Call for Evidence Land Use and Nature[1]

Community Planning Alliance Response

Question 1

How effectively do current policies balance competing demands in the uplands, including food production, nature recovery, climate mitigation, water management, and public access, and where do the key tensions remain?

Whilst government documents (such as the Land Use Framework) and current policies may suggest there should be a balance in respect of competing demands, including for the natural capital assets mentioned in the question, experience exposes that balance does not exist. We set out examples of the key tensions below.

Prioritising Economic Growth

The National Planning Policy Framework (NPPF)[2] is supposed to balance economic, social and environmental objectives but this government's obsession with growth opportunities (to the exclusion of all else) means that economic factors are presumed to far outweigh any harm to natural capital assets. Policies that protect natural capital assets are, therefore, subordinated and disregarded, as mentioned in the examples below.

The government's National Security Assessment[3] identifies global biodiversity loss and ecosystem collapse as critical threats to national security. It outlines severe risks to the UK's food, water, and economic security, treating ecological breakdown as a systemic strategic issue. These life-threatening risks are not reflected in the 'public interest test' that is made when planning applications are considered. Best and most versatile agricultural land is not protected as required by the NPPF, there are many examples of solar panels, for example, being installed on high grade farmland, rather than on rooftops, car parks, railways, etc. The planning system is predisposed to benefit scheme promoter profits rather than being an impartial assessment of evidence-based need, as we highlight below.

Furthermore, the government's growth agenda is selective and does not, for example, include enhancing or augmenting the value of our natural capital, including that which supports food production, nature's recovery, climate mitigation, water management, and public access, despite the Office for National Statistics highlighting significant benefits in the 2025 UK Natural Capital Accounts[4], citing the total annual value of ecosystem services at £41 billion in 2023, and the total asset value of ecosystem services at £1.6 trillion in 2023.

Evidence of Need

Whilst we recognise that greenfield land is under enormous pressure from development, and this is reflected in the competing demands in the uplands, we are concerned that the government is not basing its decisions on evidence of need. It appears to be persuaded by lobbyists and think tanks, rather than its own Office of National Statistics and other nationally available datasets.

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1 https://committees.parliament.uk/submission/3922/#/evidence/3922/call-for-evidence
2 https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf
3 https://assets.publishing.service.gov.uk/media/696e0eae719d837d69afc7de/National_security_assessment_-_global_biodiversity_loss__ecosystem_collapse_and_national_security.pdf
4 https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalaccounts/2025

The Hope Moor Wind Farm scheme, for example, proposes to erect 23 (200m high) wind turbines on the peat moorlands between Arkengarthdale and Teesdale, bordering the Yorkshire Dales National Park and the North Pennines National Landscape.

This project benefits from the government's policy focus on renewable energy and has been classified as a Nationally Significant Infrastructure Project (NSIP), meaning the final decision will be made by the Secretary of State. It is currently at the initial public consultation stage and there has been much local and national opposition due to concerns about the industrialisation of pristine peatland, threats to local wildlife (including red-listed birds), and potential negative visual impacts on the nearby national parks and pre-historic heritage sites.

Whilst we support the government's aim to increase the use of renewable energy and we recognise that the proposed location of the windfarm is outside the boundary of the protected national parks, much of the land is designated by Natural England as blanket bog, a priority habitat for conservation. The England Peat Map[5] shows extensive peat deposits in the area, an irreplaceable habitat.

The Mitigation Hierarchy[6] should apply to all decisions (including NSIPs). Sites that contain irreplaceable habitats should be avoided because the harm to be caused cannot be mitigated. Compensation should be an absolute last resort, only if there are no alternative sites available and this is not the case for renewable energy given that, earlier this year, the government announced[7] contracts for 157 new solar farms, 28 new onshore windfarms, eight offshore windfarms and three tidal projects.

We are also aware that, in relation to renewable energy sources, the National Energy Systems Operator (NESO)[8] considers that the "*current connections queue stands at over 738 GW, far exceeding the 200–225 GW of clean generation capacity required by 2030*". This means that the grid connection point for this scheme will not be confirmed until later in the development timeline and that the grid connection route and method do not form part of this application, and will instead be progressed through a separate application.

It is wholly inappropriate to plan for the environmental and ecological destruction to be caused by this proposal when there is no certainty that approval to connect will be given for several years, if at all.

If there was balance in the planning system, initiatives such as this would not be coming forward in this location, would not take up the time of limited public sector resources and would ensure that a needs-based assessment interrogates all the evidence to determine that such a scheme in this location **IS** in the public interest, in advance of any proposals coming forward.

We also understand that wind turbines are currently regularly switched off (curtailed) because the grid cannot cope with the amount of energy they produce. This report[9] suggests that, in 2025, Scottish windfarms were paid £350m to switch off, whilst, at the same time, over £1 billion was spent on gas to replace the wind, with the cumulative costs passed directly on to consumers in their energy bills. No windfarm proposals should be coming forward until issues such as this have been resolved as the funding could be better spend on other upland and lowland initiatives.

[5] https://experience.arcgis.com/experience/2de81f5bd54f48e99771549e0b4746d0/
[6] https://www.gov.uk/guidance/natural-environment
[7] https://www.theguardian.com/business/2026/feb/10/uk-onshore-windfarm-new-green-energy-projects-contracts
[8] https://www.neso.energy/industry-information/connections-reform/about-connections-reform
[9] https://modoenergy.com/research/en/scotland-wind-generation-curtailment-gas-plants-grid-constraints-battery-energy-storage-explainer-documentary-8cf9b5be-ad66-4297-8f5b-2d55dcc9df83

In relation to housing and employment, Greater Manchester has, for example, assumed that very little development will take place in its Upland areas in the specific Uplands policy (JP-G5) of its regional spatial plan, known as Places for Everyone (PfE)[10].

Whilst there may be little demand for new housing in uplands areas, what is delivered must meet local need and this must be assessed based on substantiated facts, not developer aspirations.

Despite all the evidence[11] that the housing shortage is not one of supply but one of affordability, the government has not established district based targets to address that need (ie a housing target to deliver social housing). Our own Homes for Everyone Report[12] clearly demonstrates that balance could be achieved by prioritising brownfield sites (where there is already enough land for at least 1.2m homes), empty homes (for which researchers have estimated that there are over 1.5 million empty, derelict or underused homes) and there are also over 1 million homes that have planning permission but are not yet built.

Rural communities are particularly affected by the government's current standard method for calculating housing targets, whereas, absurdly, many urban areas have had their targets reduced. This is inexplicable given that urban areas can provide the most sustainable development opportunities, while development in the countryside is typically unsustainable for many reasons (including lack of sustainable transport options).

Until the government bases its decisions and its policies on genuine and substantiated evidence, there will be no balance between the competing demands in the uplands and beyond.

Disregarding and Weakening Policy

Non-compliance with policy not only leads to huge levels of uncertainty for communities, it also harms trust in process, politicians and officers.

Turning again to the Greater Manchester example, the specific Uplands policy (JP-G5) mentioned above highlights that 8 (large and reasonably large) PfE allocations could have an adverse impact on the Uplands. They are required to comply with criterion 7 of the policy (which aims to ensure that "*new development does not have an adverse impact on protected habitats of the South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA from urban edge effects, loss of and/or disturbance to functionally linked habitats and recreation disturbances*"). Whilst we agree with this policy, there will be little confidence that it will be complied with (for the reasons set out below), and especially as, rather conflictingly, criterion 6 aims to enable "*more people to enjoy the distinctive character of the uplands*".

In addition, in relation to those 8 allocations, it seems Councils cannot even comply with their own policies. Oldham Council, for example, agreed that the supplementary planning document (SPD) for the Beal Valley-Broadbent Moss masterplan required a Sustainability Appraisal (SA). The Council subsequently sent the masterplan out to consultation without an SA, after screening it for a Strategic Environmental Assessment (SEA). The lack of trust in the community is evident from this Freedom of Information Act request[13], which highlights several inconsistencies with the PfE spatial plan and is now the subject of a formal review.

[10] https://www.greatermanchester-ca.gov.uk/media/2drduk0t/places-for-everyone-joint-development-plan-dec24.pdf
[11] https://england.shelter.org.uk/support_us/campaigns/social_housing/brick_by_brick_report_summary
[12] https://homesforeveryone.org/Homes-For-Everyone-Report.pdf
[13] https://www.whatdotheyknow.com/request/sustainability_appraisal_for_the

There are multiple references to PfE compliance failures in objections to planning applications submitted across Greater Manchester. This is a regional spatial plan which took 10 years and £ millions of public money to agree and adopt. The public has a right to expect that its policies will be observed. Yet, like many local plan policies, it seems that, despite the government's insistence that these an essential delivery requirement for a local authority, national, regional and local plan policies can be cherrypicked to satisfy government targets and developer profits.

Going into more detail on this issue, and remaining with the Greater Manchester spatial plan, this clear example of failure to provide balance relates to a lowland, rather than upland site, but we believe it is relevant evidence. The planning inspectorate's decision[14] that a location can be destroyed for development did not provide balance in the competing land demands as the importance of the extensive natural capital within the allocation area was subordinated to development demands, despite significant alternative brownfield sites being available. This particular site, now known as New Carrington, comprises a 335 hectare deep peatmoss (which Natural England considers to be a restorable irreplaceable habitat), 15 sites of biological importance (SBI), a site of special scientific interest (SSSI), woodland and wetland habitats, Grade 2 best and most versatile agricultural land, and provides extensive access for walkers, cyclists and riders of the over 1,000 horses stabled in and around the area (including via the Transpennine Trail and Route 62 of the National Cycling Network). Natural England advised the planning inspectors[15] that the proposed development cannot be accommodated "*without at least causing the deterioration of this deep peat irreplaceable habitat at the site, if not its loss"*.

Given the amount of suitable, available and achievable brownfield sites across England (including in the region and the area surrounding this case study), balanced policy should prevent development from causing substantial harm to natural capital assets such as these. It currently does not.

The subordination of natural capital assets has continued during the preparation of the required masterplan for this particular allocation. All other aspects of infrastructure were considered over a year ago, except the Green and Blue infrastructure, which is still being prepared. The cumulative harms to natural capital were, therefore, not included in the 2025 assessment of the developer contributions needed when planning applications come forward (including those that have been prematurely submitted in advance of the publication of that masterplan).

The planning inspectors' decision to approve this allocation rejected the protections set out in what is now NPPF paragraph 193(c), The footnote in this NPPF paragraph (now footnote 70) suggests that 'wholly exceptional' reasons relate to development schemes such as NSIPs (which is not what is being proposed for this site), guiding decision makers to refuse development that would result in the loss or deterioration of irreplaceable habitats. They determined (paragraph 635 of their report) that the planning authority were "*entitled*" to decide that the development benefits would "*outweigh the loss or deterioration of an irreplaceable habitat",* undermining the supposed protections, and weakening the term 'wholly exceptional' to cover any development, not just those which promote NSIPs.

Decisions such as this set a precedent for future schemes which result in the so-called 'balance' being distorted towards development, rather than impartially weighing the potential outcomes against all local, regional and national objectives.

[14] https://www.greatermanchester-ca.gov.uk/media/9282/pfe-inspectors-report-01-final.pdf
[15] https://www.hwa.uk.com/site/wp-content/uploads/2023/02/Places-for-everyone-NE-letter-to-Inspector-30.6.23.pdf

In another example from the same allocation, a planning application for a Battery Energy Storage System (BESS) benefits from the government's policy focus on renewable energy. Despite causing the immediate loss of almost 20 hectares of very deep peat, it has been approved in advance of the (policy required) masterplan being in place, and before a (policy required) suitable compensation strategy has been agreed. In fact, the LPA has now approved several planning applications that do not meet the specific policy requirements of the regional spatial plan.

NPPF paragraph 193(c) requires a suitable compensation strategy to be in place prior to the determination of a planning application that will harm an irreplaceable habitat. This policy was disregarded and as mentioned above, the application was approved in May 2025, but there is still no published compensation strategy.

BESS developments do not bring any permanent local jobs, so economic benefits are limited. As highlighted in the Hope Moor example above, there are also challenges with connection to the grid. The National Energy System Operator[16] suggests that BESS are significantly oversupplied, "*with around three times more projects than the permitted capacity*".

So, harms to natural capital assets are immediate, an irreplaceable habitat is being destroyed, contrary to development plan policy, with unpredictable and undeliverable benefits, despite the oversupply issue being raised with the local planning authority within local planning objections. A clear example of policy non-compliance and imbalance within the planning system.

Invalid or Absent Environmental and Ecological Appraisals

It is essential that all harms are fully assessed in advance of approving allocations or determining planning applications. Without such appraisals being available the weight of the harms to be caused by development cannot be effectively evaluated.

Going back to the Greater Manchester spatial plan, the planning inspectors recognised the lack of pre-plan appraisals (paragraph 666) but inexplicably accepted site promoter evidence based on brownfield sites in the area as a "*valid*" assessment for the extensive greenfield land which comprises the national capital assets mentioned above. It is inappropriate to make assumptions about an entire allocation site based solely on the outcomes of piecemeal promoter evidence. The outcomes of such ecological appraisals are only relevant in the context of the specific area that has been assessed. They cannot be relied upon to inform the likely impacts (including the cumulative effects) of development across an allocation site. It is also essential that such evidence is impartial and independent.

The planning inspectors' assertion that there can be a reliance on plan policy and statutory protections to "*ensure that any effects on biodiversity will be fully addressed*" is either naïve or disingenuous.

It will be acknowledged that once a site is allocated in a plan, it is a huge 'tick in the box' for development. The lack of mandated environmental and ecological appraisals in advance of an allocation means that the impact on environmental and/or ecological assets can be significantly under-estimated, with schemes emphasising unproven, unpredictable or uncertain economic benefits whilst understating, minimising or dismissing the harms to be caused to natural capital.

[16] https://www.neso.energy/neso-implements-electricity-grid-connection-reforms-unlock-investment-great-britain

Promoting Unviable and Unsustainable Development

We mention the Mitigation Hierarchy above. If the outcome of assessments means developer schemes will destroy natural capital assets or threatened bird/plant/wildlife species, or cause harm to livelihoods, or the health and wellbeing of communities, LPAs should be mandated to secure financial compensation in advance of the construction commencing (in addition to infrastructure contributions and Biodiversity Net Gain). The costs of such compensation must be considered when undertaking viability assessments.

The approval of the allocation highlighted in the case study above was made despite marginal viability for the whole site (the largest in this regional plan, paragraph 637), at the cost of affordable housing and numerous unfounded assumptions (paragraph 629).

The local planning authority (LPA) has since been required to further reduce expected developer contributions by millions of pounds. In one recent planning application a discount of £8m was offered without any guarantees that financial benefits from the development would be reinvested in the local area. Nor was there adequate mitigation for the 10,000 trees the developer proposed to unnecessarily fell in an SBI (regional policy requires a 2:1 tree replacement but the developer's submission was much less than 1:1). In this case, the Council's planning committee refused the application, but the developer does have 6 months to appeal.

What this indicates is that if a large allocation of 5,000 homes and 350,000 m^2 employment space cannot demonstrate robust viability, the planning balance must be questioned if it is approved, especially given the consequential huge level of environmental and ecological harms to irreplaceable and priority habitats, to best and most versatile farmland and to species rich SBIs/SSSI.

Furthermore, our report Besieged by B8s[17] highlights the harms to communities from overly dominant developments. It provides several case studies from around the country that set out the issues experienced by the victims of these developments, including to their financial, mental and physical health.

The assessment of 'public interest' appears to conclude that economic benefits should be given a higher weighting than the extensive impacts on, typically, rural communities.

Furthermore, the NPPF states (paragraph 7) that the "*purpose of the planning system is to contribute to the achievement of sustainable development*", yet unsustainable development is frequently approved and the associated impact on citizens and the public purse[18] is not even monitored.

Lack of Genuine Protections for Important Habitats

Safeguards against harms to irreplaceable habitats are effectively non-existent. We have set out above how developers, LPAs and planning inspectors can interpret and weaken national policy to prioritise development rather than to protect irreplaceable and priority habitats. We would also like to highlight that, in one planning application for a temporary road, residents were informed by the developer that there '*is no guidance or legislation which sets out that Permitted Development rights cannot be used in areas of irreplaceable habitats*'.

It seems there is no appetite in the government to address this deficit in the regulations, their current approach is to reduce protections, remove regulation and enable developers to pay cash to trash the environment and our ecology. We would urge the committee to make the necessary recommendations to reverse this strategy.

More Investment needed for Climate Mitigation and Nature's Recovery

The government should allocate more funding to support natural capital enhancements, such as peatland restoration and tree/vegetation planting.

This would incentivise landowners to prioritise natural capital enhancements rather than development on their land, and would support aims for long term conservation, climate mitigation and nature's recovery.

The Climate Change Committee highlighted[19] in their 7th Carbon Budget that nature-based solutions to "*increase natural carbon sequestration and reduce emissions from land would deliver 2% of the required emissions reduction by 2040, although this share grows quickly to over 5% by 2050. This includes new woodland creation and peatland restoration*".

Accelerating such initiatives would bring huge climate, environmental, and socio-economic benefits, halting carbon emissions, improving water quality, reducing flood risks, and reviving or reintroducing specialised biodiversity. Lack of such action has a cost, which will invariably be paid by the public purse, including the costs of not reducing emissions from degraded peatlands.

The report specifically highlights the potential benefits from the restoration of both upland and lowland peat.

- ***"Restoration of upland peatlands and forested peats (5%).*** *Upland peatlands (mostly consisting of blanket bog) represent the largest peat resource by land area in the UK, totalling around 2.5 million hectares. In the Balanced Pathway, the total restored or near-natural area rises from the current 30% to 60% by 2040, with annual rewetting rates reaching 45,000 hectares between 2030 and 2050.*
- ***Restoration and management of lowland peatlands (12%).*** *Lowland peatland soils occupy a smaller area (0.4 million hectares) than upland peatlands but are more emissions intensive due to their deep drainage and intensive use in agriculture. They encompass a wide range of land uses including fen habitats, cropland, grassland, and extraction sites".*

Furthermore, the Climate Change Committee's recently published report (A Well Adapted UK)[20] highlights the priority climate related risks (Table 1), and makes several recommendations for the government, including investing public money in nature restoration, making nature protection regulation forward looking, supporting the continued viability of farming, maintaining a clear focus on drought in water regulation and new development, which we would urge this Committee to support.

The report makes a clear investment case and sets out a selection of UK-based benefit-cost ratios for adaptation actions (Table 2). In relation to hazards faced, the largest wildfires typically occur in uplands areas. In terms of adaption actions, emergency response, prevention, and protection by UK Fire and Rescue Services gives a benefit to cost ratio of 6:1, making it an obvious priority for the investment of public funding.

Lack of Consideration for Community Concerns

Lip service is paid to feedback from communities about their concerns in relation to issues such as flooding, pollution and environmental harms. The government even resorts to 'name-calling' with those who aim to protect natural capital assets being labelled 'NIMBYs', 'blockers' and 'zealots'.

Furthermore, despite many interactions with developers, lobbyists and think tanks, we cannot even secure a response to our request for the MHCLG to attend a webinar focused on the victims of inappropriate and unsustainable development.

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[17] https://communityplanningalliance.org/wp-content/uploads/2026/01/251201_CPA-Report-BESIEGED-BY-B8-WAREHOUSES_Dec25.pdf

18 https://communityplanningalliance.org/wp-content/uploads/2026/03/260319_CPA-Report-WHO-PAYS-FOR-UNSUSTAINABLE-DEVELOPMENT_Mar26.pdf

[19] https://www.theccc.org.uk/publication/the-seventh-carbon-budget/

[20] https://www.theccc.org.uk/publication/a-well-adapted-uk/

Question 2

What has been the impact of agricultural policy changes (including the transition away from direct payments) on upland farming businesses, and the impact of these changes on farming profitability?

Others will be better placed to respond to this question

Question 3

To what extent do the current Environmental Land Management (ELM) schemes and other support like the Farming in Protected Landscapes (FiPL) schemes support financially and environmentally sustainable land management in the uplands?

Others will be better placed to respond to this question

Question 4

How do legal protections for uplands areas (including designation as a National Park or Area of Outstanding Natural Beauty / Protected Landscape, and designations such as Site of Special Scientific Interest, or Special Area of Conservation) impact decision-making, land management, and outcomes?

It will be recognised that National Landscapes are currently protected under section 85 of the Countryside and Rights of Way Act 2000 (as amended and strengthened by the Levelling-up and Regeneration Act 2024), which provides a statutory duty to enhance as well as protect. That duty must logically extend to the visual experience of the landscape, both from within it and from places from which it is visible. Those regulations are increasingly being bypassed in the push for major infrastructure and economic growth. The government is weakening legal protections by, for example, confirming in the response to the Fingleton Review[21] that it will legislate to constrain the Protected Landscapes Duty, clarifying that NSIP developers are not required to pay financial compensation to comply. The Campaign for National Parks has also highlighted[22] that the proposed changes in the next iteration of the NPPF dilute existing protections by replacing robust presumption of refusal (in relation to major development in our National Parks) to qualified support in exceptional circumstances. The government is signalling to developers and LPAs that there are no longer any genuine protections. This is impacting both planning and decision-making. The Hope Moor Windfarm case study, mentioned above, is an example of this. The site of this development is adjacent to the Yorkshire Dales and North Pennines landscape, a wholly unsuitable location for industrialisation. The proposed development will lead to the wholesale destruction of this moorland landscape, its unique habitats and its endangered wildlife. The scheme will also cause the wilful destruction of both designated and undesignated heritage assets, which will be impacted by the traffic, the construction and the operation of this windfarm.

[21] https://assets.publishing.service.gov.uk/media/69b3ead0b84f01b2be53a1de/building-our-nuclear-nation-government-response-to-nuclear-regulatory-review.pdf
[22] https://www.cnp.org.uk/news/changes-to-national-planning-policy-framework-threaten-protections/

It seems that, despite alternative, more appropriate, more sustainable sites being available, the developer is willing to invest resources in an environmentally and ecologically destructive application which will be strongly opposed by local communities and beyond. This is unsurprising given the encouragement of the government's rhetoric and policy changes.

The outcomes are stark! The unique ecological environments of the uplands, which help mitigate flooding, store carbon, provide income, and recreation opportunities will be permanently harmed by enforced, relentless industrialisation.

It is time genuine balance was brought into the planning system to ensure economic growth is measured alongside the value of natural capital, ecosystems services, the preservation of long-standing traditions and the benefits of a rural economy.

Question 5

What improvements are needed in land use data, mapping, and modelling to support effective decision-making in the uplands? What training or other skill development options are needed to support this?

There is, in general, insufficient data collection and information analysis about the impact of development on the uplands and the wider rural economy. The Greater Manchester spatial plan, mentioned above, did not include any reference to the impact on the rural economy, no analysis was included showing the total loss of Grades 1, 2 and 3 agricultural land, no assessment of the number of rural jobs to be lost in farming, stabling, and their supply chains, no appraisal of the impact on rural communities. Communities were notified that such analysis would be included in subsequent local plans. This has not materialised.

Improvements are needed throughout the decision-making process, beginning with ensuring the right data is captured, published and monitored. Process automation is key to bringing together currently disparate datasets, immediately increasing analytics capacity but more work needs to be done on transparent and agreed data definitions and standards, data capture opportunities and publication methods.

The Climate Change Committee's (CCC's) recently published report (A Well Adapted UK)[23] provides recommendations to build a better national adaptation framework, including proposing that meaningful objectives and measurable targets should be established. We agree and support their assertion that there is a need for "*a public dialogue on acceptable levels of risk and cost*".

The report also highlights that a "*complete and consistent monitoring and evaluation framework needs to be put into operation to track outcomes of adaptation delivery*". The report suggests that improvements to tools, methods, information and skills on adaption are needed because "*adaptation is poorly understood, undermining effective action*". It suggests that priorities include "*high-level standards, planning assumptions, and tools for climate risk assessment and adaptation action".*

We also agree with the proposals in the Land Use Framework[24] (LUF) to improve the availability of land use and decision-making data, including in relation to land ownership and changes in agricultural use.

[23] https://www.theccc.org.uk/publication/a-well-adapted-uk/

[24] https://assets.publishing.service.gov.uk/media/69c69033471d520038d0f7a6/Land_Use_Framework_Accessible.pdf

The LUF commits to making foundational data available to those who need it (we assume this will include communities), publishing more statistical analysis and improving the availability of spatial and geographic information. As with the CCC's proposals, we would like to see more information published about the intended meaningful objectives and measurable targets that will be established. It is essential that progress can be monitored, not just by government, but by communities too. There is real concern about long term food security, flooding and the other risks set out in the government's National Security Assessment.

Making data available to communities is essential, not only to build trust, but also to ensure that government-collected data can be supplemented with the anticipated citizen science observations. Communities should also be consulted on priorities for data collection. Whilst digitisation is important, no-one should be excluded from citizen science because of challenges with access or capability.

Hard data, such as the number of hectares of uplands moorlands, will need to be augmented by soft data, such as the assessments of the condition of the land, and which will, typically, be exposed to a level of subjectivity that will need to be considered. The identification of data gaps should include communities as well as decision-makers as the funding for this exercise will come from the public purse and the outcomes should address community needs as well as those of public bodies. Farmers and other citizens should be consulted on any proposals to share data which could be considered 'personal'.

The increasing use of AI and other emerging technologies will require a level of training. Whilst the client interface will typically make access very user-friendly, understanding how to interpret the outputs will be essential.

For those who wish to be involved in improving the data collection and analysis processes, training may be needed on understanding datasets and standards and even on the data itself and its sources.

Initiatives to improve land use data, mapping, modelling and monitoring to support effective decision-making in the uplands would benefit from the establishment of user groups, workshops, citizen panels and/or other public forums.

Finally, training to ensure there can be truly independent scrutiny of proposals and decisions is essential.

Question 6

How might land use and business changes in the uplands impact rural communities?

To some degree this depends on how the government's growth agenda continues to damage and impact the uplands via schemes such as the Hope Moor Windfarm initiative mentioned above.

The industrialisation of these typically isolated locations, with their previously spectacular panoramic views, may impact the economy of local communities, which are intensely rural in character. Tourism may decline, traditional skills will be lost, outdoor activity roles may no longer be required, and conservation may be abandoned.

Whilst many replacement businesses generate zero local jobs (such as Battery Energy Storage Systems) or may bring the majority of their staff with them to the new location (such as in logistics developments), jobs in the rural economy will be permanently lost.

In addition, land promoters are utilising the government's Grey Belt policy to cause further harm to environmentally and ecologically rich greenfield land. Our report, Greying the Green Belt[25], highlights the significant misuse of this policy and includes several case studies which demonstrate that our rural areas are under significant threat of overdevelopment.

Conversely, on a more positive note, the LUF, mentioned above, highlights the intention to make more data available, digitally, to "*reduce the burdens placed on farmers and land managers and make it easier for them to take decisions about the land they farm whilst also improving quality and accuracy of land data*". The addition of other technology changes (such as equipment which utilises smart GPS to apply seeds, water and fertilizers only where needed, reducing chemical waste and lowering overheads) also brings benefits, not just to the farmers themselves but also to their communities (lower pollutant levels, particularly in water resources).

With more investment from the government, new jobs in peatland restoration and woodland creation could be created to support the upland rural economy.

Question 7

How can government policy ensure that rural communities in upland areas benefit from changes?

The government must bring equity to the planning system. Whilst, as mentioned above, developers have 6 months to appeal a refusal decision, rural communities in upland areas and beyond, have no right of appeal if a decision is granted. Their only option is to take a judicial review, and they only have 6 weeks from application approval to make that decision.

The NPPF must give substantial weight to the importance of the unique ecological environments of the uplands (and beyond) and the rural economy. Sustainable development can only be delivered if there is equity between the economic, the social and the environmental objectives.

The government must also use substantiated evidence from reliable sources, such as the Office for National Statistics (not developer funded think-tanks, or lobbyists, with a profit agenda to satisfy), when making their decisions or determining policy.

Adequate funding should be allocated to specifically meet the needs of upland areas, to prioritise nature based solutions, to ensure the training mentioned above is delivered and to ensure that there is investment in local innovation.

The LUF highlights (page 54) that the "*importance and relevance of regional variation in land use can only be fully understood by utilising local knowledge and expertise and by facilitating participation in the co-design process*". The government must, therefore, ensure that local citizens can influence the plans for their areas, that there is genuine public consultation and that authorities address citizen feedback.

The risks and issues highlighted in the National Security Assessment must be fully addressed. The government should clearly set out how the UK will, for example, increase the proportion of food produced locally, despite any increase in severe weather incidents due to climate change, how farmers will be supported to address the required adaptation and how habitats and landscapes will be protected to minimise harms to species

[25] https://communityplanningalliance.org/wp-content/uploads/2026/01/251024_CPA-Report-GREYING-THE-GREENBELT_Oct25.pdf

Government should introduce a moratorium on all development on upland or lowland peat to ensure there is maximum effort in rewetting, restoring and protecting these irreplaceable habitats. Restoration of even shallow peatland has long been considered both possible and valuable[26].

ONS[27] estimates that the cost of restoring 100% of peatlands, whilst significant, would be "*approximately one-tenth to one-fifth of the carbon emissions benefits that would be gained".* Their analysis suggests that even more conservative estimates of the benefits of meeting the CCC's change objective of having 55% of peatland in good status were in *"the order of £45 billion to £51 billion over the next 100 years".*

Such a policy would, therefore, benefit both current and future generations.

Other policies such as minimising soil erosion and addressing the climate change impact on upland species, should also be prioritised.

Earlier this year, the government announced changes to the Treasury Green Book[28] which now aims to support fairer and more balanced public investment decisions across the whole of the country, including in areas such as the uplands and rural communities which have historically not received the same levels of investment as urban areas. The Committee should ensure that the Green Book rules are fully followed and that it is possible for upland regions and rural communities to realise their full potential and are thriving economically.

The revised Green Book now reflects a range of government commitments to embed environmental policy into spending decisions, including, for example, the integration of the Environmental Principles Policy Statement (making it clear that environmental principles such as integration, prevention of harm, precaution, rectification at source and polluter pays should be considered as part of appraisal processes where relevant) and appraisal guidance now requires greater consideration of climate and biodiversity outcomes, the legally binding environmental targets set under the Environment Act 2021 and subsequent environmental improvement frameworks.

As highlighted by the CIEEM[29], the inclusion of environmental principles into the UK's central spending guidance "*marks a shift toward ensuring that environmental outcomes are treated as an integral part of policy and investment appraisal, and not an afterthought*".

To further support this approach, the Committee should also ensure that generous funding is secured to enable farmers to deliver public good, including tangible benefits such as, for example, environmental protection, improvements to water quality, reductions in flood risk, and the provision of food security.

Kind regards

Marj Powner

Vice Chair

Community Planning Alliance

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[26] https://www.sciencedirect.com/science/article/pii/S0301479715301146

[27] https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalforpeatlands/naturalcapitalaccounts

[28] https://www.gov.uk/government/news/new-green-book-to-ensure-that-investment-in-all-parts-of-the-uk-given-a-fair-hearing

[29] https://cieem.net/uk-government-updates-green-book-to-embed-environmental-principles-in-spending-decisions/

About the Community Planning Alliance

The Community Planning Alliance[30] is a national umbrella group for over 700 communities[31], all are campaigning against inappropriate development in their areas, and all disagree that decisions are being made in the 'public interest'. We have extensive knowledge and experience of the planning system, and our aims include seeking increased community participation, better environmental protections and the right homes and infrastructure in the right places.

[30] https://communityplanningalliance.org/
[31] https://www.google.com/maps/d/viewer?ll=52.97433203327261%2C-1.0471043976708527&z=7&mid=1nFg3i1Ft5-K4LadaEMCb0wr17-I33Kk