



Inquiry into Land Use in England

EDGE response to Call for Evidence

the EDGE

[the Edge](#) is a built and natural environment think tank and network. It is multi-disciplinary in a landscape remarkable for its abundance of single-discipline institutions. Started as a means of creating a shared space between the architectural and engineering institutions, the Edge is a voluntary group with no staff and multiple stakeholders across the built and natural environment professions. We encourage cross-disciplinary debate and campaign for change that will improve outcomes for society.

This response has been generated by the core membership of the Edge to represent views from across built and natural environment perspectives.

Introduction

the Edge strongly supports the development of a well-designed and effectively implemented integrated land-use strategy for England and sees it as being an essential tool in tackling a number of wicked problems and delivering good governance across England. We recognise that historically developing a properly functioning, and sufficiently granular, land use resource would have been a major challenge, but technology and systems are now both readily available and affordable not only to record land use in real time, using equipment such as GPS and autonomous sensors, but also to crowd source a large proportion of the data input required from local communities and NGOs as well as statutory agencies like local planning authorities and Natural England.

A land-use strategy should be cross cutting between individual policy areas, departments, authorities and agencies, ensuring that different parts of the economy, whether agriculture, housing, industry or transport, work smoothly together to create and deliver success. It should encourage and support, in the words of the Cabinet Office mission statement, 'collective government, helping to ensure the effective development, coordination and implementation of policy'¹.

Such a strategy should take the medium to long-term view, enabling and supporting Public Goods that are not always amenable to delivery by the market and able to help reconcile conflicting goals. It should be able to operate over and above boundaries of administrative convenience.

A successful land-use policy should encompass the following;

- Be focused on delivering a number of high-level long term goals
- Provide a unified record of the current (and previous) state of land-use in an easily accessible format
- Show the future impact of potential environmental change
- Allow for the demonstration of planning and change of use proposals
- Enable consultation and interaction between interested parties, including Local Planning Authorities, landowners and community groups
- Provide a methodology for evaluating alternative land-use options and balancing different policy objectives

¹ <https://www.gov.uk/government/organisations/cabinet-office/about>

High-level goals

The following are proposals for high-level goals achievable through a successful land use policy:

1. Increased involvement of local and regional communities in agreeing proposals
2. Transitioning to low-carbon agricultural practice and regeneration
3. Significantly increased tree-planting in both rural and urban settings
4. Providing high quality infrastructure to all areas, including telecoms and public transport
5. Achieving substantial decreases in average journey/transport times and distances, especially those involving the use of private motor vehicles
6. Increasing the use of walking, cycling etc. for the majority of short journeys
7. Achieving the local production and supply of clean water, essential foodstuffs, materials and services
8. Facilitating and incentivising the local generation of clean 'community' energy
9. Protecting, enhancing and increasing the resilience of natural and historic environments
10. Avoiding urban sprawl and re-establishing connections between urban and rural environments and economies
11. Radically reducing pollution and waste
12. Measurably improving access to natural environments and open spaces for health, sport and leisure

Land Use framework

An effective *land use framework* is an essential tool in the delivery of such a policy, helping to clarify and balance the multi-dimensional aspects that are at the heart of land use considerations. A well-designed land use framework should be capable of enabling the delivery of many Public Goods including:

- A net-zero carbon emissions national economy
- Levelling up
- Equitable and fair access to opportunities, resources, goods and services
- Healthy and safe environments
- Maintenance and enhancement of biodiversity
- Food, resource and energy security
- The wellbeing of future generations

Questions and Responses

Pressures and challenges

1. What do you see as the most notable current challenges in relation to land use in England? How might these challenges best be tackled? How do you foresee land use in England changing over the long term? How should competing priorities for land use be managed?

The pressures on the use of land in England are manifold and include both the perceived need for more land for a number of uses as well as the need to maintain the many natural services that the land, and only the land, is capable of providing.

Land is required for:

Net zero

- a. Tree planting – The 6th Carbon Budget², along with its predecessors, requires 'Scaling up afforestation rates to 30,000 hectares a year by 2025 in line with the UK Government's commitment, rising to 50,000 hectares annually by 2035'. This will put substantial pressure on land currently used for other purposes, affecting many people's lives and will require detailed planning consideration, not least to ensure that mono-cultural plantations are not created with little biodiversity and few other purposes or potential access. At present there appears to be no framework in which this is required to fit with other ambitions such as Natural England's Nature Recovery Network as part of the 25-Year Environment Plan³.
- b. Carbon sequestration – soils, peatlands and wetlands are important contributors to carbon storage and such areas should be both maintained and expanded where possible and appropriate.
- c. Renewables – increased on-shore clean energy generation will be necessary to provide the extent of renewable energy envisaged to achieve a full net-zero economy and improved energy security. Ideally such generation should be part of community initiatives designed to benefit the immediate locality and to reduce transmission losses as a priority, before feeding into the national grid. Land use policies around turbines etc. will need to be rethought to ensure they gain local acceptance and the rules around planning consent considerably improved.

Ecology and environment

- d. Food and bioenergy crops – England needs to feed itself better and to reduce its reliance on the global market for food, this will require a rethought national farming strategy developed in tandem with appropriate land use policies. The potential for increased land take for a new low carbon form of agriculture under this scenario will put pressure on other demands for land, which will again require planning. The need for bioenergy crops is however questionable and should not be prioritised without detailed assessment of the true benefits.
- e. Bio-diversity gain – more land will be required if legal (and moral) requirements for net bio-diversity gain are to be delivered, whether through deliberate planting and introduction of species or through re-wilding. Whichever strategy is adopted, we need a much better understanding of the role of the billions of living organisms in every handful of soil and their role in capturing carbon.
- f. Public value – significant areas of land in England have recognised or incipient public and social value, often leading to regulatory safeguarding; for example community, ecological or heritage protection. Assessments of value are a necessary part of a land use framework and this is likely to lead to increased protection of cherished locations and vistas.

²The Sixth Carbon Budget The UK's path to Net Zero, 2020, Committee on Climate Change

³ [https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network#:~:text=Local%20Nature%20Recovery%20Strategies%20\(%20LNRS%20\)%20are%20a%20new%20mandatory%20system,action%20and%20investment%20in%20nature.](https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network#:~:text=Local%20Nature%20Recovery%20Strategies%20(%20LNRS%20)%20are%20a%20new%20mandatory%20system,action%20and%20investment%20in%20nature.)

Infrastructure

- g. Transport (& other) infrastructure corridors – Infrastructure provision needs to improve, not least to reduce the need for carbon intensive private transport. As recent infrastructure proposals, whether HS2 or the Thames Tideway project, have shown these are often contentious and good arguments for them are frequently lacking. While long-term and strategic planning for infrastructure is essential so is the need to accurately and honestly present valid arguments for their benefits.
- h. Water retention/collection and flood alleviation – land, as ever, will be needed for the safe collection and channelling of rainwater and later the potential alleviation of floods, while reducing damaging soil run-off. With global heating and an increased volatility of weather events the requirement for semi-dedicated land for this purpose is growing year on year yet will be always maintain its priority if lives and livelihoods are to be protected.

Housing & development

- i. Housing – the need to provide more housing of all types and occupancies is well documented in the face of ever-increasing household numbers. And with housing comes the need for almost all other services, but especially including employment opportunities, transport, retail, utilities and leisure facilities. the Edge considers that the great majority of new homes should be developed within or as planned extensions to existing conurbations, either as infill or densification, especially when there is good, pre-existing infrastructure provision.
- j. Industry and logistics – the global economy demands ever bigger sites for assembly and distribution of goods, often in key positions on transport routes. Other sites need to be located close to urban centres, or in the case of the potentially polluting or resource intensive ones, far from them. Identifying such sites requires consideration on at least a regional scale and careful planning to mitigate many of the potential harms associated with them.
- k. Leisure and sport – Access to green and blue space in both rural and urban settings is critical for the mental and physical health of England's populations. Land needs to be actively set aside for such uses and accessibility ensured. Frequently such land will also need to work for other activities, especially agriculture and arboriculture, and these will need to work successfully together, requiring careful land-use policies to facilitate greater rights to roam, access and other service requirements.

As noted above it is important that all land should be considered, so far as is possible, as being capable of delivering on multiple fronts simultaneously and planned accordingly. We have made major errors in the past creating mono-functional landscapes and sites, which we need to avoid in future through richer and more considered land-use policy.

- 2. What are the key drivers of land use change, which need to be planned for, and how should they be planned for? What is the role of multifunctional land use strategies in implementing these plans?

There are a series of major issues, including changes to the climate, the national demography, patterns of work and the social make up of England that a wide-ranging and well thought-through land use strategy is essential for tackling successfully.

- a. One of the Edge's major concerns and the focus of much our work is how best to deal with climate change in the built and natural environment and make the transition to net-zero carbon emissions. We consider that land use planning is a necessary and vital part of this transition, but one that has yet to develop the thinking or the tools to achieve it. It is currently a sleeping giant that needs to awaken.
 - b. Demographic change in England is leading to an older population, living in ever-smaller households, but it is also facing increasing social, employment and financial inequality. Social mobility has stalled, debt is on the increase and the prospect of generational improvements to living standards and potentially in reverse. These are all issues for an effective land-use strategy to get to grips with and to assist in developing solutions to.
 - c. Good employment opportunities are focused in certain areas of the country or even only in particular parts of cities. It is encouraging that the Government is attempting to address this through its levelling up agenda, and particularly that the Levelling Up White Paper was so emphatic in its use of a spatial approach to analysing levelling up issues, though perhaps a little less clear on how that would translate into spatial planning. It is eminently logical to extend this spatial approach to mapping and deliberating on a framework to demonstrate how the use of land can facilitate levelling up. This is the nexus where local knowledge and larger-than-local intelligence can be synthesised to optimise solutions. Again, land use planning has an important part to play to cope with this. But in the wake of the Covid19 pandemic a shift in living and working locations and patterns is also underway that can be helped or hindered from achieving positive social and economic outcomes. Urgent work needs to take place to improve small-scale locations across England to turn them into flexible employment hubs capable of generating a renaissance in working conditions and innovation. This requires creativity in land-use policies and funding as well as changes to basic planning regulations. But the window of opportunity for this is short and it needs urgent attention.
3. How might we achieve greater and more effective coordination, integration and delivery of land use policy and management at a central, regional, local and landscape level?
- a. the Edge agrees with UK 2070 that a national spatial plan is urgently required⁴.
 - b. A strategic land use framework for England with integrated land use frameworks embedded in all local plans must be urgently resourced and developed. It should provide accurate, real-time data and mapping to inform strategic national and detailed local decision making and implementation
 - c. Land use should be considered on the basis of 'Functional Natural Areas' rather than political or administrative boundaries, which nature does not respect but which often limit local authorities' ability to think and act outside their local box. A national agency should be established and empowered to have oversight and some jurisdiction over such FNAs in the same way that the NIC provides strategic oversight of the nation's hard infrastructure. We recommend this because, as the Dasgupta Review pointed out, there is no economy without nature, so the nation needs its natural capital and infrastructure to receive equivalent valuation in policy and investment terms as the material over which the NIC presides.

⁴ <https://www.theplanner.co.uk/news/the-uk-requires-a-spatial-plan>

- d. Priorities for land use should be agreed at all decision-making levels.
- e. 'Planning' at both national and local level is currently suffering from under-resourcing and staffing and needs to be empowered and invested in to do what it should do, i.e. 'plan', so that multiple needs can be met and outcomes achieved.

Farming and land management

Qs 4 & 5. These questions are outside the Edge's area of knowledge or expertise

Nature, landscape and biodiversity

- 6. What do you see as the key threats to nature and biodiversity in England in the short and longer term, and what role should land use policy have in tackling these?
 - a. the Edge concurs with the Dasgupta Review⁵ on the levels of environmental degradation, current and threatened both in England and globally as a result of actions and lifestyle choices made in England. We have a collective duty to guard, maintain and enhance biodiversity and not just in England.
 - b. The UK is one of the least natural countries in the world⁶ and it will take a concerted effort to achieve the level of nature and biodiversity restoration on which we all depend.
 - c. A strategic land use framework would enable an assessment of where nature and biodiversity can be increased including areas of re-wilding and natural regeneration on a permanent basis.
- 7. What are the merits and challenges of emerging policies such as nature-based solutions (including eco-system and carbon markets), local nature recovery strategies and the biodiversity net gain requirement? Are these policies compatible, and how can we ensure they support one another, and that they deliver effective benefits for nature?
 - a. Nature-based solutions are some of the most powerful and effective mechanisms we have for delivering carbon reduction, pollution absorption, solar shading and many other Public Goods that have long-standing proven efficacy and should be unreservedly encouraged, but not excessively relied on. Demand reduction should be prioritised over expecting nature to clear up our mess for us.
 - b. The biodiversity net gain requirement is welcome but it is limited and will not deliver sufficient nature recovery by itself and the habitat is only secured for 30 years, whereas permanent increases in biodiversity and natural environments are what is needed.⁷ There is also the problem of accurate real time baseline data, which is where the land use framework and current data and mapping will be so important. The Committee should ask to see responses to the recent Biodiversity Net Gain consultation as this covers many of these issues.

⁵ The Economics of Biodiversity: The Dasgupta Review, February 2021, www.gov.uk/official-documents

⁶ <https://www.independent.co.uk/climate-change/news/nature-wildlife-species-extinct-britain-countryside-state-of-nature-report-2016-rspb-farming-agriculture-a7256441.html>

⁷ Biodiversity in the UK: Bloom or Bust? Environmental Audit Committee Report 2021-22
<https://committees.parliament.uk/publications/6498/documents/70656/default/>

- c. Using England's natural environment as an opportunity for offsetting should not be an option. The same applies to the trend for habitat banking as an element in negotiation planning gain. England's natural capital is already a fully committed part of the Carbon Plan. Offsetting can be delivered through demand-reduction measures, but not through double-counting nature-based sequestration.

Environment, climate change, energy and infrastructure

8. How will commitments such as the 25-year environment plan and the net zero target require changes to land use in England, and what other impacts might these changes have?

The 25 year environment plan and the 2050 net zero carbon emissions requirement in the revised Climate Change Act represent a series of commitments that a fully functioning set of land use policies will be essential to delivering. Dealing with issues including clean air and water, a thriving and productive natural environment, maintaining landscapes and heritage settings, responding adequately to the existential threat of climate change, eliminating waste and pollution and ensuring biosecurity will be key to all our futures and the focus of our jobs for decades to come. And if we don't deal with them urgently we face, as a country, a seriously damaged and unproductive environment.

Land use policies need to be configured first and foremost on tackling these issues alongside other UN Sustainable Development Goals. This will undoubtedly be limiting and many of the ways we have treated land in recent years will no longer be possible or even, possibly, imaginable. The challenge will be to achieve positive change at the rate necessary and to take those with responsibilities for its stewardship along with it.

In particular, land use needs to be planned to reduce waste, whether it is unnecessary transport use, soil depletion or energy spent reversing avoidable harms from pollution. Land will need to be productive, to provide so far as possible for local communities, but not at the detriment to its future potential. We need to ensure that our actions keep the world within its carrying capacity and planetary boundaries.

9. How should land use pressures around energy and infrastructure be managed?

- a. According to the Defra's England Trees Action Plan, 10% of England is urban and home to 83% of the population. A strategic land use framework should be able to prioritise and spatially plan for competing land uses.
- b. The central purpose of a framework to manage land use is to balance and reconcile conflicting requirements with Public Goods in mind. Energy and other infrastructure needs are frequently and successfully combined with a wide range of other uses, but it does take forward planning, cooperation and collaboration between many different interest holders. It requires leadership with a view to the long term.

Land use planning

10. What do you see as the advantages and disadvantages of the existing land use planning system and associated frameworks in England? How effectively does the system manage competing demands on land, including the Government's housing and development objectives? What would be the merits of introducing a formal spatial planning framework or frameworks, and how might it be implemented?

The existing land use planning system is no longer working effectively. It has been under-resourced for many years and suffered from regular patches to keep it just about functioning. The conversion to a digitised and inter-active system has barely begun and is fragmentary and deeply inconsistent. The system is currently a dinosaur in the modern world and is incapable of facing up to the major challenges facing England and the UK in the 21st century. It needs reinventing.

There is broad awareness that a system of fairly, transparently and consistently evaluating and balancing land use options capable of acting rapidly and at reasonably low cost while building and maintaining public trust is required. This is a tall order, yet not impossible if developed on a non-partisan basis and adequately resourced. A great deal, including the on-going viability of UK PLC, will hang on its success. A mechanism akin to a citizens' panel is suggested to develop a potential framework for such a system. At the present time it is important that this should be seen to operate outside the existing political system.

The prime objective for any system of evaluation should be to deliver Public Goods, including harm reduction from reducing carbon and other pollutant emissions, while ensuring a thriving, just and equitable economy.

11. What lessons may be learned from land use planning frameworks in the devolved nations and abroad, and how might these lessons apply to England?

Not answered – this requires a major research project to answer adequately

Conclusion

12. Which organisations would be best placed to plan and decide on the allocation of land for the various competing agendas for land use in England, and how should they set about doing so?

The discussion on an England wide land use strategy is timely, urgent and deeply necessary and the Committee is to be commended for taking this on. In conclusion we would like to highlight the following points.

1. An effective and easily accessible (for all) land use strategy is an essential tool for good governance for any country at any time, but in particular England at the present moment with all the stresses and dangers inherent in the national and international economies, the impact of Brexit, the aftermath of the Covid19 pandemic and the threat of global heating. Putting a good strategy in place, backed up by an effectively public information campaign and the introduction of a digital, data-rich mapping resource for the country is essential.

2. Planning is an essential mediator between the market and those who live, work and rely on the land and in its built and natural environments. It is capable of taking the longer and wider-term view that markets do not necessarily need to worry about. We have been dangerously operating with a half-functioning system of land use planning for too long and reform is now overdue.
3. The Treasury Green Book Annex A1, *Non-market Valuation and Unmonetisable Values* section on Environmental and Natural Capital, and its associated DEFRA guidance *Enabling a Natural Capital Approach*⁸ between them contain most of the essential elements necessary to evaluate those dimensions of land use that have the greatest impact on the climate and biodiversity emergencies. It is not always evident that this is understood, or that these tools are used across national government beyond Defra, or at all in local government. We recommend that they, or the principles they embody, should be used as part of the appraisal of all land use proposals.
4. The reform needs to be handled together by local and national government, but requires a reinvigorated/reinvented/re-resourced local government system to thrive. External bodies, including the Edge, will do all they can to help, but a healthy democratic mandate is at the heart of a successful outcome.
5. Land use planning needs to be agile and responsive. It will continuously need to adapt to changing circumstances and policies and the framework should be designed to achieve this. Departmental silos must be discouraged from developing that might stymie the necessary adaptability. Land use policy should be a means of building bridges between departments, disciplines and interests, fostering collaboration and cooperation in order to achieve the Public Goods it is well capable of delivering.

the Edge April 2022
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⁸ <https://www.gov.uk/government/publications/enabling-a-natural-capital-approach-enca-guidance/enabling-a-natural-capital-approach-guidance#natural-capital-policy-project-appraisal>