology, and GIS-based landscape analysis. Skills programmes like the Farming Resilience Fund and Skills for Climate Fund were ended prematurely. Better farmer support is needed for the agroecological transition and woodland management. Local authorities lack capacity to manage public access and rights of way. Stronger investment is needed in CaBA partnerships, training, and freshwater habitat restoration. Capacity gaps risk undermining delivery of multifunctional, sustainable land use.

22. How could the sharing of best practice in innovative land use practices and management be improved? (1250 character limit)

23. Should a Land Use Framework for England be updated periodically, and if so, how frequently should this occur? (1250 character limit)

- ☑ Yes, every 5 years
- ☐ Yes, every 3 years
- ☐ Yes, another frequency or approach. Please provide details.
- ☐ No
- ☐ Don't know

Yes, the Government should review the LUF every 5 years, timing the schedule alongside the Environmental Improvement Plans periodical updates. This would allow the LUF to remain flexible enough to adapt to large step changes i.e. if the Government was to agree to a new set of global regulations or targets.

24. To what extent do you agree or disagree with the proposed areas above? (1250 character limit)

Please include comments or suggestions with your answers.

- ☐ Strongly agree
- ☑ Agree
- ☐ Neither agree nor disagree

☐ Disagree

☐ Strongly disagree

☐ Don't know

Appendix

This appendix contains supporting evidence/documents for the consultation.

Land Use Consultation

Land Use Analytical Annex