



## **PPA response to Consultation on Land Use in England**

### **About PPA**

The Potato Processors' Association Ltd (PPA) is the trade association for UK manufacturers of frozen and chilled chips/French fries and potato products, potato crisps, potato-based snack products and dehydrated potatoes.

Our members' businesses are very closely linked to UK farming and agriculture and are reliant upon UK growers supplying them with high volumes of quality raw materials all year round.

Collectively PPA members are the largest customer for UK potatoes, purchasing around 1.47 million tonnes annually<sup>i</sup> (approximately 46% of the estimated production volume in 2022<sup>ii</sup>), and accounting for circa 94% of all potatoes processed into frozen chips and potato products, potato crisps and snacks within the UK.

Over 13,000 people in the UK are directly employed by the potato processing sector and other dependent jobs, including those in the farming sector, more than double this total. The sector also makes a significant contribution to the country's manufacturing base. In 2022 the value of the UK processed and prepared potatoes market was estimated at more than £2.7 billion (not including food service), and the sliced potato crisps market was estimated to be worth an additional £1.47 billion<sup>iii</sup>.

### **Introduction**

We welcome the fact that the Government has opened a consultation on land use in England, and that this consultation forms part of a wider discussion which will inform the proposed Land Use Framework.

Being so closely linked to UK farming, our members are acutely aware of the many issues that climate change poses for UK growers, and the importance of strategically managing land resources for the benefit of the whole country.

We welcome the acknowledgement within the forward of the consultation that farming is already taking on and delivering change through new models of agricultural practice, adapting food production, and building resilience to risks posed by flooding, pests and disease. We also welcome the acknowledgement that farmers and landowners know their land best, and that it is right that they lead this transition with clarity about land use change so they can plan their businesses.

As an association, we are broadly supportive of the actions proposed within the consultation. We recognise the importance of ensuring that biodiversity, land and water are subject to improvement, and are managed responsibly, including through utilising nature-based solutions and regenerative technologies where these are supported by science. We believe this will help growers to improve their resilience to climate change impacts and continue to ensure sustainable UK food production.

We are also generally in favour of a spatial approach to land use planning, recognising that local conditions and circumstances will make certain locations more suitable for specific uses.

For the spatial approach to be effective, data must be robust and there must be buy-in and agreement from all affected parties. At the moment, the Government's data on potato growing (planted hectares, average yields, total volumes, farmgate prices, growing locations, etc) is inadequate for these purposes.

We recognise that the consultation includes discussion on food security. However, we remain concerned that Government does not formally recognise food production and supply as a public good. This is a fundamental issue that needs to be addressed in this and future work in this area.

We are also disappointed that the consultation has not been made in conjunction with relevant departments within the four nations of the UK. We believe that the Land Use Framework should be a UK-wide approach. Without much closer engagement from Scotland, Wales and Northern Ireland the framework will be less impactful and risks further fragmenting agricultural policies throughout the UK.

Whilst the consultation document briefly touches upon demand for land for infrastructure, housing and other developments, it is in fact largely focused on agricultural land, and changes that are required to usage to ensure Government meets various environmental outcomes and land-based targets that it has a legal obligation to meet under the Environment Act 2021 (England).

Urban infrastructure and access to land for recreation purposes are discussed only very briefly in the Analytical Annex. Limited data and evidence are presented, but the questions and explanatory text that make up the consultation appear disproportionately weighted towards non-farming solutions / issues (e.g. reference to long-term housing strategy, National Integrated Transport Strategy, Making Space for nature, Bringing nature closer to communities, etc).

We have broad concerns over some of the assumptions that have been made as part of the modelling. Most importantly, we are concerned that the paper assumes that transforming a large percentage of agricultural land (9%) to non-agricultural uses, alongside significant additional changes to a high percentage of other agricultural land (total 10%) will not result in any significant reduction in food production. The paper in fact suggests that UK food production can be maintained or moderately increased alongside these proposed land use changes. However, this appears to be counterfactual as the evidence for Total Factor Productivity in recent years in the agricultural sector (since 2015) which shows weak growth overall and a significant decline in several sectors (including cereals, potatoes and vegetables and horticultural products).

The consultation provides only limited indicative projections as to the type and extent of land use changes to improve environmental and climate outcomes. The projections within the Analytical Annex are not granular enough, and do not provide enough detail for us to comment on any potential impacts.

Whilst the UK is largely self-sufficient in potatoes (currently the UK produces around 70% of its potato needs), we are acutely aware that the UK planted area, and the national yield has decreased significantly over the last decade and beyond.

A significant area of potatoes in the UK is grown on rented land (as part of a rotation). We are concerned that actions to remove lower-grade land from agriculture will result in increased prices

for higher-grade land and will ultimately results in some agricultural land being made unavailable to potato growers, and some farmers being priced out of their profession.

We are concerned that in fact, without proper oversight and direct Government intervention, actions which support the transformation of existing lower grade agricultural land to other land uses for environmental benefit or for housing will further exacerbate the decline within the sector and lead to a decrease in the UK's self-sufficiency.

Loss of active substances, loss of access to the UK/European potato seeds market, price increases for actives substances, for fertilisers, for specialist machinery, for energy, and for diesel, increased employment costs, reduced access to skilled workers (including tractor and HGV licence holders), restriction of access to water, loss of access to farm payment schemes and environmental transformation schemes (e.g., ELMs/SFI), alongside more recent issues such as the challenges to the current inheritance tax regime, have all contributed to the current and ongoing decline within the potato growing sector.

Simply put, there are a so many financial and legislative obstacles and disincentives that are being placed in front of growers, and in such a short period of time, that many are being overwhelmed by bureaucracy and are unable to cope with the breadth of challenges. As a result, many are choosing to leave the profession, or worse are going bankrupt.

It is therefore imperative that any proposed changes to land use take in account the best available evidence, prioritise the rights of the growers, recognise food production and supply as a public good and, where all evidence points point to the absolute need to change land use in a particular area (to be determined on a case-by-case basis) the transformation must be supported financially and impacts to the wider market closely monitored. Government must be prepared to intervene, and intervene quickly, if a market failure starts to development because of its policy

**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 / Agree / Neither agree nor disagree / Disagree / Strongly disagree / I don't know]**

**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.**

As a general observation, the proposals and the supporting data presented within the consultation document and the supporting Annex are insufficient to allow us to conclude that the scale and type of land use change is correct.

We have concerns about the quality of the data and the way it is presented e.g.,

- Detailed calculations are not presented within the papers. In some instances, bar graphs and tree graphs are included to help visualise the issue (e.g. Figure 2 in the consultation, Figure 1 in the Annex), but charts showing the actual percentages for the data are not provided.
- Page 13 of the consultation document confirms that “the hectares needed for Net Zero contributions have been estimated from the modelled emission savings for the sector, projected on an England-only basis and using illustrative scenarios”. It states the “level of uncertainty in these estimations is relatively high”.

- Other examples include Figure 1 in the Annex indicating that the baseline data used differs from the official statistics and results in a difference a few percentage points, which again begs questions as to the accuracy of the data.

As regards potato specific data, following levy payers' votes in 2021 on the future of the statutory levy, AHDB activity in the horticulture and potatoes sectors was wound down and data collection activities ceased. Historically AHDB Potatoes (and its predecessor the Potato Council) collected and reported data on GB potato planting, yields, volume and farmgate pricing. We believe that, although there were some issues, the methodology for collecting and reporting data was accurate to a relatively high degree. Since the closure of AHDB Potatoes, Defra has been publishing its own estimates on planted area for potatoes and total volume. However, without the AHDB's data collection activities to support, we believe that the Defra data and calculations arising from this data are far less accurate.

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

[Strongly agree / **Agree** / Neither agree nor disagree / Disagree / Strongly disagree / I don't know]

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

We are generally in favour of the proposed spatial approach to land use planning, recognising that local conditions and circumstances will make certain locations more suitable for specific uses.

For the spatial approach to be effective, data must be robust and there must be buy-in and agreement from all affected parties. Presently the Government's data on potato growing (planted hectares, average yields, total volumes, farmgate prices, growing locations, etc) is inadequate for the purposes of calculating impacts.

The consultation includes discussion on food security. The principles should include recognition that food production and supply are a public good. This is a fundamental issue that still needs to be addressed in this and future work in this area.

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

Combined and local authorities (including local planning authorities)

Landowners and land managers (including environmental and heritage groups)

**Others (please specify)**

We are of the view that a Land Use Framework should be a UK-wide approach. Without much closer engagement from Scotland, Wales and Northern Ireland the framework will be less impactful and risks further fragmenting agricultural policies throughout the UK.

**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?**

**Risks to food production and prices**

The consultation does not recognise the potential risk to supply chains or the potential impact on food production and food prices. A significant area of potatoes is grown on rented land and depending on how the payment system changes this could have a huge impact on land rental

prices and the availability of land for production. Furthermore, many potato growers will be growing other crops in their rotations and any changes to payments will have an impact on whole farm businesses. Farmers who rely on government support schemes (such as the Environmental Land Management Scheme) may struggle if funding priorities shift towards non-farming land use.

The framework might also favour conservation over traditional farming, leading to income instability for some farmers. If the framework restricts farmland expansion, farmers may also be forced to charge higher prices for raw ingredients, leading to increased costs for processors.

We are also concerned that the Land Use Framework could, if badly implemented, increase bureaucracy and planning restrictions e.g., growers are already struggling to gain permits (and funding) for reservoirs and irrigation systems needed to safeguard their land and crops from agricultural drought or excess rainfall. The danger presented by a new framework is that new regulations and restrictions are introduced, making it harder for growers to expand or diversify their businesses. If permitting for new agricultural buildings, irrigation systems, or livestock operations becomes stricter, it could raise costs and slow down business growth. Further down the chain food processors need stable supply chains to plan investments in new facilities, equipment, and workforce expansion.

Decision makers should consider the potential that policies to remove land from agricultural use will potentially lead to reduced domestic agricultural supply, and the real potential that England starts 'exporting' its carbon problem. Decision makers should also consider that a potential decline in UK food production could make food processors more dependent on imports, exposing them to global market fluctuations, trade disruptions, price and quality volatility. Disruptions could create inconsistent supply chains, affecting production schedules and profit margins, affecting investment and ultimately jobs.

Land Use policy should support growers through transitional periods, should support national food production and food security, and should improve the speed at which growers can expand or diversify their businesses. Applications for permitting for items such as reservoirs and irrigation systems should be promoted and prioritised, and tax incentives or grants provided to growers and landowners who wish to take these land benefits forward.

**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?**

Government can help by collecting and providing clear and accurate data to support land managers' decisions. Clear guidance on how to transition and regulatory and financial support for landowners that wish to transition to multifunctional operations. Government should fund and publish research and guidance into risks to crops associated with some of the multifunctional operations e.g. increased risk of spread of pests and diseases from agroforestry, cover crops or catch crops.

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

For the spatial approach to be effective, data must be robust and there must be buy-in and agreement from all affected parties. Presently the Government's data on potato growing (planted hectares, average yields, total volumes, farmgate prices, growing locations, etc) is inadequate for these purposes.

The consultation includes discussion on food security. The principles should include recognition that food production and supply are a public good. This is a fundamental issue that needs to be addressed in this and future work in this area.

**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?**

Practical evidence bases: Pilot schemes, Trials and small-plot demonstrations to confirm the viability of land use change and environmental improvements. Improved data collection and reporting by Government

Stable financial support and tax incentives for growers and landowners that wish to transition to multifunctional operations or move their land to non-agricultural use.

Long term support for education: bringing new farmers into the industry and educating them in alternative techniques.

**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.**

Monitoring land use change or production on agricultural land

Accounting for displaced food production impacts in project appraisals

Protecting the best agricultural land from permanent land use changes

Other (please specify)

The question correctly identifies three key areas: 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.

Additionally, Government needs to continue to support growers through financial incentives, (e.g. tax incentives, grants, ELMs/SFI), through improved and speedier planning, and provisions of high-quality data and guidance to aid planning.

Government/decision makers should also consider a whole chain gross value added (GVA) approach, including the impact of displacement of food production on processing, on agricultural materials and engineering supply and transport, on food security and costs to consumers.

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

No response.

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

Strengthened Protected Landscapes legislation (around governance and regulations or duties on key actors) with a greater focus on nature

Tools: such as greater alignment of existing Defra schemes with the 30by30 criteria

Resources: such as funding or guidance for those managing Protected Landscapes for nature

Other (please specify)

No response.

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

Urban infrastructure and access to land for recreation purposes are discussed only very briefly in the Analytical Annex. Limited data and evidence are presented, but the questions and explanatory that make up the consultation appear disproportionately weighted towards non-farming solutions / issues (e.g. reference to long-term housing strategy, National Integrated Transport Strategy, Making Space for nature, Bringing nature closer to communities, etc).

A further consultation paper with more data on this topic is required for us to be able to reply in more details.

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

No response.

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

Urban infrastructure and access to land for recreation purposes are discussed only very briefly in the Analytical Annex. Limited data and evidence are presented, but the questions and explanatory that make up the consultation appear disproportionately weighted towards non-farming solutions / issues (e.g. reference to long-term housing strategy, National Integrated Transport Strategy, Making Space for nature, Bringing nature closer to communities, etc).

A further consultation paper with more data on this topic is required for us to be able to reply in more detail.

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

Government must strive for better communication and engagement with all stakeholders, at national and local level, and engagement must be meaningful.

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

**Please give any reasons or alternative suggestions [Yes / No / I don't know]**

Government should be careful not to further burden businesses through legal data collection requirements.

**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.**

Providing better information on local climate impacts to inform local decision making and strategies (for example, translating UK Climate Projections into what these mean in terms of on-the-ground impacts on farming, buildings, communities and nature)

YES

Providing improved tools and guidance for turning climate information into tangible actions (for example, how to produce an adaptation plan for different sectors)

YES

Developing and sharing clearer objectives and resilience standards (for example, a clear picture and standards of good practice for each sector under a 2°C climate scenario)

YES

Supporting the right actions in the right places in a changing climate (for example, prioritising incentives for sustainable land uses where they will be most resilient to climate change)

YES

Other (please specify)

**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?**

Updating existing Government tools, apps, portals or websites

YES

Changes to support use through private sector tools, apps or websites

YES

Bringing data from different sectors together into common portals or maps

YES

Increasing consistency across spatial and land datasets

YES

More explanation or support for using existing tools, apps or websites

YES

Greater use of geospatial indicators such as Unique Property Reference Numbers (UPRNs) and INSPIRE IDs to allow data to be more easily displayed on a map

YES

Other (please specify)

Closer engagement, shared resources and buy-in from Scotland, Wales and Northern Ireland, reducing the risk of fragmented agricultural policies throughout the UK.

**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? Please give any reasons for your answer or specific suggestions.**

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

YES to all

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

No response.

**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

**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.**

Development and planning

Farming

Environment and forestry

Recreation and access

Other (please specify)

No response

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

No response

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

Yes, every 5 years

Yes, every 3 years

Yes, another frequency or approach.

Please provide details.

Give the spatial approach, an open framework (covering the whole of the United Kingdom) should be updated dynamically.

- No
- I don't know

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

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / I don't know]

We agree that Government should 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.

We would emphasise the need for co-design of the processes, including meaningful engagement with stakeholders and the importance of food security.

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<sup>i</sup> Source: PPA own data, collected from members annually. Latest data May 2022. Covers period 1/06/21 - 31/05/22.

<sup>ii</sup> Source: Calculation based on PPA own data (above) and Defra. Agriculture in the United Kingdom 2022. Chapter 7 Data set, which includes "Table 7.11a Potatoes; production, value, supply and use (a)" and "Table 7.11b Potatoes". <https://www.gov.uk/government/statistical-data-sets/agriculture-in-the-unitedkingdom>

<sup>iii</sup> Source: Kantar 52 w/e 22 January 2023.