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The Centre for Rural Policy Research

Summary Response to the UK Government's Consultation on the Land Use Framework

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In the following Brief the Centre for Rural Policy Research at the University of Exeter provides a high-level summary of its response to the UK Government's consultation on the Land Use Framework¹

- 1. The consultation document suggests that the proposed changes are 'critical to make agriculture and food production more resilient to climate change'. The proposed changes could, in fact, threaten agricultural resilience and food security. Whilst the government acknowledges that the LUF will need to be implemented alongside a forthcoming Food Strategy it seems premature to propose this level of land-use change away from agricultural production based on the strength of the evidence provided.**
 - A detailed analysis has been made of the land-use requirements to meet statutory obligations around the environment, but a similarly detailed analysis has not been undertaken on the food provisioning capacity of the reduced footprint and geographical distribution of the area remaining primarily in agricultural production.
 - The analytic annex admits to significant uncertainty in its prediction that this reduced area of land can continue to provide the same amount of food (if not more) than the current agricultural land base.
 - The annex further admits that the effects of climate change and the increasing prevalence of extreme weather events have not been taken into account when drawing assumptions about future food security and resilience.
 - Apart from giving due consideration to the impacts of climate change and extreme weather events, an aligned food and land-use strategy also needs to give detailed consideration not just to the total amount of food we wish to produce, but to the types, quality, diversity and distribution of the foods we produce.
 - In delivering the LUF more closely with a Food Strategy greater attention must also be paid to the benefits of increasingly heterogeneous food production (mixed farming including

¹ The consultation and analytical annex is available at: <https://consult.defra.gov.uk/land-use-framework/land-use-consultation/>

horticulture) over more of the farmed land area coupled with supporting the development of local supply chains. Such strategies are also important for enhancing resilience at the community level and may also be more reflective of changing dietary preferences over time. At present the LUF does not provide support for sustainability and resilience measures targeted at short supply chains and enhanced and more diverse regional production of food.

2. We agree and acknowledge that the balancing of priorities for food production, nature recovery, climate mitigation and adaptation, infrastructure and economic development are a critical policy issue of our time and need to be addressed at the National Level. We are concerned, however, that an overly national focus may lead to regional disparities and injustices in terms of how the benefits and disadvantages of land-use change play out.

- The consultation report indicates that nationally 14% of utilised agricultural land will be taken out of primarily agricultural production (combining category 3.2 and category 4 changes), but because of the commitment to protect the highest grade food-producing land this means that the loss of agricultural land will be significantly higher in some regions (such as the Southwest) and lower in others (e.g. South East England).
- These differences are indicated in Figure 10 of the Analytical Annex but detailed figures on the sub-national scale of change are not provided.
- The government should provide a sub-national breakdown of predicted land-use change so that the disparities and potential injustices can be identified, discussed and addressed.
- To minimise the regional imbalances associated with these changes and achieve ‘just transitions’, Government should consider routes for protecting (a proportion) of good quality agricultural land at the regional rather than national level.

3. The LUF primarily sets out a vision of land-use changes away from agricultural production. Despite the positive messaging around the benefits of land-use change for agriculture and farmers, this inevitably will come across to farmers as starting from a position of sacrificing agricultural land, which is unlikely to encourage the positive buy-in and engagement of the agriculture sector at a time when they are feeling existentially threatened and undervalued on account of other recent legal and policy changes (e.g. to inheritance tax).

- It also underplays the benefits of approaches such as conservation farming, regenerative agriculture and agroecology in providing integrated food production and positive environmental outcomes.
- We propose that the LUF should provide a framework for genuine decision-making and change across all land-use types and foster an open co-created discussion of how the desired outcomes should be achieved.

4. The consultation puts forward multi-functional land-use as a principle to support strategic spatial planning but does not substantively support a move toward more genuinely multifunctional agricultural and horticultural production (within which food is not only an incidental by-product).

- The LUF states that ‘most changes are about making land more multifunctional’ but this only rings true when Categories 2 and 3.2 are classed as such alongside 3.1. Category 3.1 changes, however, seem closest to supporting a multi-functional transition but this is relatively small (4% of current UAA).
- Taken together, the relative emphasis given to different types of land-use change within the LUF support the idea that food production and environmental delivery need to be separated out (land-sparing). It would be useful if the analysis could compare an alternative set of options, which give greater emphasis to Category 3.1 type changes and/or more strongly justify the strength of preference given to Category 3.2 and Category 4-type changes.
- The three-compartment model described in Methodological Box three of the Annex seems to have a relatively small ‘middle box’ under the changes proposed.

5. We welcome the identification of the South West as well-positioned to deliver environment and food in equal measure through agroforestry (Table 5 – Annex). We believe however, that there is scope to think beyond agroforestry within the context of Category 3.1 type changes. The LUF could be more ambitious in promoting and analysing the potential of other types of farming system (e.g. nature-friendly, agroecological) that can co-deliver food and environmental benefits in more equal measure.

6. The LUF lays out ‘co-creation’ and ‘co-design’ as core principles in its approach to land use change going forwards, acknowledging the history of remote, ‘top-down’ decision making about our land, and the importance of working in partnership with farmers and land managers. We enthusiastically support this approach: however, we are concerned that it may become – or be perceived as – a superficial exercise in legitimisation.

- We find the prominence of co-creation in the main consultation document alongside its absence in the Analytical Annex concerning.
- There is a significant risk that a ‘superficial’ approach to co-creation could induce further cynicism, ‘buy-out’ rather than ‘buy-in’, and drive further public polarisation of agriculture and environment.
- The government should ensure that co-design processes are coherently integrated throughout, including citizen-led data gathering and innovation, policy formation and deliberative decision-making.
- To ensure that the knowledge and skills to bring about land use change reach where they are needed, agricultural advice should go beyond sectorial silos to include environmental management, be site based, free to access and create mechanisms for multi-way information exchange including feedback from farmers/land managers.



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