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Please ask for:  
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Dear Sir/Madam

### **Consultation on the Land Use Framework**

Thank you for the opportunity to comment on this consultation for the development of a national Land Use Framework. Please accept this letter, in addition to the responses to the questions submitted via the consultation portal, as representing the formal response of Arun District Council (Arun).

#### **General comments**

The aspirations and principles behind the proposed National Land Use Framework are generally considered positive, however, we note they appear to be at odds with some of the other recent legislative updates coming out from central government. These include the recently published National Planning Policy Framework 2024 (NPPF), and the English Devolution White Paper 2024.

In terms of the NPPF, no specific protection is given to the protection of agricultural land and, indeed, the 2024 revision to the NPPF deleted the specific reference that had previously been in the December 2023 version, to the important role that agricultural land plays in food production. This seems to run contrary to what the Land Use Framework is now advocating. In Arun's response to the July 2024 consultation from MHCLG on proposed reforms to the Planning System, Arun commented that removing specific reference to food production was unnecessary and short-sighted given global instability in areas that make a substantial contribution to the world's food demand, and that it could undermine the UK's food security. We argued that removal of this part of the footnote would further reduce the weight afforded to the protection of higher-grade agricultural land and will lead to it being targeted by developers. However, these concerns were ignored.

Further, the reference to exceptional circumstances (with agricultural land and food production potentially being one such circumstance) possibly justifying a lower housing requirement figure in Local Plans, was also removed in the 2024 NPPF. The Land Use Framework consultation is clear that it seeks to deliver something that will 'support' the delivery of 1.5 million homes, though, in Arun's case, it is difficult to understand how the protection of agricultural land for food production and the need to deliver such enormous housing numbers goes hand in hand. Furthermore, there have been multiple appeals in Arun in recent years where the loss of

agricultural land has been quickly outweighed by the need to provide housing, and even the loss of Grade 1 land has only been afforded 'moderate weight' by Inspectors.

The proposed rollout now of a Land Use Framework, therefore, seems to conflict with the NPPF and does not appear to represent joined up thinking on the part of central government. Clarity on how these two documents (NPPF and Land Use Framework) are intended to work alongside each other is essential, but this is currently absent.

Turning to the English Devolution White Paper, it could be argued that the Land Use Framework is aligned with the overall principles in that it is seeking to look at land use at a more strategic, regional level, as opposed to decisions on the release of land being taken at the district/borough level only. Nevertheless, the timing does not seem appropriate, because local authorities in Sussex are currently in the process of gearing up for the new combined strategic authority and making decisions about how larger unitaries may be formed. It is rather premature to expect a strategic approach to land use until such time as the combined Sussex & Brighton authority is in place and the structure, size and administrative boundaries of the new, larger unitary authorities have been decided. Accordingly, we believe it would make sense to pause rollout of the Land Use Framework for the time being.

In addition, the clear message from MHCLG over the past few months is that all authorities should be progressing their own Local Plans at pace to help deliver the government's promised 1.5 million new homes (370,000 per year). This will necessarily involve many very local decisions over the next few years on releasing greenfield land (much of it likely to be in agricultural use) for housing allocations and goes against the suggestion in the consultation on the Land Use Framework that these decisions should be made at a strategic level.

Furthermore, the way the new standard method for calculating housing need is based on the premise that all authorities in England should 'take their share' of new housing - notwithstanding any physical constraints as may be present - and has been presented as a mandatory target. The circumstances under which a local authority can seek to justify including a Local Plan housing target lower than that derived from the new standard method do not include where it would lead to the loss of higher-grade agricultural land or negatively impact on food production. The recent messaging from MHCLG, combined with the proposed changes to inheritance tax relief available for agricultural property is likely to encourage more landowners to put agricultural landholdings forward for housing or other uses, which runs directly contrary to what this DEFRA Land Use Framework seeks to achieve. This is a further area where there appears to be a lack of joined up thinking across government departments.

In summary, whilst the stated ambitions in the Land Use Framework are laudable, they will be to no beneficial effect, whatsoever, without national planning policy that promotes and enables retention of high-quality agricultural land and biodiversity rich areas.

Yours sincerely

Neil Crowther  
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Arun District Council

