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## CRPE Oxfordshire Land Use Consultation Questions & Responses

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

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

*Please explain your response, including your views on the potential scale of change and the type of change needed, including any specific types of change.*

There are significant gaps in the evidence to support the proposed scale and type of land use change. A more strategic, spatially mapped approach is needed to identify where land is best suited for renewable energy, housing, nature recovery, wildlife-friendly farming, intensive agriculture, forestry, and transport infrastructure. For instance, there is currently a lack of clarity around the amount of land required to meet renewable energy ambitions. The Land Use Change (LUC) report states that only 0.2% of land is currently used for renewable energy, yet it does not provide a clear target for the additional land needed to meet future goals.

Take solar energy as an example: while the Climate Change Committee's February 2025 report sets a target of 85GW of solar capacity by 2050, achieving this would require just 168,000 acres—or around 0.6% of England's land area—comparable to the land currently occupied by golf courses. This indicates that there is ample flexibility in where solar installations can be located, allowing decision-makers to be selective and context-sensitive.

Rooftop solar should be prioritised wherever feasible. Beyond that, land for solar development should be carefully zoned based on landscape sensitivity and agricultural value, particularly avoiding Best and Most Versatile (BMV) land where possible. Additionally, the definition of "non-agricultural land" remains unclear and requires clarification to ensure consistent and transparent planning.

The government is in danger of underestimating the amount of land use change from undeveloped to built uses, and in particular the amount of farmland that will be developed if there are insufficient planning controls over allowing housing on greenfield sites. Making effective use of land through maximising re-use of brownfield land and existing buildings should be a key principle for the land use framework.

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

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

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

**Principle 1 co-design.** *Support for participation and leadership at the local and regional scale to develop and align spatial strategies and assess the fairness of changes in land use.*



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Co-design is essential to the success of this framework. It must involve a broad and diverse range of stakeholders, not just the usual organisation, to ensure that all those with a vested interest in land use are meaningfully engaged. This process should be underpinned by a holistic, integrated approach led by national government.

We believe there is a strong case for establishing a dedicated Land Use Commission or empowering an existing body, such as the Office for Environmental Protection, to take on this coordinating role. Such a body could help ensure a joined-up national strategy while also supporting local authorities in developing place-based land use frameworks.

The co-design process used for the Environmental Land Management Scheme (ELMS) provides a valuable model of best practice that should be built upon.

**Principle 2 multifunctional land.** *Enable multiple benefits on land, targeted according to opportunity, societal needs (such as the health benefits of co-locating new homes and nature), and environmental pressures (such as reducing pollution).* agree, but we have concerns about the approach to ecosystem services as set out under 3 below.

**Principle 3 Playing to the strengths of the land.** *Support and spatially target land use change to locations where benefits are greater and trade-offs are lower. Give priority to land uses that are more scarce or spatially sensitive (for example grid capacity places restrictions on new renewable generation sites or protecting land that is best suited for food production).* CPRE response: agree. CPRE supports the need for a spatial approach to land use planning. However, it is vital that landscape is given a central role within this framework. Landscape Character Assessment should be used to identify the strengths, sensitivities, and defining qualities of different areas, helping to guide decisions that respect and enhance local distinctiveness.

There is also a concerning lack of understanding around key ecosystem services—such as the carbon and water cycles—and how these are affected by land take for development and infrastructure. Without this knowledge, we risk undermining the natural systems that underpin long-term environmental health and resilience.

In addition, we need to see a commitment to reducing all forms of pollution, including light and noise. CPRE's tranquillity mapping has already highlighted the spatial distribution of these pollutants, drawing attention to their impact on people's health and wellbeing. Minimising light and noise pollution should be a key objective in spatial planning, particularly to protect rural areas and restore a sense of tranquillity.

**Principle 4 Decisions fit for the long-term:** *Take a long-term view of changing land suitability, prioritising resilience (including to the impacts of climate change). This could include planning for new homes that are resilient to climate impacts, such as flooding and overheating.* CPRE response: agree. There also needs to be a clear long-term cross government strategy aimed at delivering the UK's net zero and nature recovery targets, as well as greater spatial fairness through a commitment to regeneration and a brownfield first planning policy. It is imperative that the Government moves away from the current siloed approach across Departments and instead adopts a joined-up, cohesive long-term strategy, supported by a dedicated budget for delivery.



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**Principle 5 Responsive by design:** *Land use policy, including spatial prioritisation and targeting, needs to be responsive to new data, opportunities and pressures.* CPRE response: partially agree, but it is particularly important that decisions are also informed by the best data, particularly on land use change to development.

**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)

While landowners and land managers play a vital role, it is equally important to engage developers, particularly those in the housing, renewable energy, and transport sectors. A truly effective approach must also strengthen community connections and influence, particularly through the development of local land use frameworks that align with and sit beneath the national strategy.

This need for greater community involvement has been well-evidenced, including in the Land Lines report and CPRE's 2022 research into land management schemes in Green Belt areas, which highlighted the importance of community participation in both the design and monitoring of schemes.

Oxfordshire is setting a positive example, having recognised the value of a Land Use Framework (LUF). We are now in the early stages of developing a local LUF and a set of guiding principles, using a co-design approach to ensure that local voices are embedded from the outset.

**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?

What we need is not more isolated departmental policies, but clear, cohesive, and coordinated cross-government policies and incentives. This Land Use Change (LUC) framework must not be the sole responsibility of DEFRA. Instead, it should be a joint effort involving the Department for Energy Security and Net Zero, the Department for Levelling Up, Housing and Communities, HM Treasury, and the Department for Transport.

Crucially, there must also be a strong and explicit link to Local Nature Recovery Strategies to ensure alignment and coherence across national and local planning efforts.

**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?



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Develop integrated policy between agriculture and forestry, with clearer national guidance on where tree planting is most appropriate. A strategic, place-based approach is essential to ensure the right land uses in the right places.

Enhance advisory support for land managers to promote multifunctional land use. Currently, advice is patchy and often limited to specific areas such as protected landscapes or farmer clusters. A more consistent, nationwide advisory service is needed to support landowners and managers in making informed decisions.

Improve education and awareness around the benefits of multifunctional land use. When landowners clearly understand the environmental, social, and economic advantages, they are far more likely to adopt these practices.

Strengthen incentives to encourage the uptake of multifunctional land uses, ensuring that public funding supports land management approaches that deliver multiple public goods.

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

There must be clear spatial mapping to identify where multifunctional land use can deliver the greatest public benefit. This mapping should be directly linked to incentive payments, with higher rewards for actions that deliver more in priority areas. These incentives should be aligned with Environmental Land Management Scheme (ELMS) options, with enhanced payments for interventions that address specific local or regional needs.

For example, where mapping identifies areas most suitable for tree planting, payment rates should be increased to encourage uptake and help meet national targets. Similarly, in regions prone to frequent flooding, higher payments should be offered for natural flood management measures. This targeted approach ensures that public investment delivers maximum value, both environmentally and economically.

**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?

Nature, Best and Most Versatile (BMV) agricultural land, Green Belt land should be the primary considerations in determining land use. These areas must be protected as a first principle. Only where land is not suitable for nature recovery, agriculture, or does not fall within a Green Belt designation should development be considered and even then, only if needed and genuinely affordable housing. The principle of Brownfield sites first should be used when considering sites for development.

Solar energy deployment should prioritise rooftop installations before any land take is considered. Ground-mounted solar should only be permitted where it avoids high-value agricultural land and sensitive landscapes.



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Local Nature Recovery Strategies (LNRS) should become the central mechanism for directing support for nature recovery. These strategies must be closely integrated with the targeting of ELMS options to ensure coordinated and effective environmental outcomes.

**QUESTION 8:** In addition to promoting multifunctional land uses and spatially targeting land use change incentives, what more could be done by Government or others to reduce the risk that we displace more food production and environmental impacts abroad? Please give details for your answer.

- Monitoring land use change or production on agricultural land
- Accounting for displaced food production impacts in project appraisals
- Protecting the best agricultural land from permanent land use changes
- Other (please specify)

Effective and efficient use of land including brownfield first planning. This relates to CPRE's longstanding campaigning for planning policies using previously developed land for most new housing in preference to greenfield, and building housing at medium or high residential densities in order to minimise the loss of greenfield land.

Up to date understanding of agricultural land quality and stronger protection of that. We strongly argued for a land use strategy to better understand and protect our resource of high quality farmland, in the 2022 report Building on Our Food Security. We have also highlighted the need for updated agricultural land mapping in a further report issued earlier this year.

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

A consistent and transparent regulatory framework for a wide range of ecosystem services is essential to unlock the potential of private investment in land use and nature recovery.

Currently, many landowners remain sceptical or uncertain about engaging with private finance. To address this, more targeted support and clear, accessible guidance must be provided to equip landowners with the knowledge and confidence to participate in emerging markets and pursue responsible private investment opportunities.

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



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Increased management for nature. CPRE supports the '30 by 30' campaign led by Wildlife and Countryside Link, of which we are members.

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

Better management of countryside around towns, including Green Belt. Since the publication of our 2026 Vision for the Countryside, we have called for better management of urban fringe areas, and our 2022 report on land management found that areas of Green Belt were seeing less investment than the countryside as a whole. An integrated land use policy and more investment could also now help prevent Green Belt land from being designated as 'grey belt' by local authorities seeking to allow housing development on it.

We are urging the Government to:

- Identify urban fringe areas as priorities for supporting nature and sustainable land management.
- Encourage local authorities, through strategic land use plans, to bring forward new models for large scale landscape enhancement in urban fringe countryside that does not already benefit from being part of a national or regional park or National Landscape.
- Promote a targeted Sustainable Farming Incentive (SFI) package for urban fringe farming to support sustainability and public benefits.
- Set a goal for 70% ELM scheme coverage on urban fringe farmland, maximising public benefit.
- Provide an attractive small farm package of bundled-up actions to make SFI easy to enter for nature-friendly smallholdings, especially market gardens and community supported farms (CSAs). This could reward actions that work in combination on such holdings, such as green manures, companion crops, wildflower strips, agroforestry and hedgerow management, with one area payment for the holding and the package.
- Protect, support and encourage sustainable nature-friendly farming enterprises in the Green Belt and wider urban fringe for their contribution to sustainable development

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

We welcome the inclusion of spatial plans, but these must comprehensively integrate considerations for development, infrastructure, nature, food, and water, and be developed through a collaborative, cross-sector approach. For spatial plans to be effective, housing growth must be closely aligned with population growth to ensure a balanced and sustainable approach. The principle of Brownfield sites first should be used when considering sites for development.

To support this, there must be strategic oversight of the total land available, with a focus on securing a sustainable food supply through responsible land management. Additionally, it is essential to strengthen policy protections for high-quality land, safeguarding it for both agricultural use and nature recovery.





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

Active and sustainable transport must be at the core of all transport planning. New developments should prioritise accessibility by active transport, with well-designed walking and cycling networks connecting residents to local amenities and employment hubs. Where active transport options are not feasible, sustainable transport solutions should be explored, focusing on areas with congestion hotspots and enhancing public transport services in these regions.

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

Spatial plans are a positive step forward, but national and regional objectives must be developed through a bottom-up approach. Local communities must be actively engaged in the decision-making process, ensuring they have a democratic say in the future of their areas.

**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 /]

We have chosen not to respond to this question at this time, as we lack sufficient understanding of the Adaptation Reporting Power process and the potential benefits of involving landowners and land managers.

**QUESTION 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)

CPRE prioritises the need for better tools and guidance to translate climate data into actionable steps. A key focus should be the Rooftop First approach for renewable energy. Rooftop solar should be widely supported, with easily accessible funding and clear guidance available for both the public and industry to install solar panels. This approach would alleviate pressure on land being used for



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solar development, allowing it to remain dedicated to food production and safeguarding the nation's food security.

**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)

The Government must provide clear, high-quality, and freely accessible spatial data, approved for official use, to enable local areas to develop their own land use frameworks. The mapping included in the consultation paper is insufficient for local communities to fully assess the implications of land use changes in their areas.

The MAGIC Map is a valuable tool with multiple layers of data, but it requires technical improvements to resolve glitches and ensure it can be used effectively.

**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? Please give any reasons for your answer or specific suggestions.

- 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

There is a significant lack of high-quality spatial data within DEFRA that can be effectively used for targeted interventions. Too many datasets currently exist, they need to be aligned and consolidated within DEFRA. The data must be robust and reliable enough to be managed by the Rural Payments Agency (RPA) as control data, ensuring that payments can be made against the data.

DEFRA's June farm surveys currently lack the detailed data needed to inform policy and funding decisions, especially for urban fringe and rural areas. There is an urgent need to improve data in the following areas:

- The management and sustainability of commercial farmland.
- The use and purpose of non-commercial land.
- The factors influencing farm transitions, such as shifts in crop/livestock production or the move away from food production altogether.





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- The broader services, including environmental goods, that farms provide beyond food production.

Addressing these gaps is essential to better understand sector challenges, identify opportunities, and develop targeted measures to support farm growth and sustainability.

CPRE recommends that the government expand data collection efforts to include urban fringe trends, farmer decision-making, and business behaviour. This will improve the targeting of policy interventions and the efficiency of public spending.

Additionally, DEFRA must improve the transparency of data related to Environmental Land Management Schemes (ELMS). There is currently no publicly available information about recipients of the Sustainable Farm Incentive (SFI). It is vital that the public understands where their money is being spent. CPRE calls for yearly updates on ELMS expenditure, specifying how the budget is allocated and which options it is spent on.

Moreover, DEFRA should make publicly available maps of all current SFI, Countryside Stewardship (CS), and Local Nature Recovery (LNR) agreements. These maps should be downloadable and regularly updated, ideally on a monthly basis. DEFRA must work with the RPA to ensure this data is easily accessible.

Finally, there is a clear gap in DEFRA's understanding of how to track the cumulative contributions of activities towards the Environmental Improvement Plan's (EIP) targets across England. It remains unclear how ELM options will contribute to meeting these targets or how much activity is required to achieve them.

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

Up to date understanding of agricultural land quality and stronger protection of that. We strongly argued for a land use strategy to better understand and protect our resource of high-quality farmland, in the 2022 report *Building on Our Food Security*. We have also highlighted the need for updated agricultural land mapping in a further report issued earlier this year.

The ALC its current outdated form cannot reliably inform the critical decisions that stakeholders need to make about competing land uses. A [new report](#) by Grounded Insight for CPRE shows the current ALC system substantially overestimates land productivity. Much less land likely qualifies as Best and Most Versatile (BMV) for food production. The situation is critical for lowland peat soils. These soils produce around 40% of UK-grown vegetables. Climate change could destroy these vital soils within decades. This raises serious questions about their current ALC grades.

We are urging the Government to:

- Updates ALC maps using the latest climate data: given that they were last updated in 1988, they no longer reflect the UK's current (and rapidly changing) climate.



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- Creates an updated ALC map for the whole of England for all grades at the most detailed level practicable – including publishing maps showing the subdivisions between Grades 3a and 3b land (a crucial distinction for planning decisions).
- Re-surveys lowland peatlands to appraise their current state and ALC grade. Given that the Fens have been losing topsoil at a rate of 10-30mm annually (Natural England, 2010) due to ongoing drainage and intensive agriculture, the likelihood is that much of the Grade 1 land in Cambridgeshire is no longer so fertile and needs re-grading.
- Uses this updated ALC system as one tool in the Land Use Framework.

**QUESTION 20:** Which spatial data should Government make free, or easy to access, to make them more useful?

We welcome the initiative to provide public access to the Land Registry. Additionally, we call for Local Authorities to publish maps of their landholdings to improve transparency. Furthermore, we urge that the remaining Land Registry data be made accessible, allowing searches by landowner to identify their land holdings. This, of course, should be accompanied by robust privacy and fraud protection measures to ensure data security.

Clear, high quality and freely available mapping data to 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.

**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)

We have chosen not to respond to this question lack sufficient understanding of capacity and skills required for these different sectors.

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

Improving the provision of advice for landowners in England is essential. Currently, advice is available only in certain areas, such as Protected Landscapes or regions with active farmer clusters, leaving many areas underserved.

Farmers and landowners respond particularly well to peer-to-peer networks, with farmer clusters being a prime example of this approach. We strongly urge the reinstatement of the facilitator fund to support existing clusters and establish new ones, ensuring that all landowners have access to the guidance and support they need.



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**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

Ideally, updates should be done on a time cycle that synchronises with the update of policies and plans that link with the Land Use Framework.

Making Government effective in policy co-creation

- A strategic oversight function to ensure the right information and policy is in place to enable delivery against a long-term land use vision;
- A cross-governmental spatial analysis function to produce evidence-based advice on strategic implications across different demands on land;
- Processes to embed land use considerations in strategic Government decisions;
- Open policy-making processes in collaboration with research organisations.

**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]

For this process to be meaningful, it is crucial that cross-government departments collaborate effectively, with joint targets shared across all relevant areas, rather than placing the responsibility solely on DEFRA.

We recommend the establishment of a new Land Use Commission for England, tasked with setting targets, updating the Land Use Framework, and monitoring progress. This body should function similarly to the highly regarded Climate Change Committee, ensuring a coordinated, long-term approach to land use management.