

Land Use Consultation
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YO17PX

Submitted by email only to: landuseconsultation@defra.gov.uk

24th April 2025

Dear Sir/Madam,

Re: Land Use Consultation

Introduction

Thank you for releasing the Land Use Consultation which we understand to be part of an on-going national engagement with stakeholders seeking to optimise the use of land. The Land Planning and Development Federation (LPDF) recognises the need for improvements in spatial planning in order to deliver the necessary infrastructure and housing alongside growing the national economy and crucially that this all needs to be appropriately balanced with the needs of our natural environment.

As such the LPDF recognise the need for a Framework or National Plan that addresses land use, but also the need for this to be aligned with and link to the various tiers of planning policy (Strategic Development Strategies and Local Plans). The LPDF strongly believe that you can only have a Land Use strategy if you have underlying strategies for all the underlying uses, i.e. a National Plan for development.

The LPDF recognise the government's wider strategic planning agenda and acknowledge and support many of the changes and reforms being brought forwards, however we note the list of strategies identified on page 10 of the consultation document, all of which are very laudable, however there needs to be a ringmaster as such to link and align the various objectives and oversee delivery. This will be critical to ensuring the objectives and targets (such as delivering 1.5 million new homes) are met.

About the LPDF

The LPDF seeks to represent the UK's leading land promoters, home builders and commercial developers. LPDF members support the housebuilding and commercial development sectors by promoting sites through the planning system, providing "shovel ready" land with a planning permission which can facilitate the delivery of infrastructure and serviced land parcels.

The LPDF seeks to actively engage with government on planning, housing and commercial development policy and to educate the wider public on the social, environmental and economic benefits of development through an evidenced based approach.



The LPDF encourages its members to deliver well designed, high quality, sustainable places which deliver a mix of housing types and tenures, commercial spaces and community uses that have a positive social, environmental, and economic impact.

Our key values include:

- Working in a positive and cooperative way with central and local government and key stakeholders, to deliver a planning system capable of supplying the homes and employment space we need.
- Promoting research and an evidence-led approach to policy development.
- Increasing the supply of new homes to meet demand and make home ownership a realistic possibility for all those who aspire to it.
- Ensuring that we build the affordable homes of all types and tenures that this country so desperately needs.
- Delivering new employment space to meet demand from businesses and support economic growth.
- Championing the impact of increased housing delivery on reducing intergenerational unfairness.
- Creating well designed, high quality and sustainable places to live and work.
- Educating and informing about the social, environmental and economic benefits of development.
- Supporting diversity of delivery in the market and championing SME developers.
- Promoting diversity and inclusivity within the sector.

Questions

Q1. 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?

The LPDF note the assessment made regarding the scale of land use change needed. In this regard one query we would raise is whether issues such as topography have been factored into the thinking, i.e. it may only be 0.2% land take, however it is not clear if this is a percentage of all the land or just a percentage of developable land?

Notwithstanding the above query, the LPDF welcome the fact that the scale of land use change required to deliver 1.5 million new homes is only 0.2%. We consider this to be a helpful statistic that could be useful in the ongoing debates and discussions regarding future housebuilding.

Q2. Do you agree or disagree with the land use principles proposed?

The LPDF are in general agreement with the land use principles proposed, however believe that with regards to principle 4 more needs to be said about mitigation and how this could assist in the delivery of new infrastructure and housing, whilst ensuring opportunities to produce food, support nature and water priorities as well as being resilient to climate impacts.

Q3. Beyond Government departments in England, which other decision makers do you think would benefit from applying these principles?



As noted in the introduction to this submission, the LPDF believe that co-ordination between departments and the multiple strategies is critical, that links need to be made to investment plans, and that there needs to be a ringmaster as such to link and align the various objectives and oversee delivery.

Through the Planning and Infrastructure Bill the Government is proposing to bring forwards new Strategic Planning Boards, that will deliver the Spatial Development Strategies (SDS). The Federation believe that the principles adopted here in relation to national land use, should follow through to both the strategic planning scale and also to the local level of plan making.

Q4. What are the policies, incentives and other changes that are needed to support decision makers in the agricultural sector to deliver this scale of land use change, while considering the importance of food production?

The LPDF have no response to this question.

Q5. How could Government support more land managers to implement multifunctional land uses that deliver a wider range of benefits, such as agroforestry systems with trees within pasture or arable fields?

The LPDF have no response to this question.

Q6. What should the Government consider in identifying suitable locations for spatially targeted incentives?

The LPDF have no response to this question.

Q7. What approaches could most effectively support land managers and the agricultural sector to steer land use changes to where they can deliver greater potential benefits and lower trade-offs?

The LPDF have no response to this question.

Q8. In addition to creating multi functional land uses and spatially targeting land use change incentives, what more could be done by Government or others to reduce the risk that we displace more food production and environmental impacts abroad?

The LPDF have no response to this question.

Q9. What should the Government consider in increasing private investment towards appropriate land use changes?

Again, the LPDF point to the need for the Government to consider other schemes and strategies and to ensure that they are thinking about how they will work together rather than just the process.

Q10. What changes are needed to accelerate 30by30 delivery, including by enabling Protected Landscapes to contribute more?

The LPDF welcome the references to National Parks and National Landscapes within this section of the consultation document. However, we believe that the Government should be linking the 30by30 objectives to the Nature Recovery Fund Proposals currently being worked up. The LPDF also strongly supports the need to increase the access for community uses of these landscapes.

Q11. What approaches could cost effectively support nature and food production in urban landscapes and on land managed for recreation?



The LPDF believe that allowing residential gardens to count towards this could assist to a certain degree. There is also the potential for these issues to be factored into the New Town proposals.

Q12. How can Government ensure that development and infrastructure spatial plans take advantage of potential co-benefits and manage trade-offs?

The LPDF recognise the need for the Government to be more coordinated around NSIP delivery, to ensure that these infrastructure projects are bringing forward all the benefits possible. It will be important to align NSIP with the forthcoming strategic plans.

A national plan, setting out national priorities and objectives, which could then link with the new strategic level, Spatial Development Strategies (SDS) could assist in maximising the potential co-benefits.

Q13. How can local authorities and Government better take account of land use opportunities in transport planning?

The LPDF believe that this is something that can to a certain extent be addressed through the effective re-introduction of strategic planning. Specifically, a national transport planning strategy, with the relevant powers required for its implementation entrusted to the new Strategic Authorities.

Q14. How can Government support closer coordination across plans and strategies for different sectors and outcomes at the local and regional level?

In order to establish clear coordination across various plans and strategies, there is a need for standard data entry and linked to this, advances in digitalisation. There is also a clear need for better communication to counter some of the negative arguments and assumptions (for example with regards to taxation).

Q15. Would including additional major landowners and land managers in the Adaptation Reporting process support adaptation knowledge sharing?

The LPDF have no response to this question.

Q16. 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. Please select the activities that should be prioritised.

The LPDF consider all of these activities important and believe that they should play a role. However, providing better information on local climate impacts to inform local decision making and strategies would be the Federations top priority from the list provided.

Q17. What changes to how Government's spatial data is presented or shared could increase its value in decision making and make it more accessible?

A national database for spatial data would help provide a national perspective, and would effectively provide a national evidence base for spatial planning. This would need to make use of all the latest technology such as satellite imagery.

Q18. What improvements could be made to how spatial planning data is captured, managed, or used to support land use decisions?



Please see response to Q17 above.

Q19. What improvements are needed to the quality, availability and accessibility of ACL data to support effective land use decisions?

The LPDF are supportive of the need to review the ACL data to improve its quality, availability and accessibility.

Q20. Which sources of spatial data should government consider making free or easier to access, including via open licencing, to increase their potential benefit?

In order to ensure more spatial data is made widely accessible for the public benefit, the LPDF believe that all spatial data should be made free or at least easier to access.

Q21. What gaps in land management capacity or skills do you anticipate as part of the land use transition? Please include any suggestions to address these gaps.

The LPDF have no response to this question.

Q22. How could the sharing of best practice in innovative land use practices and management be improved?

The LPDF have no response to this question.

Q23. Should a Land Use Framework for England be updated periodically, and if so how frequently should this occur?

Yes, a Land Use Framework would need to be reviewed and updated periodically. The LPDF would suggest that this should be undertaken at least every 5 years.

Q24. To what extent do you agree or disagree with the proposed areas above?

The LPDF have no response to this question.

