**Response from the National Landscapes Association to the consultation from Department for Environment, Food and Rural Affairs: Land Use Framework**

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The National Landscapes Association (NLA) is a registered charity that supports the mission to conserve and enhance natural beauty in National Landscapes and other protected areas. One of our key aims is to support and develop a network of ambitious National Landscape teams and partnerships that have a strong collective voice and a positive impact on the places for which they care. This consultation response has been developed by the National Landscapes Association in collaboration with the Planning and Placemaking specialist panel of representatives from across the National Landscapes network.

**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 accept the overall scale of land use change needed.

We think that future agricultural productivity improvements will not necessarily be in line with historical trends, especially under the increasing variability of climate change, and therefore there needs to be more emphasis given to integrating food production and nature recovery in regenerative agricultural systems, given England’s limited land area. Protected Landscapes are key areas where regenerative agricultural techniques that restore nature while also producing food (meeting the definition of ‘sustainable use’, ensuring accordance with IUCN Protected Area Category V) should become widespread and the norm.

ELMS should be better targeted towards PLs.

**QUESTION 2 Do you agree or disagree with the land use principles proposed?**

Strongly agree with existing principles 1, 2, 3 and 4.

Under 3. there needs to be included in the assessment and analysis of these strengths of the land a) the Protected Landscapes that were designated for their natural beauty and b) parallel consideration of land of highest nature value (alongside that of highest development and agricultural values). This would enable a properly evidence-based approach to spatially targeted land use change to locations where benefits are greater and trade-offs are lower.

Regarding Principle 5. Responsive by design – it is unclear how this principle will guide decision making. The application of this principle to the letter could result in infinite changes to land use policy, which creates an environment that is not conducive to deliver any land use change.

We support the adaptation of land use policy to incorporate new data, opportunities and pressures. This requirement may be better served by laying out time-specific review points for the framework and the process by which the framework can be reviewed. Or alternatively through rewording the principle to also articulate the commitment and forward motion that will be needed to make a Land Use Framework a usable tool in practice.

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

Combined and local authorities (including local planning authorities)

Landowners and land managers (including environmental and heritage groups)

If the Land Use Framework were able to achieve effective join-up across several different policy areas (e.g. planning, agriculture, environment, nature), then it would make sense for not only public bodies (government departments, combined and local authorities) and statutory undertakers, but also for landowners and land managers to apply these principles. This would be a worthwhile aspiration, as it would benefit both private and public sectors in increasing efficiency, avoiding costly conflicts, objections and obstacles that result from policies aimed at different outcomes in different sectors.

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

Please explain your answer:

Consistent, long-term national policy signals prioritising nature recovery, climate resilience, community benefit in National Landscapes, reducing uncertainty for buyers/investors.

Support development/alignment with innovative blended financing mechanisms (e.g., natural capital markets, environmental credits, ESG investment tools) blending public funding with private investment to fund landscape-scale projects.

Develop investment frameworks co-designed with NL teams to ensure projects are locally appropriate, community-supported & environmentally sound.

Establish clear, measurable environmental baselines &monitoring tools to give investors confidence in outcomes &to enable performance-linked returns across all habitats.

Prioritise projects that demonstrate strong community engagement &local benefit-sharing, fostering social licence &long-term stability.

Continue to provide technical &capacity-building support to NL teams &local partners to help them develop investment-ready propositions.

De-risking: Offer government-backed guarantees – a ‘DEFRA stamp of approval’ to de-risk important nature projects.

Streamline regulatory frameworks to reduce administrative burdens while maintaining high environmental standards in NLs.

**QUESTION 10 What changes are needed to accelerate 30by30 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

Strong regulations to implement the Protected Landscapes duty, that say Management Plans need to include locally agreed, PL specific contributions towards Protected Landscapes Targets and Outcomes. Amend the PLTOF to include contributions towards 30by30. In this way, contribution towards 30by30 could be included as part of the locally consulted Management Plans.

Regulations should show how relevant authorities should seek to further the purposes of the PL, and forefront the Management Plan as the most important document determining how to meet the duty. Regulations could help to deliver 30by30 by requiring/creating:

o a robust and clear monitoring and compliance system and protocol for the new duty.

o a systemic approach Relevant Authorities can take to applying the duty that is fit for purpose, rather than so burdensome that it leads to paralysis by analysis.

o Relevant Authorities to contribute to delivering the targets, objectives, policies and outcomes within the Management Plan.

o clarity about the definition of ‘natural beauty’, which should already include nature conservation

In this way, Relevant Authorities who carry out functions that affect land in PLs would also be more strongly bound to contribute more to 30by30.

Tools: such as greater alignment of existing Defra schemes with the 30by30 criteria23

Expand the habitats-based network of sites managed well for nature within and around PLs. PLs should be priority areas for this expansion/land use conversion.

The current Defra 30by30 mechanism is only one strand of the broader 30by30 approach needed to deliver against target 3 Global Biodiversity Framework (conserve 30% of land, waters & seas). The international goal requires effective conservation and management through ecologically representative, well-connected, equitably governed systems of protected areas, includes & respects local cultures & promotes harmony between people & nature. The UK’s PLs already work to promote &achieve this harmony, &can form the backbone of the larger scale approaches needed.

Support the UK’s National Landscapes to undertake processes to achieve the IUCN Green List Standard which would provide measurable assurance that a PL was delivering effective, people-inclusive conservation (in line with Pillars: Good Governance, Sound Design & Planning, Effective Management and Successful Conservation Outcomes. Once attained, this could provide a qualifying assurance that the PLs with >75% area appropriately managed for nature, meeting the criteria for the Protected Area Cat V, would also count for 30by30.

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

• Increased resources to National Landscapes, including increasing their operational funding from central government to £50 million per year (between 34 NLs) (including Farming in Protected Landscapes, Access for All, RDEL and CDEL) – which would allow for a step-up in work on the ground to shepherd 30by30 delivery into being, with teams creating new projects and commitments that move the dial on 30by30, at the same time as working to lever in other sources of finance and funding to deliver nature recovery.

• The National Planning Policy Framework (NPPF) sets out that National Landscapes (along with National Parks and the Broads) have the ‘highest status of protection’ in relation to conserving and enhancing landscape and scenic beauty. As landscapes protected for their natural beauty, it is vital that the Land-Use Framework as well as Local Plan guidance reflects that building major developments in National Landscapes should be avoided except in ‘exceptional circumstances’, (with 'exceptional' connoting rarity) and that development within National Landscapes should normally be limited and small scale, as set out in the NPPF.

**Other** (please specify)

National Landscapes (AONBs) have conservation and enhancement of natural beauty at their heart. We agree with the recommendations of the Wild Life Conservation Special Committee (1947) that a central, guiding tenet of Protected Landscapes should be about harmonising “man’s material needs with the protection of natural beauty” – and that this “will also require a sound policy of Nature Conservation” (p60). As envisioned by this original advice to the drafters of the 1949 Act that created NLs, nature conservation should be a core tenet of the purposes. NLs & NPs are IUCN Protected Areas Cat V (lived-in, working landscapes, shaped by human-nature interaction), which require >75% of the land area to be managed appropriately to meet the criteria for the category. According to IUCN, Protected Area land meeting the criteria should also be able to meet the criteria for 30by30.

Protected Landscapes should be enabled to contribute more than 30% to England’s 30by30 goal: these areas should form the backbone of the country’s 30by30 strategy. Indeed, this policy context indicates that 75% or more of the PLs have the potential to contribute, if certain changes were made that ensured effective protection, management and conservations outcomes.

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

Please explain your answer:

The references to ‘development on poor quality land’ (e.g. p26) are unclear. ‘Brownfield land’ would be a more helpful label, and prioritisation and promotion of development on brownfield land, along with promotion of urban renewal, should be a key part of the Land-Use Framework, to help lessen competing pressures on undeveloped land in National Landscapes in recognition of the finite and precious land resource highlighted in the LUF. Such prioritisation would also help deliver the co-benefits and sustainable solutions sought in Q12 & Q13, by delivering greater concentrations of new development in locations where transport and energy infrastructure already exist, and would help support both urban and rural communities to thrive.

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

Please explain your answer:

• Local and strategic land use planning needs to explicitly recognise and incorporate existing landscape designations as sites for natural beauty; planning policy protections that exist in, for example, the NPPF (e.g. the exceptional circumstances test); and the Protected Landscapes duty on relevant authorities.

• The Local Plan guidelines need to be updated to make clear that Local Plans should include existing protections, & that there should be early exchange and better mutual alignment between NL Management Planning and Local Planning processes, taking into account the protections afforded by the designation. Local Plans should also be required to treat and represent National Landscape designations consistently across the country.

• In strategic spatial planning, parallel consideration should be given to land of high development value, high agricultural value, and high nature value. At present, there is more consideration given to the first two, than the latter. There are usable datasets to show land of high nature value – for example, through Local Nature Recovery Strategies. The PLs have already been determined to be land of high/high potential nature value through their designation, and this should be better recognised.

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

Please give any reasons or alternative suggestions in the text box below.

Yes

Please explain your answer:

Yes. Because it would encourage land owners and managers to consider the impacts of climate change on their land especially the viability of future plans. The process of writing a report raises awareness of the issues, risks and potential solutions and also brings together groups to collaborate, enables peer-to-peer support and knowledge sharing that further enhances knowledge of the issues.

**QUESTION 16 Below is a list of activities the Government could implement to support landowners, land managers, and communities to understand and prepare for the impacts of climate change.**

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)

Please explain your answer:

This is the priority as adaptation has to be done at local level and hence information at the local scale is needed.

Developing and sharing clearer objectives would be a useful second priority as standards of good practice would give a clear steer about what direction of travel is needed. And if this could be supported with policy (Strategic vision) and delivered with incentives (e.g. ELMS) the package would be complete. Without all elements it will fail.

Re. providing improved tools and guidance, there are sufficient tools available, what is needed is people to ‘hand-hold’ landowners to support them to make decisions.

This is best done by ‘Boundary Organisations’ that sit between the national and local levels and represent a collective of some sort such that large-scale e.g. regional strategic priorities are considered. This could be certain types of organisations such as Associations or trade bodies e.g. The National Landscapes Association. They need to be able to translate the national targets and strategic objectives from policy into relevant actions at local level, they also ideally need to have an ‘economies of scale’ role where they work with many organisations in a consistent way and share good practice.

**QUESTION 17 What changes to how Government’s spatial data is presented or shared could increase its value in decision making and make it more accessible?**

**More explanation or support for using existing tools, apps or websites**

More human support to teach people how to use the data and what it means is the most important

**Other (please specify)**

There is work going on in the Peak District National Park to use aerial photography (national data) to create high-resolution (10m x10m) land cover maps at landscapes scale using modelling and machine learning. This is in comparison to the current lower resolution (1km x1km) maps (CEH land cover maps) that are available but do not reflect local features on the ground. The high-resolution data improves detection of ecosystem services. It would also enable conservation habitat creation and outcomes to be managed and monitored e.g. peat restoration for adaptation e.g. flood prevention and mitigation benefits e.g. sequestration. This has only been done for one national park to date - Funding to extend the technique to cover initially the Protected Landscapes is critical to measuring 30x30. If this was extended nationally it would give consistent, transparent and comprehensive data coverage, potentially to the whole of the UK. This high-resolution land cover map data could be made freely available and updated whenever the aerial photography is updated- enabling a long-term monitoring system for landuse.

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

Please explain your answer:

Any spatial analysis needs to consider not only land of high development value and high agricultural value, but also land of high value for nature – or high potential for nature recovery. These areas need to be represented visually, in spatial layers.

The Land Use Framework should require an easy to use, interactive map, that you can zoom into, that shows:

• the different agricultural land use classifications, including differentiating between Subgrade 3a and Subgrade 3b

• best and highest value land for nature and nature recovery

• designated landscape boundaries and buffer zones

**QUESTION 21 What gaps in land management capacity or skills do you anticipate as part of the land use transition?**

Development and planning

National Landscapes-specific planning capacity and skills.

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

Yes, every 3 years

**QUESTION 24 To what extent do you agree or disagree with the proposed areas above?**

Agree

Please explain your answer:

We question whether and how the Land Use Framework will be used to make these types of decisions in its current form.

It is unclear how the Land Use Frameworks sits with the NPPF and the planning system.

It is unclear how the land with best potential and value for nature and nature recovery will be represented spatially, or given the same protections as high-grade agricultural land and land suitable for development.

Even if we accept the result of the assessment, it does not mean that we see that the extent of the conversion is feasible without further mechanisms, levers and incentives.