

Email response to: landuseconsultation@defra.gov.uk



24th April 2025

Dear Land Use Framework Policy Team,

Land Use Consultation – response from the Buckinghamshire and Milton Keynes Natural Environment Partnership (the “NEP”)

Introduction

The Buckinghamshire and Milton Keynes Natural Environment Partnership (the “NEP”), the area’s Local Nature Partnership, welcomes the opportunity to comment on the Land Use Consultation.

Overall, we agree with the need for a coordinated, current, collaborative approach to the best use of land. We believe this should reflect local as well as landscape-scale needs and capabilities, and reflect a natural capital approach, recognising multiple benefits across the landscape. We would also welcome a framework that emphasises the need for consistency of data use across Government and policy, nationally and locally, and that informs decisions about land use, so that ensure nature is appropriately recognised, accounted for and supported.

Local Nature Partnerships are ideally and uniquely placed, in working locally across landscapes, with multiple sectors and having had specific involvement with (and in our case, leading the work to produce) Local Nature Recovery Strategies, **to support ambitions and lead on many of the areas that the Land Use Consultation will require in delivery**, including:

- Accelerating achievement of binding national targets under the Environment Act and Climate Change Act, such as the 30by30 and carbon targets;
- Working with the private sector to encourage and align investment in nature recovery – and so increasing investment in land use change;
- Sharing good and innovative land management practices among landowners and land managers – for example the NEP operates a Farmer Advisor Network across Buckinghamshire and Milton Keynes to enable regular sharing of updates on policy and incentives, as well as building knowledge and understanding through sharing good practice case studies and projects among the local farming communities including farmer clusters; and

- Enabling and supporting the delivery of Local Nature Recovery Strategy opportunities locally and across borders. Nature recovery is a long-term ambition and will need similarly long-term, stable and trusted support and advice mechanisms, and incentives provided to those managing land, and to organisations supporting the delivery of nature's recovery.

However, these areas of activity, led or facilitated by Local Nature Partnerships, can only happen if Local Nature Partnerships are adequately resourced and given the necessary recognition and profile. **Long-term resource certainty for Local Nature Partnerships would secure these functions** to enable national policy to be effectively, appropriately and robustly delivered locally.

Broad areas requiring further clarity

The consultation raises many broad-ranging questions across a number of different policy areas, without full clarity on its intention, use, and next steps. In particular, we would welcome further clarity on:

- Specifically, and with more detail, **how the land-use framework (LUF) is intended to be used**. For example, what is its role and purpose? What weight will it have in planning? And who should be using it, based on which data, either nationally or locally for example? Also, clarity is needed on whether the intention is for this to be used as a tool rather than a prescription for local and compatible decision-making to ensure local growth, food production and nature recovery.
- **The relationship between the proposed LUF and the Local Nature Recovery Strategies (LNRs)** that are in progress across England, which have been based on extensive data and stakeholder analysis, and which identify baseline areas of particular importance for nature, and areas that could become of particular importance for species and habitats in the future through delivery of specific actions. Will the LUF enable or incentivise LNR delivery? If so, how?
- **How the LUF relates to other key policy areas and proposals** – such as MHCLG's proposed devolution proposals, including the creation of Strategic Authorities, Spatial Development Strategies and Local Growth Plans; also how the LUF would relate to the proposed Planning Reform paper's single strategic assessment and delivery plan related to environmental impacts.
- **How the impacts of climate change on food production over the period to 2050 have been taken into account in the proposed % land use changes**. Also, the impacts of the need for renewables infrastructure to help provide cleaner energy in the future. These would seem essential parts of joined-up analysis of likely land use changes required.
- **How the consultation responses to this consultation**, which is broad in coverage, **will be used to inform specific upcoming strategies** and policies - and how responses to the LUF consultation could affect the process of specific consultation

for those individual policy areas. For example, many questions in this consultation are open in format, asking for ideas across policies in the areas of transport, farming, housing, water, infrastructure, climate adaptation, meeting nature targets including 30by30, and protected landscapes. The consultation appears to raise more questions than it proposes answers to. We believe that most of the areas being questioned here will need further detail, development and consultation.

- **Whether the LUF will be piloted before it is finalised** – this could help highlight consequences, impacts and improve it before any launch.

Specific issues we wish to raise

We also have some specific areas we wish to highlight in relation to the detailed questions asked in the consultation, as follows.

Q1 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? 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.

There are several ways in which the land use changes proposed are unclear, which make this question difficult to answer. For example, it is unclear:

- *Where* the proposed % land use changes will take place - as only % changes are provided.
- Whether, and to what extent, the proposed ambition of land use changes would achieve and align to the various legally binding mandatory targets in the Environment and Climate Change Acts.
- How the impacts of climate change on food production over the period to 2050 have been taken into account in the proposed % land use changes provided; or the impacts of the need for renewables infrastructure to help provide cleaner energy in the future. These would seem essential parts of any joined-up analysis of likely land use changes required.
- Whether, how or to what extent the impacts of land use and land use change on adjacent land have been taken into account in the estimated % land use changes.

We do not, therefore, feel in a position to comment on the % land use change proposed or needed to meet the range of policy objectives and targets compared with the baseline and taking into consideration likely change over time due to climate impacts.

With respect to the particular proposed changes:

- **Scale and type of land-use change:** Category 1 land management change should not appear as “not in scope”. More can be done for nature within all categories

identified, and in category 1, changes in management can contribute, even if these do not constitute a change in use. So, changes in management should be encouraged in this category by keeping it within scope, even if there is no overall % land use change proposed (it should therefore be in scope rather than out of scope).

Q2 Do you agree or disagree with the land use principles proposed?

While the principles themselves seem logical, there is currently not enough detail or examples provided of how to implement the principles to conclude on the difference to land-use decisions that they could make. The principles seem to raise more questions than they can answer. For example:

- How is it intended for the Framework to ensure that national policy is taken into account locally without undermining careful, place-specific work already underway – such as in priority ecosystems – including for example iconic chalk habitats in the Chilterns - chalk grasslands, ancient beechwoods, and internationally rare chalk streams, which are irreplaceable assets?
- **More information is needed as to how the principles have been arrived at** – in particular, how / whether they have been tested and the outcomes they produced.
- **The principles themselves are high-level and seem broadly common sense** – and it would be expected they should already be part of sensible decision-making frameworks. Without further case studies **it is difficult to see how they should be applied** beyond what should already be in place **so that they have impact**. Further clarity is needed here. Such high-level principles may not make a huge difference to decision-making without developed tools and examples of how they can be easily implemented in practice to make a difference to how decisions are currently made.

In respect of the specific principles,

- **Principle 1 – Co-design: We would welcome recognition of trusted local partners such as local nature partnerships** also taking a lead in some areas of the design.
- **Principle 2- Multifunctional land use** – is welcomed as a principle, but **we do not believe that it should not be assumed that every land parcel could or should provide many multiple benefits** – rather that in implementation of this principle, the multiple benefits are considered carefully and provided across a landscape – concentrating too many functions into one land area could compromise provision of the desired benefits.
- **Principle 3, playing to the strengths of the land, raises many questions** that need clarification:
 - Which benefits should be weighed up?
 - Which are the priorities? What trade-offs are in scope?
 - Where does nature and other benefits rank?
 - How should “benefits” and trade-offs be measured?

- Need to recognise there could be multiple benefits – but the *quality* of them is dependent on management and management objectives (e.g. access, nature, climate etc)
 - Who judges? What considerations are taken into account?
 - Which policy objectives should be weighed up?
 - What scale should this be applied to?
 - Also – need to be careful that scarcity and spatial sensitivity are appropriately accounted for – e.g. grid connection availability doesn't always mean renewables should be located there if there are sensitive sites – which, alongside the location of demand, would also need to be considered.
- **Principle 4 – decisions fit for the long-term: Acting for the long-term may mean short-term losses. Clarity is needed** as to the plans in place or in progress to recognise and incentivise long-term need over short-term gain?
 - **In Principle 5, responsive by design**, how is it intended for this principles to be applied alongside long-term decision-making? Opportunities and pressures on land can change with economic and climate-related conditions.

Q3 Beyond Government departments in England, which other decision makers do you think would benefit from applying these principles?

- Local Authorities – so they can tie use of the LUF principles, once finalised, into consistent decision-making locally and help meet national objectives
- Landowners and land managers
- Utilities and infrastructure providers

Local applicability: The LUF provides an opportunity to create a checklist for decision-making to ensure key objectives for land are taken into account. But we believe that **the approach would need further testing and consultation** to make it appropriately applicable locally.

Q5 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?

- There is a need for stable, long-term and trusted policy and incentives to allow for appropriate land-based decision-making.
- To enable multifunctional land use, it should be clear what benefits are to be prioritised – what's needed and where.
- Taking a natural capital approach, recognising the importance of nature and its wider environmental, social and economic benefits, is welcomed.

- However - while multifunctional land use is welcomed as an approach and recognition of the wider benefits of land and nature, **the desire for multifunctionality must not undermine existing environmental protection or land use designations such as protected landscapes.**
- Equally, the Framework **must ensure national policies do not undermine the careful, place-specific work** already underway to recover priority ecosystems.
- **Identifying the benefits and trade-offs using a decision-making tool** is common sense. However, we would highlight the **range of such decision-making tools already in existence**, and would welcome further consideration of the learning from these tools.

Q4 What policies, incentives, changes are needed to support decisions in agricultural sector to deliver scale of change while considering importance of food production?

Q6 What should the Government consider in identifying suitable locations for spatially-targeted incentives?

Q7 What approaches 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?

Q8 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?

- Landowners and managers have highlighted to us the need for any incentives or financial / fiscal support for those implementing the changes to the land to be long-term, stable, clear, joined-up across policy areas, and informed by local need, with clarity over how a land manager should weigh up the multiple demands for land.
- It should be recognised that a tool to assist with identifying benefits and trade-offs does not necessarily result in the best decisions for the use of land. For example, any **benefits must not just be identified with a decision-making tool, but it should also be recognised that the quality of delivery of those benefits depends on land management decisions** – which are often individual decisions made by landowners based on multiple factors.
- **Therefore, incentives may be needed, and should be considered, to encourage land management decisions according to local need for multiple benefits.** Such local need must be clearly supported, understood, based on reliable information and disseminated. Making data available to local decision-makers, for example via the apps commonly used to identify opportunities on, and to manage, land, would be a helpful part of this.

- **Effective land use planning depends on up-to-date ecological, hydrological, and land management data.** The organisations collecting data and enabling its dissemination and use **should be supported**.
- **Measures of success** – it is unclear how the success or otherwise of the land use framework will be measured – e.g. are there plans for food production and nature measures to be monitored, alongside the number of new homes?
- The Land Use Framework represents an opportunity to reset how we value and manage land. The Framework should enable locally-led or informed, landscape-scale action that aligns with existing strategies (e.g. LNRs) and the unique landscape character, alongside consideration of natural capital, ecosystem services benefits / ecosystem services (including supply and demand for them), underlying data (e.g. landscape, topography, soil type, land cover and use, natural habitat data, etc) climate impacts and nature objectives.

Q9 What should Government consider in increasing private investment towards appropriate land use changes?

- **Supporting Local Nature Partnerships would be supporting Nature Finance opportunities:** working more closely with, and supporting the work of Local Nature Partnerships, like the Bucks & MK NEP, which are developing Nature Finance activities and working with the private sector, yet are currently unfunded or underfunded, would be helping LNPs to work across sectors and with their partners to develop a pipeline or projects to deliver LNRs, align private funding with nature opportunities and to monitor progress.

Q10 What changes are needed to accelerate 30by30 delivery, including be enabling Protected Landscapes to contribute more? Please provide any specific suggestions.

- **Accelerating 30by30 delivery:** The Framework must ensure that those tasked with delivering and supporting and enabling the delivery of nature and climate outcomes at landscape scale have both the data, resources and capacity to act.
- **Local Nature Partnerships**, in connecting across landscapes and sectors, are a key delivery enabler – and require long term support.
- **Monitoring of land use change and the associated impacts** on the various policy drivers, objectives and targets is needed – this **needs to be considered and resourced from the outset**.

Q11 What approaches could cost-effectively support nature and food production in urban landscapes and on land managed for recreation?

- **Further explanation of how the land use framework could support existing developments** to provide better for nature and for other multiple benefits.

- Consider measures to encourage and support provision and long-term management of urban green areas. Case studies could also be shared more widely (e.g. MK was planted with communal fruit trees).

Q12 How can Government ensure that development and infrastructure spatial plans take advantage of potential co-benefits and manage trade-offs?

- **Resource capacity to deliver nature recovery:**
Local delivery bodies (e.g. local Wildlife Trusts, Protected landscapes organisations etc) **and delivery enablers (Local Nature Partnerships in particular) are under-resourced.** The Framework must ensure that those tasked with delivering, supporting and enabling the delivery of nature and climate outcomes at landscape scale have both the data and capacity to act.
- **Decision-making frameworks** should also be clear on how to make use of benefits and trade-offs beyond identifying them – for example, what is a trade-off? How should benefits and trade-offs be priorities? Examples and case studies would assist.

Q14 How can the Government support closer coordination across plans and strategies or different sectors and outcomes at local and regional level?

A key mechanism for this aim is to **support and ensure the continuation of strong and effective local nature partnerships** in every area. Local Nature Partnerships work with local partners that cross sectors, (many have links across nature, transport, LA, business etc) and work locally to coordinate and guide actions but also collaborate across regions.

Other ways to coordinate would be to work from the same data-set, and ensure key strategies – such as the LNRS – are appropriately considered within other plans and strategies.

Q16 Which activities should be prioritised (of a list the Government could implement) to support landowners, land managers, and communities to understand and prepare for the impacts of climate change?

All appear to be important. In particular we would suggest that:

- **Better information on local climate impacts** is needed – as consistent, reliable information allows for better and longer-term decision-making. Local impacts data could be better made available on apps farmers and landowners use - e.g. Land App and others.
- **Developing and sharing clearer objectives and resilience standards** (e.g. a clear picture of standards and good practice for each sector under a 2C climate scenario): We agree this would be helpful – as would some sort of incentive to meet the standards, and in particular, clearly identifying what is needed and where.

- **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).

Q17 What changes to how Government's spatial data is presented or shared could increase its value in decision making and make it more accessible?

- A clear way to meet this objective is to ensure sufficient mechanisms are put in place to monitor the delivery of Local Nature Recovery Strategies and to keep these strategies under regular review and updated.

Q18 What improvements could be made to how spatial data is captured, managed or used to support land use decisions in the following sectors?

- **Making the data available** at source for farmers and landowners and other decision-makers, **in the apps they use**, could help e.g. Land App and equivalent.

Q21 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.

From our work with partners we would suggest more of the following skills are needed:

- Ecology – e.g. particularly the provision of bespoke advice for farmers on the best use of their land.
- Landowner and land manager access to nature markets. Where / how should farmers gain skills and confidence to test new methods? What contingencies might be available?

Suggestions:

- Working more closely with the farmer advisor sector could be helpful to understand and disseminate how farmers, landowners and land managers are responding to any need for land use changes.
- For example, the Local Nature Partnership for Buckinghamshire and Milton Keynes, the NEP, operates a farmer advisor network group – that regularly shares policy updates, practice and case studies. Enabling this requires capacity and resources - and supporting these initiatives would support the sharing of skills and build knowledge of good practice in any land use transition. More support could also extend knowledge and skills sharing to demonstrations of new technology, or linking projects with research.
- Support to pilot local Nature Finance projects – e.g. those being explored by Local Nature Partnerships such as the Bucks & MK NEP, to help link finance, particularly from the private sector, and nature projects seeking funding locally.

Q22 How could the sharing of best practice in innovative land use practices and management be improved?

- **Local Nature Partnerships have a potential key role in this area.** LNPs have the potential to bring together local organisations working in these sectors, facilitating network and exchange of information and ideas.
- LNPs can also lead in operating projects or schemes at a local (i.e. county or sub-regional level) or can provide support to schemes that build knowledge and understanding of land use transition. For example, the Buckinghamshire & Milton Keynes Natural Environment Partnership operates a network of farm advisors who come together on a regular basis to exchange ideas, information and learning – promoting connections and knowledge exchange. However, this type of activity led or facilitated by LNPs can only happen if LNPs are adequately resourced and given the necessary recognition and profile.
- Farmer cluster groups (e.g. those in the Chilterns) are also successful and should be further supported.

Overall

Above all, we would emphasise that the need for joined up strategies, policies, implementation and monitoring across government, that relate to use of land locally – whether for farming, housing and development, economic growth, nature or transport infrastructure.

The LUF offers an opportunity for a clearer direction on how best to support decisions that look to align national targets with local-level delivery – for example between Local Nature Recovery Strategies, Local Plans and Spatial Development Strategies. But, we feel more consideration of joined-up and long-term policy-making, and explanation as to how the LUF is intended to be used, and its role as a decision-aiding (non-prescriptive) tool is required.

For that, we need a clear understanding of targets and objectives – what they mean locally, translated into an understanding of how to implement them, and with trusted and stable supporting policy incentives – possibly to include consideration of fiscal and / or regulatory tools.

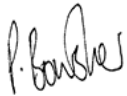
We also need consistent data and decision-making frameworks that take account of the wide variety of environmental, social and economic needs from the way in which our land is both used and managed.

Finally, the Framework must ensure that those tasked with delivering, supporting and enabling the delivery of nature and climate outcomes at landscape scale, such as Local Nature Partnerships, have both the data, capacity and resources to act. **We would welcome further discussion on this point in particular**, including how our Farming Advisor Network

could be utilised to help test aspects of application of the proposed LUF, or its join-up with strategies such as the Local Nature Recovery Strategies.

We look forward to further consideration of these points, and further clarity and consultation about the LUF and its relationship with cross-government policy areas, in due course, and would welcome further discussions or opportunities to input.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. Bowsher'.

Phil Bowsher

Chair, Buckinghamshire and Milton Keynes Natural Environment Partnership