

The Land Use Framework: A Flawed Foundation

Why the Framework, in combination with the Planning and Infrastructure Act 2025 and Biodiversity Net Gain offsetting, is likely to produce perverse outcomes and deepen conflict over development in the English countryside.

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Introduction

England's first Land Use Framework, published in March 2026, has been broadly welcomed as a long-overdue attempt to coordinate the competing demands on our finite land: housing, food, energy, nature and water. Its ambition is genuine, its spatial analysis technically sophisticated, and its diagnosis of the problem largely correct. The question is not whether the Framework means well. The question is whether its instruments — particularly when combined with the Planning and Infrastructure Act 2025 and the Biodiversity Net Gain (BNG) offsetting regime — will actually deliver what it promises, or whether they will produce a set of perverse outcomes that the Framework's aggregate analysis systematically obscures.

This paper argues that the Framework rests on a flawed statistical premise, fails to account for the realities of how and where development occurs, inadequately protects the human values people attach to their local landscapes, and — most seriously — risks converting England's biodiversity from a living, everyday presence woven through ordinary places into a managed resource concentrated in distant designated areas that most people will rarely encounter.

These are not arguments against the Framework's goals. They are arguments that the tools chosen to deliver those goals are poorly matched to the reality on the ground, and that without significant reconsideration, the Framework is likely to deepen rather than resolve the conflicts surrounding development in the countryside.

1. The Statistical Aggregation Problem

The headline claim

The Framework's central reassurance is that England has enough land to meet all its objectives simultaneously — housing, food, energy, nature — provided land is used more efficiently and multifunctionally. This conclusion is derived from sophisticated national-scale spatial modelling, and at the aggregate level it may be arithmetically correct.

But aggregate sufficiency is not the same as local availability. The Framework's analysis groups land into broad categories across large geographical areas — National Character Areas, regional zones — and identifies where different types of land use change are theoretically most suitable. This tells you almost nothing about whether the right land is available in the right places, at the right cost, with the right

infrastructure, and with the political and community acceptance needed to actually build on it.

The golf course fallacy

The Framework and its supporters have cited the fact that England's golf courses occupy more land than its solar farms as evidence that land use priorities are misaligned. This comparison is rhetorically vivid but analytically misleading. Golf courses are not distributed uniformly across the country in locations awaiting alternative use. They are embedded in communities, often on land that has been in recreational use for a century or more, typically within or adjacent to built-up areas where their redevelopment would face exactly the local opposition the Framework hopes to reduce.

The same logic applies to the Framework's broader land use statistics. Knowing that 39% of England is improved grassland, or that only 1% need be converted to renewables, tells you nothing about whether the specific fields adjoining a specific town are the right ones to build on, or whether the upland moor identified as suitable for solar is in fact a cherished local landscape.

A useful analogy: the human body is approximately 60% water. This does not mean we could usefully replace some of that water with more efficient tissues. The water is not uniformly distributed; it is precisely where it needs to be for the body to function. England's land is the same. Its apparent abundance in aggregate conceals acute scarcity in the specific locations where development is actually viable.

2. Where Development Actually Happens

The infrastructure clustering problem

Development does not go where spatial analysis says land is theoretically available. It goes where development is economically viable — which means where roads, sewers, utilities, schools and health services already exist and can be extended at manageable cost. In practice this overwhelmingly means the urban fringe: the fields and green spaces immediately adjacent to existing towns and cities.

This is precisely where resistance from existing residents is most intense. People who have chosen to live near the countryside edge of a settlement have typically done so because of that proximity. They experience development proposals not as abstract spatial reallocation but as the destruction of the local environment that defines their neighbourhood. The Framework's spatial analysis, which identifies land suitable for change in theoretical terms, does nothing to dissolve this economic logic or the community conflict it generates.

The road network problem

The Framework notes that few places in England are truly isolated, implying that most land could in principle accommodate development. But accessibility via road network is a minimum condition for development, not a sufficient one. The same road network that makes a rural location technically accessible also makes it attractive to existing residents for its peace, its scenery, and its distance from urban

pressure. The Framework's spatial analysis does not distinguish between land that is accessible and therefore developable and land that is accessible and therefore valued precisely for not being developed.

Will community resistance get worse?

The Framework explicitly endorses higher-density development near transport nodes and proposes a 'default yes' to certain planning applications near well-connected stations. This signals a more permissive planning environment in precisely the locations where existing residents feel most threatened. The Framework frames this as efficiency; affected communities experience it as imposition.

Meanwhile, the Framework's multifunctionality argument — that solar, food, nature and housing can coexist on the same parcel of land — is plausible in principle but frequently implausible in practice. A specific field cannot simultaneously serve as a solar farm, a rewilded habitat corridor, a food-growing area and a housing site. The aggregate compatibility claimed in the national analysis dissolves into site-specific conflict when actual applications are made.

There is a real risk that the Framework's sophisticated analytical language — with its talk of spatial optimisation, multifunctionality and data-driven decision-making — will provide political cover for what communities experience as a top-down intensification of development pressure, while doing nothing to address the underlying economic forces that determine where development actually occurs.

3. The Values the Framework Cannot See

Scenic beauty and tranquillity

The Framework's analytical structure is built around functional values: what land does in measurable terms. Tonnes of carbon stored. Hectares of habitat. Gigawatts of energy. Homes built. These are important, but they are not the only values at stake.

Scenic beauty and tranquillity are intrinsic values — what places are to the people who experience them — and they are largely invisible in the Framework's modelling. CPRE has done extensive work mapping tranquillity across England, showing it as a rapidly diminishing resource. The Framework does not reference this work or treat tranquillity as a material consideration in spatial planning.

The practical consequences are significant. Renewable energy potential tends to correlate with exposed upland and coastal positions — which are also among the most scenically valued and tranquil parts of England. Large solar farms, wind turbines, and the pylons needed to connect offshore wind to the national grid all alter the character of landscapes in ways that the Framework's aggregate statistics treat as negligible because they involve only 1-2% of England's land area. Telling a community in Cumbria or the South Downs that their landscape represents a tiny percentage of the national total does not make the visual impact feel smaller.

Flood risk and land instability

The Framework acknowledges that one in four homes in England may be at risk of flooding by 2050, and commits to using improved data to reduce homes built in flood-risk areas. But flooding appears mainly as a justification for nature-based solutions — plant trees, restore peatlands — rather than as a hard constraint on where development should not occur.

Land instability — subsidence, coastal erosion, slope failure — is almost entirely absent from the Framework's analysis. Large parts of England, particularly in the north, the south-west, and along coastlines, face serious and worsening land instability challenges. If these are excluded from the pool of land genuinely available for development, the aggregate arithmetic that underpins the Framework's central reassurance changes considerably.

4. Biodiversity Net Gain: A Mechanism for Losing Nature Everywhere

How the offsetting logic works

The Planning and Infrastructure Act 2025 builds substantially on the Biodiversity Net Gain (BNG) regime, introducing Environmental Delivery Plans as a mechanism allowing developers to offset biodiversity impacts by paying into designated nature areas rather than mitigating impacts on the specific site being developed. The Framework presents this as enabling development to 'come forward more easily while securing better outcomes for our most valued habitats and species'.

The language is revealing. The primary purpose stated is to facilitate development; better nature outcomes are the secondary justification. This framing matters, because the offsetting model rests on a core ecological assumption that is seriously contested in the scientific literature: that biodiversity lost in one place can be meaningfully compensated by biodiversity created or enhanced in another.

Why offsetting frequently fails ecologically

The assumption fails in at least three important ways:

- Irreplaceability. Many habitats and the species assemblages they support have developed over centuries or millennia. Ancient woodland, species-rich meadow, lowland heath — these cannot be recreated on any meaningful human timescale. The BNG framework treats a hectare of ancient woodland as notionally equivalent to a hectare of newly planted trees given sufficient multiplier. The ecological reality is that they are not comparable.
- Ecological context. Species do not exist in isolation. They exist within functioning ecological networks of predators, prey, pollinators, parasites and competitors that have co-evolved over long periods. Moving nature to designated areas assumes species can simply relocate and re-establish equivalent relationships in new places. For many species — particularly invertebrates, fungi, lichens and plants with highly specific habitat requirements — this is simply not true.

- Time lag. Offsetting typically involves committing to habitat creation that will take decades to mature. During that period, the development has already destroyed what was there. The losses are immediate and certain; the gains are distant and conditional.

The spatial concentration trap

The Framework's broader logic pushes nature into large designated areas — the 30by30 commitment, Landscape Recovery zones, large-scale peatland and woodland restoration — while simultaneously making it easier to develop the spaces between those areas. The ecological literature on this is fairly clear: large nature reserves separated by developed or intensively farmed land are substantially less effective than smaller patches connected by wildlife-rich corridors running through humanised landscapes.

The 30by30 target illustrates the problem starkly. At present just 7% of England's land is protected for nature, with four years remaining until the 2030 deadline. The government's response is a 'data sprint' to identify land that might qualify, and a commitment to Environmental Delivery Plans that will, in effect, allow development to proceed in undesignated areas in exchange for payments into the designated ones. This is not a route to 30% of land genuinely functioning for nature. It is a route to 30% of land carrying a designation, while the ecological richness of the remaining 70% continues to decline.

5. Nature as Everyday Experience: The Loss Nobody is Measuring

There is a dimension of this problem that the Framework's metrics entirely fail to capture. Nature in England has never been primarily experienced through visits to nature reserves or national parks. It has been experienced in the everyday fabric of life: the hedgehog in the garden, the butterflies on the roadside verge, the birdsong on the walk to school, the wildflowers in the churchyard, the swifts returning each summer to the eaves of familiar buildings.

This everyday nature is not spectacular enough to feature in nature documentaries or justify protected area designations. It does not generate the kind of quantifiable biodiversity credits that the BNG system rewards. It does not show up prominently in the Framework's spatial modelling. But it constitutes the primary means by which most people — including most children — experience the natural world and develop the attachment to it that motivates conservation in the first place.

The Framework's approach systematically devalues this everyday nature. A farmer who maintains a network of diverse hedgerows, a local authority that allows roadside verges to go uncut in summer, a householder with a wildlife garden — none of these generate measurable biodiversity credits. Yet collectively they may be more ecologically significant for common species than many formal restoration schemes in distant designated areas.

The risk is not merely ecological. It is cultural and democratic. If the Framework's logic is followed consistently, England risks becoming a country where nature is something you pay to visit — in a managed landscape at the end of a drive — rather than something you encounter daily in your local fields, hedgerows and green spaces. The Framework repeatedly invokes people's love of nature as a justification for its ambitions. But the policy instrument it deploys is likely to make that everyday relationship progressively harder to sustain for most people in most places.

6. Conclusion: What Needs to Change

The Land Use Framework represents genuine progress in analytical sophistication and cross-government coordination. The diagnosis it offers — that fragmented, siloed decision-making has produced inefficient and conflicted land use — is broadly correct. The question is whether the tools it proposes are adequate to its stated goals.

This paper has argued that they are not, for four connected reasons:

- The aggregate land availability claim rests on a statistical aggregation that obscures the specific, local constraints — infrastructure costs, community resistance, flood risk, land instability — that determine where development can actually occur.
- Development will continue to cluster at the urban fringe, where it is economically viable, regardless of what the spatial model identifies as theoretically suitable land. This will intensify rather than reduce community conflict.
- The Framework's functional metrics have no way of capturing or protecting the scenic, tranquil and place-based values that most people care about most when they resist development in their local landscapes.
- The BNG offsetting regime, amplified by the Planning and Infrastructure Act's Environmental Delivery Plans, is likely to accelerate the conversion of England's biodiversity from a diffuse, everyday presence into a managed resource concentrated in designated areas — making nature simultaneously more protected on paper and less present in the places where most people actually live.

The Framework should be asked to go further in four specific ways. It should incorporate flood risk and land instability as hard constraints on aggregate land availability, not merely as factors informing where nature-based solutions are deployed. It should develop a methodology for measuring and protecting scenic and tranquil values, drawing on existing work such as CPRE's tranquillity mapping, rather than treating these as adequately protected by the existing designated areas system. It should commission an independent review of the ecological evidence base for biodiversity offsetting before the Environmental Delivery Plans mechanism is implemented at scale, with particular attention to the international experience from jurisdictions where offsetting has operated longer. And it should explicitly measure and set targets for the quality of everyday nature — the biodiversity accessible to people in their local, ordinary landscapes — rather than focusing exclusively on designated area extent.

England's landscapes are not merely a resource to be optimised. They are places — with history, identity, ecological relationships and cultural meaning that no spatial model can fully capture. A framework worthy of the responsibility it claims must find ways to take those values seriously, not merely as rhetorical decoration but as material constraints on what gets built where, and what gets protected as a result.

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March 2026. This paper draws on the Land Use Framework for England (Defra, March 2026), the CPRE report 'Understanding the Tools for Integrating Land Use Decision-Making' (March 2026), Carbon Brief's analysis of the Framework (March 2026), and the body of ecological literature on habitat offsetting, fragmentation and biodiversity connectivity.