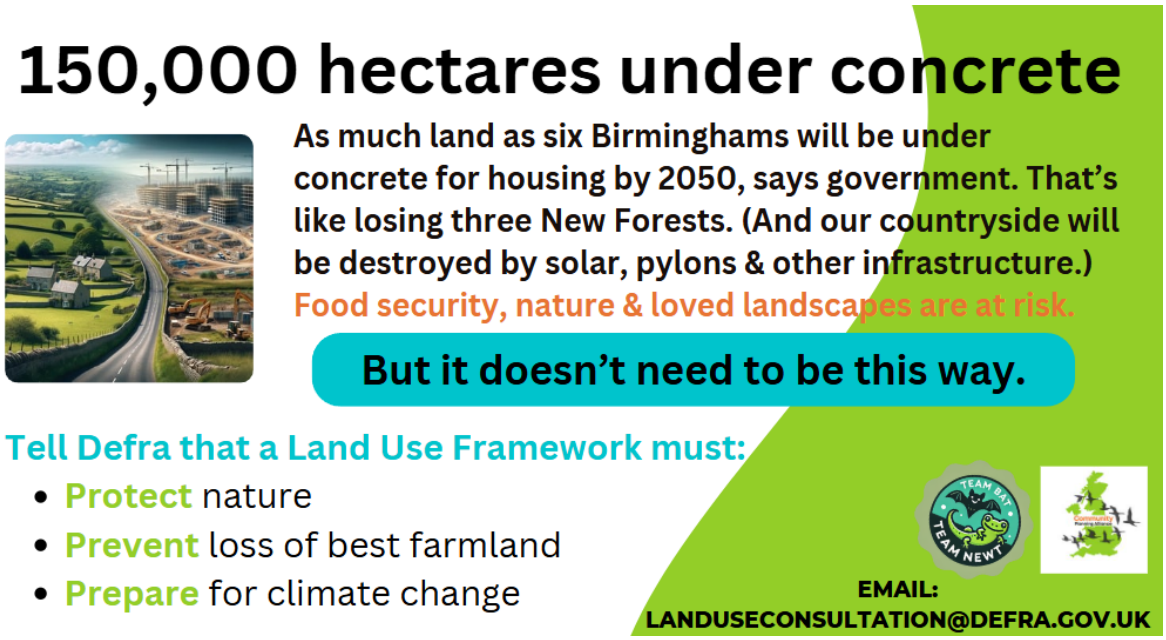
landuseconsultation@defra.gov.uk 25 April

Community Planning Alliance Land Use consultation[1] submission



Protect ecosystems, prevent loss of best farmland, prepare for climate change.

Introduction

We must remember that land is finite. To misquote Twain, *'save land, they're not making it anymore'*. It cannot be plundered ad infinitum for housing, employment space and infrastructure under the illusion that 'only' 150,000 hectares lost to housing by 2050 alone is justifiable. It is not! The Land Use Framework debate needs to be reframed to prioritise the prevention of the loss of best farmland, the protection of vital ecosystems and preparation for climate change. The voting public consistently expresses a desire for policymakers to take stronger action to protect the environment and the countryside.

A land use strategy should embrace a circular economy approach, emphasising the principles of reuse and recycling. The natural capital contribution of England's land is valued at approximately £37 billion; it is imperative that this immense asset is safeguarded for future generations. The value of natural capital is often under reported and under rated. It is not appreciated by government at the same level as GDP or other metrics. Yet we ignore this intrinsic value at our peril. Its loss is irreplaceable. In addition, the rural economy has its own value, including for tourism and for agriculture.

[1] https://consult.defra.gov.uk/land-use-framework/land-use-consultation/

We ask for the following principles to form the bedrock of the Land Use Framework:

1. **Protect ecosystems, prevent loss of best farmland, prepare for climate change.**
2. **Recycle OR repurpose** before taking new land out of food production or natural capital services. Before any land is taken out of food production or nature habitat for homes, employment space, infrastructure or renewables, there should be a sequential test. Developers must demonstrate why their proposed activity could not be successfully accommodated in another way.
3. **An evidence-based approach to alternatives** using Treasury Green Book guidance and Enabling Natural Capital Approaches.

Recognising the risks

A comprehensive land use framework must take into account the following risks:

- Threats to food production: Climate change poses a significant risk to food production within the UK. While the UK's food self-sufficiency rate fluctuates, the increasing global challenges of climate change, nature loss, and water insecurity mean the UK cannot rely on imports indefinitely. A long-term decline in the UK's natural capital represents an escalating threat to domestic food security. We must prevent the loss of farmland.
- Global environmental risks: The World Economic Forum's Global Risks Report highlights that, over the next ten years, three of the four most pressing risks are extreme weather events, biodiversity loss, and ecosystem collapse, as well as natural resource shortages. These risks must be factored into all land use decision-making processes. We cannot rely on global markets.
- Urbanisation and infrastructure expansion: The growth of urban areas and infrastructure exacerbates climate-related issues, including increased flooding due to impermeable surfaces, urban heat islands, and pollution from air and sewage contamination. We must reduce our development land take.
- Cumulative land loss and associated impacts: It is not merely the 150,000 hectares projected to be lost to development by 2050 that should concern policymakers. The associated impacts include the loss of natural capital, pollinator mortality, bird mortality due to collisions with power lines, and economic harm to farmers and tourism businesses. We must see the big picture and reduce the land taken from farming and nature.

Recommendations

To ensure responsible land use, the following measures should be incorporated into the framework:

Evidence-based approach to alternatives: DEFRA's Enabling a Natural Capital Approach and HM Treasury's Green Book should be employed to assess the carbon, natural capital, and socio-economic impacts of land use proposals. All viable alternatives must be explored before land is designated for new development, to ensure that the right things are in the right places. A comprehensive evaluation should be conducted for major infrastructure projects, such as comparing the impact of pylons versus HVDC undergrounding or offshore grid solutions.

Adhere to the mitigation hierarchy: Land use planning should adopt a hierarchy that prioritises avoidance of loss, minimises harm, and mitigates impacts where necessary. Prioritisation should be given to land use strategies that avoid consumption of greenfield land, such as deploying solar panels on car parks and rooftops.

Human Interaction Factor: The impact of humans on nature must be included in decision-making. It is not simply the loss of land to development that harms the environment. A housing development brings pollution in the form or noise, air and light. It brings cats that kill birds and dogs which scare wildlife. It brings humans which trample wildlife beyond the development. Invariably housing developments are associated with new roads and these bring further destruction and pollution, as well as severing habitats.

Preserving best farmland: Best and Most Versatile (BMV) agricultural land should remain dedicated to food production. Regenerative agricultural practices, including the use of field margins and hedgerow planting, should be actively encouraged to enhance biodiversity and soil health.

The best infrastructure is already here.

Before committing to new developments on greenfield, existing infrastructure and buildings should be upgraded, repurposed and optimised:

No new greenfield homes: **Instead, take a Homes for Everyone[2] approach.** Encouraging compact urban growth that minimises land consumption, prioritises brownfield redevelopment and use of empty homes and disused commercial buildings should be prioritised to reduce the need for new greenfield developments. Principles of gentle density should be adopted to reduce land take for homes and roads. 11,000 people have sent our Homes for Everyone report to their MP.

No new roads. **Instead, invest in public transport and active travel**. Invest in the existing rail network to increase capacity.

No new pylons. **Instead, upgrade the existing grid** using technology such as advanced conductors that can triple capacity. **Integrate offshore** (instead of the piecemeal approach) to halve the infrastructure needed onshore and offshore.

No solar on farmland. **Instead, solar (and wind) should be on all domestic, commercial and public rooftops and car parks & brownfield**: Solar panels should be installed on existing built environments such as car parks, residential rooftops, and commercial buildings before considering agricultural land for solar farms. This will also ensure that more generation is close to demand, reducing the need for transmission infrastructure.

There must be a mandatory sequential test. No homes, roads, solar or grid infrastructure should be allowed in countryside/on green spaces/on best and most versatile farmland until they can demonstrate that they have exhausted the options above.

Conclusion

The Land Use Framework must prevent loss of best farmland, protect ecosystems and prepare for climate change so that the UK can safeguard its land resources for future generations. A holistic and precautionary approach to land use is essential in the face of climate change, biodiversity loss, and increasing resource constraints.

"Save land, they are not making it anymore"

(A twist on the Mark Twain quote)

[2] https://homesforeveryone.org/Homes-For-Everyone-Briefing.pdf

About the Community Planning Alliance

The Community Planning Alliance was founded in 2021 to support grassroots campaign groups operating in the planning system. Our map lists over 600 campaigns, all over the UK.

We lobby for:

- better community participation in planning
- greater environmental protections
- the right houses and infrastructure in the right places.

Our Homes for Everyone approach provides 3 million homes without destroying nature's habitats and the report has been sent by 11,000 people to their MP.

Our Team Bat Team Newt campaign seeks to raise the profile of nature in the Planning & Infrastructure Bill. We await approval of our petition "Protect and value nature in the Planning & Infrastructure Bill" by the Government. Click here to buy t-shirts, caps & badges.

We are also campaigning for a land use framework that protects ecosystems, prevents loss of best farmland, prepares for climate change.

Contact Rosie Pearson communityplanningalliance@mail.com

Community Planning Alliance

How to solve the housing crisis for people, nature and the climate

- ☐ 1.5 million+ derelict homes renovated.
- ☐ 1 million + unbuilt homes with planning permission, built.
- ☐ 1.2 million homes developed on brownfield sites, first.
- ☐ 165,000 empty commercial properties repurposed.
- ☐ 26 million empty bedrooms incentivised for rental.
- ☐ Millions of homes left undisturbed for nature.
- ☐ Country's entire carbon budget not used up.

The answer is black & white.
Don't make the Green Belt a grey area.

"Nature underpins everything - the economy, food, health and society - but we stand at a moment in history when nature needs us to defend it."
Steve Reed OBE MP - Secretary of State for the Environment, Food and Rural Affairs

Sign up to protect our countryside, fields and Green Belt at communityplanningalliance.org and homesforeveryone.org