Aldersgate Group response: Land Use Consultation

April 2025

Background

The Aldersgate Group is an alliance of major businesses, academic institutions and civil society organisations, which drives action for a competitive and environmentally sustainable UK economy.[1] Our corporate members represent all major sectors of the economy, and include Associated British Ports, Aviva Investors, BT, CEMEX, the John Lewis Partnership, National Grid, Crown Estate, Nestlé, Siemens, SUEZ, Tesco, and Willmott Dixon. Aldersgate Group members believe that ambitious environmental policies make clear economic sense for the UK, and we work closely with members when developing our independent policy positions.

Summary

- Land use in England must evolve to protect and support the recovery of the natural environment, contribute to mitigating and adapting to climate change, strengthen food security, and meet other needs such as new housing and infrastructure. The government must clarify what land use is appropriate where, the scale of change needed and how they will approach spatial decision-making with a range of spatial plans currently in development. This clarity is important to build the confidence and certainty necessary for businesses to invest.
- The Land Use Framework (LUF) must be developed as an effective tool to support national and local government decision-making on land use, based on robust evidence and effective principles. A strategic approach to land use decisions is welcome and has the potential to resolve existing challenges and deliver wider benefits.
- The government must set out how land use change will be delivered and how the LUF will inform and connect the Environmental Improvement Plan and 30x30, Farming Roadmap, Food Strategy, Strategic Spatial Energy Plan and other relevant strategies, as well as supporting decarbonisation. Enabling policy and regulatory frameworks, alongside support for skills and the scaling of robust nature markets, will be needed to achieve the consultation's proposed land use transition in England. Future interventions must be designed well to encourage investment and avoid perverse incentives.

Questions

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**

[1] Individual recommendations cannot be attributed to any single member and the Aldersgate Group takes full responsibility for the views expressed.

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

Neither agree nor disagree.

The Aldersgate Group has long called for a LUF and welcomes the government's publication of the consultation and analytical annex. Land use in England must evolve to protect and support the recovery of the natural environment, contribute to mitigating and adapting to climate change, strengthen food security, and meet other needs such as housing, recreation, energy security and infrastructure. Indicating what land use is appropriate where, and the scale of change needed, is important to build the confidence and certainty necessary for businesses to invest in land use change projects.

Robust data and scientific evidence must underpin land use policy, with gaps, assumptions and uncertainty transparently communicated. With a wide range of spatial policies in development across Whitehall, the government must ensure that different spatial policies and their underpinning analysis are interoperable and interlinked, supporting policy alignment and better decision-making in government and beyond. Alignment between the national and local levels will also be key, with key local processes such as local development plans and local nature recovery strategies providing rich local data and knowledge.

The government must continue to improve the quality of evidence available and ensure that gaps, assumptions and uncertainty are well understood. The quality of some of the evidence currently informing the LUF has raised concerns, in particular the use of potentially out-of-date data (Agricultural Land Classification for example[2]), assumptions regarding productivity trends, and lack of consideration of water management and its impact on land. Analysis must also better consider the impact of long-term trends such as climate change and food consumption, to help futureproof decision-making.

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.**

Agree. The Aldersgate Group supports the proposed principles-based approach to guiding spatial decision-making in government. The success of the LUF will be in its implementation, coordination between departments and spatial strategies, and its engagement with land users, owners, planners and regulators. If these factors are not accounted for, the government may have to rethink its strategy to deliver on its targets for land use change. As the LUF is novel for English land policy, the government should ensure the effectiveness of this approach is monitored, evaluated and improved or evolved where appropriate. It is also important to recognise that these principles primarily apply to the policy process and policy audiences. For land use change to be implemented effectively, a holistic approach to

[2] CPRE (2025) Decision-making in land use planning and Agricultural Land Classification: stick, twist, or bust?

communications, regulations and subsides will be needed to enable and inform decisions by land users and owners, including businesses.

The principles would benefit from greater consideration of land productivity, as a key economic factor central to meeting environmental targets and food security. Additionally, the principle for long-term decision-making may be better framed as resilience. Resilience captures the challenges faced by land-based activities and the integrity of land itself, which will be increasingly tested by climate change, over-exploitation, and economic pressures.

Ensuring that these principles are reflected in spatial policies across the whole of government and beyond Defra will be essential for the integrity of the LUF.

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)**

Combined and local authorities, including local planning authorities, would benefit from applying these principles. Shared principles across national and local government for land use would also support joined-up decision making and policy alignment.

Combined and local authorities must be supported to best apply these principles. This includes clarity on the role of authorities in meeting national targets at the local level and appropriate resources to deliver. The environment is also not limited by administrative boundaries; enablers for collaboration around catchments or landscapes will be essential. Finally, achieving interoperability of data sets between administrative boundaries will be crucial. Currently, maps and data sets may vary in quality and may not directly overlay.

Applying the principles of the LUF across local and combined authorities, as well as the proposed Mayoral Strategic Authorities (MSAs)[3], would help to provide a common approach to ensure local level consistency with national policy and deliver benefits to local communities, long-term resilience and sustainability. Strategic Development Strategies (SDS) and Local Nature Recovery Strategies (LNRS) provide a framework to drive land use change at the local authority level, bringing in local expertise and knowledge. The government should consider how to best create a feedback loop between local and national data and analysis to ensure that the LUF can be implemented effectively.

Coordination across administrative boundaries will be necessary, especially where environmentally significant boundaries such as river catchments sit across multiple administrative bodies. Lessons can be learned from existing catchment-based partnerships, which promote multi-stakeholder engagement and local action on pollution within the natural boundaries of a river catchment.[4]

- **Landowners and land managers (including environmental and heritage groups)**

[3] MHCLG (2024) English Devolution Whitepaper
[4] Catchment Based Approach (2025) Website

England's landowners have an important role to play in delivering the LUF. The National Estate for Nature[5] has established a strong foundation for their involvement, but more can be done to improve access to land ownership information in England as a whole. The government should provide guidance and enabling frameworks for large landowners to support the delivery of the changes proposed in the LUF. The principles may be valuable to landowners and land managers to guide decision-making. However, the government must recognise that the principles alone are unlikely to be sufficient to drive land use change, due to the scale of land which can be influenced by an organisation or individual, and other factors which influence decision-making, such as the business case and skills.

Farming tenancy agreements can be a constraint on land use changes.[6] Examining the specific features of the landlord-tenant relationship on farms can provide insights essential to ensuring effective implementation of land use change. Landowner and tenant associations are well placed to speak to the unique challenges and opportunities that the LUF would pose to each in practice. The government must ensure risks and unintended consequences are identified and mitigated to avoid negative impacts.[7]

Heritage groups and nature conservation bodies can additionally provide expertise and experience in land use change, environmental improvement and public engagement with nature, to help bridge wider skills gap.[8,9]

- **Others (please specify)**

Some businesses have a significant land footprint, and all businesses have direct or indirect dependencies on nature. Sectors such as minerals, construction, food, and infrastructure rely heavily on land for their operations and bring valuable expertise in land efficiency. The LUF should be used by the government to give businesses confidence on what actions to take for their land use, nature recovery and nature-based climate change adaptation and mitigation, where and how. However, the principles set out in the LUF are not well-suited to business decision-making and additional guidance, policy and regulatory frameworks will be needed to support businesses.

Principally, the LUF must provide clarity for businesses on the use of land for food security and agriculture, nature recovery and biodiversity, nature-based solutions, and how it will work alongside other spatial initiatives. Site selection and negotiation with local stakeholders impacts land-based industries outside of agriculture. By improving join-up between environmental and other policies, the government can help harness opportunities and incentives for integrated solutions for decarbonisation and nature-positive uses of land. The LUF can also help frontload consideration of the environment and reduce unintended cascading consequences, such as by providing clarity on spaces that should be prioritised

[5] Defra (2025) National Estate for Nature
[6] University of East Anglia (2020) The Demonstration Test Catchments Evidence Compendium
[7] Food, Farming and Countryside Commission (2023) The Multifunctional Land Use Framework – FFCC
[8] WWF (2025) Global Risks Report
[9] RSPB (2018) Defining and delivering resilience ecological networks: nature conservation in England

for food production or other uses. Join-up with other spatial plans, such as the Strategic Spatial Energy Plan (SSEP), will be crucial. Clarity over the relationship between the Nature Restoration Fund and the Land Use Framework will be necessary to accelerate nature restoration at scale.

The Environment Agency, Natural England and other regulators and public sector bodies, such as the National Energy System Operator (NESO), also play a role in land use decisions and have access to rich data and expertise. The government must set out how they will have regard to the LUF and its principles.

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?**

Environmental Land Management schemes (ELMs) are currently the primary policy vehicle to support the agriculture sector to deliver land use change and must be aligned to deliver the scale of change proposed in the LUF. Using LUF data and principles to tailor ELMs would create more flexibility in addressing changing regional farming and environmental challenges and opportunities. ELMs should provide strong incentives and support commercial opportunities to enhance food security, support rural livelihoods, and enable sustainable land use change. ELM schemes should also disincentivise unsustainable agricultural practices or support the transition to more sustainable and profitable farming models, which may take time to return a profit.

Aldersgate Group has previously advocated that the government should fund ELMs and nature-friendly farming at a level which reflects their huge societal value. In our report on environmental regulation[10], we make the recommendation to target outcomes not outputs; we suggest that ELM payments should be designed on the same basis.

On scale, ELMs should recognise the success of river catchments as a proven scale for environmental remediation in the water sector, and their potential as a scale for nature recovery. In line with Defra's findings in their Demonstration Test Catchments project, we recommend that funding is made available for a full-time catchment officer in each catchment area, with additional responsibilities to monitor and coordinate outcomes through ELMs and other agri-environment schemes. This would allow rural payments, both private and public, to complement regulated investment in nature-based solutions around river basins. Care should be taken to ensure a fair allocation of the farming budget across England's regions.

Supporting landowners and farmers in this transition means taking a long-term view and understanding the barriers that need to be overcome, such as profitability drag during agricultural transitions to mixed use and high capital expenditure for land use changes. The government must provide clarity and support the development of new business models for land use change. Beyond ELMS, other policies and incentives can support the agricultural sector to deliver land use change, including nature markets, regulation, skills and knowledge exchange.

[10] Aldersgate Group (2024) The Role of Regulation in Restoring Nature and Delivering Net Zero

Nature markets present a significant opportunity to drive investment in land for nature recovery, climate change mitigation and adaptation. The global demand for voluntary carbon credits is estimated to increase by 15 times by 2030[11], and the World Economic Forum forecasts that biodiversity credit markets could be worth $69bn by 2050[12]. They potentially offer a mechanism to deliver nature targets in a commercial way. However, these markets are currently nascent and perceived as high risk; more demand drivers, better infrastructure and standards and assurance would provide confidence to investors. Additional detail is included in response to Question 9.

Regulation can play an important role, setting a level playing field and driving ambitious action and good practice. The Aldersgate Group set out a framework to improve environmental regulation in the report 'The role of regulation in restoring nature and delivering net zero'.[13] Four principles should be applied to develop successful environmental regulation:

1) **Whole of the environment**: This principle highlights the importance of not targeting one aspect of climate or nature without considering others.
2) **Multidisciplinary perspective**: This principle acknowledges the limitations of a narrow cost-benefit analysis approach to support decision making, and the importance of including evidence from a range of disciplines.
3) **Cross-sector approach**: This principle emphasises the importance of considering multiple sectors to develop more consistent incentives, reduce costs and deliver greater environmental benefits than when sectors are viewed in isolation.
4) **Fairness**: This principle outlines that it is important to make sure that location, ability to pay and intergenerational fairness are considered when determining where the burden of improving the environment should fall.

New regulations should target outcomes not outputs, if they are to be well suited to a cross-sectoral and whole-environment approach and support collaboration. The government should also maintain a primary focus on polluter pays and recognise the cost of inaction or insufficient action, as impacts on climate and nature can be irreversible.

Sectors must be supported through policy and regulatory changes to ease compliance and mitigate risks. It will be important to avoid disproportionate impacts or burdens on supply chains when applying new regulation, recognising how regulatory pressure can be effectively applied. The government will also need to mitigate the risk of offshoring environmental impacts and agricultural production. Finally, effective enforcement is also essential to creating a level playing field; without it, incentives and regulations may fail to deliver the intended outcomes. The regulators need to be efficiently resourced to ensure the system works effectively.

[11] UK Nature Impact Fund (accessed 2025) Website
[12] World Economic Forum (2023) Biodiversity Credits: Demand Analysis and Market Outlook
[13] Aldersgate Group (2024) The role of regulation in restoring nature and delivering net zero

Land use change will require adoption of new practices by many stakeholders. **Knowledge sharing** should be supported, with networks, guidance and access to expertise. Initiatives like the Nature Friendly Farming Network[14], Soil Association Exchange[15], and the Catchment Sensitive Farming partnerships[16] have demonstrated the value of peer-to-peer learning in accelerating the adoption of sustainable practices. Strengthening access to such resources will help drive farmer engagement and long-term resilience in the sector. These networks work because they were created in consultation with farmers and deliver advice and expertise on the issues which affect farmers the most.

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?**

Agricultural and wider environmental policy must actively support and incentivise multifunctional land use where appropriate. The upcoming Food Strategy and Farming Roadmap presents key opportunities to highlight the potential for approaches such as agroforestry, which can enhance both food production and environmental resilience.[17] However, it is important to recognise the limitations of land sharing and multifunctionality. Some desirable outcomes are better achieved through integrated land use planning and some uses of land are not complementary.

Aldersgate Group members have highlighted the breadth of definitions and angles that multifunctionality encompasses. **Multifunctionality has the potential to offer different benefits**, including:

- **Resilience and economic viability** – supporting rural business resilience with multiple income streams and balancing productivity with ecosystem resilience to be truly sustainable.
- **Increased biodiversity** – supported alongside other land uses such as solar farms and conservation grazing. This can also play a role in ecosystem maintenance, if designed with nature in mind.
- **Climate mitigation and adaptation** – for example, combining carbon dioxide removal technologies, such as biochar and enhanced rock weather, with agriculture can improve soil health, improve crop yields and mitigate climate change. Nature-based solutions can also help mitigate climate risks such as flooding, provide ecosystem services and support food production.

Barriers to multifunctional land use include uncertainty, real or perceived risk, and lack of incentives. For example, a lack of awareness of the benefits and techniques for multifunctional land use combined with lack of certainty regarding the long-term effects of multifunctionality on farmland, and nascent nature markets which are not yet robust, contribute to creating financial risk to farming businesses.

[14] Nature Friendly Farming Network (accessed 2025) Website
[15] Soil Association Exchange (accessed 2025) Website
[16] Defra (2014) Catchment Sensitive Farming partnerships
[17] Woodland Trust (accessed 2025) Agroforestry benefits for farming, nature and climate

To make informed decisions, land managers need access to high-quality ecological data, guidance and expertise. Many will also require transitional support, as shifts towards mixed and regenerative farming practices can lead to short-term yield reductions or take time to generate monetizable ecosystem services. Transitioning to multifunctional land uses, such as regenerative agriculture or agroforestry, can take up to a decade to deliver returns, albeit with potentially greater long-term benefits.[18,19]

A combination of financial and policy incentives, market-based mechanisms and farmer/land manager support will be needed to successfully overcome these barriers. Solutions include:

- **Support for multifunctional and regenerative agricultural models**, linking subsidies to outcomes and good monitoring. For example, ELMS provide a mechanism that could be used to incentivise agroforestry. The government should draw lessons from private sector initiatives, such as the Lloyds Clean Growth Financing Initiative, which has successfully provided grants to help farmers manage operational costs and reduce climate transition risks.[20] Given that the UK is starting from a low baseline for multifunctional land use, it is crucial to recognise the financial risks this transition poses to farming businesses. Providing clear guidance for farm lenders and signposting existing private sector transition grants would also help mitigate risks.
- **Support the development of nature markets** and learning from successful schemes. For example, the Woodland Carbon Guarantee has supported landowners to diversify their revenue streams and demonstrated the benefits of accreditation and third-party monitoring.
- **Support for farmers with information and advice** on implementing and sustaining multifunctionality on their land, including financial pathways. Knowledge sharing networks, such as the Nature Friendly Farming Network, can also support, placing farmer-led innovation alongside scientific evidence.[21]

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

A joined-up approach across land use is required to identify suitable locations for spatially targeted incentives, including clarity and alignment across the government's different spatial plans. It will be important to ensure that different spatially targeted incentives work coherently and are effectively communicated to avoid confusion, including how potential trade-offs can be balanced. Lack of join-up and clarity risks creating unintended consequences, uncertainty, delay and avoidable complexity for businesses to navigate.

The government must consider the relevant factors which determine best use of land, informed by robust evidence, and ensure that land-use decisions maximise multifunctionality

[18] Sustainable Markets Initiative (2025) Scaling Regenerative Farming: A Practical Guide
[19] British Ecological Society (2025) Regenerative Agriculture in the UK
[20] Lloyds Banking Group (accessed 2025) Lloyds Clean Growth Financing Initiative
[21] Nature Friendly Farming Network (accessed 2025) Website

where appropriate. Spatially targeted incentives must also consider how the best use of land may change over time, due to economic, cultural or climate pressures. For food production, the factors to consider include soil quality, climate change impacts (such as drought, extreme weather, and flood risk), and the potential nutritional value of the land (linked to productivity). In parallel, climate and nature face irreversible tipping points – unique habitats must be considered appropriately, or they could be lost forever. Recognising wider potential with different or novel land management practices will also help ensure that policy interventions are targeted effectively.

The government must ensure implementation of spatially targeted initiatives learns from existing successes and good practice, such as catchment-based approaches, and complements existing schemes. Catchment-based approaches offer a resilient foundation for land use change projects. By working within the natural boundaries of river catchments, policymakers can build redundancy into ecosystem service provision and risk mitigation, supporting long-term nature recovery and ecosystem service provision. Resilience and redundancy measures in nature projects help improve the viability of nature investment projects by improving investor confidence in the stated environmental outcomes. Catchment nutrient mitigation credits have demonstrated this effect to some extent in specific localities.[22,23]

Lessons from successful catchment-scale initiatives around water pollution mitigation and nutrient neutrality markets should be considered when designing administrative models that aim to drive investment in nature-based solutions on land. Synergies with nature-based solutions included in the Water Industry National Environment Programme[24] should be examined, to channel investment to support or connect work already being done with regulation-led private investment. Guidance and the sharing of best practices with investors, landowners, businesses and communities will be crucial in helping decision-makers pursue sensible and impactful land use change projects.

In additional to spatially targeted initiatives, **the government should not miss the opportunities of a strategic approach and connect different initiatives**. Connectivity between habitats, for example, can significantly enhance opportunities for nature recovery and must be incentivised between relevant spatially targeted initiatives.

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?**

The responses to Questions 4 and 5 set out approaches to support land managers and the agricultural sector to steer land use change, leveraging policy and regulatory frameworks. **Policy clarity, alignment and long-term certainty will be essential to give confidence to land managers to steer land use change**. This also includes decarbonisation and environmental improvement policies.

[22] Solent Catchment Market (accessed 2025) Website
[23] Dorset Council (accessed 2025) Poole Harbour Catchment nutrient credit market
[24] Natural England (2025) Blog on WINEP

The government must be clear on the overarching goals to be achieved with land use change, including achieving profitable farming systems, supporting food security and environmental improvement. This will require a shift in how the role of agriculture and land management is perceived and embedded in local socio-economic and cultural ecosystems (for example, some regions of England have UNESCO world heritage status, which changes in land use may threaten). Where appropriate, land use change will also involve the introduction of new business models, arising from multifunctionality, moving from a focus on short-term productivity to a more holistic approach that integrates environmental sustainability alongside economic viability.

Land use change will be supported by understanding what investors seek in land use change opportunities, the skills and information they need for decision-making, and equipping land managers and landowners to set out investable proposals. **Resources and guidance** should highlight the economic potential of non-agricultural land uses (such as nature recovery and nature markets), underpinned by a government strategy that offers investors and land managers the confidence to engage. Clarity on the decarbonisation and nature positive transition for sectors with significant dependencies on land, such food, will support the private sector to plan and invest in their futures and give other actors, such as investors, confidence in supporting the transition financially.

Standard methods for measuring farming impacts are required to provide confidence to farm lenders, investors and downstream purchasers of farm products with a stake in supporting sustainable land use changes. Data standardisation and digitalisation can raise awareness, inform targeted interventions and improve performance against sustainability metrics, helping attract investment. More broadly, standardised monitoring would support evaluation of progress on land use change and help inform government policy development. Reliable data is critical to fair risk sharing and reward.

On-farm accreditation and assurance have driven positive stewardship on farms, growing organic food markets, improving livestock conditions and growing farmers profits[25][26]. Commissioning an accreditation scheme for agroforestry would support growth of the practice. This would act as a ramp towards sustainable land use and land management changes, supporting capacity building in anticipation of the goals and new business models for land use change.

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**

[25] Campbell Tickell - NFU (2024) Red Tractor Independent Governance Review
[26] Countryside and community research institute (2010) The Benefits of LEAF Membership: a qualitative study to understand the added value that LEAF brings to its farmer members

Monitoring is essential to ensure robust data informs the LUF, and land use change can be evaluated. This will help understand what is working and where policy changes are required for progress or mitigate risks such as displacement of impacts.

- **Accounting for displaced food production impacts in project appraisals**

The government must carefully consider potential risk of displacement as part of policy design and consider how to best account for this risk in project appraisals. A strategic approach will be valuable, especially in cases where displacement risk can be accurately estimated. Regulation can also play a role in mitigating displacement of impacts, learning from the EU Deforestation Regulation.

- **Protecting the best agricultural land from permanent land use changes**

Protecting England's highest quality agricultural land from permanent land use changes is sensible. Defra should ensure that clear and evidence-based definitions of 'best agricultural land' and 'permanent change' are shared.

- **Other (please specify)**

The government can drive demand for good practice through public procurement. Environmental standards for public food procurement and compulsory reporting on waste by all food businesses was recommended by the House of Lords Environmental Audit Committee in 2023. This would improve end-to-end business engagement with, and drive meaningful change in, food supply chains, including mitigating the impacts of offshoring.[27]

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

Nature is vital to the economy, with 55% of global GDP moderately or highly dependent on it.[28] Nature loss presents systemic risks to businesses and the financial system, from disrupted supply chains to diminished economic growth. In contrast, investing in nature recovery offers significant opportunities in sustainability-linked markets and nature-based solutions. Businesses, increasingly motivated by regulation, customer demand and economic risks, can lead the way in restoring biodiversity, improving resilience and capitalising on new markets, such as carbon credits and ecosystem services. The Aldersgate Group's briefing, "Why nature matters for business", sets out recommendations for the government which could unlock business engagement and investment in solutions that protect nature while driving growth, innovation, and resilience.[29]

The LUF has a key role to play in the wider policy and regulatory framework for the environment. Specifically, the government should use the LUF to give businesses confidence on actions to support nature recovery and nature-based climate change adaptation and

[27] House of Lords Environmental Audit Committee (2024) Environmental change and food security: Government Response to the Committee's Second Report
[28] PwC (2023), Managing nature risks: from understanding to action.
[29] Aldersgate Group (2024), Why nature matters for business.

mitigation. By clarifying what land use is appropriate where and what land use change is needed in England, the government can add certainty and improve business confidence to act on nature recovery by reducing the risks of investment. Beyond this consultation, the government must set out how the changes proposed in the LUF will be implemented in practice and how the LUF will inform policy and regulation.

The LUF must tie in with ELMs and wider agricultural policy to avoid unintended consequences. Coordination with ELMs will be essential to ensure farming businesses are not disadvantaged by ending their existing farming activities if other land uses are prioritised. The NAO report on The Farming and Countryside programme states that the iterative programme design (which includes ELMs payments) makes it difficult for farmers to plan their businesses to remain viable, to continue food production and achieve the Programme's environmental objectives[30]. Long-term budget certainty for ELMs should help drive investment in land use changes by businesses and financial institutions.

The government's sustainable finance framework can also help increase private sector investment towards appropriate land use changes. Mandating economically significant companies to disclosure integrated climate and nature transition plans will help improve the availability, comparability, and transparency of information, helping to mainstream nature into business and financial decision making. Similarly, the UK government should continue to champion the Taskforce on Nature-related Financial Disclosures (TNFD) framework and encourage companies and financial institutions to become early adopters. The TNFD can help companies and financial institutions to identify nature-related risks and opportunities and shift financial flows away from nature-negative outcomes towards nature-positive ones, such as regenerative agricultural practices.

The LUF should also be aligned with nature markets to avoid introducing an additional layer of complexity and perverse incentives. Consideration should be given to how different uses of land are valued and how to resolve issues, such as if the value of land is attractive for biodiversity credits but is needed for flood relief.

Robust nature capital markets could provide an investment opportunity and revenue mechanisms for land use change where appropriate. The government may wish to consider how revenue support could support action towards desirable outcomes, learning lessons from feed-in tariffs that were available for renewables.

Nature markets are nascent and require robust regulatory and monitoring frameworks to ensure that these markets are high quality and reduce the currently high risk of investment. Defra must consider solutions such as:

- **Robust reporting regimes**: The government should continue to support the development of nature markets, including through the work of the British Standards Institute and new standards for nature market governance. The government should

[30] NAO (2024) The Farming and Countryside Programme

also consider necessary next steps to develop the Soil Carbon Code, including identifying appropriate methodology.

- **Accreditation**: The UK ETS, Woodland Carbon Code and Peatland Carbon Code are backed by independent accreditation, increasing confidence for participants and setting them aside from less trusted carbon markets. The development of agroforestry accreditation, building on the example of farming and forestry accreditation, would also be valuable to build confidence in land use change. Support for accreditors should also be provided to develop new schemes for nature recovery and regenerative agriculture, which could reduce the monitoring burden on regulators and provide frameworks for land use change. For example, the LEAF Marque is a leading assurance system for sustainable farm products[31].
- **Monitoring, reporting and verification (MRV)**: Ensuring that the data and science are of high quality is necessary for market confidence and growth. MRV is currently expensive, but essential; it ensures long-term solutions for sustainability are prioritised and losses are prevented. At present, additionality, assurance and monitoring are not available and gold standards need to be defined.
- **Demand drivers**: Lack of demand is a key barrier for the growth of nature markets as investors do not have confidence in long-term demand for credits. The government must resolve the uncertainty creating for nature markets since the announcement of the Nature Restoration Fund.
    - Lessons should also be learnt from Biodiversity Net Gain (BNG). Addressing existing challenges and broadening the scope of BNG towards "Environmental Net Gain", going beyond diversity and considering the environment more broadly, could leverage more investment into nature recovery and multifunctional land use or land use change. A tightening up of the on-site BNG standards and monitoring should improve mitigation of harm onsite and assist in participation in the off-site market, which has greater potential for large scale nature recovery.
    - The Government should consider the potential for including the Woodland Carbon Code in the UK ETS framework, with an acknowledgement that this brings both opportunities and risks: it would likely drive demand for carbon sequestration credits but should not be a replacement for industrial decarbonisation and investment in engineered solutions.
    - The National Wealth Fund should look to build on the UK Infrastructure Bank's work on natural capital markets.[32] Strategically investing in natural capital projects could help crowd-in greater sums of private investment, while supporting the NWF's dual mandate of tackling climate change and supporting regional economic growth.
- **Aggregation**: The government should consider how the LUF considers bundling and the role of mediators and aggregators of land use change projects within a local area or catchment. Aggregating small projects into larger portfolios can attract investment from larger, less-risk-averse investors, such as pension funds (a process also known as bundling). Support for collaboration and participation or leadership of public sector

[31] Agronomist & Arable Farmer (2021) New study demonstrates the value of the LEAF Marque beyond certification
[32] National Wealth Fund (2022) The role of UKIB in natural capital markets

bodies in consolidation activities will be valuable. Lessons from catchment-based approaches will also be helpful.

The government must also ensure that risks are well understood and managed. If participants experience poor outcomes, confidence in markets could be undermined and jeopardise their long-term success. Ensuring effective and robust frameworks as well as the skills needed are available will be critical to success. One specific risk concerns stacking, where multiple environmental benefits are combined on a single piece of land, and could lead to a concentration of investment in small areas if applied inappropriately. Market framework policies should be designed to mitigate this risk and encourage more widespread investment.

10. **What changes are needed to accelerate 30 by 30 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**

Updating the purposes, powers, and funding for protected landscapes, such as National Parks, should be central to a renewed 30x30 delivery programme. This must include significant improvements to the existing protected site network, which can act as vital assets in achieving biodiversity goals. Furthermore, introducing a Public Nature Estate obligation for public bodies and expanding the Public Nature Estate itself would significantly enhance the UK's natural capital and contribute to 30x30's success.[33]

- **Tools: such as greater alignment of existing Defra schemes with the 30by30 criteria**

Standardised methodologies will be an essential tool to aid delivery of environmental improvement, ensuring quality and robustness of actions. Standardised methodologies could build on the natural capital approach, methods for measuring ecosystem services such as those used nationally by ONS and in Defra's guidance on Enabling a Nature Capital Approach (ENCA)[34], and the concept of public goods.

Farmers have a critical role to play in the delivery of environmental targets. The government should support the agricultural sector to contribute most effectively, including by increasing ease of adoption to maximise contribution. ELMs could form part of the delivery of the 30x30 target, in particular through the Landscape Recovery Tier. This window for ELM reform presents a valuable opportunity to explore revenue support mechanisms for nature recovery, similar to those used in the renewable energy sector, helping to incentivise transformative practices that deliver both environmental and economic benefits.

[33] Aldersgate Group (2024) Why nature matters for business.
[34] Defra (2020) Enabling a Natural Capital Approach.

- **Resources: such as funding or guidance for those managing Protected Landscapes for nature**

Protected landscapes require adequate funding to deliver progress towards the 30x30 target. National Park Authority budgets have faced real-terms cuts, which could have a negative impact on their ability to support UK nature recovery targets.

- **Other (please specify)**

The government needs to set out a delivery plan to meet the 30x30 target, including clarity on the role of the private sector. To meet this ambitious goal, clear milestones, timelines, and accountability mechanisms are needed. The private sector can play a key role, alongside public bodies, in ensuring the effective protection and restoration of 30% of the UK's land and seas by 2030.

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

N/A

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

As outlined in the Aldersgate Group report 'Electric Dreams'[35], strategic planning can support the delivery of new renewable energy and grid infrastructure, whilst protecting nature and strengthening community support for the net zero transition more generally. The government must use development and spatial plans to:

- reduce cascading challenges in the planning system
- front-load consideration of the natural environment
- improve join-up between environment, energy and other infrastructure policy to harness opportunities and incentivise integrated solutions for decarbonisation and nature-positive energy infrastructure.

The government must also consider what policy and regulation will support greater uptake of good practice and innovative solutions to maximise co-benefits. For example, regulation such as Biodiversity Net Gain (BNG) provides a level-playing field and ensures developments make a net positive contribution to the environment as standard practice. Mandating BNG for Nationally Significant Projects (NSIP), expected to take effect in 2025, would support multifunctional use for land for infrastructure and biodiversity enhancement, while increasing demand in related markets.

Government departments should better synthesise environment and infrastructure policy by setting out shared priorities and identifying opportunities for nature recovery and landscape enhancement with development. This must translate into alignment between spatial plans,

[35] Aldersgate Group (2024) Electric Dreams

including the Strategic Spatial Energy Plan (SSEP), Centralised Strategic Network Plan (CSNP) and Regional Energy Strategic Plans (RESP), marine plans and the LUF.

Integrating natural environment considerations early in planning processes, including within the Planning and Infrastructure (P&I) Bill, National Planning Policy Framework (NPPF) and the SSEP, would help address the current lack of coordination and challenges. For example, the choice of location of new energy infrastructure is not based on a holistic assessment but is often driven by the availability of grid connections or location of offshore windfarms. This can result in clustering of developments in particular areas, creating cumulative negative impacts. By front-loading environmental considerations, the risk of delays and unforeseen complications during later stages of development can be reduced.

Some applications also enter the system despite being unfeasible on environmental grounds; they will not be granted consent but contribute to additional strain on the already limited resources in the planning system and undermine the trust of local communities in developers and government to deliver high-quality infrastructure. Strategic coordination on land use planning should eliminate this.

Strategic planning offers the opportunity to use strategic environmental assessment for site selection, reducing the risk of selecting sites that are not suitable and for which mitigation of impacts would be significant or not possible. Exploring strategic approaches to mitigation of development impacts also has the potential to support development and deliver more for nature without weakening nature protections.

Effective management of trade-offs can also be supported by greater accessibility of land use and planning data. New technologies can enhance the efficiency of environmental impact assessments, improving the ability to mitigate negative effects, identify opportunities for multifunctional land uses, and ensure that sites deemed inappropriate for development are not pursued. These innovations would ensure that environmental sustainability and development objectives are not at odds, but work in tandem to achieve long-term, positive outcomes for both nature and the economy.

The case studies below highlight the potential co-benefits and opportunities for nature that can be delivered with developments and infrastructure.

- Kingsbrook Development in Aylesbury (UK)[36]: Barratt Homes partnered with the RSBP, delivering 2,450 homes and 400 acres of open green spaces. Halfway through construction, the development includes nearly 6,000 new trees, hundreds of swift bricks, bat boxes, ecological habitats and hedgehog highways. Wildlife monitoring by the RSPB has observed 96% increase in starling populations, a 72% increase in Whitethroats and a doubling of local bumblebee populations.
- Kidbrooke Village in London (UK)[37]: A new urban neighbourhood in London is delivered 4,800 new homes along with 20ha of species rich meadows to meet Biodiversity Net Gain commitments (completed before mandatory BNG). This project

[36] Barratt Developments (accessed 2025) Kingsbrook, Aylesbury
[37] Natural England (2019) London Wildlife Trust: Bringing Kidbrooke alive with wildlife (2019)

created a multifunctional green corridor linking Sutcliffe Park with the nature reserves at Kidbrooke Green and Birdbrook in the surrounding areas.

- Kensworth quarry[38]: Cemex UK and RSPB developed a biodiversity plan to enhance biodiversity on the site, including the creation of chalk grassland that has the potential to support some of the UK's rarest and most endangered species. Cemex UK calculated that the restoration of the site produces a surplus of biodiversity credits which, if theoretically traded, would be worth over £1 million. This underscores how adopting a nature positive approach can add value to both a business' assets and its natural capital. Over the last decade, Cemex UK and the RSPB have restored over 1,750ha of quarries to provide homes for 46 threatened bird species.[39]

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

N/A

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

The government should look to incentivise collaboration and coordination across plans and strategies. As set out in answers to other questions in this response, interoperability and shared data, as well as shared methods, standards and principles for decision making will support closer coordination and reduce potential challenges. Catchment-based approaches provide valuable examples to learn from, especially relating to collaboration across administrative boundaries and sectors.

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 / No / I don't know]

Increasing knowledge sharing on climate adaptation for landowners and land managers is crucial, irrespective of the specific goals of the LUF. The Adaptation Reporting Power (ARP) is a valuable tool for encouraging businesses and stakeholder groups to engage with the climate risks they face. It also serves as an important mechanism for signalling that businesses or coalitions are actively addressing these risks. Peer-to-peer learning, especially in the agricultural sector, is vital for building collective resilience and ensuring that knowledge is effectively disseminated.

The government should consider to what extent the ARP process supports greater awareness and knowledge sharing, or if other mechanisms would be more effective. The burden of reporting should also be considered, to ensure the process is straightforward and effective in driving intended outcomes.

[38] RSPB (2023) Quarries, creating unique homes for nature
[39] New Civil Engineer (2024) Cemex RSPB quarries case study

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 fully support initiatives aimed at helping landowners, land managers, and communities navigate the impacts of climate change. These groups may currently face barriers to accessing information that is both relevant to their day-to-day operations and aligned with their business and social needs. Ensuring that information is not only accessible but also adaptable to local contexts and solution-focused is key to overcoming these challenges.

Establishing resilience standards can play a pivotal role in supply chains, for example, by enabling supermarkets or financial institutions to incentivise and support land managers and landowners in adopting climate-resilient practices. These organisations are increasingly engaging with their supply chains to meet internal sustainability targets, which can drive broader uptake of resilience measures.

Furthermore, research and innovation are critical to deepening our understanding of climate change impacts and developing practical solutions for land management. A dedicated strategy to support research and innovation in land management would not only aid stakeholders in building resilience but also help them enhance profitability and increase the adoption of multifunctional land uses that benefit both the environment and the economy.

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)**

N/A

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**

As recommended in the report 'Electric Dreams',[40] the government should support the Planning Inspectorate, statutory consultees and other key stakeholders to increase digitalisation of the planning system, thereby improving access to spatial and environmental data and information and improving the efficiency of the system. Early data sharing can improve public consultation in future planning decisions.

- **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**

The opacity of land ownership in England means that collaboration around environmental goals and land governance with local authorities can be costly and time-consuming. If there are barriers, financial and temporal, to understanding the stakeholders involved in land-based decision making, it ultimately will slow down the rate of progress, regardless of the outcome in mind.

- **Government-published land and agricultural statistics**

N/A

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

Land use decisions must be based on up-to-date and robust data. The government must ensure that the quality, availability and accessible of ALC data is of an appropriate standard to support effective land use decisions. It is also important to recognise the limitations of relying solely on ALC data, with a range of factors influencing land use decisions. The government must consider how to best incorporate environmental metrics and how data can support and incentivise decision-making towards more sustainable and multifunctional land uses.

[40] Aldersgate Group (2024) Electric Dreams

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

Public sector data has been a cornerstone of private sector growth in many industries, particularly in healthcare. The same opportunities could be realised for UK companies operating in the geospatial sector. By revising the way government-owned geospatial data is licensed, new business models could be fostered to support sustainable farming, development, and nature recovery. The UK National Data Strategy, published in 2020, provided a strong framework and clear principles for unlocking data to drive growth and innovation. Leveraging this data for sustainability-focused solutions can play a vital role in advancing the UK's green economy and supporting key environmental goals.

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**

Skills gaps include ecology and planning. The government should ensure that statutory consultees and local authorities are appropriately and efficiently resourced, with access to centralised or regional hubs and relevant expertise to help reduce uncertainty around timescales for applications and improve community engagement.[41]

Building skills within local government will be essential to enabling the delivery of land use change at the local level, as well as supporting planning decisions and effective public engagement, ensuring that communities are involved in shaping and support land use decisions. Ecological expertise at the local level will be vital for implementing radical changes to land use that support nature and climate objectives, as well as for monitoring outcomes to ensure that targets are being met. Strengthening local ecological skills will ensure that land use changes are not only effective but also sustainable in the long term.

- **Farming**

Capacity, skills, and experience gaps exist in ecology, regenerative farming and agroforestry. The government should resource peer-to-peer learning, site visits and demonstrations, and knowledge networks as proven models for upskilling. The government should also ensure a clear pipeline and training for advisors in regenerative farming specifically. Strengthening ecological education by integrating applied ecology into school curricula and ensuring agricultural courses include a strong ecological component would also be valuable.

The apprenticeship system can also support the development of land management capacity or skills. Apprenticeships, such as the Level 2 countryside worker or Level 3 forest craftsperson apprenticeship, for example, offer pathways for new market entrants into environmental and conservation roles. The government should also carefully consider plans

[41] Aldersgate Group (2024) Electric Dreams

to ask employers to fund more Level 7 apprenticeships outside the new Growth and Skills Levy, as this could lead to a sharp decrease in the number of Level 7 apprenticeship starts – including those which support roles in critical demand. The Level 7 ecologist apprenticeship and Level 7 soil scientist apprenticeship, for example, are both important for informing future land management decisions.[42]

It is important to acknowledge that farming faces unique challenges with land use transition, including wider barriers such as supply chain, tenancy restrictions, revenue uncertainty or culture. Resolving these barriers while providing long-term incentives and support will be needed to develop new skills and capabilities.

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

The government should also consider the skills gap within the financial services sector, as this could impede the transition to sustainable land use. The sector plays a crucial role in underwriting, lending, and investing in nature markets and nature-related investments. However, research conducted by PwC, in partnership with the Aldersgate Group and the Financial Services Skills Commission, found that the demand for green skills is quickly outpacing supply in the financial services sector.[43] This growing skills gap threatens to stifle the growth of these markets and disrupt the flow of capital, potentially hindering the sector's ability to support sustainability initiatives effectively.

A programme of upskilling and reskilling is urgently needed to meet the growing demand for green skills in financial services. To close this gap, financial institutions should look to partner with educational institutions to develop firm-wide sustainability training programmes. Lloyds Banking Group, for example, partnered with the Cambridge Institute for Sustainability Leadership and the Royal Agricultural University, to train specialist relationship managers on the impacts of the transition on the agricultural sector. Additionally, the government can play a pivotal role by providing clearer guidance on the skills needed for a future net-zero economy. One example to draw from is the approach taken by the Monetary Authority of Singapore, which partnered with the Institute of Banking and Finance Singapore to identify 12 key technical skills and competencies – including natural capital management, green lending structuring, and sustainability reporting – that are essential for finance professionals working in sustainable finance roles.

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

As mentioned in previous questions, networks such as the Soil Association Exchange[44] and the Nature Friendly Farming Network[45] are examples to learn from. The Soil Association

[42] See Aldersgate Group (2024) Beyond the Levy: Ensuring the effective implementation of the growth and skills levy
[43] PwC, Aldersgate Group, and Financial Services Skills Commission (2023) Job greening in the UK Financial Services Sector
[44] Soil Association Exchange (accessed 2025) Website
[45] Nature Friendly Farming Network (accessed 2025) Website

Exchange has fostered collaboration on organic farming, agroecology, and soil health, helping landowners transition to organic practices through technical support and market access. This includes the assessment of around 240kha of farmland in the UK to support more sustainable agriculture and produce a farm environmental baseline,[46] and the creation of an Exchange Market where farmers can get paid for carbon dioxide mitigation efforts.[47]

The UK should also look to learn from other countries. In Portugal, the Montado system[48] combines grazing with tree planting to enhance carbon sequestration, biodiversity, and productivity. Similarly, in Spain, regenerative agriculture in regions like Castilla-La Mancha[49] supports soil fertility, water conservation, and resilience.[50]

23. **Should a Land Use Framework for England be updated periodically, and if so, how frequently should this occur?** Yes, every 5 years / Yes, every 3 years / Yes, another frequency or approach. Please provide details. / No / I don't know **Please provide details.**

Yes, another frequency or approach. The government must provide long-term certainty with the LUF, with a long-term vision for the future of land use in England. Whilst stability in the long-term direction of travel is important, the LUF should also be based on accurate and up-to-date data, which may require periodic updates.

For businesses, stability and clarity in direction are essential for informed decision-making. Frequent changes can create uncertainty, undermining confidence to invest or implement land use changes. The government must provide clear timelines and scopes for updates, ensuring that the LUF is regularly reviewed to effectively drive sustainable land use changes. Agility will be important to address the risks and uncertainties that the LUF will need to contend with.

Prevailing climatic and economic trends will affect land in England and present novel uncertainty. Updates should consider how climate change, agriculture productivity, the wider food system and diets are evolving. Future land use may also be impact by novel markets, which could prompt farmers to diversify into non-food crops, such as those to be produced to make alternative fibres and other natural alternatives to fossil fuel-based materials, or biomass. The UK is also currently lacking a horticultural strategy, with potential growth of the sector.

Updates should also consider technology development and opportunities. Production innovations such as vertical farming, novel breeding and crops science could improve output on existing farmland or concentrate production on relatively small parcels of land in cities.

[46] Sustainability Magazine (2024) Sustainable Farming Driven by Milestone Lloyds Initiative
[47] Soil Association Exchange (accessed 2025) Introducing Exchange Market
[48] Agforward (2017) – Montando and Mosaic Systems in Portugal
[49] Agroberichten Buitenland (2024) Agroecology is a sustainable solution for Spain's agricultural sector
[50] European Commission (2024) Rural Development Programme 2014-2020 of Castilla-La Mancha, Spain

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]

Agree. Cross-government join-up and coordination will be essential to the effective implementation of land use change. The government must ensure that the LUF is effectively embedded into policymaking. We welcome the government proposed approach of providing a strategic oversight function and long-term land use vision, cross-government analysis and evidence-based advice, embedding land use principles in decision-making, and collaboration.

The government must ensure that coordination processes put in place can operate with stability and in the long term, reducing the risk of uncertainty. Effective business engagement will also be valuable to ensure the implementation of the LUF can be a success and mitigate any potential unintended consequences.