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By email to the Land Use Framework Consultation Team in Defra
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25 April 2025

Dear Sir/Madam

CPRE Sussex response to the Land Use Framework Consultation

This is the formal response of CPRE Sussex – the Sussex Countryside Charity - to the above application. CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country.

Thank you for the opportunity to engage with this national conversation on land use. This is fundamental to the nation's sustainable development. Developing a land use framework is essential but will be very challenging. We have responded by letter because there are some general points that we feel must be made to help this national conversation succeed and these are not really best dealt with by responding to the questions. These points have implications for Sussex and possibly other geographical areas covered by this consultation.

At the outset, CPRE Sussex wants to be clear that it welcomes the opportunities there are in the idea of a Land Use Framework for rebalancing land use by providing a mechanism that would, to give but one example, favour making more space for nature on land and in the water through more nature-friendly farming (including in this the planting of more hedgerows and trees of the right kind in the right places). No one land use is an inherent good. All land uses must account for the constraints of the environment in terms of the resources that can be extracted at any one time. Land use practices can too easily lead to needless losses of natural capital and ecosystem services. CPRE Sussex hope a Land Use Framework could enable more sustainable decisions that lead to gains in natural capital and ecosystem services which would grow the economy, increase social cohesion and benefit health and wellbeing. As such we support the principle of having a national Land Use Framework and expect that regional or subregional Frameworks with a greater level of detail will be required to guide strategic planning in due course.

However, CPRE Sussex has concerns about six issues which might stop the principle becoming a really positive contribution to the way land is used and managed. We set these out below:

First, the consultation sits in a policy context that is not favourable to the environment or a balanced approach to land management. The Government's view expressed by Ministers and set

out in draft legislation is straightforward. In essence, it is: **The environment is a block to growth and as such should be swept aside.**

This view of the environment is wrong because all of our wealth and health is derived from planetary processes that provide the natural capital and ecosystem services on which humanity depends. Ignoring this for short term economic gain ignores the commitments the UK has to Sustainable Development and a number of international agreements and UN Conventions, including those on climate change. Future generations will not thank this Government if it persists in needlessly rolling back progress on environmental measures that have steadily improved people's lives since 1947 and earlier. The UK is already one of the most biodiversity poor countries and the raft of policies the government is pushing forward with will likely make this situation even worse.

In such a policy context the chances of developing a balanced land use framework that takes account of fundamental environmental realities seem slim. Thinking of the environment as a blank space for development, which the government approaches to planning seem to do, is one reason why we have climate change racing away from us at a higher pace than ever imagined and why the Victorians and their immediate predecessors reduced parts of northern England to an appearance similar to the surface of the moon. At least the Victorians did act and in doing so introduced a model for pollution control that helped a damaged environment regenerate. A land use framework needs to have that kind of vision of regeneration.

CPRE Sussex feels that, that overall, the Consultation and Questions are worded in such a way as to suggest there is an underlying presumption that Development and Infrastructure should be the land uses of primary importance rather than the aim being to develop a balanced Land Use Framework where all users of land have a responsibility to use that land in accordance with the principles of sustainable development. Such a balanced approach would help more rounded test of development needs to be deployed where environmental, social and economic factors all have an equal part to play in decision-making. Too often, land use decisions are made through a mainly economic lens that ignores the fact that all environmental resources are limited in some way as Johan Rockstrom and his academic colleagues have pointed out over past decades.

CPRE Sussex is not alone in holding such views and notes that, very recently, senior members of the ecological and environment community, including Partha Dasgupta (author of the Treasury report on the *Economics of Biodiversity*) have written to the government on the destructive nature of the Planning and Infrastructure Bill. These significant problems in this Bill, pointed up in the expert letter, need to be avoided in the Land Use Framework. A Framework will need to strike a balance between all land uses and make it possible for any land use to deliver more sustainable outcomes than happens under the fragmented and piecemeal approach that has grown up. For example, currently, development planning for housing and infrastructure grants permissions on a case-by-case basis and thus in sum total seems to take little account of important environmental factors such as natural capital, ecosystem services, biodiversity and the impacts of climate change. Further, concepts such as connectivity across landscapes and habitats is rarely if ever considered. And consideration of the health and wellbeing benefits of greenspaces enriched by wildlife seem to be similarly limited.

Any Framework must provide a vision for the future that all land users can take up. Agriculture, as much as any other land use must adapt to become more sustainable. CPRE Sussex knows that progressive land-owners and tenant farmers in Sussex are already working to make their production more sustainable. They need the right balanced Framework within which to continue and develop these approaches further so that we can all have the amount and quality of food and nature we all need to thrive. Agriculture will also need more certainty about support for transition if more sustainable practices are to emerge. Other land uses need to innovate as well to achieve sustainable development in the proper sense not that which is focused solely on short term economic gain that adds to GDP.

Second, the Definition/Quantification of urban land: Here, the consultation plays into the developers' playbook and seems to ignore key sources of information available from the research community (the notable lack of specific references suggests the evidence base of the consultation is weaker than it needs to be). There seem to be a number of different approaches to urban land in the document. The worst aspect, perhaps, is the apparent separation of gardens from the total urban area. This reduces both the size of urban areas and the impact of future urbanisation. This approach should be opposed as it is a line pushed by chartered surveyors and land agents employed by developers to minimise land take by development. The approach is unbalanced because urban gardens do not deliver the same services as greenfields, especially as many front gardens are now used for car parking and rear gardens often are extensively decked or otherwise denuded of vegetation or built in. Urban land and other land uses should be based on good research and on some consistent basis and, for example, might be calculated from the Land Cover Map produced by UKCEH and that must include all land within the urban boundary. This might highlight how much of this land is used by infrastructure but an overall view of the area covered by urban and suburban land and smaller settlements needs to in evidence.

Third, is the matter of Natural Capital and Ecosystem Services, on which the Consultation is very weak. Most importantly, the supporting ecosystem services (the water cycle, the carbon cycle and the nitrogen cycle etc etc) are missing from explicit consideration. Only those services that generate a direct economic return are included. This is a fundamental mistake. All of humanity's health and wealth is derived from the environment - but it is these cycles that we have modified heavily to generate this wealth. Climate change is just one consequence of ignoring the need to keep these cycles in balance; water pollution by nutrients is another. Ecosystem services and natural capital both should be prominent in any Framework and all land consumed for housing or infrastructure has a negative impact on these services. This must be recognised and actions proposed to counter the losses and disruptions. This is how we will get to sustainable development. CPRE Sussex would argue unless we put nature first in our thinking it will be difficult to get to that overarching goal.

Fourth, comes data availability and quality on which the Consultation is very weak. The quality of the maps provided is poor and it is impossible in fact to see what they mean for any local area in Sussex. The maps produced by Forestry England (?) seem to have been produced at too low a level of resolution to use in any way at local scales and this calls into question the validity of the Consultation. CPRE Sussex is also concerned about the use of the Land App that is often referred to in the context of the Framework. This looks like a very high-level non-site specific piece of

commercial software. Its use may well run counter to the Aarhus Convention which expects signatory states to provide appropriate environmental information freely available to citizens.

Fifth, food supply and flood defence: These two important land uses and functions seem to take second place to housing and infrastructure. It is as if we must have the housing and infrastructure on greenfield sites and the other multifunctions of land must take second place - and likely be degraded in consequence. There is no challenge in the Consultation to the development and infrastructure sectors to find ways of taking less land or creating multifunctionality in the use of land by infrastructure and housing. This is just a small example of the lack of balance in the draft. No land use is necessarily more important than any other at this level of detail and no sector should take a greater share of the need to innovate to reach the goal of sustainable development than any other.

Sixth, Connectivity across a Patchwork Landscape: Sussex is a patchwork of land uses and one considerable contribution that a Land Use Framework could make is to increase connectivity between different parcels of land. Over years, for example, valuable areas of forest and woodland and wetland have become fragmented and this undermines their value for biodiversity and its amenity value because a larger connected habitat is the more valuable than smaller unconnected areas. Sussex has a number of examples, such as Worth Forest, where reconnected fragmented woodland areas could deliver benefits to both local and national players. The Sussex (Local) Nature Partnership is already working on a Local Nature Recovery Strategy and together with other initiatives (such as Weald to Waves) and the work on individual landowners this means there is an opportunity to connect nature and to reconnect people and other land uses to it. It is likely Sussex will need a patchwork of intensive, extensive and rewilding approaches to our farmland (see Jake Fiennes' "Land Healer" book) and the Framework could be a step in the right direction to helping landowners and groups of landowners achieve this, rather than trying to apply a uniform approach to wildly different parts of the land, even where it might be better managed for wildlife.

Work on Connectivity could also help other land uses become more sustainable as it could imply the use of multifunctional corridors for, say, transport and infrastructure or infrastructure and development (e.g. rooftop solar deployment). CPRE Sussex would hope that Connectivity – and ReConnectivity - become themes in the Framework, if not one of the principles that guide it.

Lastly, we would point to the ONS natural capital accounts as a means of noting the value of nature in broad terms. The data for 2023 can be found at:
<https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalaccounts/2023> .

CPRE Sussex have answered those consultation Questions (see Annex) that seem most relevant to Sussex and confirm their support for the responses that CPRE nationally will have made.

Yours faithfully,

Professor Dan Osborn,
Chair, CPRE Sussex

ANNEX

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?

CPRE Sussex disagrees with the assessment for various reasons: (a) the real area of urban land appears to be understated by the exclusion of gardens and the methodology thus will underplay the real growth in urban areas in future. (b) The methodology is also very limited in its timescales.

Strategic planning now needs to account for future climate change impacts on health and wellbeing and on nature and its impacts on the global hydrological cycle. Climate change will also reduce the amount of land in coastal areas by erosion and management of this will likely require loss of some agricultural land. Coastal erosion has been rapid in at least two parts of Sussex (near Littlehampton and at Cuckmere Haven). The area has a long coastline that is subject to accelerating rates of erosion as the sea level rises. Any strategic planning in Sussex will need to account for this. Thus, a time scale to 2050 is inadequate. A timescale out to at least 2100 would be preferred and would allow either nature-based or engineered solutions to be developed, planned for and deployed. Likewise, Sussex will be subject to higher temperatures than anticipated even relatively recently (in excess of 40°C) and such temperatures will lead to overheating in urban areas that suggest these need redesign to use land in urban areas more efficiently – these aspects are not included in the consultation but any Framework needs to account for them. A Framework would also need to contain more data on the opportunities provided by brownfield development. Overall, the potential for intra-urban development seems to have been overlooked.

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

Our answer to this question would depend on how the principles are applied. The list is certainly incomplete as the importance of natural capital and the supporting ecosystem services are not recognised as a principal factor to be accounted for in strategic planning.

Sussex contains a large part of the South Downs National Park and also has two National Landscapes (the High Weald and Chichester Harbour) covering extensive areas of land and coast. In addition, Sussex has a number of other valuable sites for wildlife some of which are specifically managed for nature and some of which were created to address issues of coastal flooding (e.g. wetlands near Pulborough, the reserves near Pevensey and the managed realignment site at Medmerry). These areas have important landscape value. Sussex also has the Brighton and Lewes Downs Biosphere Reserve (UNESCO designated). The Consultation seems to make little reference, as we read it, to sites outside areas already protected by legislation, such as National Parks and Landscapes. This means that the rest of Sussex, including areas such as the Low Weald or the area around Chichester (where much high value agricultural land has been built over) or the Manhood Peninsula or Wealden are likely to come under very great development pressure. This is already evident in Horsham and Wealden Districts and Mid-Sussex is under similar pressures.

Because of this, further principles need to be included in any Land Use Framework:

- (i) **Assessment of Natural Capital and all Ecosystem Services must form a fundamental part of developing any Land Use Framework.** Such an assessment should be informed and updated by data already held in databases, online material and new data from field surveys. This last provision on field surveys is vital. It is the only way the impact of all forms of environmental change can be identified and managed. If there were reliance on online systems only, then the information would soon be outdated and bad decisions would result with unknown consequences. It is notable that the Government's approach seems to be to do away with as many field surveys as possible. No Land Use Framework would remain viable for long without the refresh provided by new and updated information from the real world. It would be a Framework without a strong enough evidence base. Inclusion of such a provision would help to deliver policies initiatives relevant to 30by30 and the duty to further the purposes of National Landscapes. Such a principle could help develop more sustainable communities in contact with nature as recognising the value of natural capital (such as trees and hedges) and the ecosystem services they can deliver (such as an attractive environment in which communities can thrive) might help prevent the unnecessary destruction of natural resources when at present sites are cleared for development. There is an example in Burgess Hill in West/East Sussex where recognising the value of trees and hedges has led to a development in tune to some degree at least with the landscape character of nearby more natural areas.
- (ii) **Overdevelopment of areas outside valued landscapes (such as National Landscapes and National Parks) must be avoided and strategic planning should ensure this;** further all development and infrastructure projects should minimise the land they take during construction as well as at completion. Land is in limited supply but often large amounts of land are taken to help make site surveys easier or for reasons of meeting standard workflow practices. Any sector taking land should work to take as little as possible as a matter of best practice. Land used during construction should be restored to its former condition. In terms of opportunities to develop best practice in strategic planning Sussex's Low Weald provides a helpful example. Land in the Low Weald comes under substantial development pressure (because much surrounding land is protected) and there would be a benefit if the Land Use Framework would help strategic planning (perhaps through the new Mayoral Authority) deliver sustainable development rather than the type of development that is ostensibly growth at all costs but which is often subject to market constraints (such as those in the housing market) that are far more important than the environmental constraints to development the government has focussed on. This would mean not, for example, squeezing as much development into Sussex as there would have been if Protected and National Landscapes had not been present. Squeezing in overdevelopment could lead to many cliff edge developments built right up to the borders of the Protected and National Landscapes and thus diminish their value. It would also urbanise the countryside making it difficult to develop other land uses (e.g. farming, water management and nature recovery) effectively as environmental connectivity would be weakened. Defra sponsored authoritative reports on "Making Space" for nature and water some time ago and it would be helpful to draw on these reports in developing a Framework. CPRE Sussex

feel that the Low Weald area could be an archetype for strategic planning because it is: large in scale, distinct from surrounding areas, characteristic, in terms of its appearance, biodiversity and its settlement patterns of its underlying geology and hydrodynamics, cross boundary (with respect to existing District Councils), contains a range natural features that deliver important ecological and societal functions, largely undesignated, wholly unplanned for as a distinct geographical area, and thus, extremely vulnerable. Achieving sustainable development in the Low Weald would be an innovation challenge for the development and infrastructure sectors of the economy and provide a test bed for the viability of agriculture and nature recovery under any Framework. The Low Weald is one area of Sussex that would benefit from a Framework with a strong emphasis on Connectivity. CPRE Sussex addressed some of the issues relevant to the Low Weald in part of its input to the Inquiry on the Mid-Sussex Local Plan. A short extract is attached as an **Appendix** to these answers illustrates the extent of the problems that occur in the absence of a Land Use Framework grounded in consideration of natural capital and ecosystem services. This extract also illustrates the difficulties that can arise when areas do not have some form of land management framework that covers their characteristic features. It thus illustrates where any Land Use Framework could have good effect drawing perhaps on the management approaches provided within protected landscapes.

- (iii) All land use should demonstrate the contribution it makes to health and wellbeing. Defra has commissioned much research into the value of green spaces and nature to people's health and wellbeing. It would be good to see this research used to establish such a guiding principle for the use of land. Innovation in this area would probably reduce the costs for the NHS as the benefits of getting people to engage with nature outweighs the cost of engagement many times over.

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

The upcoming Sussex Mayoral Authority and all any new planning authority established post local government reorganisation in Sussex should be subject to the principles.

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?

Decision makers in this sector need certainty which the Government have failed to supply. The changes to agricultural payment systems have happened too quickly and will undo much of the progress that this sector has made on the environment in recent years; for example, the sudden freeze on the FSI scheme has had a very negative impact on sustainable approaches in the sector. A more granular view of the sector is required. For example, in Sussex, there are large land-owners, tenants with large holdings, small farms with vibrant businesses, a range of crop and animal husbandry types. There are also relatively recent developments such as the new vineyards. This indicates how important it is to take a multifunctional approach to land. Too often

countryside land appears as blank on the maps of planners and other government groups. The countryside is not a blank space into which development can be poured without costs in terms of opportunities for biodiversity gain, lost agricultural production (not good given the current level of global political uncertainty), and reduced opportunities for flood control and climate adaptation.

QUESTION 5 to 8:

These questions are largely outside the competence of CPRE Sussex to answer. However, we would ask why it is that these questions are being addressed only to land managers. Surely if the Consultation were a balanced and fair one there would be a matching set of questions for other sectors – such as development and infrastructure.

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

The Government's track record on this looks to be poor already. The proposal for developers to pay into a fund to enable offsetting of environmental damage of unknown levels (since there will be no surveys to discover what damage has been done by a development under the Planning and Infrastructure Bill) suggests it does not understand what might be attractive to real investors in nature. We all need to invest in nature if we are to thrive. What needs to be considered is the carrying capacity of land under various land uses and a determination to reverse the decline in biodiversity that has impoverished the nation and made so many people divorced from the natural systems that sustain them. Investment in nature would be good for the nation's health and there is abundant evidence for this; significant parts of it commissioned by Defra itself. Incorporating some of the findings of that research into a Land Use Framework would go some way at least to attracting the right kind of investment from the private sector.

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

It is not very clear what is meant by Protected Landscapes contributing more. Protected Landscapes (and non-protected ones for that matter) already contribute to the nation's health and wellbeing and to the economy. They are also a force for social cohesion – or can be if opportunities are taken for cross-cultural working. The National Lottery have funded a number of projects examining these aspects of how green spaces can improve life for many parts of society – from childhood to older ages. This work needs to be used in developing a Framework for multifunctional land use. CPRE Sussex would point to work by the Green Alliance and the Committee on National Parks as important organisations addressing issues covered by this Question. CPRE Sussex view the South Downs National Park Local Plan as making a significant contribution to the lives of Sussex residents and visitors as it is grounded in Natural Capital and Ecosystem Services. This example might be followed elsewhere.

If anything holds back Protected Landscapes, such as the South Downs National Park and the two National Landscapes in Sussex, it is a lack of resources. At a time when our environment is changing rapidly it seems unwise to only maintain or even reduce funding.

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

CPRE Sussex is not in a position to comment in detail on this. In Sussex, the Brighton and Hove food network have expertise in this area.

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

Under a Land Use Framework there should be one spatial plan for a regional or sub-region that ensures development and infrastructure come forward in a complementary manner. Wider use of Grampian style pre-development conditions could do much to help here and ensure that co-benefits and trade-offs are managed effectively. CPRE Sussex do not believe that all trade-offs can be managed. There is research evidence to illustrate how difficult this can be. This can be found in reports produced by Government itself and by the academic community in relation to land use. Any Framework needs to be explicitly and transparently informed by such research and evidence. The lack of specific references to support the proposals set out in the consultation is disappointing as it suggests, thus far, the evidence base has not been used to best effect.

In our response to the Consultation to the Sussex Mayoral Authority we made reference to a lack of powers in relation to several aspects of a Land Use Framework. Specifically, we argued that as it is the Mayoral CCA in Sussex that will prepare the Spatial Development Strategy the Mayor needs greater duties (and powers) in relation to climate and nature, to balance against a singular focus on development and growth. The Mayor should have a responsibility to use any national Land Use Framework to shape their work and might also be required to develop a local Sussex Land Use Framework at a suitably local level of detail.

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

In Sussex it is likely that strategic transport planning will fall to the new Mayoral Authority. Our response to the consultation on the new Authority made the point that transport facilities and needs vary greatly from one part of Sussex to another. There should be a strategic focus on solving local transport deficiencies in consultation with local communities. The Government has recently rightly cancelled very expensive plans to fix a traffic flow issue that primarily occurs at a single complex junction on the A27 near Arundel. CPRE Sussex worked with local communities and bodies to find a more economical solution and such an approach might help the Mayoral authority find innovative solutions to transport issue within Sussex. What is not required is large amounts of public money spent to solve problems using large scale engineering methods (e.g. dualling carriageways when more selective improvements would be effective). What is required is better integration of local transport modes and routes and where appropriate strong promotion of active travel. Wherever possible different transport and infrastructure systems should use the same pathways through the countryside to help minimise land use take. Transport and infrastructure could also be better integrated. For example, all transport routes could deploy renewable energy

systems – innovation in the design of wind turbines could mean this would not be limited to solar energy. Innovations of this kind should be a feature of work to deploy a Land Use Framework.

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

In Sussex, a Land Use Framework for Sussex could guide the work of the new Mayoral Authority which should have responsibility for the matters posed by the 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.

The Reporting Power is probably under-used as a means of monitoring progress on adaptation to climate change. Sussex is already being affected by the impacts of climate change. This is already evident in a range of changes including high temperatures, intense rainfall events, storms and coastal erosion. Major landowners in Sussex are already working together to adapt and groupings such as Weald to Waves are working to develop a nature recovery and sustainable land use initiative which will directly or indirectly address adaptation issues. It would perhaps be better if the upcoming Mayoral Authority had the reporting power responsibility so that progress across the whole of Sussex could be understood and incentivised as necessary. One reason for this is that adaptation is as much an urban issue as it is for the countryside.

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.

CPRE Sussex would not want to prioritise any of these actions as in its consultations with local communities on such issues all of these actions by government would seem to be required to help communities understand and adapt to climate change which, for Sussex, is already happening in terms of higher than expected temperatures, intense rainfall events and flooding, coastal erosion and biodiversity changes (including the possibility of the introduction of invasive, pest or disease species).

As a Land Use Framework would need to properly account for climate change it would need two things: (a) a perspective out to the end of the century at least and (b) a scenario base where global average temperatures have exceeded 2°C to reflect the reality of climate change. It seems likely from the best modelling (by the UK Met Office and others) that the global average rise in temperatures will likely be above 2.5°C by the end of the century and may even exceed 3°C if net zero ambitions are not met.

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?

Many bodies have greater competence in this area than CPRE Sussex. However, we are greatly concerned that the Government, and senior officials such as the Chief Planner, is putting too much emphasis on the use of online tools to assess environmental factors and that it is dismissive of the value of onsite surveys of environmental resources. It is self-evident, surely, that online resources exist only because of painstaking survey and monitoring work over many years by enthusiasts and professionals alike. Abandoning field surveys means that online resources will rapidly become outdated because the environment is not full of static features. Even the seemingly rock-solid white cliffs of the Sussex “Seven Sisters” have sections that fall into the sea on a regular basis. Sussex’s biodiversity is changing all the time in response to the changing climate and this brings with it new species (some invasive or disease bearing). Over reliance on online tools, or worse perhaps, commercial Apps that provide limited coverage will lead to bad decisions, the loss of valuable wildlife and the degradation of our best landscapes.

CPRE Sussex urge the Government to engage with the research community that has worked for many years on problems of data integration and data sharing. A lot of work is needed to make environmental data more integrated and available to individuals and communities as required under the Aarhus Convention. The problems in achieving this are non-trivial. They will not be dealt with by pushing a commercial App on interested parties.

The current data and mapping that appears to underpin this Consultation is of insufficient quality to make it possible for CPRE Sussex to understand at any useful level the implications of a Land Use Framework for Sussex’s communities. This is a great pity and has reduced our capacity to comment constructively on how a Land Use Framework might best be developed and deployed. We hope this issue can be resolved as the national and sub-national conversation continues.

An important point for Defra to note is the difficulty members of the public have in orientating themselves on maps. Very often online resources map the same features differently and fail to provide clear points of reference. Any data principles for a Land Use Framework need to take such matters into account.

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.

CPRE Sussex has limited expertise in this area. However, we are concerned about the Government’s apparent keenness to do away with many environmental protections via the Planning and Infrastructure Bill currently before Parliament. We are also concerned that there is a trend internationally to roll back reporting on environmental matters and the UK does not seem to be immune from this trend. Spatial data alone is not likely to enable the multifunctional use of land – this would need a suite of models and tools to be made available akin to those that could be made available to manage climate change impacts as alluded to in earlier questions. Again, CPRE Sussex would urge the government to engage with the research community on these matters and to provide adequate funding to develop the necessary tools and models. Some of

these may well already exist, including in the private sector, but have not been referred to in the Consultation.

CPRE Sussex believes the following kinds of information are important to facilitate maintaining and updating environmental data for use by all sectors that in any way make use of land (including the coast, rivers and waterways of all kinds): environmental survey data gathered in the field (by both traditional field survey and by remote sensing methodologies) to assess how different land uses affect the multifunctional value, nature and characteristics of land. The base set of data would need to cover the following areas: biodiversity in the soil and on the land (to ensure we all know what may be damaged or enhanced by any form of development); the levels of carbon and nutrients in the soil (as a measure of climate change mitigation and adaptation and as a guide to effective stewardship of the land); the grade of agricultural land based on its capacity to produce food, or serve as the basis for forestry or woodland cover of various kinds; data in support of the sustainable management of water resources and the management of flood waters by natural or other systems; data on brownfield sites within and without urban areas so that “brownfield first” policies for development planning can be used to best effect; model derived data on the potential for renewable energy production on roofs over car parks and other aspects of the energy system; clearer presentation of data in the what might be referred to as the MAGIC family of data systems and their successors. Many people find such systems difficult to use.

Note: CPRE Sussex and CPRE Hampshire have worked with Southampton University have developed a model based on remote sensing data to estimate the solar energy capacity of roofs in the two counties.

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

Sussex has a complex set of soils and land types because of its underlying geology and topography. This makes it important in any Land Use Framework to have an Agricultural Land Classification that takes this into account. The current system is perhaps too crude to be effective at preventing the best and most versatile land from being used for development. The tendency to allow high quality land to be lost to development as has happened around Chichester and elsewhere in Sussex is surely unacceptable if what we are interested in is maintaining the multifunctional potential of our limited supply of land.

Perhaps the question being asked here is the wrong one. What is really needed is a multifunctional land use classification deployed as part of the Land Use Framework. This would identify not only the best agricultural land but also the land most suitable for development – starting in that case with brownfield land classed as the most suitable for development. Another classification could involve multifunctional routes for infrastructure development to minimise land take by this form of land use. Yet, another form of classification could be for nature recovery and involve ensuring that protected landscapes and sites were adequately connected.

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?

CPRE Sussex believe as much environmental data should be as freely available as possible but recognises that there are costs to be recovered by those who have generated or organised datasets or developed models and tools to make it possible to apply the data to various problems.

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.

CPRE Sussex suspect that the main skills base that is missing is one linked to appreciating how the environment actually works in practice. More account needs to be taken of planetary processes and skills need to be developed that allow development to work with these rather than working in ways that put such processes at risk of delivering disbenefits to humanity (e.g. as is happening with the carbon cycle and climate change).

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

There is much research and best practice available to help here. For CPRE Sussex, the key factor will be to consult with and listen to local voices who can solve local problems effectively. Sadly, the trend is for Government to cast local voices as “blockers” or even “zealots”. Most local voices are keen to find solutions (e.g. in developing climate resilient communities or deploying acceptable renewable energy schemes or buying land for conservation or supporting regenerative or rewilding initiatives by Sussex landowners). Engaging local communities in putting any Land Use Framework into practice would help ensure success in bringing forward sustainable development. This is an approach that underpins the Sustainable Development Goals to which the UK government is committed.

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

CPRE Sussex believes there are well established reporting cycles in Government on environmental issues that suggest a 5-year update would be appropriate timed to fall between updates to development and transport planning so that one can inform the other. Updates should not occur at periods longer than 7 years as significant land use change can occur over such time scales.

QUESTION 24: To what extent do you agree or disagree with the proposed areas above? Please include comments or suggestions with your answer.

CPRE Sussex agrees that all these areas seem a necessary part of developing and using a Land Use Framework. Co-working between government and the academic, charity and practitioner research communities is an essential part of what would make a Land Use Framework both sound and workable. This should apply across all aspects of developing and making use of a Framework, including downscaling to regional or sub-regional levels. It should not be restricted to policy areas

as there would be contributions to be made from basic data provision onward all the way to applications and what will be a raft of necessary innovations in development and infrastructure planning because a balanced Land Use Framework should not just be about Agriculture making way for Housing and Infrastructure with some Forestry thrown in the mix. A good Framework would be based on strong evidence on the inherent multifunctionality of land and the opportunities and constraints there are for any form of development when the overall goal is to achieve sustainable development so that future generations have at least the same level of opportunities that this one has had.

Appendix to the response to Question 2 part (ii): Part of CPRE Sussex Input in respect of Mid Sussex District Council's regulation 19 consultation draft district plan 2021 – 2039 (with some deletion of footnote material)

The draft Plan's strategy for effective land use addresses primarily the issue of where it is and isn't deemed appropriate to permit new development. Whilst we recognise and welcome the Plan policies that foster the High Weald (including Ashdown Forest) and the setting of the South Downs National Park, and BMV agricultural land, the effect of that is to impose much greater development pressure on the rural Low Weald, as this Plan Review amply demonstrates.

The Low Weald is an ecologically important area of high sensitivity to large scale development. Because of that it seems to us to be of paramount importance to develop a policy that makes clear where and in what circumstances development will be allowed to trump its environmental conservation and enhancement. So we would wish to see the Plan for our rural District fulfil its overall land use purpose by identifying other areas which serve a particularly valuable intrinsic purpose that need policies to promote the conservation and enhancement of those purposes.

To that end we invite the Council to consider adding a specific policy, as described below, that recognises the natural capital and environmental importance to the District of the Low Weald. The Low Weald, including that part of it situated within the Mid Sussex District Plan area which is of relevance to this draft Plan, has a particularly special landscape character that represents everything that is important to the rural nature of our rural district, but is at the same time particularly exposed to development pressure. Its pattern of small, widely separated, downland villages, its lack of sustainable connectivity, and its agricultural heritage all make it wholly unsuitable as a main focal point within which to satisfy the District's urban expansion. As would its role as the principal rural landscape that segregates the South Downs from the urban conurbations from Crawley and Gatwick northwards to London.

That development pressure is mainly accounted for by the Council's failure to give due weight to its own evidence as to the real and substantial environmental constraints that exist across the District. The Council-commissioned Capacity Study of Mid Sussex District to Accommodate Development (June 2014) concluded that "almost two thirds of the District is covered by primary level constraints, i.e. areas that are afforded the highest protection under national policy. In the remaining parts of the District, very few areas (only 4% of the District) are not also covered by one or more secondary constraints (still sensitive but have less weight applied to them in national policy) or not already built upon. Only those areas in close proximity to the main settlements have more than three services within walking distance and are therefore likely to be more sustainable locations for new development." (para 6.24).

The Council's failure to give proper weight to this report's conclusions leads directly to the Council's current proposals to accommodate much of the full quota of District's new housing and business sites within the 50% of the District that lies outside the High Weald AONB and away from the Ashdown Forest SAC/SPA. The pressure is exacerbated by the proximity of convenient urban areas – Brighton and Gatwick/Crawley – that are unable to meet their own housing quotas.

As matters stand, the Low Weald is inadvertently set up by the Updated District Plan to become the playground of the construction industry. But it cannot represent positive planning to force most of a full “standard method housing quota” – a quota that exceeds Mid Sussex’s own actual housing needs by, on the Council’s own 2022 calculation, over 5,600 dwellings – into 50% of the District area when that area, the Low Weald has high landscape value and low development capacity. The Low Weald is as much in need of individual policy certainty as the High Weald, arguably more so given its overall lack of statutory designation.

We seek the addition into the Plan of a specific policy that addresses how the balance is to be struck between the conservation and enhancement of the Low Weald habitats on the one hand and new development pressures on the other, so that, at a landscape level, its uniqueness is fostered and not haphazardly fragmented, degraded and eroded. The general provisions of DPC1 are not, in themselves, sufficient to provide that balance that recognises the uniqueness of the Low Weald. To that extent, DPC1 is not justified; and, absent any cross-boundary policy-driven arrangements with other authorities that cover other parts of the Low Weald, it is not effective either.

The special features of the Low Weald are recorded in Natural England’s Landscape Character Area (NCA) profile 121 (<https://publications.naturalengland.org.uk/publication/12332031>). This report explains the main character features that make the area of special importance. It details the varied and extensive ecosystem services that the Low Weald provides and, importantly, the opportunities that exist to enhance the natural qualities and resources of the Low Weald: what the report calls “Statements of Environmental Opportunity” (of which it explains five in detail).

Unlike the High Weald which, being designated as a National Landscape, has its own Management Plan for whose preparation and implementation MSDC and the other planning authorities covering its area are legally responsible, the Low Weald has no body, or group of bodies, accountable for managing it as a holistic landscape. Natural England’s NCA profile is the equivalent of a National Landscape Management Plan.

In our view, if MSDC is to honour its environmental responsibilities for the District in accordance with its Plan vision to “improve the economic, social and environmental well-being of our District” the NCA report needs, at a minimum, to be treated as a material consideration by the Council in its strategic planning policy and planning decisions. That would provide what is in reality the only opportunity that exists to give effect to the protection of the Low Weald’s crucial ecosystem resources and services, and its environmental enhancement by promoting and giving effect to the environmental opportunities spelled out in Natural England’s report.

We would envisage a Low Weald Policy - the foil of the High Weald policy DPC4 - that (a) requires the Council to treat as a material planning and sustainability consideration the need to conserve and enhance the Low Weald’s ecosystem services, and to promote the specific environmental opportunities, listed in the NCA report, (b) acknowledges a correlation between the scale and extent of any development proposal and the degree of risk of threat or harm to the Low Weald, and (c) commits the Council to seek to work constructively with other planning authorities whose

area includes part of the Low Weald to achieve the same objectives as a holistic whole. As just one practical example, we would wish to see co-operation with Horsham District to prevent the further fragmentation of Worth and St Leonards ancient forests, and to increase their connectivity.