LAND USE CONSULTATION, ENGLAND

Response to Land Use Consultation, England, Jan-Apr 2025

IEMA - BIODIVERSITY AND NATURAL CAPITAL NETWORK APRIL 2025

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CONTENTS

ABOUT IEMA

We are the Institute of Environmental Management and Assessment (IEMA). We are the global professional body for over 22,000 individuals and 300 organisations working, studying or interested in the environment and sustainability.

We are the professional organisation at the centre of the sustainability agenda, connecting business and individuals across industries, sectors and borders. We also help and support public and private sector organisations, governments and regulators to do the right thing when it comes to environment and sustainability-related initiatives, challenges and opportunities.

We work to influence public policy on environment and sustainability matters. We do this by drawing on the insights and experience of our members to ensure that what happens in practice influences the development of government policy, legislation, regulations and standards.

EXECUTIVE SUMMARY

IEMA welcomes and supports this precursor to a land use framework for England. IEMA comments come from a workshop with members and key stakeholders and make the following recommendations:

- A land use framework is an essential tool for understanding land use, food production and promoting the recovery of biodiversity.
- The Land Use Framework must act as a spatial delivery mechanism for the Environmental Improvement Plan (EIP), explicitly mapping how EIP goals and legal targets will be achieved across land categories and types. This includes a clear alignment with EIP's Outcome Indicator Framework.
- The Land Use Framework must also align with planning reform and the emerging Environmental Outcome Reports (EORs) regime. Planning and land use decisions must be based on a shared set of spatial and environmental priorities that reflect statutory targets under the EIP, Biodiversity Net Gain (BNG), and Local Nature Recovery Strategies (LNRS).
- The land use framework must include a 'roadmap' of all the policy and regulation relating to land use including interaction with ELMS, LNRS, BNG, the Planning and Infrastructure Bill Nature Restoration Fund, etc. The Framework must integrate and spatially align schemes and targets (ELMs, LNRSs,

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BNG, 30 x 30, NBSAPs, EIP targets, Net Zero etc.). A clear explanation of how these interact in practice is critical for landowners, planners, and businesses. The Land Use Framework should act as a unifying policy layer across these tools to avoid duplication and to maximise environmental outcomes.

- Changes to land use must not disproportionately affect smaller landowners.
- The proposed land use change (categories 1–4, covering only 19% of agricultural land) is not sufficient to meet the scale of change needed for Government's 30x30, EIP, and net zero commitments. The Framework should include a scenario analysis that models higher ambition pathways, showing how greater proportions of land—across all categories—could contribute to environmental goals. This includes urban green space, peri-urban land, and under-utilised public land.
- A centralised, standardised and open-access data system must underpin the Land Use Framework. Government should incentivise the sharing of privately held land use and biodiversity data (e.g. from developers, farm consultants, or estate managers) and embed a duty to report spatial outcomes against the Framework's principles. This is essential for monitoring delivery of the EIP and aligning land use decisions with nature, climate and food goals. This data system should be governed by a national digital platform (e.g. an Environmental Data Observatory) that is integrated with the EIP Outcome Indicator Framework, allowing transparent tracking of environmental performance at national, regional, and local levels.
- The Land Use Framework must be underpinned by a national land use skills and capacity strategy. This should address green skills gaps across sectors, including ecology, natural capital accounting, soil science, and spatial data analysis. It should also support local authorities, land managers, and advisors to interpret policy, use environmental data, and engage with land use change schemes such as ELMs and LNRSs.
- A Land Use Framework must include who, if anybody, will oversee it, over what time frame, and how.
- Include a focus on climate risk and adaptation (alongside climate change and biodiversity and natural capital) in any land use framework.

QUESTIONS AND 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 ANALYTICAL ANEX

A land use framework is a long anticipated and much needed tool and a consultation in advance is welcomed. As a pre-cursor to such a framework, this consultation has been disappointing.

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A land use framework should enable the effective interaction of different spatial policies including BNG, ELMS and planning reform (as set out in IEMA's Key Recommendations for UK Policy Makers in 2024[1]). Although these are touched upon – often mentioned only once or twice in the introduction – the questions in this land use consultation seem to focus on agricultural land (understandable because that's the majority of land) alongside some (but not all) relevant processes (getting landowners on board, data, and a nod to skills). It feels as if only some aspects of land use have been set out here.

The consultation does not adequately show how proposed land use changes will contribute to the statutory targets in the EIP. A robust Land Use Framework must spatially allocate environmental responsibilities and land use functions in a way that helps deliver the EIP's 10 goals and supports the Outcome Indicator Framework. This should include indicative maps or visual tools that demonstrate the cumulative contribution of land categories to EIP indicators, ensuring landowners and public bodies understand their role in achieving national environmental targets.

Furthermore, the Framework must be able to demonstrate how EIP-aligned actions (e.g., wetland creation, soil improvement, biodiversity restoration) will be spatially prioritised to maximise environmental benefits and reduce trade-offs. This is especially important given the Government's legal obligations under the Environment Act 2021.

The consultation has no mention of the role of ELMs – the Government's key process for supporting biodiversity and natural capital enhancement in the agricultural sector. One of the principles set out in this document is co-designing and align spatial strategies and this must be relevant for Government departments also.

If this paper aims to develop a 'shared vision for land use in England', then it doesn't seem to be taking a broad enough view or asking the right questions.

A land use framework needs to include:

1) A 'roadmap' of all the policy and regulation relating to land. This will allow landowners to understand the policy landscape and make the right decisions for their land and for the environment.
2) Show how Government targets for nature such as 30 x 30, NBSAPs, the targets in the Environmental Improvement Plan, and Government targets for net zero, will be achieved across the different land uses in England. This should allow landowners and their businesses to understand their part in achieving the Government's environmental targets.
3) Include climate mitigation and adaptation and biodiversity and natural capital enhancement.
4) Consideration of who owns the land to include tenant, small and large agricultural organisations.
5) Who, if anybody, will implement a land use framework, over what time frame, and how.

Of the changes to agricultural land proposed in the 4 categories given, 81% of land will remain unchanged. It feels that:

- Changes to land use will disproportionately impact a small amount of land and there will be a need to ensure that these impacts can be proportionately distributed across larger and smaller land owners

[1] https://s3.eu-west-2.amazonaws.com/iema.net/documents/IEMA-Climate-Biodiversity-2024-FINAL-1.pdf

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- The proposed changes do not seem to be enough to meet the Governments 30 x 30 and other environment and climate targets – it would have been very helpful to have a breakdown of agricultural land's expected contribution to 30 x 30 or how it relates to the targets in the EIP (ideally showing the contribution of all types of land to 30 x 30).
- To address this, the Land Use Framework should include scenario modelling that reflects different levels of ambition—e.g. business-as-usual, EIP-aligned, and 30x30+ pathways. This would allow policymakers and stakeholders to understand the environmental returns, trade-offs, and infrastructure needs under each scenario. It would also help to identify which areas or types of land (e.g. marginal farmland, underused urban land) could contribute more to national targets.

There is scant inclusion of, and no 'map' of, land use and the interaction with other Government initiatives such as the Environmental Land Management Scheme or LNRSs and how these support/dovetail with any land use changes.

This includes the absence of a clear explanation for how the ELMs, LNRSs, and BNG will operate together. These are key delivery mechanisms for the EIP, and their interactions should be explicitly set out and spatially mapped within the Land Use Framework.

Critically, the consultation does not adequately show how proposed land use changes will contribute to the statutory targets in the Environmental Improvement Plan. A robust Framework must allocate land functions in a way that delivers EIP goals and supports the Outcome Indicator Framework. This should include visual tools that demonstrate how land categories cumulatively contribute to national environmental outcomes.

The consultation also fails to address the role of Environmental Outcome Reports (EORs), currently under development by MHCLG. These must align with the Land Use Framework so that project-level decisions support national environmental targets rather than conflict with spatial land use priorities.

Without clear coordination across ELMs, BNG, LNRSs, and the EOR system, the risk is inefficiency, overlap, and a lack of confidence among landowners, planners, and developers to make long-term, sustainable decisions.

Livestock farming is not considered in the context of net zero and land use, and should be included in the final framework.

There is no inclusion of intertidal land. This is an area that holds potential for increased environment and climate benefits and is recognised in Biodiversity Net Gain and should be also in any land use framework.

Rewilding should be a feature of category 1 – please consider the inclusion and role of rewilding in the final framework.

QUESTION 2: DO YOU AGREE OR DISAGREE WITH THE LAND USE PRINCIPLES PROPOSED?

IEMA broadly support the principles and IEMA support the emphasis on the need for a long-term view.

The principle on decisions fit for the long term should also embed a requirement that long-term land use decisions demonstrably contribute to statutory EIP targets, using data and mechanisms already established under the EIP monitoring framework.

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Co-design and aligning spatial strategies must include other schemes such as BNG, LNRS, Regional Spatial Strategies and Local Plans, etc. The co-design principle must ensure alignment across Government departments and planning regimes, including MHCLG's development of EORs and wider planning reform. Environmental assessments and land use strategies must draw from the same evidence base and spatial logic to deliver consistent outcomes for nature and climate.

Co-design must also apply to the alignment of existing mechanisms such as ELMs, BNG, and LNRSs. These should not be developed or implemented in silos. The Land Use Framework offers a vital opportunity to weave these into a coherent delivery system, using shared spatial priorities, common language, and agreed performance metrics.

The principle on multifunctional land is not clear – biodiversity and ecosystem services would be better to be highlighted as a need alongside societal (though they do support societal needs but currently the text seems to consider nature in relation to housing) and environmental pressures should include mitigating climate change.

We recommend that the Land Use Framework embed binding spatial principles that prioritise nature recovery, biodiversity conservation, and environmental functionality. These must be linked directly to statutory environmental targets, especially those in the EIP and the Government's 30x30 commitment. LNRSs should be the core mechanism for spatially targeting land use change, supported by clear mapping of biodiversity priorities, climate vulnerabilities, and areas of ecosystem service value.

Spatial principles should give priority to actions that deliver environmental benefits in areas where they are most needed and can be most effective—such as restoring wetlands in flood-prone catchments or targeting pollinator habitats near arable farming regions. Without such spatial logic, the framework risks being too generic to guide effective action.

We also recommend clear criteria or thresholds for how these spatial principles will influence land use incentives, planning decisions, and environmental reporting. This could include a "nature recovery hierarchy" to support prioritisation and reduce trade-offs between food, infrastructure, and biodiversity outcomes.

With reference to new homes that are resilient to flooding – new homes should not be built in areas that are prone to flooding and instead spatial strategies should identify how to avoid this.

The principles sound aspirational rather than practical and IEMA would like to see more detail on how these principles will be enforced/encouraged/communicated within the context of any policy/legislation in the next iteration of a land use document.

QUESTION 3: BEYOND GOVERNMENT DEPARTMENTS IN ENGLAND WHICH OTHER DECISION MAKERS DO YOU THINK WOULD BENEFIT FROM APPLYING THESE PRINCIPLES?

IEMA believes that yes, these principles should apply to combined and local authorities (including planning authorities) and landowners and land managers (including environmental heritage groups).

Others to whom these principles should be applied include housing and infrastructure developers and the water industry.

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There is no mention of the meta data in taking a spatial approach – there needs to be a body who is able to look at strategies and data collected that offers an overarching spatial view but also allows individual Government departments, local authorities, combined authorities and others relevant stakeholders to access spatial information that is local or relevant to them.

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?

Government could be more interventionist in order to ensure nature restoration. The Government could set mandatory or voluntary biodiversity net gain (as for developers and NSIPs under the Environment Act), environmental net gain or nature positive targets for protected sites, agricultural land, and specific non-agricultural land.

The Government could set up a scheme to strongly encourage voluntary reporting that includes standard ways to measure and report. Voluntary reporting may create reputational enhancement, investor confidence, and attract employees. This would mirror the requirement in the Global Biodiversity Framework for businesses (and landowners tend to be businesses) to report their impacts and dependencies on nature.

Government must also provide joined-up guidance on how ELMs, LNRSs, and BNG interact. These schemes should be integrated into a single, comprehensible delivery framework so that farmers and landowners can make confident, long-term land use decisions. The Land Use Framework should become the reference point for understanding how multiple schemes operate together across landscapes.

Consistency and certainty are key to those businesses in, and dependent on, the agricultural sector. It may seem counter-intuitive to the trope that business hates red tape, but where changes can be embedded in regulation it can ensure continuity across changing governments over time and leads to business having the confidence to invest in change (knowing that it is unlikely to be reversed).

Consistency and certainty are also key for funding. The unexpected removal of the Sustainable Farming Incentive has forced farmers to suddenly reconsider their income stream and activities. Changes to funding must be gradual and flagged well in advance, alongside alternatives and bridging funding while businesses adapt their plans and budgets.

Presenting the return on investment with practical examples of land use changes will provide inspiration and assurance that the changes needed can continue to support their business.

QUESTION 6: WHAT SHOULD THE GOVERNMENT CONSIDER IN IDENTIFYING SUITABLE LOCATIONS FOR SPATIALLY TARGETED INCENTIVES

The Government must understand which land and crops can provide the greatest, most useful and most income-creating yields that also support nature recovery. This approach must consider other Government policy and regulation and schemes.

Therefore, spatial targeting of incentives must be informed by up-to-date biodiversity mapping and the spatial priorities identified in LNRSs and other statutory plans. These tools should form the foundation of a

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spatially intelligent approach, helping to direct funding and land management toward areas that can deliver the highest environmental returns.

The consultation should also consider land types currently excluded from the four main categories, including peri-urban land, former industrial sites, intertidal land, and underused public estates (e.g. Ministry of Defence land or local authority holdings). These offer untapped potential for nature recovery, carbon sequestration, and green infrastructure, especially near communities where co-benefits are high.

Land use change should be primarily borne by larger landowners where their land will be impacted less overall. The best land for food can still contribute to environmental/climate benefits.

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?

Landowners need to understand what the benefits are to the land owner/sector, to food production and/or for environmental and climate benefits, of any land use change. This can be done through communication, education, and promotion by the Government in tandem with local authorities.

A clear land use framework needs to set out land use change and nature enhancement required by landowners, how it can be achieved (real examples) and how that will be funded. This includes the contribution to 30 x 30 and the EIP. This can create a 'golden thread' that runs from Government to the agricultural sector.

In 2024 Countryside and Wildlife Link called for a nature-positive Sustainable Farming Advisory Service[2] at a free (or affordable at cost), widely accessible and high-quality advice offer for farmers to ensure the right actions are targeted in the right place on the right farms. Such an advice service seems likely to give farmers confidence to understand and invest in land use changes.

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?

Reduce land use degradation and promote through communication good land use practice that supports food production and environmental and climate benefits, across all land use.

Targets for food production linked to environmental targets would help understand requirements for food production and the actions required by landowners.

Having baseline information on how much we displace food production and environmental impact abroad currently would be useful to measure against and allow changes to be identified and understood and mitigated.

[2] https://wcl.org.uk/docs/assets/uploads/Link_Briefing_Priorities_ELMS_July_2024.pdf

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QUESTION 9: WHAT SHOULD GOVERNMENT CONSIDER IN INCREASING PRIVATE INVESTMENT TOWARDS APPROPRIATE LAND USE CHANGES?

The blockers to private investment on all land tend to be:

- Uncertainty in long-term Government commitment.
- A high risk of negative environmental impact on land (floods, extreme weather events, etc.)
- No clear structure to what investment means and what a ROI might look like or any regulation around this kind of investment.
- Lack of responsibility or a mechanism for/ability to monitor investments in nature over time.
- Committing land to a 30-year rewilding or BNG scheme when at some point during those 30 years there might be an opportunity to sell the land for greater monetary return for an activity with greater value, such as housing.

As mentioned before, consistency and stability in Government policy and regulation supports investment, as does a demonstrative ROI.

For nature-based solutions, there is an opportunity to engage business to protect their source of goods and services that supports their business (including crops). Mandatory reporting for business can facilitate this.

Philanthropic investment can provide opportunities for business to enhance their reputation but could also be seen ironically as 'greenwashing'.

QUESTION 10: WHAT CHANGES ARE NEEDED TO ACCELERATE 30X30 DELIVERY, INCLUDING BY ENABLING PROTECTED LANDSCAPES TO CONTRIBUTE MORE?

Protected landscapes need strengthened legislation around governance including measuring and monitoring and the provision of resources to do this. There should be required, regular reporting on impacts and improvements and actions taken in response to mitigate negative impacts on a site.

Some protected sites may be too degraded to provide the level of enhancement required. There must be figures and evidence before distributing any amount of nature recovery to protected sites and any enhancement must be suitable for that site.

There must be more resources to enforce penalties for illegal environmental activities on protected sites (and on all sites).

Green/blue land needs to be considered more for use by nature (and people) – it provides both potential for biodiversity enhancement and can also provide nature pathways.

Protected landscapes and 30x30 delivery should be aligned with the Land Use Framework's spatial principles, ensuring coherence between nature recovery targets and actual land use change on the ground. This includes embedding the use of spatial biodiversity data and LNRS priorities when designating or enhancing 30x30 sites.

Scenario analysis should inform which land outside existing protected areas could help deliver 30x30 and other EIP goals. This would make the framework more flexible and adaptive as pressures on land use intensify.

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QUESTION 11: WHAT APPROACHES COULD COST-EFFECTIVELY SUPPORT NATURE AND FOOD PRODUCTION IN URBAN LANDSCAPES AND ON LAND MANAGED FOR RECREATION?

Local authorities offer the greatest opportunity to support nature in urban areas but often do not have the resources (knowledge, money, people) to act on this. Local authorities must be funded to upskill themselves to help them, with their local communities, to make the best decisions to create environmental and climate benefits.

For other land managed for recreation, there needs to be an incentive to act. This could be the promotion of good practice through BNG or ENG or nature positive reporting (see question 4 above).

QUESTION 12: HOW CAN GOVERNMENT ENSURE THAT DEVELOPMENT AND INFRASTRUCTURE SPATIAL PLANS TAKE ADVANTAGE OF POTENTIAL CO-BENEFITS AND MANAGE TRADE-OFFS?

Good data is key to ensure that trade-offs are considered effectively, alongside knowledge and understanding of the likely trade-offs that might occur. This requires good communication and education from the Government and local authorities.

We recommend a statutory link between the Land Use Framework and Environmental Outcome Reports, requiring that all EORs assess the alignment of proposed development with spatial land use priorities. This would improve coherence between project-level planning and national land strategies and ensure better management of environmental trade-offs.

QUESTION 14: HOW CAN GOVERNMENT SUPPORT CLOSER COORDINATION ACROSS PLANS AND STRATEGIES FOR DIFFERENT SECTORS AND OUTCOMES AT THE LOCAL AND REGIONAL LEVEL?

Government should avoid a top-down approach and create plans with different sectors and local and regional level government. Plans should use what processes/resources/information is currently available first, considering what's already being done and building on that wherever possible.

Link all spatial and site development including LNRSs alongside BNG, biodiversity duty, public services, wellbeing etc. in the duty of local and regional authorities (like the biodiversity duty).

QUESTION 15: WOULD INCLUDING ADDITIONAL MAJOR LANDOWNERS AND LAND MANAGERS IN THE ADAPTATION REPORTING POWER PROCESS SUPORT ADAPTATION KNOWLEDGE SHARING?

Adaptation and climate risk must be a key part of a land use framework and be part of strategic spatial planning and considered alongside nature to create nature-based solutions. Adaptation can mitigate flooding and land loss. Major landowners and land managers, as businesses, should report under the adaptation reporting power.

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QUESTION 16: WHAT ACTIVITIES DO YOU THINK SHOULD BE PRIORITISED?

All of the listed options provided should be prioritised. The preferred option is for supporting the right actions in the right place in a changing climate because this requires informed local decision making, understanding how to turn local information into tangible actions, a clear picture of a 2C scenario etc. Ultimately, the best option will be context specific.

Oversight and enforcement of nature-positive actions that should be carried out by local authorities but are not, should be improved – who is to know that a local authority is not undertaking its biodiversity duty, for example?

QUESTION 17: WHAT CHANGES TO HOW THE GOVERNMENT'S SPATIAL DATA IS PRESENTED OR SHARED COULD INCLUDE ITS VALUE IN DECISION MAKING AND MAKE IT MORE ACCESSIBLE?

Data must be brought together in a standardized way – similar level of content in similar formats (i.e. using meta data standards) - with an incentive for private data collections to be shared in a way that's easy (in terms of cost and tech associated) and accessible. (See also question 18.)

We recommend the creation of a national environmental data observatory that integrates datasets relevant to the Land Use Framework, including biodiversity condition, habitat extent, land use type, ecosystem service mapping, and carbon flux. This should be linked to the EIP Outcome Indicator Framework to support national accountability and help decision-makers track environmental progress at multiple scales.

Data sharing from private actors (e.g. ecological consultants, developers, landowners) should be encouraged through a combination of incentives (e.g. fixed price data purchases, recognition schemes) and policy signals. Over time, reporting to a national data platform should become standard practice where public money is received (e.g. ELMs) or environmental assessments are required (e.g. EORs).

Given the urgency of the need, the environmental data platform should be mandated and funded as part of the framework's first phase, rather than be seen as a long-term aspiration

QUESTION 18: WHAT IMPROVEMENT COULD BE MADE TO HOW THE SPACTIAL DATA IS CAPTURED, MANAGED OR USED TO SUPPORT LAND USE DECISION IN THE SECTORS?

There must be a standardised structure to how data is captured in terms of level of data, type of data, and technology used to capture and store the data, ensuring that the way data is captured is the most up to date and most commonly used method. The data should adopt meta data standards and will need to be updated as required. It could be that the standardised structure will be different across types of land.

The Land Use Framework should support cross-sector data alignment through common schemas and protocols - for example, enabling ELM scheme participants, LNRS authors, BNG assessors, and planning authorities to use the same spatial layers and ecological indicators. This not only enhances consistency but also enables the integration of local monitoring efforts into national reporting.

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QUESTION 20: WHICH RESOURCES OF SPATIAL DATA SHOULD GOVERNMENT CONSIDER MAKING FREE OR EASIER TO ACCESS, INCLUDING VIA OPEN LICENSING TO INCREASE THEIR POTENTIAL BENEFIT?

Local Environmental Records Centres (LERCs) are a recognised source of information already and could be a good resource to reference with support to provide affordable or free information. However, this could only be done if LERCs were adequately resourced to allow costs to be covered and therefore enable data to be provided freely at no risk to the LERCs organisational resilience.

In addition, Government should review which high-value national datasets (e.g. habitat condition, protected species ranges, agricultural land classifications) could be made fully open access. A long-term solution should involve core public funding for data custodians (including LERCs) in return for their contributions to a national open data platform aligned with land use and EIP delivery.

QUESTION 21: WHAT GAPS IN LAND MANAGEMENT CAPACITY OR SKILLS TO YOU ANTICIPATE AS PART OF THE LAND USE TRANSITION?

Green skills are key to the success of the land use transition and nature enhancement ambitions. There are critical shortages across ecological, soil, and environmental data professions, including:

- Ecologists and biodiversity surveyors
- Soil scientists and agroecology experts
- Natural capital experts and environmental economists
- GIS and spatial data analysts
- Land use planners with environmental specialization
- Local authority officers capable of interpreting and enforcing environmental duties

In addition to technical specialists, strategic and operational upskilling is required for farmers, advisors, estate managers, and local community organisations. These skills include interpreting local environmental data, using land classification and habitat maps, understanding nature markets (e.g. BNG, carbon), and applying adaptive management techniques

We recommend that Government work with professional bodies (e.g. IEMA, CIEEM, RTPI) and further education providers to:

• Co-design a National Land Use Skills Strategy
• Create accredited short courses and micro-credentials to train the current workforce
• Provide support for upskilling within local authorities and advisory services
• Fund a new Land Use Transition Advisory Network, modelled on existing successful partnerships like Catchment Partnerships or Farm Advice Services.

The Land Use Framework should identify these capacity needs and explicitly set out how skills development will be resourced and delivered.

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Given the urgency of the needs, it is recommended that the suggested Land Use Skills Strategy should be developed and piloted within the next 12 months, with priority placed on supporting local authorities and land advisors in the interim.

QUESTION 23: SHOULD A LAND USE FRAMEWORK FOR ENGLAND BE UPDATED PRIORIODICALLY AND IF SO HOW FREQUENTLY SHOULD THIS OCCUR

The framework itself should be updated about every 7 years with regular reports on the operational successes and challenges in the interim that are acted on, and with the information being captured for the next update. If there are dramatic issues regarding the plan then the option to update sooner should be available, alongside appropriate governance and safeguards.

QUESTION 24: TO WHAT EXTENT DO YOU AGREE OR DISAGREE WITH THE PROPOSED AREAS OF GOVERNANCE?

The proposed areas of governance seem agreeable.

A strategic oversight function would have to include oversight of the actual policies such as Land Use, ELMs, LNRSs, etc. (along with advice for landowners noting that this links to the proposed spatial analysis function). It should also include oversight/a central resource for data. The oversight function must have powers of referral for non-compliance (referral to an organization that has enforcement responsibility).

For open policy making in collaboration with research organisations, this should also key stakeholders in land use.

CLOSING REMARKS

IEMA urges the Government to ensure that the Land Use Framework is more than a mapping or categorisation exercise. It must be a strategic delivery platform for legally binding environmental targets, supporting alignment across departments, spatial planning systems, and funding programmes.

Delivering the ambitions of 30x30, Net Zero, and the Environmental Improvement Plan will require not only spatial clarity, but also a step-change in skills, data systems, governance, and investment certainty. We are calling for a framework that enables practical transformation and we stand ready to support Government in building it.

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MORE INFORMATION

IEMA are happy to work with DEFRA on these proposals and to discuss any of these points, or additional ones, further.

For more information on this consultation response please contact:

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