

LAND USE CONSULTATION, APRIL 2025

This response is written for and on behalf of the Colne Valley Regional Park (CVRP) Trust.

INTRODUCTION:

We welcome the principle of a national Land Use Framework.

We believe this should reflect landscape-scale needs in line with DEFRA's Catchment Based Approach (CaBA)– so that decisions are made on a landscape basis in the way that land is used and experienced by people and wildlife, rather than being split by county and administrative boundaries – that often don't exist on the ground in any meaningful way.

We would very much welcome joining the conversation with government as they develop this initiative.

We hope that the Land Use Framework can be piloted before it is finalised. The Colne Valley Regional Park is the ideal place to do this because:

- It is outside of Protected Landscapes so is a great example of areas that stand to benefit from the 'joined up thinking' approach that the LUF could bring,
- There is an existing partnership and organisation acting in the local area of 110km²: The Colne Valley Regional Park Trust – which is supported by 100 other organisations that have joined as members.
- It is at the junction of eight planning authorities and five Local Nature Recovery Strategies, therefore an ideal location to test how the joined-up approach can work.
- As well as the opportunity for geographical unity the Colne Valley also gives an opportunity for thematic unity as the objectives of the Regional Park cover recreation, farming, community participation, landscape quality, rural economy etc. We are not a single issue organisation such as wildlife organisations, farming groups or recreational user groups – instead we cover all of this and more so are well placed to balance approaches and explore opportunities for multifunctionality.
- The Colne Valley is nationally important for wildlife. As well as having nationally significant populations of waterbirds it includes 14 SSSI's, 1 SPA, 1 NNR, 7 LNRs plus multiple ancient woodlands and county wildlife sites.
- The Colne Valley is regionally important for access to nature/green space – with the proven health and wellbeing benefits that this can bring to the 10 million people who live within 15km
- The Colne Valley is at the 'epicentre' of competing land uses. Its location in the rural urban fringe with multiple large development proposals plus sandwiched between two of the biggest civil engineering projects in Europe (HS2 and proposed Heathrow Expansion). All that development gives a real opportunity for joined-up approach to planning that can pool planning gain/biodiversity offset etc from multiple developments to create one of the best green corridors around any city in Europe – a no cost to the taxpayer. In this way we create the win wins for growth and the natural environment that the government is calling for in recent planning reform working paper. This land is in the floodplain so is not suitable for

large scale development – therefore taking this action will not conflict with the government’s growth agenda.

- All that is missing from the current planning and land use system is a vision and a plan to make this happen, we see that the LUF can become part of the solution.

The results can then be replicated around other major cities for public benefit.

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? [Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / I don’t know] 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 welcome the principle of a national Land Use Strategy.

However, our experience of six decades of working in the rural urban fringe next to a major city leads us to advise to avoid potential pitfalls:

- The LUF needs a to be a clearer description of *where* the changes will take place. To simply state that just 0.2% of the country will be needed for new housing by the end of the parliament and 1.1% by 2050 doesn’t seem like much but that is very misleading to people who live in and around the rural urban fringe. Much of that change is likely to be concentrated into rural urban fringe areas like this that are outside rural centres and outside of protected landscapes.
- The edge effect. The Colne Valley is on the edge of five counties. There must be a workable mechanism for ensuring co-ordination across administrative boundaries. For too long we have seen decision making as though each county is an island – this applies to everything from production of local plans to Local Nature Recovery Strategies. A national land use strategy can help unite thinking and action across county boundaries.

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

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / I don’t know]

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

We support all the principles.

However:

- there should be specific wording to ensure that these principles apply across administrative boundaries. For example the text for Co-design should be amended to “Support for participation and leadership at the local and regional scale *working across county boundaries*

to develop and align spatial strategies and assess the fairness of changes in land use.” (*our addition in italics*)

- these type of ‘high-level’ principles may not make a huge difference to decision-making on the ground without further guidance. CVRP can help by becoming a pilot area, working with Natural England or another relevant organisation. See the introduction above for further information on why the Colne Valley is an ideal test bed/pilot area for a LUF

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)**

Local Authorities would benefit from applying these principles. Specific wording should be applied to guidance to LA’s to ensure that they consider the LUF and the needs, opportunities and constraints from neighbouring LA’s.

I’m not sure how landowners and land managers would be obligated to apply these principles – although they should certainly at least be guidance. It should be down to national government and local authorities, supported by landscape-scale partnerships or organisations such as Regional Parks, Community Forests and National Landscapes to show leadership in this area.

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?

There should be strong and clear policies in National Planning Policy and in Local 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?

Incentives for land managers should be appropriately locally ‘weighted’ to reflect the actual and perceived costs. For example, a landowner creating a new path right next to a major city (where thousands will potentially use any new paths) should receive an enhanced payment compared to a landowner in rural area away from tourist destinations (where few will use new paths).

Initiatives should be implemented that can support and advise farmers in areas outside of Protected Landscapes, such as Regional Park’s and Community Forests.

Recognising the importance of nature, landscape quality, active travel and countryside recreation and its wider environmental, social and economic benefits, is welcomed.

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

The presence of an established partnership with multi-functional objectives should inform where government targets initiatives. This need not always be National Landscapes it could also be Regional Parks or Community Forests.

Proximity to major centres of population and the ability for land to potentially benefit millions of people should also be a strong driver for where government targets initiatives..

Further information on why urban fringe areas (like the Colne Valley Regional Park) are suitable locations can be seen in the bullet points in our introduction (see above)

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?

Greatest public benefits could be established through creation, improvement and management of Green Infrastructure in areas in close proximity to large numbers of people eg on the edge of major cities.

There should be a focus on creating and improving connectivity for wildlife and people (paths, active travel etc) in areas next to large urban populations– for example there are multiple protected sites within the Colne Valley, yet the land in-between them is becoming of increasing poor quality. Developer contributions could be pooled to improve this green infrastructure and the natural environment for the benefit of people. With regard to lower trade offs: This land is in the floodplain so not suitable for large scale development – therefore taking this action will not conflict with the government’s growth agenda.

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)

We suggest an amendment to “Protecting the best agricultural land from permanent land use changes” with the addition of “where those changes harm grade 1 and 2 agricultural land’s ability to produce food” eg land can still produce food if public access is created or biodiversity enhancements or tree planting takes place in the field margins, yet it cannot if the land is developed.

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

Cross-boundary working across county boundaries in line with DEFRA's Catchment Based approach

Pooling of resources from multiple development and multiple LA's to work on a landscape scale in line with DEFRA's catchment based approach.

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 criteria²³**
- **Resources: such as funding or guidance for those managing Protected Landscapes for nature**
- **Other (please specify)**

Government needs to create means to operate 30 by 30 in key areas that are outside of protected landscapes yet are still important for wildlife and people eg regional parks – for example the Colne Valley is of national importance for wildlife yet the valley floor/floodplain has disjointed protection through a series of individual SSSI's and nature reserves that are connected to each other in the landscape but not in terms of protection. Furthermore, it is located on the doorstep of over 10 million people, so is an ideal location to demonstrate the real public benefit of 30 by 30.

There should be a broader definition of 'nature'. In planning policy terms Change definitions to include the 'natural environment' so its also includes people and the way they benefit from the nature and the landscape – with all the proven health and wellbeing benefits that access to nature and access to green space brings.

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

Development provides the opportunity to pool planning gain/biodiversity offset etc from multiple developments to create some of the best green corridors around any cities in Europe – a no cost to the taxpayer. In this way government can create the win-wins for growth and the natural environment that the government is calling for in the recent planning policy reform working paper. In areas like the Colne Valley to the west of London land in the floodplain (so not suitable for large scale development - therefore taking this action will not conflict with the government's growth agenda) can benefit from a large number of proposed developments in the adjacent areas not in the floodplain.

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

Government should resource capacity for cross boundary planning and visioning in areas of high development pressure that have high biodiversity value, with large populations nearby– cross thematic partnerships such as regional parks can provide the vehicles to achieve this in areas such as the Colne Valley to the west of London.

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

Take a focus on creating and improve connectivity for active travel – especially in a ‘green’ landscape setting where attractive routes can be created.

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

Use and support cross boundary cross theme organisations such as regional parks, community forests etc. For more information see the bullet points in the introduction (above)

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)

Skills and capacity Gaps exist in maintaining and enhancing Landscape quality. Biodiversity is covered by existing strategies and organisations but there needs to be a broader definition of ‘nature’ to also include the ‘natural environment’ as used and experienced by people.

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

There must be a cross boundary focus. Using DEFRA’s Catchment Based Approach (CaBA) would be an effective way to do this through existing partnerships

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 / Agree / Neither agree nor disagree / Disagree / Strongly disagree / I don’t know]

We would welcome discussion with DEFRA, Natural England or other appropriate organisations about how Colne Valley Regional Park can be a pilot area to test this approach. The reasons for why this is a good area can be seen in the bullet points in the introduction (above)