REA: Land Use Framework Consultation Submission

The Renewable Energy Association (the REA) is a not-for-profit trade association, representing British renewable energy producers and clean technology and promoting the use of renewable energy in the UK. It has around 550 corporate members, making it the largest renewable energy and clean tech trade association in the UK. More info available at www.r-e-a.net.

The REA has members involved in wide range of renewable and low carbon technologies across power, heat, transport and circular bioresources. All of these sectors have critical roles to play in the delivery of net zero. These sectors are also at differing stages of development, with the need for Treasury support to be appropriately applied to push sectors forward and address specific barriers to deployment.

Summary

Overall, REA support the principles and proposals in a Land Use Framework for England as providing much needed clarity and direction for the sector. We recognise this is a starting point and only the beginning of a long running process to implement meaningful changes to implement the Framework – which must include clear support for renewables and associated clean technologies in order to transition agricultural land to these priority areas.

In particular:

- A technology neutral approach is vital in terms of energy related matters and all renewable and clean technologies should be included;
- For biomass crops specifically, there is a real danger that very little will actually change unless there is demand for using those materials for energy purposes. As can be sometimes understandably reticent to change, policies to drive a demand for the material would need to be stable and long lasting (or at least, long enough for the period the farmer would have to commit to establish, grow and harvest the material). The failure to do this in the past is the key takeaway why miscanthus and other such crops have not been widely adopted despite some grants having been available – incentives for use of these materials in energy policies were never around for long enough to make much difference;
- There are a range of new and innovative practices and technologies that can be applied to agricultural land – for example our members believe as much as 20 TWh worth of biogas could be produced from UK rotational crops[1], and agrivoltaics can match up farming and energy production on the same land;
- We must learn from devolved nations' similar policies and experiences – for example Welsh farmers protested at the way that policy was handled, and the first Scottish Land Use Framework did not adequately recognise the opportunities from energy crops;
- There is clearly lots of interplay with other policies - eg The Farming Plan, 7th Carbon Budget response, CP30 and 30 by 30 and this must be considered carefully going forwards;
- Likewise, Government need to ensure joined up thinking between national, regional and local and related policy changes – eg the various spatial plans – Spatial Development

[1] Forthcoming, but based on work from BIP Europe: https://bip-europe.eu/downloads/?filter%5B%5D=19

Strategies for local plans; Strategic Spatial Energy Plans, and similar for water management, alongside Local Nature Recovery Strategies;

- The Biomass Connect research programme has been vital in growing the R&D side of biomass crops and it is essential it be funded beyond its current end date this year. The programme shows that such crops co-exist with other farming activities including food crop growth, and support biodiversity growth and sustainable farm diversification;
- In terms of rural issues in particular, rural decarbonisation ill require the full range of technologies, beyond electrification only and should include bioenergy options as a must including the use of renewable gases in transport and NRMM. Farming is starting the transition away from fossil fuels but this needs more impetus. Biofuel and gas tractors have a role to play in the transition to clean gas fuels on farms and in time this will include the use of green hydrogen for fossil fuel replacement, as well as biomethane[2].
- As with Net Zero policy generally, workforce resources and skills could be a major block on delivery if not addressed – we outline how to address these below;
- A review timeframe could be timed to coincide with the Carbon Budgets, running every 4 years to align objectives and delivery;
- A Framework must consider land use over time, recognising that output and environmental services can change from year to year across agricultural land. Temporal multifunctionality enhance farmers' flexibility and resilience. Temporal strategies should be considered alongside spatial strategies.
- There is a considerable need for a cross industry Expert Group or similar body, to drive forward the agenda over coming years as this is only the start of the process.

Consultation 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?

Strongly agree.

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.

We agree that a wholesale change is required, and this provides a unique opportunity to reshape our landscape to create and support more sustainable farming, rural and agricultural businesses, the environment, people, and nature.

Any changes should consider the role that good agricultural management can play by integrating food crops and biomass crops to the benefit of the soil over the long term. Regeneratively farmed arable land, which encompasses the use of long (5+ years) and diverse crop rotation, can

[2] During 2025, a number of initiatives are being planned on this topic, including a farm-scale biogas summit with officials from DESNZ, DEFRA and DfT at Askham Bryan in April, plus events at JCB and Cenex on gas fuels later in the year. Also, an event at New Holland's Basildon factory in June 2025. REA would be pleased to provide further details.

improve soil health, increase carbon sequestration, enhance biodiversity, decarbonise farming and support long-term agricultural resilience, all while producing sustainable food and biomass.

We recognise however this is just the starting point and the next stage of developing incentives and support is critical to achieving an ambitious land use framework.

QUESTION 2: Do you agree or disagree with the land use principles proposed?

Strongly agree.

Please provide any reasons for your response including any changes you believe should be made.

While the challenge will be in the detail, we agree with these high-level principles as they reflect the need and opportunities for multi-use of the same land, for example through energy crops and agrivoltaics and other renewable energy production and circular economy principles.

In addition, while we support these principles and understand the notion of using very good land for food production, flexibility must be provided for grid infrastructure, given route restrictions and the growing concerns over energy security and the need to support increasing energy demands for a modern economy.

The other guiding principles of: co-design; playing to the strengths of the land; decisions fit for the long-term; and being 'responsive by design' are all important and appropriate.

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

We believe that Combined and Local Authorities (including local planning authorities), landowners and land managers (including environmental and heritage groups) are all important to engage with. This intersects with combined authorities' powers and responsibilities on planning and development of local Spatial Development Strategy (SDS) plans for their areas. As there's currently debate around local authorities having statutory climate change responsibilities, amongst other things, we expect they will be heavily involved in the likes of developing Regional Energy Spatial Plans.

Landowners and managers will be critical in terms of education and outreach to see the opportunities and necessity of the changes.

In addition, organisations like the REA and other relevant trade bodies should be consulted on. Representing around 500 members across power, heat, transport and circular bioresources, we have growers, producers, generators, landowners, and farmers within our membership who will be directly impacted by any future Land Use Framework and should therefore be involved in designing any principles for it. Our industry stands ready to help government to achieve an ambitious framework that is fit for the future, delivering for people and nature.

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?

Firstly, we need a long-term strategy for biomass crops, with clear and ambitious targets. Inconsistent, short-term policies historically have damaged confidence amongst growers and end-users when it comes to expanding biomass supply. To date, policy hasn't incentivised supply and demand in tandem. When supply was incentivised, government relied on the market to increase demand. When that didn't happen, a new policy would incentivise demand, while supply was decreasing. This approach was a result of short-term thinking, quick fixes, and poor engagement with industry, to ensure what was being implemented in policy, also worked in practice. Failure to continue funding the work of Biomass Connect, and the eight on-farm demonstration hubs, which showcase 10 biomass species and how they grow in each UK region, would be another example of short-term policy failure. This consultation, however, is an opportunity to address that.

Recent initiatives such as the Sustainable Farming Incentive (SFI) and Countryside Stewardship (CS) have created competition where shorter-term and not necessarily more sustainable activities are rewarded more highly than planting the likes of biomass crops or short rotation coppice (SRC), locking out significant proportions of appropriate land for domestic biomass supply, hampering energy security and socio-economic growth. For example, the above schemes often offer significantly higher payments to farmers for planting the likes of short-term flower mix or grassland, than for panting biomass crops on less agriculturally productive land. Using arable land for this type of short-term planting does not necessarily provide biodiversity or soil health benefits if intensive agriculture is resumed post-scheme.

Instead, a new set of incentives should offer long-term security for the planting of biomass crops, SRC and Short Rotation Forestry (SRF) with an income stream attractive enough to compete with other environmental subsidy programmes such as SFI. Help with up-front costs (an area where biomass crops can struggle to compete) or inclusion in SFI/related schemes would help to level the playing field.

It is also important that outdated perceptions of biomass as a competitor to food are addressed by Government. Biomass crops can be grown on marginal land and/or in rotation with other crops on off years in an agriculturally sustainable manner that does not compete with food. Such an approach strongly aligns with sustainable agricultural practices, delivering both food and biomass in a regenerative manner.

Additionally, the contribution of crops grown for Bioenergy with CCUS – tapping into the carbon removals market – should be further recognised and rewarded. Other countries, like the Netherlands, allow integration into GGR value chains via carbon credit sharing mechanisms, rewarding the farmer or landowner who planted the crop which went on to produce a carbon removal (and sold as a carbon credit). Current support schemes for biomethane production (Renewable Heat Incentive and Green Gas Support Scheme) include relatively arbitrary crop caps with no regard to the benefits that certain crops can deliver. Sustainable crops used for CCUS should be encouraged and should be recognised in revised support.

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?

Multi-functional land use entails the delivery of multiple benefits from land (food and non-food agricultural production, climate and ecosystem services) over a range of temporal and spatial

scales. This also recognises the integration of annual energy crops (rye or maize silage for AD, or industrial hemp for combustion) into food crop rotations, on the same parcel of land.

This could provide an opportunity to support Short Rotation Coppice biomass crops and also agrivoltaics – the practice of growing crops or food production as well as livestock farming, alongside sustainable solar PV farms.

This latter option provides valuable diversification opportunities for farmers, biodiversity gains, and energy production and is increasingly adopted in Europe and elsewhere – REA would be happy to provide examples of this and list a number of Case studies below.

Case study 1: Agrivoltaics - APV-RESOLA project, Heggelbach, Germany

APV-RESOLA – Agrophotovoltaic - A Contribution to Resource-Efficient Land Use - Fraunhofer ISE

The APV-RESOLA project, initiated by the Fraunhofer Institute, implemented a 194.4 kWp agrivoltaic system in Heggelbach – ie pairing ground-based solar PV with agricultural practices. The project found that in hot and dry years, crops such as celery and potatoes experienced yield increases of up to 12% and 86%, respectively, under the solar panels. This demonstrates the potential of agrivoltaics to enhance crop yields under certain climatic conditions.

Additionally, it is worth noting that Germany has established a legal framework, including DIN SPEC 91434, to define the requirements for agrivoltaic systems. This framework ensures that agricultural activities remain the primary use of the land, facilitating the integration of solar energy production with farming. The UK could also adopt a similar framework.

Case study 2: University of Exeter, 2024

Evaluating tracking bifacial solar PV based agrivoltaics system across the UK - ScienceDirect

A UK-based study evaluated the integration of tracking bifacial solar PV systems with potato farming. The research analysed energy production and crop yields, indicating that such systems can be compatible with certain types of agriculture.

Case study 3: Mandy Wilson, farmer in Cumbria

As profits dry up, farmers are pivoting from seeds to solar | WIRED

In Cumbria, a farmer named Mandy Wilson transitioned from traditional farming to leasing her land for solar panel installation. This move provided her with a more reliable income stream, providing her with an additional £30,000 per annum. This case study shows that agrivoltaics can offer financial stability to farmers who grow low-profit crops such as barley.

Case study 4: Moor Bioenergy, Future Biogas, 2025

In February 2025, Future Biogas opened the UK's first *unsubsidised* biomethane BECCS plant. This plant fed with locally grown maize, rye, and barley – the average distance is 6-8 miles. All crops are grown under long-term contracts with local farmers, ensuring that all biomass is grown using sustainable, low-carbon practices. This includes long (5+ year) and diverse crop rotations, minimum/no tillage, spreading organic-rich digestate to lane, and use of cover crops. These farming practices align with the **Regenerative Farming Principles** (see RASE, 2023).

The sustainability and traceability of all crop feedstock is audited and verified by the ISCC. The resultant biomethane is purchased by AstraZeneca, decarbonising their UK-based sites. Here,

their net zero by 2026 target is supporting the decarbonisation and sustainability of farming. Future Biogas must ensure low-carbon farming practices are used to maximise the carbon savings delivered by the biomethane.

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

Land capability mapping tools matching crop types to soils/climate would likely be more useful than top-down approaches. For example, a geospatial modelling of theoretical biomass crop suitability across Scotland by combining existing datasets was carried out, available here: https://www.climatexchange.org.uk/projects/perennial-energy-crops-and-their-potential-in-scotland-evidence-review/

This should also consider Agricultural Land Classifications, Nature Recovery spatial plans and the SDS process for planning.

In general, for biomass crops, inconsistent policies historically decimated industry confidence, while recent initiatives such as the Sustainable Farming Incentive (SFI) and Countryside Stewardship (CS) have created competition where shorter-term and not necessarily more sustainable activities are rewarded more highly than PEC/SRC. This has locked out significant proportions of appropriate land for the domestic biomass supply needed to reduce reliance on imports and grow the biomass sector.

Government action should be taken to address outdated perceptions of biomass' competition with food and support deployment on less arable and marginal land.

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?

The interplay of the various spatial strategies under development will be key, giving landowners and farmers visibility of the opportunities and trade-offs available, while protecting the best land for food production at all times.

For biomass crops, there is a real danger that very little will actually change unless there is demand for using those materials for energy purposes. As can be sometimes understandably reticent to change, policies to drive a demand for the material would need to be stable and long lasting (or at least, long enough for the period the farmer would have to commit to establish, grow and harvest the material). The failure to do this in the past is the key takeaway why miscanthus and other such crops have not been widely adopted despite some grants having been available – incentives for use of these materials in energy policies were never around for long enough to make much difference

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? Please give details for your answer.

The stated principles of monitoring land use change or production on agricultural land, accounting for displaced food production impacts in project appraisals and protecting the best agricultural land from permanent land use changes are all important here.

Strong sustainability frameworks have long been in place in energy support mechanisms, and these provide some protection on this side of the Land Use framework.

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

Incentives should offer long term security for the planting of biomass crops (e.g. PEC/SRC), with an income stream attractive enough to compete with other environmental subsidy programmes such as SFI, including help for up-front costs which remains a barrier.

Further consideration and support should be given to the role of biomass in heat for off-grid properties, heat networks, and industrial processes.

Additionally, the contribution of crops grown for bioenergy with CCUS, i.e. carbon removals, are not currently recognised down the chain in their contribution to UK Net Zero targets. Other countries e.g. Netherlands allow further integration into GGR value chains via carbon credit mechanisms.

QUESTION 10: What changes are needed to accelerate 30by30 delivery, including by enabling Protected Landscapes to contribute more? Please provide any specific suggestions.

We wholeheartedly support the government's commitment to protecting 30% of the UK's land by 2030. With 5 years until the deadline, this important commitment requires ambitious planning and action to deliver.

One key element we urge the government to carefully consider is a legislative ban on the extraction, sale, and use of peat in England. A ban of this nature had been pending under the previous government but has since been suspended under the current government.

There is ample evidence to demonstrate how essential peatlands are to the UK's natural environment. Among the most carbon-rich ecosystems on earth, peatlands 'lock in' an estimated 3.2 billion tonnes of carbon in the UK alone, provide vital habitats for endemic fauna, and deliver essential ecosystem services like reduced flood risk –now more essential than ever amid increasing frequency of flooding events in the UK. Furthermore, peatlands occupy approximately 12% of the UK land area, meaning that protecting all peatlands can be a relatively 'easy win' to get the UK a considerable way towards its 30% land preservation commitment.

Finally, while the horticultural sector represents the primary market for continued peat extraction and use in the UK, there are viable and more sustainable materials which have been proven to work as alternatives to peat-based products (e.g. growing media) used in horticulture. Green-waste derived composts - particularly those that have performed well in tests for suitability in horticulture, e.g. for use in growing media - represent a viable, lower-carbon alternative which do not have significant land use demands. In recent years there has also been a small amount of business-funded research into the use of separated fibre digestates in growing media, and further research on this topic would be valuable. Banning the extraction, sale and use of peat in favour of waste-derived materials thus reduces Land Use demands

overall, support's the government's ambitions to move to a more circular economy and strengthens the protection of peatlands in support of the UK's 30 by 30 goals.

To accelerate the 30by30 delivery, government and the devolved administrations should provide annual updates on its progress toward this goal (e.g., percentage of currently protected land) and next steps to achieve its 30% goal by 2030.

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

Community growing spaces, orchards and small allotments could be created on brownfield sites, new developments and larger recreation grounds perhaps and paid for by Community Infrastructure Levy (CIL) contributions.

In terms of growing media, for waste-derived composts

Government should fund a review into generic guidance on specifying, sourcing and purchasing certified, waste-derived compost products (e.g. as soil improvers, woody mulches and ingredients in growing media, manufactured topsoils, turf dressings and divot-repair mix). The review should include relevant industry organisations, revise the guidance where necessary and ensure it suitably explains how use of these product types supports nature and food production in urban landscapes and on land managed for recreation.

Work with trade associations, membership organisations for consumers, retailers, businesses and public sector organisations on targeted campaigns to raise potential product specifiers' and buyers' awareness of the guidance, sources of certified waste-derived compost products, products that include them, and how to identify these products.

For waste-derived digestates

Government should follow a similar approach as recommended above for waste-derived compost products, though the starting point would be to research the criteria for, then create generic guidance on specifying, sourcing and purchasing certified, waste-derived digestate products (e.g. separated digestate solids for use as soil improvers and liquid digestates for use as biofertilisers).

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

This emphasises the need for a joined-up approach across Government, and a Steering Board to coordinate delivery of the various strands of inter-related policy.

It also relates to the Planning and Infrastructure Bill proposals too – the new universal system of strategic planning throughout England - Spatial Development Strategies (SDS) - "To be produced by combined authorities and partnerships of county councils and unitary authorities for areas where there is no devolved authority. SDSs will set the overarching spatial strategy for local plans."

To ensure the SDS are executed effectively, demand such as homes, water and transport infrastructure should be properly assessed, forecasted and modelled before grid needs are assessed. Such thinking must also consider the new Local Nature Recovery Strategies (LNRSs) that are spatial in nature and being finalised this year.

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

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

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

No response intended 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.

A fairly simple and practical, but critical ask is to maintain support for the Biomass Connect programme, initially supported under the Innovative Feedstocks Programme. While we appreciate there was a short extension to maintain the eight demonstration hubs until the end of the year, that support is limited, meaning data collection is limited, and no open days or events can take place. The eight on-farm hubs, each 5 hectares in size, are strategically located across the four nations of the UK, serving as living laboratories and have over a quarter of a million plants from 10 biomass species planted. The Demonstration Hubs offer potential growers' valuable insights into biomass cultivation, tailored to their regional climate and landscapes, and demonstrate the diversity of biomass crops to the agricultural community, policymakers, and potential end users.

As these crops were only planted in 2023 and 2024, many won't have even had an opportunity to deliver their first harvest, demonstrating the potential of the crop in question. Without continued once support, the eight hubs risk being turned into something else. Given the resource and extensive work that has gone into the programme, this would represent a missed opportunity to gather meaningful data on miscanthus, willows, grasses and SRF crops - a real own goal – at a time when the Climate Change Committee has recommended increasing domestic feedstock growth.

If, however, we manage the project's survival, the pilots can deliver robust, regionally specific data on biomass crop yield, suitability and resilience for 10 biomass crops. This will improve the evidence base on land use change, soil carbon, soil health, hydrology and biodiversity as well as helping inform best practice in biomass crop establishment and cultivation through the R&D Hubs. The programme can also recommend varieties to growers and deliver a programme of events and demonstrations providing information on biomass crop types, agronomy, performance, and resilience tailored to regional climates and landscapes.

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?

No response intended

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?

- **Development and planning: such as environmental survey data**
- **Farming: such as supply chain data and carbon or nature baseline measurements**
- **Environment and forestry: such as local and volunteer-collected environmental records**
- **Recreation and access: such as accessible land and route data**
- **Government-published land and agricultural statistics**

Farm Carbon Accounting Tools

Inconsistency of farming data is a recognised issue with considerable implications for land use. In 2024 ADAS completed a large piece of work comparing the methodologies used in a series of popular Farm Carbon Accounting tools and found that different tools can produce significantly different results when calculating the same farm scenario (read the report here). There is currently no consistent approach taken to assessing carbon removals or emissions from soils, vegetation and land use change by calculators. The inconsistencies in the way farm carbon emissions and removals are measured makes it difficult to make reliable, evidence-based decisions about how farms can reduce their carbon emissions and increase their carbon removals; this can significantly impact land use.

Examples of where data improvements should be made: relevant production processes; emissions factors from an agreed set of robust databases for embedded emissions in fertilisers, feeds and fuels; improvements in modelling approaches for making best estimates of nitrous oxide emissions when fertilisers are applied, guidance or agreement on which emission types to use from which use phase; and if co-products are also produced, data on what value they have in another product's production process.

It is essential to achieve greater consistency in data types used and their incorporation into the calculation tools. This, together with more accurate figures will enable farmers to make informed, evidence-based land use decisions.

Soil health indicator and monitoring

Commissioned by Defra as part of its 25 Year Environment Plan, work is ongoing towards defining a heathy soils indicator; it could include physical properties (e.g. a measure of soil structure), chemical properties (e.g. soil carbon, nutrients, and pH), bare ground (soil) and a measure of soil biological activity. Further development of statistically and scientifically robust national monitoring programmes may be needed to provide data for this indicator. The Joint Nature Conservation Committee will finalise the indicator models and the chosen indicator will use data gathered through the Natural Capital and Ecosystem Assessment (NCEA) programme. The indicator will use data gathered through NCEA to show how different soils are contributing to different ecosystem services as a measure of soil health and will contribute to a comprehensive and robust baseline for soil health by 2028.

In REA's view, the soil health model should include the soil physical, chemical, bare ground and soil biological activity measures/test types listed in the paragraph above; if fewer are to be chosen in order to keep soil sampling and testing costs as low as possible, the REA would appreciate opportunity to discuss what should be selected.

There is a diversity of inputs to farms and a need to prioritise farm use of its slurries and farm yard manures. The REA also highlights that the composting of agricultural biodegradable wastes

and, where needed, bringing in compost from off-farm sources aids the circular bioeconomy as well as agricultural soil health. In addition, how these renewable resources are managed, soil health and Farm Carbon Accounting tools influence farmland use decisions.

The following excerpt from ISWA's report on Benefits of Compost and Anaerobic Digestate when Applied to Soil provides (amongst other things) example figures about composts and their effects:

- studies have shown that over a period of 4 - 12 years between 11 % - 45 % of the organic carbon applied to soil as compost remained as soil organic carbon;
- soil organic carbon increases of between 50-70 kg C ha^{-1} yr^{-1} t^{-1} dry solids applied as compost are possible;
- every tonne of soil organic carbon holds the equivalent of about 3.67 tonnes of atmospheric carbon dioxide; and
- 1 tonne (fresh mass) of green waste derived-compost applied to soil over one hectare (10,000 square meters) results in a net $CO_{2\text{-eq}}$ saving of 143 kg ha^{-1} $year^{-1}$ due to the increase in soil organic matter alone.

The REA's generalised point is that the soil health indicator and Farm Carbon Accounting tools need appropriate contents because they link to the circular bioeconomy, how bioresources are managed and land use decisions.

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

We are aware that the NFU would like to see data on all six grades of agricultural land (1-3a; 3b-5) made more accessible, demarcating the Best and Most Versatile land, and preferably more finely-scaled. We support their suggestion that "time-series data from remote sensing (pixel sizes less than one hectare) is calibrated against intensively assessed 'ground truth' sites, e.g. where development has been proposed and ALC expertly determined, to generate a predictive map at a scale of about 10 hectares. The current ALC maps (available as PDFs and on MAGIC) have a resolution of about 80 hectares, unsuitable for assessment of individual fields or proposed development sites. We need information on such limitations to be clearly provided."

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?

No response intended QUESTION 21: What gaps in land management capacity or skills do you anticipate as
part of the land use transition? Please include any suggestions to address these gaps.

There may be a gap in energy related capacity and skills relating to land use transition – in line with the broader skills gap we see in the net zero sector.
We published a EV and Net Zero skills report[3] last year with a number of recommendations for addressing skills shortages - crucially, the report outlines four key recommendations and these recommendations all require collaboration between the Government, the industry, and the

[3] REA & Curzon Consulting, 2024, REA EV Skills Report - REA

Education sector. By adopting these recommendations, the UK can empower its workforce to seize the local and national opportunities offered by the industry.

The recommendations are:

- For the sector to create and participate in outreach programmes to inspire the next generation of Net Zero heroes.
- For the Government to create local Centres of Excellence for Net Zero skills to mitigate local skills gaps and harness the passion for the environment on display from young people today.
- For the sector and UK Government to create upskilling programmes to ensure continued improvement and promotion of opportunities to the existing workforce.
- For the UK Government to create reskilling programmes to ensure that those in the workforce without relevant skills, outside of the sector can access the growing number of opportunities on offer.

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

No response intended QUESTION 23: Should a Land Use Framework for England be updated periodically,
and if so, how frequently should this occur?

We agree it should be updated periodically and believe this should either be on a 5-year basis, or every 4 years to coincide with the Climate Change Committee advised Carbon Budgets for the period. This could allow for the framework to respond to the requirements of the Carbon Budget in question (and other priorities) while maintaining a manageable frequency for all involved.

QUESTION 24: To what extent do you agree or disagree with the proposed areas above? Please include comments or suggestions with your answer.

REA agree with the proposals to "consider how best to co-ordinate and provide: a strategic oversight function to ensure the right information and policy is in place to enable delivery against a long-term land use vision; a cross-governmental spatial analysis function to produce evidence-based advice on strategic implications across different demands on land; processes to embed land use considerations in strategic Government decisions; open policy-making processes in collaboration with research organisations."

While we agree with the proposed measures, strategic, cross government oversight will be critical to ensure effective delivery and longer-term continuity. Government must establish an implementation board or similar body comprised of Government, industry and other relevant groups to oversee delivery and multi-year implementation.

REA would be happy to serve on such a body to represent renewable and clean technology industry.

REA, April 2025