



Office for Environmental
Protection
Wildwood
Wildwood Drive
Worcester
WR5 2QT

03300 416 581
www.theoep.org.uk

24 April 2025

The Rt Hon Steve Reed MP
Secretary of State for Environment, Food and Rural Affairs

Dear Secretary of State,

We welcome the opportunity to respond to the consultation on the proposed Land Use Framework (LUF). We welcome the prospect of a more coherent approach to land use policy and spatial prioritisation, and we find much to commend in the proposed framework.

The consultation rightly focuses on balancing land use objectives for the environment, climate and food production. As it covers around two thirds of England's land, farmland presents the greatest opportunity to make space for nature, yet it falls largely outside of current spatial planning frameworks. The consultation is clear about the significant scale and pace of land use change needed to deliver targets for nature recovery and Net Zero.

Government also aims to reconcile demands for clean and cheaper energy and for new homes and to meet its ambitions for economic growth. We support the government's broad ambitions for the proposed planning reforms set out in the Development and Nature Recovery Working Paper. We will respond separately on the detailed proposals.

We welcome the intelligent principles for decision-making set out in the consultation. Maximising the benefits of the land will depend on balancing multifunctionality, while playing to the strengths of the land, and foresight of long-term opportunities and risks, including from climate change.

The focus now should be on finalising and operationalising the LUF. It must become an integral and influential framework to bring much needed coherence to land use policy. Additionally, it needs to be adaptive and dynamic to accommodate evolving land use demands and evidence.

To improve join-up across a complicated and fragmented policy context, coordination of the LUF should be strategically prioritised, ensuring effort is proportionate to impact. In our view, the upcoming revised Environmental Improvement Plan will be crucial. As will the updated Carbon Budget Delivery Plan and the planned Farming Roadmap. In guiding local decisions, the LUF must also interact coherently with existing frameworks, including local plans, nascent Local Nature Recovery Strategies, and new Spatial Development Strategies.

To strengthen the influence of the LUF, we propose you consider options for giving it meaningful legal footing. This is especially important to provide assurance that the LUF will actively inform those local-level plans and strategies that are central to its delivery, but which are drawn up and implemented outside central government.

A strategic oversight body is proposed. This needs to have clear authority to coordinate effectively nationally, regionally and locally, and to enable resolution over inevitable disputes concerning land use. It also needs to have capacity to assess how land use policies stack up to achieve the desired outcomes. It should be supported with an effective monitoring and evaluation framework that tracks the influence and outcomes of the LUF and enables accountability.

To deliver at scale, the government will need to strengthen the economic viability of land use change for landowners and occupiers, particularly farmers. Environmental Land Management schemes will play their part, but additional investment and advice is needed. In addition to launching the Nature Market Accelerator, we suggest that the government should undertake a broad review of the policy, fiscal and regulatory landscape to determine if it is adequate for mobilising private investment at scale and supports place-based delivery.

We expand on these points in the Annex, where we respond to some of the consultation questions directly. I trust that you find these thoughts helpful. Please do let me know if we can be of any further assistance.

Yours sincerely,



Dame Glenys Stacey, Chair of the Office for Environmental Protection

Annex: OEP response to the Land Use Framework consultation

We focus our response on aspects of the consultation (9 of 24 questions), which address the areas we have previously scrutinised and which we judge to be the most strategically important. We have considered how the proposals align with the key targets and commitments in the Environmental Improvement Plan (EIP), and reviewed proposals through the lens of our key recommendations for the EIP review, in particular our five recommendations to:

1. get nature friendly farming right,
2. maximise the contributions from protected sites,
3. set out clear mechanisms for reconciling competing demands,
4. mobilise investment at the scale needed,
5. harness the support needed to achieve ambitions, and to regulate more effectively.

We summarise here the key areas we have identified that require strengthening, including the LUF itself, and how it is operationalised. These can all be progressed in future iterations, or during the delivery of the LUF.

Gaps in the assessment

The most important omission is the land use change required to meet apex targets that are outcome-based, including the species abundance targets to halt and reverse nature's decline. Analysis of the effects of land use change on the environmental pressures caused by agriculture would be beneficial. The effects on agricultural nutrient runoff into the water environment are especially important to understand. The significant impacts of future climate change on land use benefits are another important gap. There also needs to be more transparency on the implications of land use change for the farming and food sectors.

The land use principles

Whilst these are intelligent principles, they are currently open to interpretation. We suggest that further guidance is therefore needed on how to apply them, what the intended outcomes are, and how these will be monitored. Integrated spatial visualisation and decision-making tools could also be developed for balancing food and environmental objectives.

What policies, incentives and other changes are needed?

Environmental Land Management schemes can deliver better value for money through spatial prioritisation, for example by providing premium payments for actions that align with the land use change priorities of the LUF. There also needs to be further long-term agreements, to provide predictability for farmers and reduce the economic risks of land use decisions. This should be accompanied by advice and guidance.

The government should undertake a broad review of the policy, fiscal and regulatory landscape to determine if it is coherent with stimulating private investment at the scale and direction needed to realise the land use changes envisaged in the LUF consultation. It should also review whether there is adequate capability and capacity in the environment sector to make the most of that investment. Furthermore, clarity is needed over how government intends for existing nature markets to interact coherently with wider policy developments.

Effective regulation and enforcement are essential for ensuring wider economic sectors are driving coherent land use change. We note the conclusion of the recently published Corry Review that the regulatory system is not working as well as it should, to support either nature recovery or economic growth, as well as the government's ambitions for the proposed planning reforms. We are still considering these and will respond separately. We have previously also highlighted the need to regulate more effectively in our advice to government on the review of the EIP.

Finally, we suggest that the government should clarify how it intends to achieve the 30 by 30 commitments of the Global Biodiversity Framework, and set this in the context of a national plan for land use.

Government's role in joining up decisions on Land Use Change and in policy co-creation

An important first step to operationalising the LUF is to prioritise the relevant policy system with which it must interact and influence. Once prioritisation of the policy context is clear, we suggest that the government should publish a roadmap for how the LUF will bring coherence across relevant national and local plans, many of which are already in place or are developing in parallel.

To strengthen the influence of the LUF, as well as improve clarity and consistency in its application, we propose you consider options for giving it meaningful legal footing. This could be realised through embedding reference to the LUF within the National Planning Policy Framework. Government could also consider proposing new legislative provisions which, for example, could make explicit reference to the need for local planning authorities to consider the LUF in drawing up local plans and strategies.

A strategic oversight body is proposed in the consultation. To be effective, this will need to have clear authority, to ensure the LUF principles are being applied as intended, and to enable resolution for inevitable disputes over land use. It will also need sufficient capacity to assess how the policies and local plans stack up and evaluate whether they are aligned with the scale and pace of the land use changes envisaged in the LUF consultation. To achieve this, it will need to be supported with a clear effective monitoring and evaluation framework, which tracks the influence and outcomes of the LUF, and ensures accountability.

RESPONSE TO SPECIFIC QUESTIONS

A Long-Term View of Land Use Change

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?

We endorse the government's action in publishing its evidence on the scale and type of land use change needed to achieve its goals for nature and climate, whilst maintaining food production. It is bold and helpful to produce this.

Overall, the assessment is a good indication of what is needed. It is aligned with our own analysis on requirements for the extent of high-quality nature friendly farming for restoring terrestrial and freshwater biodiversity¹. It is also comparable to estimates at a UK level, including by the Royal Society². and the Climate Change Committee (CCC) 7th Carbon Budget pathways in the land use sector.

However, there are important missing elements. This leaves uncertainty regarding the scale of land use change proposed and should be addressed in future iterations of the assessment.

The most important gap in our view is omission of the land use changes required to realise apex targets that are outcome-based, including the species abundance targets to halt and reverse nature's decline. This desired outcome is shaped by the complex interplay of land use and wider natural and human factors, including pollution, climate change, resource use, and unsustainable land management practices, all of which can have cascading effects on ecosystems.

Whilst complex, these interdependencies should be assessed in examining the scale and type of land use change that may be needed to deliver nature and climate targets, with a focus on species abundance as the apex target. Furthermore, time lags are important to consider, given that the benefits of habitat restoration, creation, and connectivity improvements may take years or even decades to fully materialise.

Analysis of the effects of land use change on the environmental pressures caused by agriculture would be especially beneficial. The potential implications of land use change on nutrients in the water environment are important to understand, given the Environment Act 2021 statutory agriculture nutrient target, and interdependencies with that Act's species abundance targets, where a quarter of the measured species are freshwater species.

The significant impacts of future climate change on land use benefits are another important gap. The analytical annex considers the impacts on tree growth, but not the risks of changing habitat ranges, pest and disease, and extreme weather, drought and flooding. This analysis is critical for informing a government strategy for

¹ OEP (2025), Progress in improving the natural environment in England 2023/2024, Retrieved from <https://www.theoep.org.uk/report/government-has-chance-get-track-meet-legal-environmental-commitments-window-opportunity>

²The Royal Society (2023), Multifunctional landscapes: Informing a long-term vision for managing the UK's land, Retrieved from <https://royalsociety.org/news-resources/projects/living-landscapes/multifunctional-land-use/>

adapting the agricultural sector to climate change. As highlighted in our recent EIP assessment reports and those of the CCC, this continues to be a key policy gap.

With regard to the impacts on food production, the assessment states these can be offset by productivity improvements. To realise this, the annex includes the estimate that the ‘background growth rate’ would need to continue at 0.5% per annum. This is not a matter for the OEP particularly, we appreciate, but others may point out that the annex does not provide detailed workings behind the estimate. Recognising that significant productivity improvements have been made over the years, it is unclear how these will be maintained.

Based on the Dimpleby report, a comprehensive independent review of the National Food Strategy, reallocating 20% of the least productive farmland for nature would only reduce total calorie output by 3%.³ While this suggests there is room for land use change without causing a significant effect on agricultural output, it does not provide a full picture of the potential impacts on society, trade and the economy. Again this is not a matter directly for the OEP, but others may argue for more transparency on the potential implications of land use change on the farming and food sectors.

Principles: Taking a Spatial Approach

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

The five principles are all consequential to realising better land use. They are widely understood to be important, aligning with stakeholder priorities^{4,5,6}. Particularly significant is the principle of “*multifunctional land*”. Land is a finite resource and under growing demands, a multifunctional approach ensures land is used as efficiently as possible to deliver multiple outputs and benefits. Furthermore, we recognise the need for ensuring “*Decisions [are] fit for the long-term*”, especially with regard to driving assessments into how land use benefits could change under future climate change and developing relevant adaptation strategies (see response to question 1).

However, we have concerns that the principles will not deliver the desired aim, which is to “*transform how government makes policy*”. Without any underpinning legislation or statutory guidance, they are unlikely to bring much-needed coherence across a complicated and fragmented policy landscape, or across the multiple scales of land use decision making (see question 14).

³National Food Strategy Independent Review (2021), p227, Retrieved from <https://www.nationalfoodstrategy.org/>

⁴ The Royal Society (2023), Multifunctional landscapes: Informing a long-term vision for managing the UK’s land, Retrieved from <https://royalsociety.org/news-resources/projects/living-landscapes/multifunctional-land-use/>

⁵ WCL (2023), A land use framework for England, Retrieved from <https://www.wcl.org.uk/docs/Link%20land%20use%20framework%20briefing%20-%20November%202023.pdf>

⁶ FFCC (2023), Multifunctional Land Use Framework, Retrieved from [Multifunctional Land Use Framework - Food, Farming and Countryside Commission](#)

We consider that the principles currently are more open to interpretation than may be appropriate for their intended use. For example, they are not mutually exclusive and potentially conflicting; “*playing to the strengths of the land*” leads policy makers to prioritise some land uses over others, whereas “*multifunctional land*” supports combining land uses. There are also numerous ways they could be implemented, with different analysis leading to different outcomes.

We suggest that further guidance is therefore needed for how to apply them. Where possible, consistent methodologies or tools should be defined or developed to support this. For example, integrated spatial visualisation and decision-making tools could be developed for balancing food and environmental objectives. The National Infrastructure Spatial Tool is a good example and explores infrastructure needs (e.g. energy, water, transport, digital telecoms) at local authority level, ranking locations in terms of need for each land use type.

The intended outcomes should also be defined, with a monitoring and evaluation framework established to track these, and the influence of the LUF more broadly. We also advise considering options to give the LUF meaningful legal footing, including the decision-making principles (see question 14 response).

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

Given that the LUF focuses on balancing land use objectives for the environment and food production, and must interact with local planning frameworks, in our view, the principles most importantly need to be applied by the delivery bodies associated with the Department for Environment, Food & Rural Affairs, the Department for Energy Security & Net Zero, and the Ministry of Housing, Communities & Local Government policy remits.

Beyond the government’s delivery bodies, the principles should be applied by local and strategic planning authorities. They are key land use policy and decision makers, producing relevant spatial plans and strategies, such as local plans, spatial development strategies and, particularly relevant in this context, Local Nature Recovery Strategies (see question 14 response).

National Park and National Landscape authorities are also crucial local decision makers, given the importance of these protected landscapes for nature recovery and heritage farming.

Major landowners could also benefit from applying these principles. For example, the National Estate for Nature group, which collectively owns 10% of England’s land, and aims to support the delivery of Environment Act 2021 targets and nature recovery objectives, and to enable exchange of experiences, knowledge and action on land management and change.⁷

⁷ DEFRA (2025), Environment Blog, England’s major landowners to work together to drive nature recovery, Retrieved from <https://defraenvironment.blog.gov.uk/2025/03/24/englands-major-landowners-to-work-together-to-drive-nature-recovery/>

Private sector land use agents, providing advice and guidance to farmers and landowners, would also benefit from applying these principles, based on consistent methodologies and tools (see response to question 2).

Making the Best Use of Land: Aligned Incentives

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?

In our view, greater focus is needed on the economic viability of land use change for farmers, landowners and occupiers. Financial incentives need to be of sufficient scale to ensure land used for nature, water, and carbon emissions reduction are attractive when compared to other agricultural uses, and provide a reliable and predictable source of income over the timeframe needed for nature recovery (>25 years).

Environmental Land Management schemes are an important policy lever. There is now an opportunity for ensuring better value for money by spatial prioritisation, for example by providing premium payments for actions that align with the land use change priorities. Expansion of the more ambitious parts of Countryside Stewardship and Landscape Recovery schemes, which offer long-term agreements, will help secure the long-term predictability needed by farmers and landowners and reduce the economic risks of land use decisions. Greater funding is needed from private sources to make land use change a more attractive prospect over the long term (see question 4 response).

The economics of the wider food system and profitability of farming should also be considered, as this is a key driver of both land use and land management, including intensification, cost-cutting behaviour, and willingness to engage in Environmental Land Management. We therefore welcome the recently announced objectives for the Farming Profitability Review.⁸

There are also important cultural and behavioural factors that must be considered. Farmers have a strong identity associated with producing food and maximising yields and may not have the time or resources to navigate complex policy and funding applications. Self-directed and uncoordinated uptake of incentives is therefore unlikely to achieve the scale and type of change required. Instead, government should provide for advice and guidance which is easily navigable, including on what incentives are available, how to access them, and how to make the necessary transition in skills and knowledge.

Finally, effective regulation and enforcement are essential for ensuring coherent land use change. For example, regulations requiring Environmental Impact Assessments and Biodiversity Net Gain affect land use decisions over development and for nature

⁸ DEFRA (2025), Farming Profitability Review: terms of reference, Retrieved from <https://www.gov.uk/government/publications/farming-profitability-review-terms-of-reference/farming-profitability-review-terms-of-reference>

protection and restoration. Regulations to improve river water quality could also have a growing impact on land use change through encouraging more nature-based solutions for flooding and pollution.

We note the proposals and recommendations in the Corry Review, and the provisions in the Planning and Infrastructure Bill, are intended to improve aspects of environmental regulations and how they are implemented. We are still considering these, and will respond separately to the Planning and Infrastructure Bill. However, we have ourselves highlighted to government the need to regulate more effectively in our advice to government on the review of the EIP.

Question 9: What should government consider in increasing private investment towards appropriate land use changes?

In a challenging economic and fiscal environment, it is particularly important now to focus on multiple ways and mechanisms to stimulate greater private investment. As outlined in our latest EIP progress assessment, there are a range of policy tools available to achieve this, including mechanisms for ‘financing green’ and ‘greening finance’⁹.

We suggest that the government should undertake a broad review of the policy, fiscal and regulatory landscape, including across key sectors most dependent on nature and exposed to nature related risks, to determine if it is coherent with stimulating investment at the scale and direction needed to realise the land use changes envisaged in the LUF. It should also review whether there is adequate capability and capacity in the environmental sector to make the most of that investment, including across the whole supply chain, such as the supply of seeds and saplings for woodland creation.

Nature markets provide a potentially important mechanism for stimulating demand and supply. The main markets (Biodiversity Net Gain, Nutrient Neutrality, Woodland Carbon Code, and The Peatland Code) are, however, relatively nascent markets and their growth is difficult to predict. We see opportunities to increase private sector investment. But there are also risks, including around double counting, fraud, lack of additionality in delivering outcomes, and uncertain policy, which undermine trust and market growth. These emerging markets therefore need a clear and stable regulatory framework and effective governance and oversight.

We endorse the government and British Standards Institution’s work to develop the overarching principles for market design and operation, and for harmonising investment standards for different environmental goods¹⁰. However, our understanding is that there remains significant incoherence across nature markets, including their rules and governance structures, and drivers of growth.

⁹ OEP (2025), Progress in improving the natural environment in England 2023/2024, Chapter 12, Retrieved from <https://www.theoep.org.uk/report/government-has-chance-get-track-meet-legal-environmental-commitments-window-opportunity>

¹⁰ BSI, The Nature Investment Standards (NIS) Programme, Retrieved from <https://www.bsigroup.com/en-GB/products-and-services/standards-services/the-nature-investment-standards-programme/>

The government should provide more clarity over how it intends existing nature markets to interact coherently with wider policy developments. One important question is how to blend or ‘stack’ private funding with government funding. This is especially relevant to Landscape Recovery schemes, which have piloted different blended finance models¹¹. Another related question is how existing nature markets will interact with the planned Nature Recovery Fund, to be enacted through the Planning and Infrastructure Bill.

We also note the Corry Review recommendations related to these issues, including to launch a Nature Market Accelerator (recommendation 21), to review how existing nature markets (including Biodiversity Net Gain) can be streamlined and simplified (recommendation 24), and to publish a call for evidence on further opportunities to increase private investment into nature from economic sectors (recommendation 22).

Making the Best Use of Land: Making Space for Nature

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

We suggest that the government needs to determine and set out how it intends to achieve the 30 by 30 targets, including which actions are included in scope, how it will measure progress, and how it will drive positive land management through policy and effective legal protection. We first highlighted the need for the government to transparently set this out in our 2022/2023 EIP progress report. Despite recent policy updates,^{12 13} there remains a lack of clarity on these issues.

Defra’s Protected Landscapes Targets and Outcomes Framework is a useful step forward¹⁴. These set out how these landscapes could collectively contribute to the government’s environmental targets. This now needs to be integrated into individual protected landscapes’ management plans and translated into delivery on the ground.

To improve habitat quality in protected landscapes, there will need to be tangible links to incentives including Environmental Land Management schemes and other private funding mechanisms. Dedicated funding should be supported by advice, such as the Farming in Protected Landscapes programme, to increase uptake in schemes (see response to question 4). There should also be safeguards for ensuring

¹¹ DEFRA (2022), Environmental Land Management tests and trials: June 2022, Retrieved from <https://www.gov.uk/government/publications/environmental-land-management-tests-and-trials>

¹² DEFRA (2023), Delivering 30by30 on land in England, Retrieved from <https://www.gov.uk/government/publications/delivering-30by30-on-land-in-england/delivering-30by30-on-land-in-england>

¹³ DEFRA (2024), 30by30 on land in England: confirmed criteria and next steps, Retrieved from [https://www.gov.uk/government/publications/criteria-for-30by30-on-land-in-england/30by30-on-land-in-england-confirmed-criteria-and-next-steps#:~:text=Areas%20contributing%20towards%2030by30%20\(30by30,important%20species%20found%20in%20England](https://www.gov.uk/government/publications/criteria-for-30by30-on-land-in-england/30by30-on-land-in-england-confirmed-criteria-and-next-steps#:~:text=Areas%20contributing%20towards%2030by30%20(30by30,important%20species%20found%20in%20England)

¹⁴ DEFRA (2024), Protected Landscapes Targets and Outcomes Framework Published 31 January 2024, Retrieved from <https://www.gov.uk/government/publications/protected-landscapes-targets-and-outcomes-framework/protected-landscapes-targets-and-outcomes-framework>

protected landscapes are well-managed and protected from pressures arising from outside the site, such as air pollution, and so that they can adapt to climate change.

We consider further clarification around delivery of Local Nature Recovery Strategies to be vital to accelerate achievement of the 30 by 30 commitments. This includes the need for requirements relating to delivery, and clarity over funding and roles and responsibilities linked to coordination of delivery, monitoring and evaluation.

Making the Best Use of Land: Joined-up Decisions on Land Use Change

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

There should be a strong focus on operationalising the LUF, so that it becomes an integral and influential framework and brings much needed coherence in land use policy and local planning. In a complicated policy landscape, a strategic approach to coordination is necessary, so that effort is proportionate to impact on land use.

An important first step is to understand and prioritise the relevant policy system, including the most impactful plans and strategies on land use, the relationships between them, and how these areas should ideally operate alongside the LUF.

A structured theory of change could be developed to visualise this policy system overall and articulate how it can work coherently. The process of developing the theory of change would also help to improve cooperation amongst delivery partners, and identify blind spots and risks that require management, such as displacing food production and environmental impacts abroad (e.g. consultation question 12).

Whilst we have not completed a comprehensive review, our initial view is that coordination should focus on the revised EIP, the Carbon Budget Delivery Plan and the Farming Roadmap, as well as the rollout of Environmental Land Management Schemes.

The LUF should also interact coherently with the National Planning Policy Framework, National Policy Statements drawn up under the Planning Act 2008, local plans and spatial development strategies, which should in turn be informed by other relevant local plans and strategies (e.g. River Basin Management Plans, and Local Nature Recovery Strategies). These plans collectively inform local decision-making over housing, infrastructure and natural assets. Another important interaction is with the new provisions in the Planning and Infrastructure Bill on land use change, such as the delivery of Environmental Delivery Plans and use of a Nature Recovery Fund.

Government will also need to reconcile demands for energy, housebuilding, and growth. However, this applies to a smaller extent than for agriculture and natural environment objectives, given the evidence presented in the consultation suggests

that the footprint for all new housing and utility infrastructure is projected to come to less than 2% by 2050.¹⁵

Once this prioritisation of the policy landscape is clear, we suggest that the government should publish a clear roadmap for how the LUF will influence and bring coherence across relevant national, strategic and local plans, many of which are already in place or are developing in parallel.

To strengthen the influence of the LUF, as well as improve clarity and consistency in its application, we propose you consider options for giving it meaningful legal footing. This was previously recommended by the House of Lords land use committee¹⁶. Government could consider proposing new legislative provisions which, for example, make explicit reference to the need for local planning authorities to consider the LUF in drawing up local plans and strategies, including Local Nature Recovery Strategies. Such provisions could also clarify what weight decision makers should afford to the LUF relative to other policy and local planning frameworks.

An effective governance system is also crucial to enabling coordination across land use delivery partners, and geographic scales; national, regional and local. We consider this in our response to question 24.

Co-Creation and Engagement on a Land Use Framework

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

We agree that the LUF should be dynamic and adaptive, able to respond to the evolving policy, land use demands, and the developing evidence base. For example, the development of pathways for nature and climate targets, and enhancements to soil monitoring and other initiatives of the Natural Capital and Ecosystem Assessment programme.

The detailed assessment on needs for land use change, and spatial mapping evidence, should be updated periodically. The appropriate timing of these updates depends on the pace of developments in policy and the evidence base. However, we would support completing an update at least every five years, sequenced so that it aligns and informs any updates of EIPs, and future review of Local Nature Recovery Strategies.

There are however aspects of the LUF that should remain relatively constant, to set long-term direction for policy and decision making. For example, the key principles for better decision making, and the high ambition in the land use change needed to deliver nature and climate related targets.

¹⁵ The LUF consultation indicates the land footprint for new housing could reach 1.1% by 2050, and confirmed the footprint for all key utility infrastructure across England in 2022 was 0.2%. Assuming, under a rapid development scenario, the land used for utility infrastructure doubled, reaching 0.4% by 2050, the direct land use footprint for all new housing and utility infrastructure would be 1.5% by 2050.

¹⁶ House of Lords, Land Use in England Committee (2022), Making the most out of England's land.

Question 24: To what extent do you agree or disagree with the proposed areas for improving Government's role in land use policy co-creation?

We commend the government for starting to consider what broader changes are needed for how land-related policies are coordinated across departments.

A strategic oversight body is proposed in the consultation. We suggest that this needs to have clear authority and capacity to ensure the LUF principles are being applied as intended amongst delivery partners, and across multiple scales (national, regional, local). It will also need to enable resolution in the inevitable event of disputes over land use. This will require ensuring policy decisions are suitably balanced across outcomes, considering synergies and trade-offs holistically, and avoiding being swayed by single interests. Furthermore, the body will need to be able to assess how the policies and local plans stack up, and to evaluate whether they are aligned with the scale and pace of the land use changes the LUF consultation assesses as needed.

To achieve this, we suggest that the oversight body will need to be supported with a clear and effective monitoring and evaluation framework, which tracks the influence and outcomes of the LUF, and ensures accountability. This could be designed around a theory of change approach (see response to question 14).

The proposed cross-governmental spatial analysis function is also important. Our understanding is that a lack of coherent spatial datasets and analysis is a common barrier to environmental planning and delivery. For example, our review of Local Nature Recovery Strategies, on which we will be reporting further in due course, has found data gaps and data quality were among the most significant barriers to the Local Nature Recovery Strategies production process. A lack of coordination in spatial mapping was also found to be problematic, leading to both inconsistency in approaches taken between different Responsible Authorities, and limited integration of the Local Nature Recovery Strategies with other relevant spatial plans and strategies.

This analytical function should therefore work to improve the interoperability of spatial data and help to harmonise capability and skills in spatial planning through provision of guidance. This would enable a more coherent approach to spatial analysis across national, regional and local scales. It should also help to define or develop consistent spatial methodologies or tools for applying the LUF decision making principles. This could involve, for example, developing integrated spatial visualisation tools for farming and environmental objectives, such as the National Infrastructure Spatial Tool (see question 2 response).