

April 2025

Land use in England

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.

We are in broad agreement with government's assessment of the scale and type of land use change needed, particularly in the context of the nature and climate crises – whilst acknowledging the need to reduce trade-offs. We also support a multifunctional approach to land use that can deliver co-benefits, for both nature and heritage (as well as public access to both). As has been recognised in a recent joint statement between Natural England, Historic England and the National Lottery Heritage Fund, our historic and natural environments are strongly interlinked.

It is important that any proposed changes take fully into account any potential impact on heritage, and that the historic environment is not compromised or damaged as a result, including with regards to the protection of archaeological sites.

To help meet its target of delivering 1.5m homes, there is a real opportunity for Government to incentivise the reuse of existing buildings, which allows local areas to meet their housing and amenity needs while maintaining a sense of place, offering low-carbon opportunities for new homes, community assets and cultural venues. Historic England estimates that 670,000 new homes could be created by repurposing vacant historic buildings.

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

Disagree.

We acknowledge the importance of the multifunctionality of land use, however the draft land use framework could better reflect the rich heritage of our landscape including the integral role played by the historic environment in shaping landscape character – alongside the abundant wellbeing benefits that it brings and recognise the multiple benefits that the historic environment can deliver for nature (e.g. historic buildings and

features providing havens for wildlife). Heritage is only mentioned twice throughout the entire framework document, which diverges from the Secretary of State's launch speech. It is vital that this acknowledgement of the pivotal role of heritage be adequately conveyed as the framework continues to be developed and finalised.

We also support the principle of playing to the strengths of the land. Heritage has much to offer in this regard, with historical evidence demonstrating past land uses, including approaches that were well-suited to local conditions - informing future action by demonstrating how land use has changed over time. Such evidence of past human activity is held in various sources, but especially important will be the implementation of statutory Historic Environment Records outlined below.

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

As the Heritage Alliance, we believe it is key that heritage groups be involved in the ongoing development of the land use framework and can also benefit from applying these principles.

To take one example, English Heritage has already been applying similar principles to their work to balance the needs of both the historic and natural environment. They are working alongside the Kent Wildlife Trust, the White Cliffs Countryside Partnership and the Western Heights Preservation Society on a partnership project to restore 80 hectares of precious chalk grassland habitat and defensive earthworks across Dover Castle and the historic Western Heights in Dover. The project will create vital habitat for key species, including the red-billed chough - which centuries ago would have been a common site in the area, but which became extinct for more than 200 years. In addition, a mixed-breed livestock herd will also be introduced in the area to support the long-term management of the landscape, through conservation grazing. The project will also help to restore the local historic landscape, giving people the opportunity to connect with both the natural and the historic environment.

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?

Heritage should be included in any incentives for land use delivery and, as already mentioned, and be viewed through the lens of providing multiple benefits, including for nature recovery, climate change mitigation and people's health and wellbeing.

However, with much landscape heritage at great risk (e.g. stone walls, traditional farm buildings), it will not have a future without long-term, sustainable funding: once our

heritage is gone, it is gone forever. Part of the solution is to build on the previous successes of agri-environmental schemes, such as under the Farming in Protected Landscapes (FiPL) scheme. An extension of FiPL to 2028 at least, for example, should be explored.

A commitment from the Government's Heritage Council, now several years overdue, was for DEFRA to appoint a strategic lead official for heritage within DEFRA to ensure that heritage is considered properly across the range of the department's policy areas. This is a timely opportunity to fulfil this key commitment for the benefit of wider decision-making.

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

Evidence of past land use can help to inform existing and future land use. Historic Environment Records (HERs) can help decision-making on land use and development by providing information about the historic environment in a given area, such as buildings, archaeological sites and finds. HERs also help to advance understanding by providing information to the public and engaging them with their local heritage, whilst contributing to the realisation of social, economic, and environmental benefits including promoting local distinctiveness, pride and a sense of place.

Implementing this statutory provision, which is overdue for bringing into operation, would:

- Overcome most of the real or perceived obstacles to development from heritage, which tend to result from impaired process rather than flawed policy;
- Ensure high-quality data that provide greater certainty and support better decision making;

We would welcome a commitment from the Government on a speedy timescale for implementing the provisions relating to HERs outlined in section 230 of the LURA 2023.

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

Protected Landscapes cover nearly one quarter of the UK, and are possibly the most effective route to meeting the government's 30x30 ambition.

It is essential that cultural heritage remains embedded in the purposes of National Parks. Adequate tools and resources are needed so that they can develop long-term partnerships and provide stability in long-term planning for delivery.

More generally what is best for heritage is often also best for nature so it will be important to consider both together in consideration of biodiversity targets. The Heritage Responds report from the Historic Environment Forum includes several case studies.

<https://historicenvironmentforum.org.uk/hef-activities/archive-and-resources/heritage-responds/>

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

It remains unclear how the land use framework will operate alongside other pre-existing (or in development) plans and strategies, such as Local Nature Recovery Strategies; nor how it will interact with forthcoming legislation on devolution and the Government's modern industrial strategy. We would therefore welcome clarity on where and how the land use framework sits within the hierarchy of spatial and related plans.

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.

A re-use first approach is also environmentally critical. Abolishing the Permitted Development Right (PDR) for demolition to encourage reuse over unnecessary waste would be an important step, as would a review of the use of PDR in the planning system more generally. Fiscal incentives for repair and maintenance currently incentivise new-build over repair and maintenance of existing structures and are an important connected lever be reviewed in tandem with any new approaches to land management.

Funding up front for those wanting to invest in renewable options and adapt buildings and sites for greener energy is very difficult to get - this is an area where up-front grants for e.g. adaptation of historic buildings to get them off the grid would be positive.

18 What improvements could be made to how spatial data is captured, managed, or used to support land use decisions in the following sectors?

As mentioned above, Historic Environment Records (HERs) provide a sustainable mechanism to keep an engaged understanding of landscape, and should be used to help us understand the history of land use and inform contemporary decision making.

However, there is currently variable availability of heritage information to clarify heritage and planning consent processes, with HER services vulnerable to cuts and closure, and

with varying degrees of digital access. We therefore strongly recommend that section 230 of the Levelling up and Regeneration Act 2023, which places a requirement on local authorities to provide HERs (and which is overdue for bringing into operation), be implemented as quickly as possible. This has been a long-standing ask of the heritage sector.

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

Yes, every 5 years.

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

Agree.

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