

Submitted to Land Use Consultation
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Foreword

Confidentiality Question

i Would you like your response to be confidential?

No

Please explain your answer.:

Using and sharing your information

Introduction

ii What is your name?

Name:

Dr Vincent Holyoak

iii What is your email address?

Email:

iv What is your age?

v What is your gender?

Male

vi What sector do you work in?

Sector:

Non Government Organisation: Other

Please explain your answer:

Historic Environment

vii Are you responding as an individual or on behalf of an organisation?

Organisation

Please explain your answer:

Historic England

Our vision for land use in England

Purpose of this consultation

A long-term view of land use change

What we mean by land use change

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?

Not Answered

Please explain your answer:

Historic England fully supports the principle of land use change to achieve the government's policy objectives. To drive this – it would be helpful to set out a clear methodology for achieving a hierarchy of goals, rather than simply providing data. This would better guide those drawing up plans and allocating land uses.

The timing of the framework will be vital, given the anticipated publication of other strategies (eg. infrastructure) - but it is not clear how the LUF will mesh with these.

We endorse the points made by the Environment Secretary in launching this framework (eg. "Wherever you are in England, the history of our landscape is ever present. The distinctive features that make up the nation we know and love are never far away"). We estimate that heritage features are present on over 10% of agricultural land.

Aside from its intrinsic value (as recognised by cultural services within NCA and the OIF for protected landscapes), the inclusion of heritage data in the LUF will be vital. Consideration of "time depth" supports wider understanding of the dynamic nature of England's landscapes and their changing character. The historic environment can act as a catalyst for public engagement and discussion on future change.

Principles: Taking a spatial approach

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

Agree

Please explain your answer:

We strongly support a framework and better integration. A piecemeal, siloed approach to delivery reduces opportunities and creates inefficiencies and unnecessary, artificial trade-offs between outcomes.

We agree with the principles of co-design and multifunctionality. Defining the desired outcomes, relative weighting (eg. through spatial prioritisation) and introducing a methodology for decision making will be vital to achieving resilience and efficient, sustainable delivery.

While we support prioritisation of outcomes within areas, we advocate a holistic approach, recognising that more sustainable agricultural practices not only benefit the environment, but increase productivity, profitability and yields. We believe it is possible to achieve better outcomes across all goals.

It will be important to incorporate other environmental information, including the National Heritage List for England and local authority Historic Environment Records (which provide information regarding historic land use and land cover, including Historic Landscape Characterisation data, showing the evolution of today's landscapes). These support consideration of time-depth (eg. past land use and vegetation) which identify opportunities for future change.

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)

Please explain your answer:

Co-design of the framework and knowledge of the objectives will engender better ownership and delivery of the outcomes. We therefore think that combined and local authorities have an important role in applying the principles. Heritage curatorial staff and Historic Environment Records are a vital part of the environment and planning teams within these authorities.

Not Answered

Please explain your answer:

We particularly want to highlight heritage as a key component of the wider environment. Heritage and nature are inextricably linked, mutually supporting and occur in the same places and spaces, as the Environment Secretary acknowledged in his launch speech. There is rarely any need for trade-offs if a holistic approach is taken. Indeed, sustainably managing heritage is not only a vehicle for delivering wider environmental benefits (eg. for nature recovery and climate change adaptation and mitigation) – it underpins the distinctive character of places and community identity. It is important that the principle of co-design recognises the value that the heritage sector and especially land managers and owners can bring in supporting change.

In this respect, we would reiterate the need for join-up with existing policy commitments (eg. EIP, the OIF for protected landscape management plans). Engagement with statutory consultees more broadly will also be important. This will assist in ensuring that there is access to expert advice on important topics (such as heritage, flooding, biodiversity etc) for decision makers.

Not Answered

Please explain your answer:

Making the best use of land

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?

Please explain your answer:

Forty years of investment have transformed England's agricultural sector from intensive, often environmentally damaging farming to diversified, more sustainable, regenerative systems.

ELM supports the simultaneous provision of high quality food, habitats and species while sustaining the distinctive historic and natural character of places. But these environmental and public goods would otherwise not be delivered by the market and secure services that would be uneconomic or secondary. It is important that schemes are championed in the long term, providing land managers with certainty, the means and the confidence to make long-term term decisions about land use and management.

The conservation of historic environment presents opportunities to manage land more sustainably while also delivering the change needed. Techniques such as no-till conserve historic features while improving soil health and water regulation. Historic boundary features such as dry-stone walls and hedges provide key habitats and wildlife corridors. Nature and heritage are indivisible and co-dependent. To overlook either comes at the expense of delivering public goods and VFM. We therefore encourage the LUF to champion the holistic management of places.

Making the best use of land

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?

Please explain your answer:

Incentivisation and certainty are fundamental. The stop-start, often short term nature of support mechanisms detracts from implementation and leads to marginal or temporary gains. Woodland creation especially is a commitment which requires much longer term planning and assurances. Support mechanisms could include:

- Rewarding long term management of features.
- Encouraging the use of Conservation Covenants, incentivising farmers to secure the benefits derived from heritage and other features in the long term.
- Payment between landowners and responsible bodies for ecosystem services over a defined period.
- Expanding the ambition of Landscape Recovery is an example of longer-term land use change, encouraging diversification and potential for private sector investment and marketable natural capital resources.
- Tailored support for more marginal land types and remote places- such as the uplands and commons. The pressures on these land types are well documented and these farming businesses rely on diversification to survive. Without support, they will disappear.
- Exploring what the barriers are for land managers to enter natural capital markets and alternative means of income for land managers adopting multifunctional land use.

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

Please explain your answer:

We would urge recognition of the fundamental need to integrate and align the delivery of environmental and other economic and public good outcomes. While data can underpin opportunities and constraints mapping (which in turn can be a useful tool in identifying potential suitable locations), delivery often requires further assessment and much higher granularity.

It is also important to have facilitate engagement between a wide range of stakeholders - local authorities, statutory consultees, landowners, promoters and the wider public - regarding suitable locations. Early and proactive engagement is usually undertaken in drawing up local plans and this should continue in the framework. It would, however, be vital to ensure that the appropriate levels of assessment of such sites had been undertaken to address any issues that might arise from proposed allocation. In so doing, there will be a need to either align with existing standards governing spatial targeting (eg. Strategic Environmental Assessment etc), or to modify legislation accordingly. In this respect we would also reiterate the need to consider heritage outcomes, to enhance recognition of the potential for co-benefits, but also detriment.

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?

Please explain your answer:

- Continued adoption of NCA approaches within Defra schemes and encouraging the use of the Enabling NCA Approach guidance for land managers. This supports more sustainable agriculture and is a useful steer for land managers evaluating their land's NCA potential - accessing subsidies, private markets or bolstering ecosystem services for increased yields or resilience.
- Use of ENCA encourages the collation of data (including asset type, condition, its monetary worth, benefit flows and the value produced by asset management and upkeep), crucial for land use decisions. Once collated, spatial prioritisation models can best direct resources.
- The land use framework would best be underpinned by qualifiable government objectives - including Defra's FCP SMART objectives. These would be more helpful if public facing, with clearly defined policy intentions.
- The Cultural and Heritage Capital approaches being developed by DCMS could be helpfully incorporated in the LUF to better define and ascertain the value of cultural assets and services within the environment, landscape and place - as well as the socio-economic benefits they provide. We encourage Defra to continue to work alongside DCMS to develop the CHC framework further.

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?

Monitoring land use change or production on agricultural land

Please explain your answer:

It is important for any multifunctional values of agricultural land to be understood alongside the land's value for food production, cultural and ecosystem services. Markets could be developed to support these outputs (eg. developing slow-food/premium markets for stock used for managing the less productive land, such as the uplands and on permanent grassland). Recording land use will also be fundamental to understanding change. Now that the BPS has ended, it is particularly important to continue to have a mechanism for recording and understanding land use change as it occurs. This includes intensification/polarisation as farmers chose which of their land to enter into incentivised management that delivers environmental gain or where they might choose instead to intensify outside of controls.

Not Answered

Please explain your answer:

Not Answered

Please explain your answer:

Not Answered

Please explain your answer:

Making the best use of land

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

Please explain your answer:

We strongly believe that in principle, the opportunities for investment should be widened to recognise the potential and scope for achieving better value and wider public, economic and environmental objectives (including heritage), rather than restricting them to achieving just one or very limited goals.

As an example, Environmental Development Plans could be used to mitigate the impacts of development on other environmental features rather than restricting them solely to protected features of protected sites or to protected species. While it may be appropriate to make these their primary objectives, better value for money and a much wider range of benefits and sustainable change could be achieved through taking a more holistic approach. In this context we note that Natural England's statutory purposes under NERC 2006 extend to conserving wider landscape, including its historic environment.

Making the best use of land

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

Strengthened Protected Landscapes legislation (around governance and regulations or duties on key actors) with a greater focus on nature.

Please explain your answer:

We note that the Outcomes Indicator Framework for protected landscapes and the revised duties (under LURA) have only been in place for a short time – it would therefore seem premature to review these once more now. We also note that one of the key strengths of these places (as recognised through their designation, regulations and duties) is their multi-functionality (rather than having a focus upon one outcome to the potential detriment of others). As we have suggested above, we feel that the most efficient way to achieve the ambitions of 30by30 etc is to take a more holistic approach to their delivery.

Not Answered

Please explain your answer:

Not Answered

Please explain your answer:

Not Answered

Please explain your answer:

Making the best use of land

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

Please explain your answer:

Incentivisation for local food networks to support urban food production:

- Historic parks, gardens, cemeteries and other green spaces underpin green infrastructure in urban and rural places. This includes allotments, which

support local food production and provide nature, community, health and wellbeing benefits.

- Historic green spaces have an important role to play alongside new green spaces in creating better, more joined-up places for nature, local food growing and supporting climate resilience, wellbeing and pride in place.
- The Green Infrastructure Framework provides principles, standards and guidance on creating and managing green infrastructure. Embedding the Framework more widely in planning and other policy could promote urban green spaces providing better quality, multifunctional benefits.
- It is key that existing green spaces are maintained, managed and new green spaces have resources in place to deliver multiple benefits. Sustainable funding for parks and green spaces has been explored through the NLHF's Rethinking Parks work. The Nature Towns and Cities partnership between Natural England, NLHF and the National Trust has a library of resources on unlocking funding and finance for urban green spaces.

Making the best use of land

Making the best use of land

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

Please explain your answer:

The proposal to deliver strategic planning through Spatial Development Strategies (SDSs) will allow for landscape scale policies that have potential to help to manage the impact of new housing and major infrastructure projects on valued landscapes and heritage assets. It will be essential that SDSs and the Strategic Spatial Energy Plan (SSEP) are well integrated and that there is early consideration of valued landscapes and heritage assets – because this avoids the need for unnecessary trade-offs.

Such trade-offs are usually identified via the mitigation hierarchy. It should be noted that the application of the mitigation hierarchy with regard to the historic environment is different from its application to the natural environment, where compensatory measures in different locations may be more achievable. For heritage assets generally, compensatory measures may be less achievable, so greater emphasis should be paid to avoiding, minimising or mitigating impacts. This distinction further emphasises the importance and value of early engagement with Historic England, so that it can assist accordingly.

Making the best use of land

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

Please explain your answer:

Transport infrastructure can impact the historic environment through the intensification of existing traffic or the construction of new road or rail. Increasing congestion can affect historic towns, cities and the countryside, while development of new infrastructure may cause direct damage to landscapes and heritage assets. Such infrastructure may also be an historic asset in its own right.

A more strategic approach will enable consideration of the needs of different types of transport and users in an integrated manner early in design and development. This will help identify opportunities to incorporate and reflect built and cultural heritage. Consideration of heritage can be incorporated at different stages of transport planning, including developing local transport plans and local plans. Factors to take into account include the:

- Role of the historic environment in influencing a plan's objectives, for example tackling traffic congestion in historic towns and cities.
- Potential direct and indirect impact of a plan's proposals and programmes on historic remains, features, sites, townscapes, and landscapes.
- Opportunities for new transport measures to promote and enhance access to and enjoyment of the historic environment.

Making the best use of land

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

Please explain your answer:

We strongly support greater coordination. Indeed, this principle is the basis for Historic England's Joint Statement with Natural England and the NLHF. The sustainable management of heritage features and assets can support the delivery of nature recovery and climate goals. Historic England has similarly been a strong advocate for recognition of the opportunities afforded by heritage features to achieve the goals of LNRS, not least because of the correlation between heritage features and habitats – both of which can often be supported and sustained using the same management practices. Our efforts to use heritage to support LNRS outcomes have met with only limited success, however, because consideration for heritage and the nature recovery opportunities it affords was not integrated into the underlying statutory guidance.

We therefore think that sustainability and better public and environmental outcomes will rely on more effective coordination across sectors. The government can support this most effectively by taking an expansive, cross-sectoral and cross-departmental approach to the plans, strategies and policy objectives that should be taken into consideration.

Making the best use of land

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 in the text box below.

Yes

Please explain your answer:

Extending the Adaptation Reporting Power (ARP) to more organisations and major landowners would in principle support adaptation knowledge sharing, but this may also be perceived by them as an additional burden. The definition of "major landowners" would therefore be fundamental to ensuring that the most appropriate organisations are included to capture the required information.

Currently, the ARP is primarily used to assess the current and future impacts of climate change on individual organisations, and to feed into both the Climate Change Committee's UK Climate Change Risk Assessment and the Government's National Adaptation Programme. The extension to major landowners and land managers would require additional information on land management to be captured through the ARP. As a result, this would in part change the focus of these reports and increase the amount of work required to prepare them.

The guidance provided by Defra for reporting organisations is currently tailored to allow organisations to report in a way proportional to their capacity. Any change in focus would require careful consideration to ensure that reporting, which already represents a substantial commitment, remains proportionate to capacity and resource.

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 explain your answer:

The "natural" environment has been shaped by human activities over millennia and historic components of the environment should be included in any information developed for those preparing for the impacts of climate change.

Option 1 could provide support at the local scale and link in with existing spatial data tools such as the Met Office's Local Authority Climate Service, if made publicly accessible.

Including heritage data within spatial tools would assist planning, development and land management by enabling better consideration of approaches that deliver for nature and heritage.

In options 2 - 4, including heritage would facilitate approaches that deliver a range of public, economic and environmental goals and would ensure consideration of the full range of adaptation requirements and opportunities, including those appropriate for heritage and the use of traditional methods in adaptation action such as natural flood protection.

Historic England has developed an approach which supports the use of historic landscape and management methods which can be utilised in responses to climate change, especially flooding and the biodiversity crisis (Research Report 69/2022: The historic landscape: assessing opportunity for change).

Making the best use of land

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?

Not Answered

Please explain your answer:

We see value in all the changes suggested above. In particular, we support the use of government data through private sector tools, bringing data from different sectors together through common portals, underpinned by increasing consistency and interoperability between datasets. Given the recognition that Natural Capital Accounting and ecosystems services assessment models give to the historic environment, it is important that data on heritage assets and historic land characterisation are included and that the models are developed to inform risk/condition/opportunity and co-benefits. In this context, we note that Heritage at Risk is included in the Outcome Indicator Framework for protected landscapes, while condition of Scheduled Monuments is a proxy for overall impacts upon heritage within the 25 Year Environment Plan Outcome Indicators. Defra's FCP SMART objectives also recognise the value that heritage assets bring in supporting the delivery of other environmental objectives.

Not Answered

Please explain your answer:

Not Answered

Please explain your answer:

Not Answered

I feel this way because:

Not Answered

Please explain your answer:

Not Answered

Please explain your answer:

Other (Please specify)

Please explain your answer:

We see value in the all the changes suggested above. In particular, we support the use of government data through private sector tools, bringing data from different sectors together through common portals, underpinned by increasing consistency and interoperability between datasets. Given the recognition that Natural Capital Accounting and ecosystems services assessment models give to the historic environment, it is important that data on heritage assets and historic land characterisation are included and that the models are developed to inform risk/condition/opportunity and co-benefits. In this context, we note that Heritage at Risk is included in the Outcome Indicator Framework for protected landscapes, while condition of Scheduled Monuments is a proxy for overall impacts upon heritage within the 25 Year Environment Plan Outcome Indicators. Defra's FCP SMART objectives also recognise the value that heritage assets bring in supporting the delivery of other environmental objectives.

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

Please explain your answer:

Sustainable decision-making relies on easy access to a range of specialist datasets. For the historic environment, this must leverage critical repositories including data on designated heritage assets on the National Heritage List for England, data from which is freely available for use via the Open Data Hub, and local Historic Environment Records (proposed for statutory backing in the Levelling Up and Regeneration Act). Similarly, planning datasets must be developed and managed using robust and effective data standards, for which Historic England has significant internal expertise, working with a range of organisations to set standards.

Wider implementation of open government licencing and publication as open data to promote easy access to locally captured planning and environmental datasets.

Not Answered

Please explain your answer:

Making the best use of land

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

Please explain your answer:

We have no views to offer.

Making the best use of land

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

Please explain your answer:

Data on designated heritage assets (and several other national heritage datasets) are already available to access via Historic England's Open Data Hub and open government licencing. The publication of local authority derived planning and environmental datasets under open licencing, such as local authority maintained Historic Environment Records, would also facilitate their greater use in supporting decision making around land use change.

Making the best use of land

21 What gaps in land management capacity or skills do you anticipate as part of the land use transition?

Not Answered

Please explain your answer:

Farming

Please explain your answer:

Hedge laying, dry stone walling and thatching are examples of rural craft or specialist skills and industries that are at increasing risk, mainly due to shortages of skilled crafts people and a lack of opportunities for new entrants. Modern alternatives (such as wire fencing and imported water reed for thatch) may be cheaper or require fewer skills to install, but they degrade the distinctive character of places, as well as impacting habitats and species. Changes in agricultural practices, such as larger farms and intensified cultivation have also led to the replacement of traditional boundaries and many falling into disrepair. As a result, the skill gap for these crafts is threatening the character of places but also distinctive elements of England's cultural heritage.

Not Answered

Please explain your answer:

There is an opportunity to improve outcomes and skills through training in understanding heritage data, its integration with other environmental data, identifying co-benefits, constraints and opportunities, and communicating and sharing with relevant communities and stakeholders. This would align very well with the Defra Advice strategy.

Not Answered

Please explain your answer:

Not Answered

Please explain your answer:

Making the best use of land

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

Please explain your answer:

We have no comments to offer.

Making the best use of land

Co-creation and engagement on a Land Use Framework: next steps

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

Yes, every 3 years

Please explain your answer:

We feel it important that the framework should be updated regularly. We would favour this being undertaken on at least at three year intervals, similar to the Environmental Improvement Plan and also in recognition of the frequency with which policy goals can be amended and updated.

It is also important to consider the cycles on which other strategies and plans are reviewed and updated and how this might affect the timing of the review (eg. the infrastructure strategy is reviewed every 10 years, and local plans every 5 years, the 30by30 commitment). It will be important to align the cycle of publication correct so it can be a proper useful document.

Co-creation and engagement on a Land Use Framework: next steps

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

Strongly agree

Please explain your answer:

We strongly agree with the proposed areas – from our experience in seeking to embed spatial prioritisation within decision-making and to collaborate with our sister agencies and wider government – we know that heritage and nature not only exist in the same places, but are mutually dependent. A failure to consider goals holistically not only reduces the potential for public, societal, economic and environmental gains – but can introduce unintended consequences and create market failures and inefficiencies. Ultimately, it reduces value.

Consultee Feedback on the Online Survey

Overall, how satisfied are you with our online consultation tool? Please give us any comments you have on the tool, including suggestions on how we could improve it.

Very satisfied

Feedback: