

Department for Environment, Food & Rural Affairs

Land Use in England Consultation

Response from Propertymark

April 2025

Background

1. Propertymark is the UK's leading professional body of property agents, with over 19,000 members representing over 12,500 branches. We are member-led with a Board which is made up of practicing agents and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.

Consultation summary -

2. The Department for Environment, Food & Rural Affairs (DEFRA) are seeking views on the long-term changes in land use in England which they say is required to want to meet the challenges of climate and biodiversity changes, loss of natural habitats and unacceptable levels of pollution. The Department wants to start a public discussion on how land can deliver their missions for Growth and Clean Energy, boost food security, and meet statutory climate and nature target.
3. DEFRA is proposing to introduce a Land Use Framework on the back of the consultation which will create a toolkit to support decision making and inform discussions on long-term food security, supporting development and achieving targets on climate and nature.
4. The Land Use Framework will interact with other foundational strategies that DEFRA are developing; the Environmental Improvement Plan, a 25-year roadmap for farming, and a food strategy. And across government, the Land Use Framework will support sustainable growth, interacting with the Strategic Spatial Energy Plan as they accelerate to clean power by 2030, and driving the ambition to build 1.5 million new homes.

Propertymark response -

5. Propertymark welcomes the opportunity to respond to this consultation, as an organisation we represent property agents across the UK with a wide range of skills and expertise, many of whom

work in rural areas and deal directly with land management and development. The consultation also links to the UK Government's planning reforms which Propertymark has responded to a number of consultations and calls for evidence to represent agents views on achieving the government's target of building 1.5 million homes during the course of the parliament.

6. Overall, Propertymark broadly agrees with much of the information in the consultation document. We agree that there should be a balanced approach to changes in land use and recognise that there is a need for developers and land agents to be involved in this process as well as environmental organisations.

7. However, there are three points where we think the consultation response should make particular considerations:
 - Firstly, we think that the scale of change of land use required for residential development is massively underestimated. There is significant demand for new homes and therefore new infrastructure, community buildings etc which will take up substantially more hectares than DEFRA has estimated.

 - Secondly, there is a lack of joined up thinking between governmental departments, particularly where there is overlap between environmental principles and planning. The consultation mentions the Green Infrastructure Framework and the 'golden rules' for major development on green belt land under the National Planning Policy Framework but there is more scope for cross-governmental input. As well as looking to outside organisations, private utility companies, representative bodies and charities, who can help inform decision making while sharing information and best practice. Implementation of a working group on land use change would be a good place to begin these cross-organisational conversations.

 - Thirdly, the consultation proposes a significant amount of information should be exchanged in order to meet its goals. This information should be stored in a digital format to ensure it is in one place, easily accessible and can be added to and updated to inform future enquiries. Creating a digital 'logbook' of land and property builds a history of that location which can be referenced in the future and will provide an invaluable resource to help with buying and selling land and property.

8. For a small number of questions Propertymark has not provided a response, this is because we do not have the expertise to answer queries on these questions and the views of another relevant body should be sought.

Questions -

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

9. Propertymark agrees that there needs to be a change in land use in some areas, this is particularly key in delivering the number of homes required to bolster the housing market. The analysis states that “the scale of land use change required to deliver 1.5 million new homes is relatively small: around 30 thousand hectares (0.2%) by the end of the Parliament and around 150 thousand hectares (1.1%) if housebuilding were continued at the same rate to 2050.”
10. However, as the figure derived for urban expansion is an approximation and not based on the 1.5 million homes figure, there is concern that this is a significant underestimation especially when taking into account the amount of infrastructure required to maintain and operate this number of homes. There will, for example, be spatial implications of building new energy provision (solar and wind farms take up significant land area which are usually built on redesignated green space rather than brownfield sites) and supply networks such as electricity substations, sewage treatment centres, reservoirs, new road networks and public/ community buildings such as schools and hospitals which have large footprints. The 150 thousand hectare figure is a projected increase of only 5,172 hectares per year (2021 – 2050).
11. Looking at the latest data available from the Ministry of Housing, Communities and Local Government (MHCLG), in the three years from 2019/2020 to 2021/2022, 48,500 hectares of land change was from non-developed uses to developed uses.¹ This figure does not include land which is considered ‘non-developed use’ such as grassland and residential gardens, which in DEFRA’s estimation would be included within the 30,000 hectare figure as it does not fit into the other categories outlined in the land use consultation. In the context of MHCLG’s data, ‘developed use’

¹ [Land use change statistics – hectarage 2019-20 to 2021-22 statistical release - GOV.UK](#)

also includes other land uses such as industry and commerce, transport and utilities and community services, which would all be expected to grow in line with an expansion of housing.

12. It is important to note that the period used in the example data above (2019/2020 to 2021/2022) includes the Covid-19 pandemic when construction and development was significantly impacted and house building was at a low, therefore the number of hectares of land change from non-developed to developed use is likely to be much lower than in a usual period of house building. Between 2013/2014 and 2017/2018 new developed use land came to an average of 29 thousand hectares per year², much more than the five thousand hectare estimate outlined in the Land Use consultation.

Question 2: Do you agree or disagree with the land use principles proposed? Please provide any reasons for your response including any changes you believe should be made.

13. Propertymark agrees with the principles proposed, however, we have concerns that they are idealistic and optimistic in design and lack clarity and nuance. The proposed framework will need to go into more detail about how these principles can be achieved and how to create a fair balance across the country, to ensure that there is not an unfair weighting on one area or another in any of the principles. For example, principle three: *Playing to the strengths of the land*, is an important process for ensuring that land is used appropriately, however it could negatively impact areas where more house building is required but that land is designated for other uses. The largest portion of land which is required to change is Category four: *change away from agricultural land for environmental and climate benefits*. This change could see some areas lose farmland for renewable energy generation sites, which could impact on local economies if they rely on farming as a main source of income and negatively affect local agricultural land prices.
14. Furthermore, the areas which are going to be less impacted by the principles are urban areas; the consultation document gives only one mention of repurposing brownfield sites which it says would be covered by the Green Infrastructure Framework. Propertymark thinks that there should be more consideration for this type of land use change within this proposed framework, in order to link together the changes required to build the number of houses needed, the infrastructure that goes with it and protect biodiversity and food production at the same time.

² [Land use change: hectarage 2017 to 2018 - GOV.UK](#)

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

15. It is essential for their success that these principles are included in the National Planning Policy Framework and that local planning authorities include them in their local plans. There are three other decision makers that we would benefit from applying the principles:

- Firstly, as mentioned above, there needs to be joined up thinking in terms of changes of land use and best use of land, this should be across governmental departments as well as within local authorities. For example, taking into account changes in land use from agricultural to housing while considering the impact that new infrastructure, roads etc, will have on biodiversity in the area.
- Secondly, local planning officers are best placed to make decisions on the impact of the principles in their local area as they hold local knowledge and can make informed decisions about how to apply the principles without compromising other planning responsibilities and priorities.
- Thirdly, private developers should also be involved in the decision making process when applying the principles, since 1959 (with the exception of 1970 and 1977) private companies have built the majority of new housing in the UK. In 2023 private companies built 147,300 new dwellings (76%) out of a total of 193,010 new dwellings³. It is important to include private developers in the application of the principles, as they will need to build properties fit for the long-term “planning for new homes that are resilient to climate impacts, such as flooding and overheating” as well as working with local authorities and independent climate organisation such as The Land Trust and The Wildlife Trust to ensure that new developments can be beneficially multi-functional “such as the health benefits of co-locating new homes and nature”.

³ [Indicators of house building, UK: permanent dwellings started and completed by country - Office for National Statistics](#)

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?

Question 5: How could Government support more land managers to implement multifunctional land uses that deliver a wider range of benefits, such as agroforestry systems with trees within pasture or arable fields?

16. It is not relevant for Propertymark to answer these questions.

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

17. As noted in the consultation, there is a risk that changes could become concentrated in certain areas and thought needs to be applied to ensuring that long-term changes will create fair outcomes. This links back to our answer to question 2 about playing to the strengths of the land. The government needs to be attentive to ensuring that there is not a divide across the country where some areas are impacted more by urban growth and other areas are impacted by biodiversity developments, both negatively impacting on the food supply/ agricultural production of those areas. Furthermore, these disparities could create areas where agricultural land is at a premium price and others where it is much less valuable, yet there is need for agricultural development for food production across the country. DEFRA should work with MHCLG to develop clear planning procedures that sit within both the Land Use Framework and the National Planning Policy Framework which give fair weighting to various land uses across the country.

Question 7: What approach(es) could most effectively support land managers and the agricultural sector to steer land use changes to where they can deliver greater potential benefits and lower trade-offs?

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?

18. It is not relevant for Propertymark to answer these questions.

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

19. There must be a comprehensive package of grants and subsidies to support appropriate land use changes as well as education to those who will make the changes. Cross-departmental, local planning authorities, non-governmental and private organisations such as the Woodland Trust and utility companies should be involved to bring together expertise in delivering changes to local areas. They need to provide education to landowners and to private companies looking to invest in land for a change of use in a sympathetic way to the environment. The consultation references the Planning and Infrastructure Bill, this is an example where the lines between government departments are blurred and joined up thinking is required to deliver necessary changes.

Question 10: What changes are needed to accelerate 30by30 delivery, including by enabling Protected Landscapes to contribute more?

20. It is not relevant for Propertymark to answer this question.

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

21. Local authorities should work with developers to ensure that there are adequate green spaces, trees planted and sizable gardens per property on new residential developments, to enable residents to make best use of the land for environmental improvements. There should be no limits or restrictions on how a green space within a development can be utilised by residents, local residents' organisations and residents' management companies, in the case of freehold estates, should be given responsibility to work with homeowners to develop green spaces how the community sees fit. This will often result in more biodiverse spaces and projects such as community orchards, as well as giving the local community ownership of their surroundings, which in turn will make them more likely to upkeep those spaces.

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

22. It is Propertymark's view that local authority local plans will need to align with spatial strategies as well as nature-based policies and climate objectives in order to deliver the ambitious development and infrastructure targets the UK Government has set itself.

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

23. Local planning authorities will have to take responsibility for ensuring that land used for transport planning is the most efficient for residents and has the least environmental impact. Where possible, extensions of public transport including rail and bus networks, which connect with appropriate employment opportunities, will increase the popularity and desirability of a new residential area. As well as integrating green travel solutions throughout developments and transport networks such as dedicated footpaths and cycle ways. Planning of new developments needs to take into account transport options other than simply car use, which will overall improve the saleability of a site and the health and wellbeing of the residents.

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

24. While local planning authorities are best placed to know and understand their own land needs and opportunities for change, there should be oversight by other governmental and non-governmental organisations which can support different perspectives on a particular area and feed into local plans, land viability studies and planning decisions. As mentioned throughout this response, there should be joined up working to ensure a balanced approach to change in land use. Each organisation or authority will have its own priorities and targets to meet, but in working together this should be mitigated and produce the best outcomes. By having both national and local oversight of land use this should limit regional disparities.

Question 15: Would including additional major landowners and land managers in the Adaptation Reporting Power process (see above) support adaptation knowledge sharing?

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.

25. It is not relevant for Propertymark to answer these questions.

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?

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?

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

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?

26. In answer to questions 17 to 20 collectively: Propertymark supports greater use of Unique Property Reference Numbers (UPRNs). These can be used a tool to hold a wide range of data about a property, including the fabric of the building, any energy efficiency improvements and utility connections (i.e. spring fed or mains water supply). UPRNs could be utilised to hold additional information such as the government's spatial data, linking with land registry, to give a better and wider understanding of the property and its assets, particularly rural properties and those with land. Digital property 'logbooks' can be used with the UPRN to hold a significant amount of data which would link to all of the suggestions in question 18 including land access, environmental surveys, pollution testing and Agricultural Land Classification grade. By keeping records in one digital location then it can easily be maintained and updated, and it would become invaluable material information at the point of selling the property or land. As much information as possible should be free to access, by keeping it in a digital property 'logbook' or database this creates a history and ongoing record of a property which can be accessed by all relevant parties. Propertymark understands that Land Registry and Ordnance Survey require fees in order to operate effectively, these costs should be kept under review to ensure that they are not prohibitively high.

Question 21: What gaps in land management capacity or skills do you anticipate as part of the land use transition?

27. As mentioned in our response to question 9, education is key to ensure understanding of land use changes, impacts of environmental policies and the best use of land. This could be through DEFRA or non-governmental organisations such as environmental charities. This education should be available to planning authorities as well as developers and land agents.

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

28. Representative bodies should be invited to join with other organisations to set up a working group which meets regularly to share information on land use and land use changes. The Agriculture and Horticulture Development Board (AHDB) does not appear to have a wide enough scope or remit to disseminate information to developers and environmental organisations and other relevant parties. A wider ranging group would be able to feedback to members, help educate and take forward best practice ideas which come from across the sectors.

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

29. Yes, the Land Use Framework should be reviewed every five years, this will keep it under review and in line with the requirements of the National Planning Policy Framework.

Question 24: To what extent do you agree or disagree with the proposed areas above?

30. Yes, Propertymark agrees with the proposed areas in the consultation document. A strategic oversight and cross-governmental analysis supports the ongoing theme throughout our response that there should be greater joined up working in order to achieve the aims of the framework. Furthermore, use of digital data collection from across sectors which builds a picture of the land and/or property would be invaluable to futureproofing this work and ensuring clear information can be referenced and relied upon.