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## Land Use Consultation Response

### Introduction

Land is a finite resource and there are ever growing and competing demands for its use. There is currently no overall strategy for land use to guide planning and there have long been calls for a strategy for managing land resources to ensure that we have a secure and sustainable future. As such we welcome the development of a land use strategy. However, we have severe concerns about the strategy proposed and in particular its impact upon national food security.

### The Aims of the Proposal

The government's stated aims of the proposals are:

**Make space for nature recovery, water, and emissions reduction.** England's land use will need to change as we move towards 2050 to help deliver our legally binding targets under the Environment Act and Climate Change Act.

**Support sustainable and resilient food production.** The food system needs to support farmers and landowners to invest in the long-term viability of their businesses, contribute to food security and increase their resilience to climate change.

**Deliver new infrastructure and housing.** Decision makers at every level need information and tools to deliver sustainable development, including 1.5 million new homes new energy and water infrastructure, and the relatively small area of land use change it requires. We want to use strategic spatial planning to assess gains and losses against national and regional objectives, moving responsibility for managing land use trade-offs away from individual projects.

**Fix the foundations for resilient long-term economic growth.** Supporting sustainable economic growth over the coming decades will mean investing in its natural capital foundations and long-term climate resilience.

**Co-create plans for delivery.** Land use change that improves the overall productivity of land alongside wider social and environmental benefits will only happen with the right skills, data, incentives and structures in place. We want to collaborate with land managers, businesses, and communities

### The Proposals

The government proposals focus on the changes in the use of agricultural land with a focus on freeing up land to enable it to be used for other purposes. The changes are set out in the table below.



<b>Category 1 – Land management change</b> Changes in the way the land is farmed, without introducing new habitats or planting trees. It falls outside of the scope of land use change discussed in this document. Examples: Planting cover crops to reduce soil loss, or reducing fertiliser use to prevent water pollution.	Not in scope
<b>Category 2 – Small changes maintaining the same agricultural land use</b> Introducing nature within fields, in margins and / or small portions, providing environmental and climate benefits alongside food production. Examples: Arable field margins, riparian features such as river buffer strips.	1% (50kha)
<b>Category 3.1 – Changes in agricultural land use, for both food and environmental / climate benefits</b> This is mainly about incorporating more trees alongside food production	4% (370kha)
<b>Category 3.2 – Changes in agricultural land use, mainly for environmental and climate benefits with limited food production.</b> The land is being farmed mainly for other benefits than food. Examples: Creation / restoration of species-rich grassland habitats; responsible management of peat; planting of short rotation coppice.	5% (430kha)
<b>Category 4 - Change away from agricultural land, for environmental and climate benefits.</b> Land use becomes non-agricultural. Land is fully dedicated to delivering environmental and climate benefits. Examples: Restoration and maintenance of peat-forming and peat-dependent habitats; creation of woodland; creation / restoration of coastal and lowland heathland habitats.	9% (760kha)

## Our Concerns

### The Overall Approach

The proposals appear to have predetermined that the only land available for repurposing is agricultural land. It should instead have been an open evaluation of all land types to determine the best use of this finite resource. Rather than “how can we free up agricultural land for development” it should have assessed of types of land and the proposed uses and asked “what land do we need for development and how can we most efficiently use the land that we have”. It also assumes that development can only happen on newly released land and that land can only be used for one purpose.

The CPRE Report “Shout from the Rooftops: Delivering a Common Sense Solar Revolution”<sup>1</sup> is a good example of where land could serve more than one purpose.

### Food Security

The greatest concern is that the proposed changes significantly reduce the amount of land that will be used for agriculture. This is at odds with the claim that “the Government is committed to maintaining food production”.

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<sup>1</sup> <https://www.cpre.org.uk/resources/shout-from-the-rooftops-delivering-a-common-sense-solar-revolution/>

It is suggested that the current level of food production can be maintained on less land by improvements in efficiency because historically yields have improved over the years. There are two major flaws in this suggestion; firstly that, for environmental reasons, farmers are being asked to reduce their use of inputs such as pesticides and fertilizers that are the very tools that have been used to deliver the historic increases in yields; and secondly that the changes in weather patterns resulting from climate change are predicted to reduce yields.

The UK is already heavily dependent upon food imports and even before this proposed reduction in agricultural land our current poor level of food security was highlighted by the Climate Change Committee as one of the main national risks of climate change and one of the few that can be addressed at a national level. It is predicted that the conditions for food production will deteriorate both nationally and globally reducing overall yields.

We are already seeing impaired growing conditions as a result of changes in weather patterns which mean that crops cannot thrive in the way that they used to and in some cases crops are lost entirely as a result of extreme weather or flooding. This is not just happening in the UK and it threatens the sources of our food imports as well as our home supplies. We cannot simply rely on imports to fill any shortfalls because, as we have seen in the past, nations prioritise their own population when there are shortages.

Our concerns should not come as a surprise to the government who should be aware of the precarious state of the United Kingdom's food security following the critical warning from the National Preparedness Commission that was issued in February<sup>2</sup>. This report finds that “there is too much complacency about UK food security and civil food resilience barely features at all in forward planning”. Something that is all too evident in these proposals.

The government's recent change to the NPPF to remove the limited protection of Best and Most Versatile land is one example of that complacency. If there is to be any hope of maintaining the current levels of food production it is essential that our most productive land is not taken out of production. If anything the UK should be seeking to increase the amount of land reserved for agriculture, and certainly not reduce it.

### **Health and Wellbeing**

Although these proposals probably do not generally consider the level of detail that might address this directly, when land is developed it is important to the health and wellbeing of residents that they should have ready access to quality green spaces. The importance of the Green Belt as a breathing space for communities is perhaps an exception that warrants consideration at this level. All new development should provide a quality environment in which residents can thrive rather than just survive.

### **Reusing Brownfield Land**

There needs to be much more emphasis on bringing brownfield land back into use to preserve other land for other purposes.

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<sup>2</sup> ‘Civil Food Resilience for the National Preparedness Commission’, by Tim Lang, Emeritus Professor of Food Policy at City St. George's, University of London (<https://www.citystgeorges.ac.uk/news-and-events/news/2025/february/safeguarding-uk-food-security>)

## Conclusions and Recommendations

We strongly object to the approach taken in these proposals.

It is hard not to conclude that the proposals simply assessed the amount of land that the government believes will deliver their non-agricultural goals and to assume that agriculture will be able to improve efficiency at a rate that will maintain food security. This assumption is both dangerous and complacent.

Before considering any reduction of the land available for agriculture it is essential that there is robust evidence that the United Kingdom can be guaranteed food security in a changing world.

If there is to be any hope of increasing the efficiency of food production, then it is essential that the best agricultural land is retained. It was a mistake to remove the protection of Best and Most Versatile land from the NPPF and this should be reversed and protection enhanced so that development is directed to poorer quality land.

The proposals as they stand will inevitably reduce food security which is a critical concern because it has been identified as one of the greatest risks to the nation as a result of climate change. It is also one of the few that we have some agency in mitigating.

24<sup>th</sup> April 2025