



The countryside charity
Dorset

Dorset CPRE

April 2025

Dorset CPRE Response to the Land Use Consultation

This response is prepared by the Dorset branch of the Campaign to Protect Rural England (CPRE).

We welcome and support the introduction of a Land Use Framework for England, and submit the following responses to the consultation questions:-

Question 1: To what extent do you agree or disagree with our assessment of the scale and type of land use change needed, as set out in this consultation and the Analytical Annex?

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

We strongly agree that better strategic decisions on land use, improved land management and well judged land use change are required to enable England to meet its environmental commitments, whilst meeting the needs of its population.

We are concerned however that the actual amount of land use change required for infrastructure, housing and other development is likely to be far higher than currently estimated in the Analytical Index. The figures provided in the index focus on land change to meet housing needs up to 2050 (150,000 ha) however no figures have been provided for land use change to meet employment needs (business parks etc). To ensure that that no more land than is absolutely necessary is developed it is essential that re-use of brownfield land and existing buildings is maximised to meet employment and housing needs, including the re-use of often vacant space above ground floor shops for residential accommodation. Essential to achieving this is ensuring that projects with planning permission are actually delivered. CPRE has identified that over a million approved dwellings that have yet to be delivered. Poole has a significant number of urban sites with planning permission for development that for legal purposes have been started, yet have not progressed to completion and have sat in a moribund state for many years, if not decades. In the meantime, further valuable greenfield land is released for development.

As advocated by the Open Spaces Society (OSS), any proposed Land Use Framework should include provision for public access and recognition of the importance of this for public connectivity with nature and for community health and wellbeing.

The Government's commitment to meet Target 3 of the Global Biodiversity Framework (Kunming - Montreal Global Biodiversity Framework), by ensuring that at least 30% of the nation's land and sea is being effectively conserved and managed by 2030 is to be applauded. The Wildlife and Countryside Link's 30x30 in England 2024 Progress Report¹ identified that currently 2.93% of Land is effectively well managed for nature and contributes towards the 30% figure. This is significantly lower than the 11% referred to in the Annex. We welcome and strongly support the "30by30" commitment and wish to see it implemented in the interests of nature, climate and people.

¹ Wildlife and Countryside Link [30x30 in England 2024 Progress Report](#) October 2024

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

Dorset CPRE broadly agree with the land use principles proposed. We welcome acknowledgement of the need for participation and leadership at local and regional levels to co-design spatial strategies. It is essential that local communities are involved in the conversation, are well-informed and effectively consulted, regarding how best to use land in their area.

In our opinion there is a strong case for the establishment of a Land Use Commission, or an existing body such as the Office for Environmental Protection, to take on the role of delivering an integrated approach and helping local authorities develop similar frameworks at the local level.

With regards to Principle 3, Playing to the strengths of the land, we would like to see landscape valued and acknowledged as an important function of land along with the societal, ecological and other benefits that areas of high landscape value provide. Landscape character assessments should be used to identify the strengths, vulnerabilities and valuable characteristics of different areas of the country. It is important not to forget the impact of land use change on the soil when considering the strengths of the land and making decisions fit for the long term, which can have ramifications for carbon sequestration, flooding, etc.

In making decisions fit for the long term (Principle 4), there also needs urgently to be a clear long-term strategy aimed at delivering the UK's net zero and nature commitments, while ensuring food security.

By adopting the principles and the strategic, integrated approaches we recommend below, the Government can seek to ensure that development including infrastructure contributes positively to economic growth while protecting food production, biodiversity, and climate resilience, and respecting the interests of communities.

Our recommended principles and strategic, integrated approaches are as follows:

1. Integrating Multi-Objective Spatial Planning

Development and infrastructure plans should align with national land use priorities, considering food security, biodiversity, carbon sequestration, water management, and community needs.

A Strategic Spatial Planning Framework should ensure infrastructure, housing, and clean energy projects avoid high-quality agricultural land and environmentally sensitive areas.

2. Embedding Nature and Climate Resilience in Development Plans

Require new housing and infrastructure projects to incorporate nature-based solutions, such as urban green corridors, floodplain restoration, and sustainable drainage systems.

Ensure all developments are net zero carbon and include climate resilience assessments to account for future changes in water availability, flood risks, and heat island effects.

3. Using High-Quality Land Use Data to Guide Decision-Making

Government must make spatial data accessible to local authorities, developers, and land managers. This includes updated Agricultural Land Classification (ALC), biodiversity data, and flood risk maps.

Encourage the use of GIS-based decision-support tools to assess trade-offs and optimize site selection for infrastructure and housing projects.

4. Strengthening Policy Coordination Across Sectors

Link spatial planning decisions with the Strategic Spatial Energy Plan (SSEP) and National Infrastructure Strategy, ensuring energy, water, and transport infrastructure align with sustainable land use goals.

Encourage local planning authorities to integrate Local Nature Recovery Strategies (LNRSs) into development plans to enhance biodiversity and ecosystem services.

5. Incentivizing Sustainable Development on Brownfield

Implement spatially targeted financial incentives to prioritize development on brownfield land.

Introduce biodiversity and climate-positive planning conditions, ensuring all major developments provide net biodiversity gain and contribute to local climate resilience strategies.

6. Engaging Local Communities in Decision-Making

Establish mechanisms for public participation in land use planning to ensure local communities have a say in balancing development with environmental and social priorities.

Encourage co-design approaches, involving farmers, conservation groups, and planners in shaping regional land use frameworks.

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

- **Combined and local authorities (including local planning authorities)**
- **Landowners and land managers (including environmental and heritage groups)**
- **Others (please specify)**

We agree with the suggested decision makers. It is important that communities are able to play a role in both the design, support and evaluation of spatial strategies impacting their geographical area. This was highlighted in CPRE's 2022 report, *The countryside next door: Why we need to invest in greener, healthier Green Belts*².

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?

A range of policies and incentives are needed to support decision makers in the agricultural sector. Key to achieving the land use change required is the formation of collaborative regional groups of agricultural decision makers to enable joined up decision making regarding land use. These groups need to be supported by adequate funding to help them achieve their aims.

Funding should be made available to train farmers to adopt regenerative farming techniques, restoring soil health. Evidence shows that the adoption of regenerative farming techniques need not result in a decrease in crop yields.

² CPRE [The countryside next door. Why we need to invest in greener, healthier Green Belts](#). May 2022

Farmers should be incentivised to create Geo Spatial Land Maps of their land holdings, enabling the identification of the most suitable use i.e. food production, restoration for nature etc.

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?

The contributions that properly managed and maintained hedgerows can make towards meeting environmental targets should not be overlooked, enabling nature recovery even on high quality, intensively farmed land. They offer farmers and land managers a real opportunity to generate a positive impact on the environment without sacrificing food production capacity. In Dorset, the Great Big Dorset Hedge Project works to restore and extend Dorset's network of iconic hedges, supporting biodiversity and helping to mitigate the impacts of climate change.

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

Please see response to Question 7.

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?

We submit the following comments in relation to Questions 5-7:

Statement 1

Co-design with the farming community would be a prerequisite to success. But co-design as witnessed in the development of the Sustainable Farming Incentive (SFI) has become a corrupted concept.

The farming community has been asked to cope with radical policy changes that have taken some years to evolve (in the case of the Environmental Land Management Scheme or ELMS), but more recently the shocks have come thick and fast culminating in the sudden blocking of all new applications for the main ELMS component - the Sustainable Farming Incentive. All faith in any co-design concept has been shattered. Trust has been lost - perhaps irrevocably.

Refinements to the Sustainable Farming Incentive are to be expected in the near future. There is absolutely no hope of government policy being taken seriously by the farming community at large unless the revised SFI programme, that we are assured will come, is improved in the eyes of the farming community (rather than simply cheaper to run).

DEFRA must learn that co-design is not a process that is a temporary work flow which is only switched on while receiving inputs but switched off when DEFRA return to their silo to do decision-making...the decision-makers need to test their decisions on their co-design partners before announcing their decisions. Until DEFRA demonstrates that it has learnt this aspect of co-design all new policy initiatives are destined to be treated with justified disdain.

Statement 2

Cheap food policies have driven us down the wrong paths for decades. We need to value our food such that farmers are paid a realistic rate versus costs and that would help to make land use changes affordable.

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.

To reduce the risk that food production and environmental impacts being displaced abroad it is essential that effective and efficient use of land takes place. To achieve this the following are required:-

1. Revision and update of the Agricultural Land Use Classification (ALC) System - central to the decision-making process is access to up to date and accurate information. The current Agricultural Land Classification system has been in use since 1988 and uses out of date climate data. As this system is used to inform land use decisions it is essential that it is accurate and based on the most up to date information. (*'Decision-making in land use planning and the Agricultural Land Classification System: stick, twist, or bust?'*³ CPRE February 2025)
2. Brownfield first approach to development - It is vital that our development needs are met wherever possible through the re-use of previously developed land/ brownfield sites with housing needs being met through medium and high-density schemes to minimise the loss of greenfield land.

QUESTION 9

We have chosen not to answer this question.

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

- **Strengthened Protected Landscapes legislation (around governance and regulations or duties on key actors) with a greater focus on nature**
- **Tools: such as greater alignment of existing Defra schemes with the 30by30 criteria**²³
- **Resources: such as funding or guidance for those managing Protected Landscapes for nature**
- **Other (please specify)**

We welcome and support the Government's target to protect and conserve a minimum of 30% of land and sea for biodiversity by 2030. As identified by DEFRA, our National Landscapes have the potential

³Grounded Insight. Report for the CPRE. [Decision making in Land Use Planning and the Agricultural Land Classification system: stick, twist or bust?](#) January 2025

to make a significant contribution to meeting this target, potentially up to 50%. However, this can only be achieved through adequate and consistent funding. Our National Parks have seen a 40% budget cut in real terms which in some cases has resulted in selling off public land and reducing their ability to deliver nature recovery projects. In order to pro-actively meet these ambitious targets not only should our current National Parks and National Landscapes receive the funding required to carry out ambitious and necessary nature recovery programmes, but also new National Parks should be created where appropriate, including the proposed Dorset National and Marine Park.

Currently many of our SSSIs are poorly managed and cared for, if they are to contribute to our 30by30 targets, greater resources need to be allocated for their monitoring and management.

As discussed in our answer to question 5, the nation's hedgerows can make a significant contribution towards meeting our environmental goals, including 30by30. They also have an important role to play in the urban environment, reducing air pollution and sheltering urban wildlife. Increased funding to not only plant more species rich hedgerows, but also to train land managers to properly maintain existing hedges has the capacity to accelerate 30by30 delivery.

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

Policies should be put in place to safeguard urban areas which provide important wildlife habitats from development and allow for the creation of nature corridors linking such sites. Urban forests (*the ecosystem containing all the trees, plants and associated animals in the urban environment*) make a significant contribution to both supporting nature in urban landscapes and provide numerous environmental benefits as well as enhanced recreational opportunities. Engaging communities in urban tree planting, hedge planting and gardening schemes in addition to having societal benefits can provide a cost-effective means of supporting nature in the urban environment.

The contribution that land designated as Green Belt surrounding our conurbations makes to nature and food production should be officially acknowledged and added to the Green Belt purposes. Take up of agri-environment schemes on agricultural land in the Green Belt has been shown to be relatively poor, actions encouraging urban fringe land managers to enter agri-environmental land management schemes would contribute to a range of objectives: support for nature recovery, the enhanced production of quality food close to communities, and public mental and physical health and wellbeing with benefits to the NHS, local authorities etc.

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

To ensure that development and infrastructure spatial plans take advantage of co-benefits and manage trade-offs effectively, the Government should adopt a strategic, data-driven, and integrated approach. The following key measures should be considered:

1. Integrating Multi-Objective Spatial Planning

Development and infrastructure plans should align with national land use priorities, considering food security, biodiversity, carbon sequestration, water management, and community needs.

A Strategic Spatial Planning Framework should ensure infrastructure, housing, and clean energy projects avoid high-quality agricultural land and environmentally sensitive areas.

2. Embedding Nature and Climate Resilience in Development Plans

Require new housing and infrastructure projects to incorporate nature-based solutions, such as urban green corridors, floodplain restoration, and sustainable drainage systems.

Ensure all developments are net zero carbon and include climate resilience assessments to account for future changes in water availability, flood risks, and heat island effects.

3. Using High-Quality Land Use Data to Guide Decision-Making

Government must make spatial data accessible to local authorities, developers, and land managers. This includes updated Agricultural Land Classification (ALC), biodiversity data, and flood risk maps.

Encourage the use of GIS-based decision-support tools to assess trade-offs and optimize site selection for infrastructure and housing projects.

4. Strengthening Policy Coordination Across Sectors

Link spatial planning decisions with the Strategic Spatial Energy Plan (SSEP) and National Infrastructure Strategy, ensuring energy, water, and transport infrastructure align with sustainable land use goals.

Encourage local planning authorities to integrate Local Nature Recovery Strategies (LNRSs) into development plans to enhance biodiversity and ecosystem services.

5. Incentivizing Sustainable Development on Brownfield

Implement spatially targeted financial incentives to prioritize development on brownfield land.

Introduce biodiversity and climate-positive planning conditions, ensuring all major developments provide net biodiversity gain and contribute to local climate resilience strategies.

6. Engaging Local Communities in Decision-Making

Establish mechanisms for public participation in land use planning to ensure local communities have a say in balancing development with environmental and social priorities.

Encourage co-design approaches, involving farmers, conservation groups, and planners in shaping regional land use frameworks.

By adopting these approaches, this Government can hopefully ensure that infrastructure and development contribute positively to economic growth while protecting food production, biodiversity, and climate resilience.

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

Dorset is predominantly a rural county lacking a major road network or an effective public transport system across most of the county. Over half the Dorset area is protected as a National Landscape. Recent Housing targets are now unrealistically high and unsustainable without a significant

investment in infrastructure which cannot be provided by developer-led funding models (CIL, Section 106 etc). Such exaggerated development plans also do not tackle the real housing crisis and threaten the agricultural industry, the sensitive environment and heritage, and the county's tourist economy. In addition, large solar farms threaten prime Greenfield locations without providing any significant community benefit. Dorset CPRE recommends the following to take into account better opportunities in transport planning:

1. Significant investment in rural public transport to enable viable, sustainable routes between housing, education and employment sites to support economic development. This should include bus routes with an aspiration towards "Every village, every hour" and conversion of railway lines from single track to double track to enable sustainable metro/commuter services.
2. Private car journeys to be reduced using a combination of carrot and stick (e.g. investment in public transport, active travel, reduced parking spaces and low-emissions zones); and encouragement for quick conversion to electric vehicles for reduced pollution and carbon footprint.
3. New housing developments to be concentrated around existing larger towns in "brownfield developments" where a "gentle" density increase, reduced parking spaces and conversion of some car parks will create many more housing opportunities close to infrastructure and services. This will support public transport and reduce private car usage.
4. Policy of "rooftop first" for PV solar will preserve much green land for agricultural and environmental use. Small solar arrays built as community energy projects can be encouraged, will support community resilience and provide local electricity generation for rural electric car charging and heat pumps.
5. Support a National Park in Dorset which would promote and facilitate more holistic transport and infrastructure planning alongside the conservation and enhancement of agricultural, environmental, landscape and heritage areas.

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

We have chosen not to answer this question.

QUESTION 15: Would including additional major landowners and land managers in the Adaptation Reporting Power process (see above) support adaptation knowledge sharing? Please give any reasons or alternative suggestions

[Yes / No / I don't know]

Yes, major landowners and land managers should be included in the Adaptation Reporting Power (ARP) process introduced by the 2008 Climate Change Act. The ARP is already proving to be invaluable in preparing the nation to adapt to climate change, extending this to include more major landowners and managers can only be a good thing.

Questions 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 Projections²⁹ 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 scenario³⁰)
- **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)**

Providing better information on local climate impacts and developing clearer objectives and resilience standards for each sector go together and should be the first priority. This would greatly help in achieving the right actions in the right places. Creating adaptation plans, supported by advice on what they should contain and on consistency of approach would also be very helpful.

An important issue in relation to climate and moving towards net zero carbon is how farmland should be used and managed. In addition to safeguarding best and most versatile land for food production, there is a strong case for prioritising roofs for solar power installations over large-scale ground-mounted installations on farmland which can provide a wide range of benefits in addition to food. In 2023 Germany installed a record 14GW of solar capacity with residential rooftop installations driving the increase.

Question 17: What changes to how Government's spatial data is presented or shared could increase its value in decision making and make it more accessible?

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

We agree that consistent sharing and use of non-sensitive data and evidence is a key priority to support land use decisions. In our view what would be particularly helpful and encourage greater use of the data and evidence that does exist would be bringing the data and evidence together in one place. There also needs to be greater consistency across data sets, better presentation particularly of mapped information, regularly keeping material up to date where appropriate, and help available if needed with uses, applications and interpretation.

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

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

We have chosen not to answer this question.

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

As mentioned in our response to Question 8, a major overhaul of the ALC system is required. It is essential that it is founded on the most up to date data and uses the most recent maps. A recent report by the CPRE (Decision-making in Land use planning and the Agricultural Land Classification System: stick, twist, or bust) outlines in detail the changes required. These include:-

1. Conduct a review and update of the ALC system, including implementing ADAS' 2022 recommendations to, at a minimum, update the ALC's climate dataset1
2. Re-survey lowland peatlands
3. Better protect Best and Most Versatile (BMV) land in the planning system
4. Use an updated ALC system as one tool in the Land Use Framework

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

Clear, high quality and freely available open source mapping data would allow local areas to produce land use frameworks of their own. The mapping provided with the consultation paper is insufficient for local communities to judge the implications of land use change for their area. Greater ease of access to land ownership data held by HM Land Registry would help facilitate joined up decision making relating to land use.

QUESTION 21: What gaps in land management capacity or skills do you anticipate as part of the land use transition? Please include any suggestions to address these gaps.

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

There is a general issue of inadequate resources outside Government. Many local authorities are already short of sufficient staff and skills at the right level to enable the planning system to function

effectively in both development management and plan-making. Highways authorities often have insufficient resources to maintain public rights of way in their areas.

We hope the opportunity will be taken to address some of these issues through the current round of local government reorganisation.

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

We have chosen not to comment on this question.

QUESTION 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

Yes, the Land Use Framework for England should be updated every 5 years.

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]

To facilitate a unified approach to land use and to make the government effective in policy co-creation it is essential that a separate arm's length Land Use Commission is established to oversee the creation of the Land Use Framework, as recommended by the House of Lords Land Use in England Committee in its 2022 report⁴ into Land Use in England.

⁴ House of Lords. Land Use in England Committee. Report of Session 2022-23 [Making the most out of England's land](#) December 2022.