Response from the Trees and Design Action Group to the House of Lords Select Committee on Land Use in England call for evidence

The Trees and Design Action Group (TDAG) was founded in 2007 as a not for profit and apolitical collaborative forum to promote best practice in the planning, planting and management of urban trees. TDAG was incorporated as a charitable trust in 2013.

The group shares the collective vision that the location of trees, and all the benefits they bring, can be secured for future generations through strong collaboration in the planning, design, construction and management of our urban infrastructure and spaces.

The uniqueness of TDAG is that, as an organization, it crosses the boundaries associated with professional disciplines engaging with a wide range of professionals who have an interest in trees and the built environment. They include leading built environment practitioners and developers as well as organisations such as the Forestry Commission, the Woodland Trust, the Tree Council and the Community Forests. No other built environment organization in the UK provides such an effective forum or communicates with such a wide range of disciplines.

The key strength of TDAG is that those taking part in TDAG's work can do so in TDAG's name i.e., a neutral organisation with no commercial agenda influencing its guidance, proposals or actions.

TDAG has produced a series of good practice documents especially *Trees in the Townscape: A Guide for Decision Makers; Trees in Hard Landscapes: a guide for delivery* and is currently developing *Trees, Planning and Development: A guide for delivery* to complete a trio of documents providing a very broad understanding about the urban forest. In addition, we have produced in association with Dr Andrew Hirons at Myerscough College with support from NERC *Tree Species Selection for Green Infrastructure: a guide for specifiers* and some short guidance documents *First Steps in Urban Air Quality, Urban Heat* and *First Steps in Valuing Trees and Green Infrastructure.*

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TDAG welcomes this inquiry and the challenges outlined and questions raised.

1. TDAG works across the whole of the UK and has long been concerned tha,t unlike Wales and Scotland, England does not have a land use strategy or spatial planning framework and it is worth noting that UK 2070 concluded that we need a national spatial plan. It is also worth noting that 10% of the land in England is classified as urban and 83% of the population live in these areas (England Trees Action Plan).

2. How we use our land has a significant impact on how we respond to the challenges of climate and ecological breakdown, our commitment to delivering the UN's Sustainable Development Goals and how we can do so within the timescales needed.

3. Over the years many reports have been produced touching on the issue of land use (a list of references is provided at the end of this document):

- The two key Treasury reports, the Stern Review of 2006 set out the economics of climate change and the Dasgupta Review of 2021 the economics of biodiversity.

Both reports clearly set out the case for effective action and effective land use planning has a key role to play here.

- The Climate Change Committee has also put the case for the role of land use in achieving a net zero UK - *Land use: policies for a net zero UK* in January 2020.

- The Environment Act and 25-Year Environment Plan focus on the role of nature-based solutions with green recovery networks etc.

- The Environment Agency has four projects underway looking at flooding and coastal erosion.

- The National Food Strategy is another element involved with land use planning.

- The Food Farming and Countryside Commission is running two land use pilots in Devon and Cambridgeshire and these should teach us a great deal about local delivery.

- The Levelling Up White Paper produced by DLUHC should also be informed by land use if effective levelling up is to be achieved as will the Planning White paper when it is delivered.

4. In short, we have a great deal of information, but what we don't have is a consistent and integrated application of the information onto a geographical map of England so that some of the critical decisions that need to be made to respond to the climate and ecological emergency can be made within context – at a landscape planning scale – spatial planning – regional planning, whatever the terminology, this is what we are asking for!

5. The key points that TDAG would like to make are:

   (i)   Many issues relating to land use are interconnected and so it should be examined at a systems level showing the relationship between soil health, food growing, carbon capture, renewable energy and biofuels (although this last should not be a priority compared to food growing), all aspects of water management, tree planting for carbon capture and productive forestry for construction, restoring all aspects of nature and biodiversity including the restoration of upland and lowland peatlands, moorlands, wetland, where development should take place, sustainable transport networks, ensuring access to nature for all for leisure, education and mental and physical health and wellbeing.

   This means that:

   (a) Critically and urgently, government departments really need to align with one another in the context of the national spatial plan and ensure that their aims and outcomes are congruent. This should include, as a minimum, the Treasury, DLUHC, Defra, DfE, DfT, DHSC as well as the work of the National Infrastructure Commission, the Construction

Leadership Council, Integrated Projects Authority and the National Geospatial Commission.

(b) Government needs to set the critical standards for the climate and ecological emergency that all decisions need to satisfy so that the aims of the Environment Act, the outcome of the Levelling up White Paper et al, reflect and complement each other, as they need to.

(ii) The proposed Environmental Land Management Schemes (E.L.M.S) raise the issue of public good and the concept of public good should permeate all decision making. This means that 'planning' needs to be restored to what 'planning' was intended to be so that it focuses beyond development control to delivering the public goods and value that are needed.

We would draw the Committee's attention to the recommendations in the recent report by the Digital Task Force for Planning (https://digital4planning.com/a-digital-future-for-planning/)

(iii) What TDAG considers missing is consistent open source or at least affordable real time data and mapping systems so that the necessary layers of decision making can be consider concurrently. If government (the National Geospatial Commission?) could take the lead and clarify the data and mapping systems so that they were congruent and integrated, then this would make a tremendous start in terms of developing a national spatial plan.

(iv) When we talk of a national spatial plan, we are talking about getting a clear overview so that there is clarity about, for example, where to plant the 30,000 hectares of trees per annum until 2050 that the CCC is calling for without compromising other demands on land and the other interconnected considerations for decision making set out in our opening paragraph.

(v) A national spatial plan or land use framework would not negate the need for local land use planning as proposed by the FFCC pilots.

(vi) But this means that all local authorities should have their adopted local spatial plans so that their decision making is congruent and we don't have housing developments, for example, just because a housebuilder has done some 'cheap/opportunistic' land banking or in the case of biodiversity net gain sites for habitat banking, if acceptable, are part of a bigger plan linking to nature recovery networks, ambitions for school green spaces (as per the Sustainability and Climate Education Strategy) and so on.

6. In summary, a national spatial plan or land use framework for England would provide the focus for joined up working across all departments at both national and local government level with agreed standards for responding to the climate and ecological emergency emphasise public good as a priority in decision making.

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25th April 2022   sue.jamesriba@gmail.com

Land use references:

Government policy and documents

Environment Act (2021)
https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted
Improving the natural environment with focus on waste, air, water and biodiversity gain.

25-Year Environment Plan
https://www.gov.uk/government/publications/25-year-environment-plan

Under the Act the 25-Year Environment Plan "can move from ambition to reality as the first statutory Environmental Improvement Plan. "
Tony Juniper, Chair, Natural England:
https://naturalengland.blog.gov.uk/2021/11/23/the-environment-act-2021-a-turning-point-for-nature/

NPPF July 2021
11. Making effective use of land pp. 35 – 37
Mostly focused on how to deliver housing.

Food Strategy – Henry Dimbleby review
https://www.nationalfoodstrategy.org/

DLUHC – documents relating to land use in England
https://www.gov.uk/government/collections/land-use-in-england

House of Lord's debate putting the case for a land use framework 28th October 2021
https://lordslibrary.parliament.uk/land-use-frameworks-integrating-policies-in-england/

This led to the present inquiry.

Treasury commissioned reports

Stern Review (2005-6)
In July 2005, the then Chancellor of the Exchequer, Rt Hon Gordon Brown MP, commissioned Sir Nicholas Stern to report to the Prime Minister and the Chancellor by Autumn 2006 on an evidence-based assessment of the economics of moving to a low carbon global economy and the implications of that assessment for the UK.1 Sir Nicholas was then Head of the Government Economic Service and former chief economist at the World Bank. On 30 October 2006, Sir Nicholas' review of The Economics of Climate Change was published. On publication of the Review, HM Treasury described it as "the most comprehensive review ever carried out on the economics of climate change".

Treasury Select Committee Inquiry into Stern Review (2006)
https://publications.parliament.uk/pa/cm200708/cmselect/cmtreasy/231/231.pdf

Dasgupta Review: The Economics of Biodiversity (2019-2021)
https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review
The Review demonstrates that in order to judge whether the path of economic development we choose to follow is sustainable, nations need to adopt a system of economic accounts that records an inclusive measure of their wealth. The qualifier 'inclusive' says that wealth includes Nature as an asset. The contemporary practice of using Gross Domestic Product (GDP) to judge economic performance is based on a faulty application of economics

Government Agencies

Natural England

Natural Capital Atlas (2020)
http://publications.naturalengland.org.uk/publication/6672365834731520

Nature recovery framework and local nature recovery strategies
https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network#:~:text=Local%20Nature%20Recovery%20Strategies%20(%20LNRS%20)%20are%20a%20new%20mandatory%20system,action%20and%20investment%20in%20nature.

Local nature recovery networks as part of the 25-year environment plan
http://publications.naturalengland.org.uk/publication/6105140258144256

Natural Capital Atlas
http://publications.naturalengland.org.uk/publication/6672365834731520

Environment Agency

"Flood and coastal erosion management plan" and has four pilot projects underway
https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2

Government Foresight Reports:

Land use futures (2010)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/288845/10-634-land-use-futures-summary.pdf
This Project has taken a broad and overarching look at the future of UK land use over the next 50 years. It demonstrates that there is a strong case to develop a much more strategic approach: to guide incremental land use change, incentivise sustainable behaviours, and to unlock value from land.

This report shows that a reappraisal is vital to help address major challenges ahead – for example, relating to demographic shifts, climate change, and rising demand for commercial and residential development in areas such as the South East of England. The challenge is to meet the rising expectations which will come with rising incomes; and to deliver a wider range of sustainable benefits from land. In particular, a more coherent and consistent approach is needed for managing the growing demands on land – at different levels of Government, and across the wider community of stakeholders involved in the many land use sectors.

Other:

House of Lords debate 28th October 2021 Land Use Framework Baroness Young
https://hansard.parliament.uk/lords/2021-10-28/debates/23AF7A56-3FAE-46FA-AF3C-A4108C1FBA89/Debate

CCC

The Committee on Climate Change published: *Land use: policies for a net zero UK* in January 2020
https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/

References:
- Professor Allan Buckwell (2019) Summary report, CCC land use advisory group

- Tim Benton (2019) Climate change and diets – a CCC discussion meeting

- Vivid Economics and ADAS (2020) Policy framework for deep emissions reductions and carbon removals in agriculture and land use in the UK

- Dr Iain Brown (2020) Scoping Wider Impacts of Low Carbon Farming

- Vivid Economics and CEH (2020) Economic impacts of Net Zero land use scenarios

- https://www.theccc.org.uk/wp-content/uploads/2020/01/Environment-Systems-Ltd-2020-Tree-Suitability-Modelling-%E2%80%93-Planting-Opportunities-for-Sessile-Oak-and-Sitka-Spruce-in-Wales-in-a-Changing-Climate.pdf

UK 2070 Commission
http://uk2070.org.uk/
https://www.theplanner.co.uk/news/the-uk-requires-a-spatial-plan

Natural Capital Research https://www.natcapresearch.com/

Various tree mapping systems
Some of these are commercial, some are open source, some are led by citizen science. At the same time local authorities have inventories of publicly owned trees but none of these systems actually 'talk to each other' in a consistent way for decision making. (NB. TDAG and Forest Research are running a workshop on this issue in June 2022 and will be happy to make outcomes available).