

Response to Defra's Land Use Consultation

23 April 2025

Summary

We strongly agree that significant land use change is needed in order to meet nature and climate targets but we are concerned that the scale of land use change proposed in this consultation is insufficient. Defra must ensure that the final Land Use Framework sets out the scale of change needed in order to deliver the 30x30 commitment and other key environmental targets. The Framework should also include a vision for Protected Landscapes which recognises the huge potential for land use which supports nature recovery in these areas. To deliver this vision, Government needs to reform the legislative underpinning for Protected Landscapes including updating their purposes, reforming governance, and providing additional powers to influence land use in these areas.

Our response provides further detail on the legislative changes and calls for a number of other measures aimed at maximising the potential benefits of land use change in Protected Landscape, including:

- Stronger support for a just transition which incentivises farmers and land managers to adopt practices such as regenerative agriculture, the adoption of appropriate grazing regimes, natural regeneration, targeted action for species recovery and maintenance and protection of priority habitats.
- Eliminating the most damaging land use management practices including a ban on all burning and afforestation on peatland, an end to commercial peat extraction, irrespective of peat depth, and the introduction of licensing for driven grouse shoots.
- Increased resources for the regulatory bodies, such as Natural England and the Environment Agency, to ensure they are better equipped to monitor and enforce these, and other regulations aimed at ensuring land is managed in a way which supports nature recovery.
- Requirements for large landowners, of both public and private land, to report on what they are doing to contribute to 30x30 and deliver National Park management plans and nature and climate targets. This is particularly important given that 90% of land in National Parks is privately owned.
- A doubling of the core funding for National Park Authorities.

Response to Questions

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?

Agree

Please explain your response, including your views on the potential scale of change and the type of change needed, including any specific types of change.

We strongly agree that significant land use change is needed in order to meet nature and climate targets. However, we do not believe that this consultation provides the evidence needed to allow us to say whether we agree with the assessment of the scale and type of land use change needed. As the modelling is based on area-based targets, rather than outcomes targets, it is unclear whether the changes proposed are sufficient to meet outcomes targets in areas such as net zero, species abundance and water pollution.

We are also concerned that the scale of land use change proposed is insufficient to meet the 30x30 commitment. The Analytical Annex acknowledges that what is currently proposed may be an underestimate of the level of change required and overestimates the amount of land that currently counts towards 30x30. Wildlife and Countryside Link's most recent 30x30 progress report [estimates](#) that just under 3% of England's land qualifies which is very different from the 11% figure quoted in this Annex which does not even match the figure of 7% included in the [Defra policy paper](#) on 30x30 published last October. This discrepancy needs to be addressed if there is to be any confidence in the accuracy of the assessment provided but even if the higher figure of 11% is accepted, it is still not clear that the scale of change proposed in this framework would be sufficient to deliver 30x30, especially as the consultation refers to the land use changes being delivered by 2050 which, is of course, long after the deadline for 30x30.

Defra must ensure that the final Land Use Framework includes delivery of 30x30 as a fundamental underlying principle. It must set out the scale of change planned in order to deliver this commitment which is fundamental to ensuring both nature recovery and food security long term.

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

Agree

Please provide any reasons for your response including any changes you believe should be made.

We don't disagree with any of the five land use principles proposed but we are concerned that they fail to address the urgent imperative of tackling the nature and climate crisis. We would therefore like to see the inclusion of an additional principle about supporting nature recovery and climate action. We would also like to see principle 3 amended to include a specific reference to giving priority to delivering nature recovery and access opportunities in Protected Landscapes in line with the proposed updated purposes for these areas.

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)
- Others (please specify)

We believe all of the above would benefit from applying these principles, as would all public bodies whose decisions have an impact on land use, including Government departments and their arms-length bodies. The decisions made by bodies such as Natural England, National Highways, National Park Authorities and the Planning Inspectorate can have a significant impact on land use even if they are not the owners of that land, so it is important that they are applying the principles. Government bodies that own and manage land, such as Forestry England, Ministry of Defence and National Park Authorities should be expected to be exemplars in their application of these principles.

QUESTION 4: 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?

Agri-environment support should focus on landscape scale recovery and supporting farmers to adopt practices to enable nature recovery. The Environment Land Management scheme (ELM) should provide proper long-term assurance and support to encourage investment in the kind of changes in land management needed to deliver 30x30 and other environmental targets. This is vitally important in National Parks and National Landscapes (especially in the uplands), where significant land use change is required. Government should be clear that natural-process led land management is the priority across all Protected Landscapes, and reward the agricultural sector for delivery of that, with food production in those landscapes a secondary outcome.

There should be a just transition supporting farmers and land managers to adapt to the phasing out of basic payments, and the adoption of land management practices that will drive public goods. This is particularly important in areas where there is likely to be a greater proportion of land use change such as the uplands. Support should cover regenerative agriculture, the adoption of appropriate grazing regimes, natural regeneration, targeted action for species recovery and maintenance and protection of priority habitats.

Rewilding should be recognised as a legitimate and potentially beneficial land management choice. Where it is an appropriate management choice for nature recovery those who wish to adopt it, should be rewarded and supported to do so.

The Landscape Recovery tier of ELM should be scaled up, across all Protected Landscapes to drive change at scale; already it is clear that there is huge appetite and ambition to deliver landscape recovery through this scheme but there are also concerns regarding Defra's pace and ability to respond. The Farming in Protected Landscapes (FiPL) programme should also be scaled up and embedded in ELM, with National Park Authorities empowered to make decisions on FiPL aligned with their Management Plans.

QUESTION 5: 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?

Through appropriately targeted agri-environment support as set out in our response to Question 4. There should also be a requirement for all government owned and managed land within Protected Landscapes to be managed for nature by 2030. This will require a government commitment to phase out intensive and damaging practices (such as conifer planting on peat) and move to natural-process led management.

QUESTION 6: What should the Government consider in identifying suitable locations for spatially targeted incentives?

Government has committed to halting the decline of biodiversity, meeting Net Zero and ensuring 30% land is managed for nature by 2030. National Parks and National Landscapes are at the heart of this. They cover 25% of the land in England and have been designated in law for over 70 years ago, in recognition that these areas contain the best of our nation's natural wealth. These landscapes have long been underfunded – directly in terms of core grant – and indirectly, in the way that government expenditure does not sufficiently target incentives towards them. The fact that only 6% of National Park land is managed effectively for nature, shows that there is a clear case to spatially target incentives to deliver landscape change in these areas. National Parks and National Landscapes should receive much

greater support for agri-environment schemes in recognition of their special qualities and statutory purposes and the fact that such schemes have such a vital role to play in driving change and delivering 30x30 in these areas. There is a clear case for Protected Landscapes to receive greater support via an increase in targeting spending, such as water company investment and government grants such as the Climate for Nature fund in these areas.

Upland areas in National Parks are particularly at risk of inappropriate land use changes if a lack of support through agri-environment schemes results in agricultural intensification in these areas. Incentives should be better targeted at farmers and land managers to ensure this does not happen. There is also an important role for National Park Authorities in advising or guiding where particular land use changes may be most appropriate within their National Park and ensuring the Land Use Framework is reflected in their Local Plans and Management Plans would help achieve this.

QUESTION 7: What approach(es) 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?

It is vitally important that the Land Use Framework is used across government to drive change. All incentives, including taxation, research and capital and revenue expenditure, should be aligned across Government to aid this delivery. We recommend extending the planning system to cover agriculture and forestry activities as this would be a very effective mechanism for ensuring land use changes are delivered in a way which provides the greatest potential benefits, particularly in National Parks where 70% of the land is farmed and a high proportion of land is owned and managed by Forestry England. This would ensure that any land use changes in a National Park complied with policies in the relevant Local Plan and were helping to deliver the Management Plan and Local Nature Recovery Strategy for that area.

This should be accompanied by the introduction of measures to eliminate the most damaging land use management practices including a ban on all burning and afforestation on peatland, an end to commercial peat extraction, irrespective of peat depth, and the introduction of licensing for driven grouse shoots. There also needs to be increased resources for the regulatory bodies, such as Natural England and the Environment Agency, to ensure they are better equipped to monitor and enforce these, and other regulations aimed at ensuring land is managed in a way which supports nature recovery.

Ensuring that a greater range of people have an opportunity to shape how, and where, land use changes are implemented would help maximise the potential benefits, particularly in National Parks. This could be achieved by embedding deliberative democracy and ensuring representative decision making via a Citizens' Assembly in each National Park. These

Citizens Assemblies should bring together land managers, farmers, residents, visitors, people who have never visited, nature and climate experts and others to consider and inform the priorities for nature recovery and how best to achieve them.

QUESTION 8: In addition to promoting multifunctional 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? Please give details for your answer.

- **Monitoring land use change or production on agricultural land**
- **Accounting for displaced food production impacts in project appraisals**
- **Protecting the best agricultural land from permanent land use changes**
- **Other (please specify)**

The Government should support and encourage dietary choices which include reduced consumption of meat and dairy products as this would lead to a reduction in the amount of land required to be used for animal feed or animal production in the UK and thus reduce the risk that we displace more food production and environmental impacts abroad.

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

The Government should establish a Climate Peatlands Fund to fulfil the huge potential for peatland restoration in the uplands. This should be accompanied by measures to mobilise private sector investment, underpinning voluntary codes and markets with a regulated framework that provides long-term certainty for business and ensures that investment is delivering for nature aligned with National Park Management Plans. This should be primed with a long-term commitment to Government investment in peatlands.

However, the Government needs to recognise that it is unlikely to be able to rely too much on private investment to deliver the kind of land use change needed to meet 30x30 and other environmental targets. It must therefore continue to provide appropriate levels of public investment in order to deliver appropriate land use change. Public bodies, such as Forestry England, the Ministry of Defence (MoD) and water companies must be required to align investment for nature recovery and there should be a doubling of the core funding for National Park Authorities (NPAs). Core NPA grants, currently make up a tiny proportion of Government environment funding: a doubling will restore budgets in real terms, to 2010 levels. In return, Government should set out clear expectations of what NPAs should deliver on nature recovery, public access and inclusion and other key outcomes including leveraging other monies.

New duties introduced through the Levelling Up and Regeneration Act 2023 now require all public bodies to “seek to further” the statutory purposes of National Parks (and National Landscapes). This should unlock significant investment to support appropriate land use change in these areas. However, the regulations setting out how these duties should be applied have not yet been published and these are now urgently needed to ensure rapid implementation and secure compliance by all relevant authorities.

QUESTION 10: What changes are needed to accelerate 30by30 delivery, including by enabling Protected Landscapes to contribute more? Please provide any specific suggestions.

- **Strengthened Protected Landscapes legislation (around governance and regulations or duties on key actors) with a greater focus on nature**
- **Tools: such as greater alignment of existing Defra schemes with the 30by30 criteria**
- **Resources: such as funding or guidance for those managing Protected Landscapes for nature**
- **Other (please specify)**

We welcome the Government’s commitment to amending the statutory purposes for Protected Landscapes and reforming National Park governance. We believe that this offers significant opportunities for accelerating nature recovery in these areas. The legislative changes needed to deliver these commitments should be introduced swiftly and there is a perfect opportunity to do this through amendments to the Planning and Infrastructure Bill which is already going through parliament.

Government’s policy paper on 30x30 is clear that Protected Landscapes will provide the backbone for delivery. They contain half of England’s priority habitats and SSSIs, 60% of deep peat, and nearly 88% of heather and acid grassland habitats. However, the policy paper is also clear that currently, much of these areas do not meet the protection or management criteria. The government therefore needs to implement changes to legislation and management of these areas to ensure that these criteria are met across these landscapes. For example, 94% of National Park land in England could be managed for nature – the vision and changes should aim for this.

The Land Use Framework should set out a vision for Protected Landscapes where wildlife is in abundance, supported by effective and proper protections for nature at the landscape scale and where all damaging activities are prohibited. Where all the rivers and lakes are clean, all the peatlands are restored to full health and all their ancient woodlands and temperate rainforests are expanded and broad-leaved woodland coverage is doubled. This would be a future where communities are supported to thrive through the green economy,

where every citizen feels welcome and has an opportunity to experience peace and tranquillity.

To deliver this, Government needs to reform the legislative underpinning for Protected Landscapes including updating their purposes, reforming governance, and providing additional powers to influence land use in these areas. It also needs to provide more investment through alignment of incentives and core funding to the Protected Landscapes bodies.

The final Land Use Framework needs to be crystal clear that National Parks and National Landscapes are for nature. They are the national priority places for nature's recovery and are places where the priority for land use is natural-process-led management. This could be reflected in a new land use category of 'natural process led land'.

That's not to say that National Parks and National Landscapes are not important for many other reasons: their spectacular natural beauty, deep cultural heritage, opportunities for public enjoyment, health and wellbeing, farming and food production and, of course, local livelihoods and vibrancy of communities. A focus on nature should enable delivery of these other outcomes: without nature, there is no health, no economy, no food, no future. Farmers and commoners within the National Parks are already facing a perilous future – it's crystal clear that we need much greater investment and support for regenerative land management to reflect the huge public value that nature recovery within National Parks provides – and of course, health and wellbeing, access and recreation, and cultural heritage.

Strengthened purposes

For Protected Landscapes to contribute fully to 30x30, they will need a stronger remit to drive and secure nature recovery, so it is absolutely clear that their statutory **purposes need to be updated**.

However, it is essential that the final wording agreed for the amended purposes does not result in any reduction in the status and standing of the Protected Landscapes, including at an international level. For that reason, we recommend the adoption of the following principles with regard to the language and definitions to be used when amending the purposes of National Parks:

- The purposes, when combined with the Sandford Principle, send a clear signal of prioritisation and support resolution of conflicts.
- Nature recovery and natural beauty are the priorities. These should be clearly defined in the legislation drawing on internationally agreed definitions, appropriately

- updated where necessary e.g. to ensure that something cannot be 'naturally beautiful' if it a) damages natural ecosystems and b) hinders nature recovery.
- The word(s) used to strengthen support for nature recovery in the conservation purpose must also take account of existing national and international definitions and commitments. The current purpose refers to 'wildlife' and Glover proposed using the word 'biodiversity'. However, the IUCN's internationally agreed definition of a protected area places a strong emphasis on 'nature conservation' which is defined more broadly than 'biodiversity'.
 - There should continue to be a reference to 'cultural heritage'. 'Cultural heritage' should be defined clearly in a way which makes it clear that it cannot be used to support cultural and traditional practices that are directly causing biodiversity loss or hindering nature's recovery, such as the burning of peatland or intensive sheep farming.
 - The purposes should include a specific emphasis on tackling climate change in terms of both adaptation and mitigation (as identified in our 2021 report on National Parks and the Climate Emergency.) The purposes, coupled with the Sandford Principle, should emphasise the need to deliver climate action in ways that also deliver for nature, for example natural regeneration of woodlands and natural flood risk management.
 - The second purpose should be reformed to better emphasise inclusivity and the health and wellbeing of current and future generations.
 - The first purpose must have precedence if there is a conflict between the purposes so the Sandford Principle should be strengthened and must continue to apply and should be extended to The Broads.

Governance reforms

There is a need for legislative change in order to **reform governance** to enable National Park Authorities to deliver the renewed purposes and 30x30. There are also some quick wins that could be delivered without the legislation.

As a first step, improving the performance of NPA Boards could be addressed immediately through a Ministerial direction reminding NPAs of the expectations and duties which apply to Board members. This could build on the model in Wales, where the government issues a 'remit' letter to NPAs setting out what they are expected to deliver in return for the funding they receive. There is also a need for improved training, fixed term appointments and clear performance standards to make it easier to remove under-performing members. A review of the public appointments process could also deliver some quick wins to appointment of Secretary of State members, ensuring that the criteria for appointments are inclusive and reflect the purposes of National Parks.

Another opportunity to deliver change quickly exists in the form of the regulations which are required to ensure effective implementation of the changes introduced through section 245 of the Levelling-up and Regeneration Act 2023 (LURA 2023). This legislation created a series of important new duties which require all public bodies to “seek to further” the statutory purposes of Protected Landscapes and provides for the Secretary of State to make regulations which set out how those bodies should comply with those duties. As NPAs are included in the list of bodies to which these duties apply, these regulations should set out clear expectations of how NPAs are required to use these new duties to deliver their purposes, including nature recovery in National Parks. These regulations could give statutory underpinning to Ministerial expectations on Board priorities, behaviours and recruitment (for example, ensuring that local authority members are appointed based on those most qualified for the role).

There is also a need to **amend primary legislation** to ensure National Parks have the leadership required to address the challenges of the 21st century. This could be delivered by a small amendment to the Planning and Infrastructure Bill which makes it easier to reduce the size of Boards and requires an increased proportion of members to be appointed on the basis of having relevant skills and experience. We believe at least 50% of Board members should be nationally appointed based on merit and expertise, as was proposed originally by Hobhouse when Labour was first establishing National Parks. Increasing the proportion of national members will also help increase diversity on NPA Boards, particularly if it is supported by changes to the application process, and consideration of the timing of Board meetings and other relevant arrangements in order to support and encourage those from a diverse range of backgrounds to apply. We can provide further details of a draft amendment which would allow the Secretary of State to amend secondary legislation to increase the proportion of National Park Authority members who are nationally appointed, on the basis of their skills and experience. It would also require that consideration is given to ensuring members appointed by local and parish councils have relevant experience and that there is a balance of experience across the purposes of National Parks.

Given the scale of the challenges we currently face and the huge potential for National Parks to deliver more for the nation across multiple policy agendas, including public health and social inclusion as well as nature recovery and climate action, there is an urgent need for a **more wide-ranging review** of the existing governance model. This wider review should take place in parallel with the legislative amendments and the other changes we set out above in order to ensure rapid implementation of the changes needed to deliver culture change, reduce bureaucratic burdens, and ensure NPAs are dynamic, focused on their purposes and can deliver nature recovery and other key priorities at pace.

At present, NPAs are constituted in a similar way to local government authorities. For example, the New Forest National Park Authority has a similar level of bureaucratic burden as the New Forest District Council, despite the latter having a much wider remit and being 15 times the size in terms of budget. Amending the legislative underpinning of National Park Authorities, so that they are more akin to non-departmental government bodies would enable great cultural reforms and allow them to be more innovative.

Tools

Other measures needed include:

- Streamlining of the consenting process through the development of MoUs or similar to speed up the delivery of nature recovery projects.
- The introduction of strong and effective regulations setting out clear expectations for what public bodies need to do to deliver their new duty to seek to further the purposes of Protected Landscapes.
- The statutory guidance on Local Nature Recovery Strategies should be amended to ensure that these are fully aligned with Protected Landscape Management Plans.
- Water regulators must ensure that water companies reduce pollution and comply with high standards across all National Park waterways.
- Support for small scale horticulture in National Parks to allow more food to be produced locally and to shorten the food supply chain to local businesses. Our Food 1200 is an example of small-scale land use change driving nature recovery and climate benefits.
- National Park Management Plans should identify priority nature recovery areas where nature recovery will be accelerated in order to meet 30 x 30 targets.
- Requirements for large landowners, of both public and private land, to report on what they are doing to contribute to 30x30 and deliver National Park management plans and nature and climate targets. This is particularly important given that 90% of land in National Parks is privately owned.
- An updated legal remit for the Forestry Commission which requires it to prioritise nature recovery.
- Extending the Protected Landscapes duty to large private landowners.

Resources

There is a need for significant increases in resources for National Park Authorities to ensure the amended purposes can be delivered effectively. The current funding deficit acts as a significant barrier to Protected Landscapes contributing more to nature recovery. There should be a doubling of the core funding for National Park Authorities (NPAs). Core NPA grants, currently make up a tiny proportion of Government environment funding: a doubling will restore budgets in real terms, to 2010 levels. In return, Government should set out clear

expectations of what NPAs should deliver on nature recovery, public access and inclusion and other key outcomes including leveraging other monies.

Public bodies which own and manage significant land holdings should be required to contribute towards the cost of habitat restoration in these areas, recognising the “polluter pays” principle. For example, the MoD should contribute towards peatland restoration where unexploded ordinance can add to the cost and Forestry England should be required to remove plantations to restore peatland habitats and tackle issues with self-seeded conifers.

Other

Every test of public opinion we reviewed for our Health Check report showed that nature is what people most value and want to see prioritised in Protected landscapes. When National Parks were created 75 years ago, it was under a ‘People’s Charter’ that set out a vision for every citizen to walk, completely immersed in nature, surrounded by the awe and wonder of our most special landscapes and wildlife. A new People’s Charter should renew the social contract for National Parks, setting out what nature needs, what communities need, and what society needs. This should be founded on:

- Celebrating and supporting people’s connection with nature as an essential for nature recovery, ensuring that every citizen, no matter their age, race, class or where they live, feels welcome and connected to National Parks. This should be underpinned by new rights of access to land and water, coupled with a duty to behave responsibly and respect nature and those who live and work in rural communities.
- Embedding deliberative democracy and ensuring representative decision making via a citizen’s assembly in each National Park to inform the Management Plan. This would build connections and understanding across different constituencies, bringing together land managers, owners, farmers, residents, visitors, people who have never visited, nature and climate experts and others to consider and inform the priorities for nature recovery and how best to achieve them.
- Reforms to support greater public and community ownership of land in National Parks, including a requirement that any land over a certain size is first offered for community or public purchase when put up for sale, supported by a Treasury backed capital fund to support public sector purchase of land in National Parks.

There are further details of the other changes needed to accelerate 30x30 delivery in Protected Landscapes in the Health Check report we published last year:

<https://www.cnp.org.uk/health-check-report/>

QUESTION 11: What approaches could cost-effectively support nature and food production in urban landscapes and on land managed for recreation?

Significant areas of land in the upland National Parks are managed for the recreational activity of shooting. The Moorland Association [states](#) that its members are responsible for 860,000 acres of upland heather, much of which is likely to be in National Parks. This is land which has the potential to deliver huge benefits for nature and climate but unfortunately this potential is currently limited by the way in which this land is being managed and in particular the adoption of practices aimed at maximising the benefits to the shooting industry such as moorland burning to increase the numbers of red grouse.

To ensure this land is supporting the changes needed to deliver 30x30 and other environmental targets, the Government must address the damaging impacts of driven grouse shooting which include raptor persecution and intensive management as well as moorland burning. As voluntary action has repeatedly failed, there are now only two options left: a ban (which was supported by over 100,000 people in a recent parliamentary petition), and licencing, which is now in place in Scotland. The Government should, therefore, (i) ban all burning on peat, irrespective of depth; (ii) license driven grouse shooting as this practice is so strongly associated with wildlife crime and the elimination of any species that reduce the number of grouse available to be shot; and (iii) licence pheasant shooting – it's long past time to better regulate an industry that releases such vast numbers of non-native gamebirds into the countryside, with unchecked impacts on food webs, woodland ground flora and fauna, hedgerow structure, predator numbers, the spread of avian influenza and many other deleterious effects.

Reforms are also needed to support greater public and community ownership of land in National Parks, including a requirement that any land over a certain size is first offered for community or public purchase when put up for sale, supported by a Treasury backed capital fund to support public sector purchase of land in National Parks. This would enable local communities to buy up grouse moors and manage them for recreational uses which better support nature recovery.

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

The development of the Land Use Framework must be integrated with other Government initiatives which have an influence on land use including Environmental Land Management schemes, the Environment Improvement Plan, the Farming Roadmap, the National Planning Policy Framework, the Strategic Spatial Energy Plan and plans for the introduction of Spatial Development Strategies and Freeports.

QUESTION 13: How can local authorities and Government better take account of land use opportunities in transport planning?

There needs to be much greater recognition of both the opportunities and the challenges to delivering land use change through transport planning. Transport infrastructure – both road and rail – is usually along linear routes and there is significant potential to increase the ecological connectivity between other sites if the land on road verges, railway embankments and so on along these routes is managed appropriately. However, these same corridors can also provide significant challenges if they fragment the landscape and reduce the ability of species to move freely across a landscape. Careful consideration needs to be given to ensuring that the opportunities are maximised and the challenges addressed through the introduction of mitigation measures such as green bridges where needed.

Transport planning also has vital role to play in connecting people to nature, and this is particularly important in the case of National Parks which should be available for everyone to visit and to benefit from the contribution to health, well-being and spiritual inspiration these special places provide. Currently too many people – often those who would benefit the most – are excluded from visiting because of the lack of transport options. Nationally around a fifth to a quarter of households don't own a car – 23.5% in England and 19.4% in Wales¹ - and the numbers are even higher in many of the urban areas close to National Parks, for example, 39% of households in Manchester are carless.

Cuts to rural bus services in recent years have meant the options for those without private transport are now more restricted than ever. The limited alternatives also mean that those visitors that do have a choice usually arrive by car – around 93% on average. This high level of car use is responsible for a significant proportion of the carbon emissions associated with visits to National Parks. For example, visitors travelling to the Yorkshire Dales account for around 25% of the total annual greenhouse gas emissions for the National Park. It is also putting at risk precious landscapes and wildlife, which could limit the potential for land use changes which support nature recovery in these areas. As well as contributing to high levels of roadkill through collisions, road transport has a wide range of other negative impacts many of which extend well beyond the road itself, including air pollution, light pollution and water pollution, all of which have consequences for the birds, mammals, insects and plants in these areas (for more details on this, see *Traffication: How Cars Destroy Nature and What We Can Do It* by Paul Donald). At a time of climate and nature emergency and an increasing recognition of the health benefits of access to nature, this situation cannot continue, and it is

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[https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingenglandandwales/census2021#:~:text=The%20percentage%20of%20households%20with%20no%20cars%20or%20vans%20decreased,%2C%2022.9%25%20in%202011\).](https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingenglandandwales/census2021#:~:text=The%20percentage%20of%20households%20with%20no%20cars%20or%20vans%20decreased,%2C%2022.9%25%20in%202011).)

essential that greater priority is given to improving car-free access to, and within, National Parks.

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

There is a clear role for Protected Landscape Management Plans to be used as a mechanism for co-ordinating the various strategies of the different sectors whose activities have an impact on land use in these areas and who need to be adopting the kind of land use change needed to deliver 30x30.

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.

Yes

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. Please select the activities you think should be prioritised and give any reasons for your answer, or specific approaches you would like to see.

- 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)
- Providing improved tools and guidance for turning climate information into tangible actions (for example, how to produce an adaptation plan for different sectors)
- Developing and sharing clearer objectives and resilience standards (for example, a clear picture and standards of good practice for each sector under a 2°C climate scenario)
- Supporting the right actions in the right places in a changing climate (for example, prioritising incentives for sustainable land uses where they will be most resilient to climate change)
- Other (please specify)

We support the implementation of all these activities and believe that the last one (supporting the right actions in the right places) is particularly important, for example, it's essential that measures to increase woodland coverage are only supported in the right

locations and are not allowed to damage other priority habitats such as grasslands, peatlands etc. It is also important to ensure that the incentives for sustainable land use also support natural regeneration and colonisation as well as planting as such naturally formed habitats are likely to be more resilient to climate change.

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?

- Updating existing Government tools, apps, portals or websites
- Changes to support use through private sector tools, apps or websites
- Bringing data from different sectors together into common portals or maps
- Increasing consistency across spatial and land datasets
- More explanation or support for using existing tools, apps or websites
- Greater use of geospatial indicators such as Unique Property Reference Numbers (UPRNs) and INSPIRE IDs to allow data to be more easily displayed on a map
- Other (please specify)

All environmental, land use and biodiversity data should be cut to the boundaries of Protected Landscape boundaries and made readily available to those responsible for delivering land use change. Our Health Check report identified that the limited data available made it much harder to develop a proper understanding of the state of nature in Protected Landscapes.

Undertaking more frequent and improved condition assessments for SSSIs to ensure these areas are delivering the best outcomes for ecosystems – with focused enforcement to ensure that the negative impacts of drainage, pollution, nutrient enrichment and moorland burning are reduced.

QUESTION 18: What improvements could be made to how spatial data is captured, managed, or used to support land use decisions in the following sectors? Please give any reasons for your answer or specific suggestions.

- Development and planning: such as environmental survey data
- Farming: such as supply chain data and carbon or nature baseline measurements
- Environment and forestry: such as local and volunteer-collected environmental records
- Recreation and access: such as accessible land and route data
- Government-published land and agricultural statistics

All environmental, land use and biodiversity data should be cut to the boundaries of Protected Landscape boundaries and made readily available to those responsible for delivering land use change. Our Health Check report identified that the limited data available made it much harder to develop a proper understanding of the state of nature in Protected Landscapes.

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

The ALC is badly out of date and does not currently recognise land that's best managed for nature, nor recognise the latest climate data. It should be updated. All environmental, land use and biodiversity data should be cut to the boundaries of Protected Landscape boundaries and made readily available for those responsible for delivering land use change. Our Health Check report identified that the limited data available made it much harder to develop a proper understanding of the state of nature in Protected Landscapes.

QUESTION 20: Which sources of spatial data should Government consider making free or easier to access, including via open licensing, to increase their potential benefit?

All environmental, land use and biodiversity data should be cut to the boundaries of Protected Landscape boundaries and made readily available to those responsible for delivering land use change. Our Health check report identified that the limited data available made it much harder to develop a proper understanding of the state of nature in Protected Landscapes. National Parks are mostly in private ownership, we therefore support proposals to make Land Registry's data free to access as will this increase transparency.

QUESTION 21: 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.

- **Development and planning**
- **Farming**
- **Environment and forestry**
- **Recreation and access**
- **Other (please specify)**

There are likely to be gaps in the skills needed to support regenerative agriculture, the adoption of appropriate grazing regimes, natural regeneration, targeted action for species recovery and maintenance and the protection of priority habitats. Skills that aid facilitation,

increase mutual understanding, bring communities together to plan and deliver change and build social capital are essential to enable land use transition.

QUESTION 22: How could the sharing of best practice in innovative land use practices and management be improved?

Support for farmers and land managers to visit others who are adopting innovative land use practices and learn from them.

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

Yes, every 3 years

We recommend the land use framework for England be updated every 3 years. The evidence base underpinning the land use framework should be kept up to date. The Government should report on progress against land use framework targets every 3 years and update the analysis in light of the data and progress against targets and any updated environmental targets (for example, any updates to the Environmental Improvement Plan).

The updated land use framework should then feed into other policies, plans and decisions. While it will be impossible to have all plans on the same timeframe, in their next iteration plans should take account of the updated land use framework.

QUESTION 24: To what extent do you agree or disagree with the proposed areas above? Please include comments or suggestions with your answer.

Strongly agree

We strongly agree that all of these proposed changes will be necessary for effective implementation of the land use framework.

The strategic oversight function should be cross-Government, hosted in the Cabinet Office.

The spatial analysis function must include strong biodiversity evidence and expertise, alongside other spatial analysis.

Many Government plans and policies impact land use and land management – so we welcome embedding land use considerations in strategic Government decisions.

Open policy-making processes should occur in collaboration with research organisations as well as other stakeholders who have evidence and expertise to bring to bear upon land use, for example, conservation organisations.

For further information about this response, please contact: Ruth Bradshaw, Policy and Research Manager, email: ruthb@cnp.org.uk