



Land Use Consultation: Response by The Vegan Society

Submitted: 25 April 2025

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?

Disagree.

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.

In order to achieve the identified goals of the strategy – including food security, sustainable food production and making space for nature and infrastructure – it is necessary to consider a more transformative and fundamental change that is not directly addressed within this framework: that is to free up land from its unnecessary use supporting the industrial-scale farming of animals [1]. Doing so would also bring significant co-benefits, in regard to public health, the environment and animal welfare, which are not identified or set as goals in the consultation but which should be taken into account (see Q2). Actions which remove land currently used to support animal agriculture and enable its use for other purposes are consistent with and in-scope for this consultation under Categories 2, 3.1, 3.2 & 4.

As the consultation document notes, 85% of the UK's Utilised Agricultural Area is estimated to support animal agriculture – fully 40% is used only for growing animal feed (WWF, 2022). England can 'make space' by releasing the land currently locked up by the harmful, inefficient practices of such industrial scale farming of animals, including both the use of land to grow commercial feed and the use of land for grazing. This land can then be used create and restore habitats – for example, as woodland, and species-rich natural grassland – while permitting the use of a smaller total area of land for the sustainable and secure production of healthy, plant-based food for direct human consumption, through agro-ecological stock-free growing (Farmers for Stock-Free Farming).

Land can be released by transitioning production and consumption away from animal-based foods towards plant-based foods because animals inefficiently convert calories and protein from plants into calories and protein for human consumption. Only 3.8% of the protein from the plants consumed by a cow becomes protein in the beef derived from it, for example (Our World in Data, 2016). Consequently, a kilocalorie of beef takes 50 to 100 times as much land to produce as a plant-based alternative does, with a similar land use ratio for



producing a gram of protein from a cow in comparison to a gram of protein from peas or tofu (Our World in Data, 2021).

These inefficiencies are eliminated by growing plants directly for human consumption. In the 2021 National Food Strategy, Henry Dimbleby noted: “85% of the farmland that feeds the UK, both here and abroad, is used to rear animals – even though meat, dairy and eggs only provide 32% of the calories we eat. By contrast, the 15% of farmland (roughly half in the UK, half overseas) that is used to grow plant crops for human consumption provides 68% of our calories” (Dimbleby, 2021).

Taking one scenario of combined changes in food production, Dimbleby calculated that “increasing productivity by 30% and reducing meat eating by 35%, we could produce the same amount of food from 40% less land.” This example shows that more ambitious land use change goals than are proposed in the consultation are not just achievable, but can be achieved while delivering significant co-benefits.

The evidence in support of dietary change as a mechanism for releasing land has grown since the 2021 Food strategy was published. Modelling studies consistently indicate lower land use by vegan diets in comparison to meat-based diets (Scarborough, 2023). A 2023 study published in Nature Food using actual data based on UK diets (standardised by calorie intake across all dietary categories) found land use required for a vegan diet was 38% of that for a medium meat consumption diet of 50-100g per day (Scarborough, 2023). A 2024 Nature study focusing on Sweden concluded that vegan diets reduce land use by 44% compared to reference diets (Bunge, 2024).

The climate mitigation benefits of land use transformation in this way have also been quantified. The most proven reliable strategy for large scale CO₂ removal which we currently have is agroforestry and mixed woodland habitat restoration, which is appropriate on up to 75% of England (Watts, 2006). The 2019 report, 'Eating away at climate change with negative emissions: Repurposing UK agricultural land to meet climate goals' (Harwatt & Hayak, 2019) found that restoring all current grazing land to forest would sequester up to nine years' worth of our CO₂ emissions, directly supporting healthy food production and producing fertility-building composts too. Some of these woodlands can be managed for nut, fruit, timber, construction material and agricultural fertility production, as well as being restored habitat for free-living animals, and educational and leisure uses.

The Climate Change Committee has also consistently recommended reduction in the amount of land devoted to animal agriculture. The agriculture and land use pathway proposed in its Seventh Carbon Budget (2025) requires land use change, primarily for reforestation, to achieve the UK's Net Zero goals. Within the pathway,



reduction in the number of livestock in the UK will account for fully 68% of the land required for alternative uses by 2040. The committee states: "Early action is vital to release land from agriculture and scale up tree planting to deliver the sequestration potential of new woodlands before 2050." To achieve this, the pathway proposes a 38% reduction in livestock by 2050, driven primarily by a 35% reduction in meat consumption by 2050, and a 20% reduction in dairy consumption by 2040.

A shift from agricultural land use from supporting animal farming to plant-based farming also meets other goals established for the land use strategy.

The growing of monoculture commodity grains on high quality agricultural land for the purpose of feeding animals in industrial scale farming generally contributes to ecologically poorer farms, with poorer soil health, increased water use, reduced biodiversity and excessive use of fertilisers (Decoding Biosphere, 2024). In addition to methane and nitrous oxide emissions from animals and slurry, this fertiliser use is a significant driver of nitrogen pollution. The UN-affiliated Taskforce on Reactive Nitrogen examined twelve scenarios which would achieve the EU's target of reducing nitrogen loss by 50%: eleven involved dietary change towards more plant-based diets. The authors concluded that "Full exclusion of meat and dairy products from human diet combined with ambitious technical measures could ... reduce nitrogen waste by up to 84%" (UNECE, 2023).

Furthermore, we currently have neither food security, nor resilience, in England. Horticultural production in the UK is in an ongoing decline, with vegetable production in 2023 at its lowest since 2015 and fruit production at its lowest since 2015 (apart from 2021). Only 53% of vegetables and 16% of fruit are home grown (Defra, 2024). Importation of vegetables and cereals to feed animals leaves the UK vulnerable to global supply chain issues. The UK spent about £3.3bn on imported animal feed in 2022: dietary transition leading to a reduction in number of animals will reduce this demand, and ensure a greater proportion of UK produce is available to feed ourselves. Farmed animals are estimated to consume 51% of our domestic wheat, 64% of barley, 36% of oats, 60% of maize, and 92% of field peas (WWF, 2022).

In contrast, any increase in production or consumption of animal products will push the UK further away from meeting the goals of the strategy. Intensification of animal farming – in addition to its unacceptable impact on animal welfare, see below – may reduce demand for pasture but will drive demand for feed and increase emissions and pollution. Moves towards regenerative farming may reduce, though far from eliminate, the environmental and welfare impacts of animal farming, but without reciprocal reduction in demand for animal based foods, would require even larger amounts of land than are currently used and could not supply current production levels.



In regard to negative animal welfare impacts, the [Sentience Act \(2022\)](#) section 2(2) requires that the Government gives “all due regard to the ways in which [a] policy might have an adverse effect on the welfare of animals as sentient beings”. The consultation document does not, however, reference animal welfare and this is a significant omission, especially given that intensification of animal farming may be proposed as a mechanism to take land out of use for grazing. To comply with the act, this omission must be corrected in evaluation of consultation submissions and in development of the land use strategy.

Freed from industrial scale farming of animals, we can sustainably transition all current cropland to agro-ecological production of most of the cereals, legumes, vegetables and seeds we need for everyone to enjoy healthy food security. The transition also brings direct socioeconomic benefits. Agro-ecological crop farming for food in England and similar regions tends to be as or more economically viable than animal farming, including providing more and better rural employment (Soil Association, 2022; Food and Agriculture Organization, 2023).

Active biosphere managers – farmers, growers, aquaculturists, foresters and others – in England, are experienced and highly skilled in managing major changes. There is also evidence indicating that a substantial proportion engaged in animal farming are open to transitioning away from it, with a farmer survey conducted by Stockfree Farming finding 49% reporting they would consider stopping farming animals entirely if there were other viable options that could generate equal or higher income and 63% of livestock farmers willing to consider decreasing livestock numbers if there were other viable options that could generate equal or higher income (Stockfree Farming, 2024). To successfully transition at the pace we now require, however, they need a land use framework that provides support, including from Government at every level e.g. in: finance, access to land, training, re-equipping, planning, and supply chain development (see Questions 3, 4 and 5).

In conclusion, taking land out of use for animal farming contributes substantially to meeting the ambitions established in Categories 3.1, 3.2, 3.3 and 4, and – if well-managed and appropriately incentivised (see Q4) – is likely to allow even more land to be freed up to meet the overall aims of the strategy, while also bringing further benefits in terms of Net Zero, biodiversity, public health. Such a major transition cannot be achieved in isolation, of course, and requires cross-government approach – critically, it must be integrated with the government’s forthcoming food strategy.

The case for higher consumption of nutritious plant-based foods to promote health – especially fruit, vegetables, legumes, pulses and nuts – is widely and deeply supported across experts and expert bodies, including in the 2021 Food



Strategy and by the 2019 EAT-Lancet Commission. That dietary transition can be facilitated by effective, practical policy actions, many of which have already been implemented in other countries (The Vegan Society, 2024; Government of Denmark, 2023) – see Q4 for further detail. Doing so will ensure that the corresponding land use transition will not lead to importation of unhealthy and potentially low welfare animal-based foods, prevent scarcity increasing food prices and promote the interests of British farmers and land managers.

Therefore, this proposed Land Use Framework can go much further to target a higher percentage of land use change, in order to meet food security and resilience goals, restore more nature and habitats and mitigate climate and environmental impacts. Substantial support and incentives to move away from animal farming and towards other, more sustainable forms of land management will be required to ensure that farmers and land managers can have a just transition and secure livelihoods. This will need to be combined with cross-departmental mirroring action in all other related Government strategies, such as the food strategy, to encourage diet change to support the needed land use change at the same time.

Footnote

[1] Industrial scale farming of animals means not just fully enclosed methods, but any system where animals cannot properly express their natural behaviours e.g. artificial breeding; removal of offspring; farms with large numbers of animals, causing 'ghost food waste', destroying free-living animals' habitats; routine confined transport and killing of animals. 'Ghost food waste' (Lymbery, 2023, UNEP 2009) is currently not widely reported: it is the significant loss of food nutrients when arable land is used to feed animals in farming, instead of feeding us directly.

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

Agree

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

We agree with the principles proposed, but they are not complete. In particular, they do not fully encompass the full scope of gains that could be made through land use change, which should be included in evaluation of submissions and design of the strategy.

The first area in which land use change can create co-benefits is in public health. The case for higher consumption of nutritious plant-based foods to promote health – especially fruit, vegetables, legumes, pulses and nuts – and lower consumption of meat and dairy foods is widely and deeply supported across experts and expert bodies, including in the 2021 Food Strategy and by the 2019 EAT-Lancet Commission, and is embedded in current UK dietary guidance, the Eatwell Guide (NHS). The corresponding long-term public health benefits also yield substantial savings on health, social care and illness-related benefits. For instance, research commissioned by The Vegan Society and conducted by the Office for Health Economics found that every one million people in England who switch to a sustainable, healthy plant-based and vegan-suitable diet will generate an estimated £121 million of health care cost savings for NHS England (Henderson and Sampson, 2024).

In regard to animal welfare, we note in Q1 that the [Sentience Act \(2022\)](#) section 2(2) requires that the Government gives “all due regard to the ways in which [a] policy might have an adverse effect on the welfare of animals as sentient beings”. All forms of land use for animal agriculture have welfare implications, from lameness in free-ranging sheep to mortality rates in intensive chicken production. In particular, intensive animal farming in which animals are confined indoors demands less direct land use (ie excluding feed production) and may be proposed as a mechanism to free up domestic agricultural land. The consultation document does not, however, reference animal welfare and this is a significant omission. To comply with the Act, this omission must be corrected in evaluation of consultation submissions and in development of the land use strategy.

These essential additional considerations are therefore relevant to some of the five principles outlined in the consultation.

In the case of the principle of co-design, the full range of relevant stakeholders and experts – encompassing the areas outlined above - must be included in co-



design. In addition, England's farmers are significantly older than the general population, so the future of sustainable farming requires a significant increase in people returning to, or coming for the first time, into agriculture. These people will come from diverse backgrounds, and will require stable access to suitable land and other resources. Co-design cannot only involve current land managers, farmers and policymakers, but must also empower and include future biosphere managers.

In the case of the principle of long-term benefits, those associated with dietary impact on public health must also be considered.

We therefore recommend that the principles informing the land use strategy should explicitly include considerations around public health and animal welfare as equally weighted with other priorities, to ensure that any proposed land use changes don't inadvertently include trade-offs that would result in negative outcomes for public health, nature and animal welfare.

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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)

Local authorities. As landowners, local authorities have an obvious role to play in promoting sustainable land use, and can directly use their planning powers to prevent industrial animal farms. In so doing, and in combination with measures to facilitate dietary change (see below), they not only reduce farmed animal numbers and the consequent demand for land for feed, but reduce pollution and promote healthier diets (Compassion in World Farming; EAT-Lancet 2019).

Local authorities also have a key role in facilitating dietary shift towards more plant-based diets, which in turn will facilitate land use change. Their influence can include:

- ensuring procurement of locally sourced plant-based foods for catering conducted in local authority institutions;
- contributing to health and nutritional information and public awareness campaigns;
- supporting access to fresh fruit and vegetables in, for example, breakfast clubs and 'food deserts';
- using planning powers to limit outlets selling unhealthy and high emissions food;
- limiting public space advertising for unhealthy and high emissions food;
- and supporting community growing of plants for human consumption.

Others:

Communities All communities need to increase their community resilience, for example through food growing and procurement, and thus need to have decision-making power about stewardship of land in their areas. Community resilience can be increased through these principles as we have amended them: ethical stewardship decisions, emphasizing the protection and restoration of habitats for free-living animals, and ending the industrial scale farming of animals. Secure access to land for all those who wish to engage in sustainable land stewardship requires full local community involvement to be realised (Landworkers Alliance 2021). The viability and sustainability of communities, urban and rural alike, depends on sufficient and secure access to land, for affordable food production as well as other community needs (e.g. affordable housing etc.). Tolhurst Organic Partnership CIC is an example of a community supported



agriculture scheme, which provides the vegetables (and some fruit) for a relatively large number of households per farmed hectare, predicated upon secure access to suitable land as well as divesting from industrial scale (or other) farming of animals (Tolhurst).

Commercial organisations. We all have responsibilities to support sustainable land stewardship, and those with significant financial turnover have particular responsibility to fund it. Financial risk is a significant barrier to agro-ecological transitions (Soil Association, 2024). Therefore, commercial organisations including banks, trusts and large food processors and retailers, need to also be applying the principle of supporting transition from animal-based food to plant-based food land use. This will, for example, specifically address their responsibilities to reduce Scope 3 greenhouse gas emissions, as well as wider social and ethical duties.

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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?

Transition of land away from use in animal farming is essential to meet the core goals of the land use strategy: secure food production, environmental protection and making space for uses such as infrastructure and housing. To achieve this transition effectively and equitably, significant dietary change away from animal-based foods is essential. This requires policies which address not just what is produced on the land and how, but what people eat, in order to facilitate the necessary diet change.

The Vegan Society proposes a package of measures to promote a managed transition to a sustainable plant-based food system (The Vegan Society, 2024), which address both demand for and production of healthy plant-based foods for human consumption in the UK.

Policies addressing demand may not apply directly to land managers but play a critical role in incentivising the transition by creating a market and framework of support for plant-based foods. Those include:

- **Public education and awareness advertising campaigns on health and sustainability environmental benefits of healthy plant-based foods and diets.** This could include public health advertising to promote fruit and vegetable consumption, recipes and meal plans based on healthy and affordable plant proteins such as beans and pulses, as part of the Eatwell Guide.
- **Making it easier and more affordable for people to access healthy food.** This could include providing fruit and vegetables through voucher schemes such as Healthy Start, as well as schemes which provide access to healthy plant foods in areas with low access or 'food deserts'.
- **Nutrition and practical education for the general public in plant-based foods.** This could be in educational settings, such as in the school curriculum and community education, or provided by other sources, including libraries and via social media.
- **Improved training for health and food professionals in regard to healthy plant-based foods.** This training to include modules dedicated to plant-



based nutrition for all relevant health professionals, and qualifications in the preparation of nutritious plant-based meals for catering professionals.

- **Public procurement and catering to source and provide more plant-based foods.** Specific measures may include requirements for meals to conform to specific emissions-per-portion limits; plant-based by default public sector menus; and removing the obligation to provide meat and dairy from School Food Standards.
- **Measures to encourage food supply companies to transition towards a higher proportion of sales of plant-based foods.** This could include a requirements for large food companies of more than 250 employees - including processing, retail, manufacture, catering and out-of-home - to report data on a mandatory and uniform basis. Current reporting of metrics such as on sales by protein splits for sold products type, sales and of fresh fruit and vegetables, and to set mandatory targets for increasing sales of plant-based proteins, is inconsistent between businesses which stalls action and punishes market leaders. Government guidance can close the gap.
- **Improved and more transparent labelling for health and environment.** Mandatory holistic environmental labelling for food products, taking into account GHG emissions, land and water use. Fibre content and advice on recommended limits (such as for red meat) may be included in on-pack nutritional information.

Measures to support land managers in transition include:

- **Support the horticulture sector to produce more fruit, vegetables, nuts and pulses in the UK.** Specific measures may include farming subsidies, released from supporting animal feed production; support for research into plant varieties and production methods; assistance with marketing, both domestic and for export; ensuring access to labour; and regulation ensuring fair prices within the supply chain. (For more detailed proposals, see NFU and Sustain et al 2024.)
- **Policy support for increased production and provision of plant proteins for human consumption.** In addition to measures identified above in the context of horticulture, these could include grants, loans and/or subsidies targeted at the financial needs of farmers transitioning away from animal agriculture; payments for reduction of high environmental impact livestock; support for training and retraining of farmers. (For further information, see Stockfree Farming 2025.)



- **Increased investment in and support for alternative proteins.** This can include further investment in the National Alternative Proteins Innovation Centre and its work, and support for businesses in marketing.

In regard to financial support, fully funding the agro-ecological transitions away from industrial scale farming of animals, to sustainable plant-based agriculture is vital. The current c. £2.4 billion budget to support farming for 2024-25 (with another c. £2.4 billion for 2025-26) is insufficient, with independent research suggesting this may be less than 50% of the funds needed simply to meet legally binding environmental obligations. (RSPB, 2024). The costs of inaction, meanwhile, are considerably higher, with the consequences of climate change and other environmental damage potentially leading to a 12% decrease in UK GDP by 2035 (Green Finance Institute, 2024).

Dietary shift can also play a key role in securing savings to the Exchequer. Research indicates that a 20% reduction in average meat consumption could yield £1.2bn of savings to the NHS per year (CAWF, 2024), and that for every million people turning vegan, NHS England could save £120m per year (Henderson and Sampson, 2024).

Government is not the only source of funding, however. Ensuring that primary producers get a fair share of the profit from the food made with their crops is also vital for sustainable land stewardship. Large food processors and retailers need to properly support sustainable land use. Aggregate grocery profit for UK large retailers in 2023-24 rose to c. £44 billion (CMA, 2024): Sustain have calculated that farmers may get as little as under 1% of the profit from the food value chain, however (Sustain, 2022). Only a small percentage shift of large retail profit to farmers for agro-ecological measures would provide them with greater income and financial security, boosting the desirability of plant food production, and enabling a transition in land use. Government can and should facilitate that measures to ensure supply chain fairness, which Defra has already identified as a priority, are robust.

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Sustain, Soil Association and Wildlife Trusts 2024, Home Grown: A Roadmap to Resilient Fruit and Vegetable Production in England
<https://www.sustainweb.org/assets/home-grown-report-1718965792.pdf>

The Vegan Society/Office of Health Economics 2024
<https://www.vegansociety.com/news/news/switch-vegan-diets-could-save-nhs-67-billion-year>

The Vegan Society 2024, A Vegan Manifesto For Sustainable Plant-Based Transition
<https://www.vegansociety.com/sites/default/files/uploads/downloads/The%20Vegan%20Society%20Manifesto.pdf>



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?

It is very important that the rules and budgets for grant funding do not force land managers to remain locked into farming of animals, as is currently too often the case. As with the well-known model of transition to organic farming, which takes a minimum of three years, financial support from central government must cover the transitional costs including capital investment in new equipment, income for the transitional years for workers, and the cost involved in retraining.

Recent farmer-led research by The Soil Association found only one in five farmers are confident that financial and business factors will not be a barrier “to transitioning to farming systems that prioritise climate and nature” (Soil Association, 2024).

We also need more support for people entering or returning to land management, including secure access to suitable land, to bring more, and more diverse, people into this work.

References

Soil Association 2024, Assessing financial risk as a barrier to farm transition
https://www.soilassociationexchange.com/_files/ugd/21f3ea_722f091a025243b89089e1f5290913e7.pdf

QUESTION 6: No comment.

QUESTION 7: No comment.

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.

Policies which affect demand for products of the land, not just supply, will reduce the risk of displacing food production and its impacts abroad. In particular, measures which reduce demand for meat and dairy will ensure that the land use benefits derived from transition away from animal-based farming are not translated into increased imports and/or displacement of environmental harms.



The environmental impacts of farming animals typically exceed those of growing crops for plant-based alternative foods to equivalently meet our nutritional needs (Poore and Nemecek 2018; Springmann 2024). Therefore, to achieve our food, environment and land use targets we will also have to work together to increase the proportion of plant-based foods we choose to grow and eat. We need to transition away from industrial scale farming of animals, *and* give sufficient active support for people choosing healthier, more sustainable, largely UK-grown food. Together, all these measures will significantly decrease embedded environmental harm from food and feed imports, and at the same time, help us to increase net food production and improve food security and resilience.

The Climate Change Committee have set this out clearly in their Seventh Carbon Budget, stating “a reduction in demand for meat and dairy in the UK avoids imports of these products increasing” (Climate Change Committee, 2025). Empowering people to choose to transition toward more plant-based diets (Raghoeber, 2020) alongside effective support for farmers to grow this food, will significantly reduce our need to import food and feed and thus, our export of environmental harms. They find that food and agricultural products are the single largest source of the UK’s exported climate damage (e.g. imported carbon footprint, c. 80 MtCO₂e or 21% in 2021).

The Committee explicitly notes that measures to reduce the climate impact of animal-based farming cannot meet climate goals without a reduction in livestock numbers and the accompanying land use change.

References

Climate Change Committee 2025, Seventh Carbon Budget
<https://www.theccc.org.uk/wp-content/uploads/2025/02/The-Seventh-Carbon-Budget.pdf>

Poore & Nemecek 2018, Reducing food’s environmental impacts through producers and consumers. 2018, Poore J and Nemecek T, Science 360,987-992 doi:10.1126/science.aag0216,
<https://www.science.org/doi/10.1126/science.aag0216> (accessed 2025-04-10)

Raghoeber, S., Van Kleef, E, and De Vet, E. (2020) Increasing the proportion of plant-based foods available to shift social consumption norms and food choice among non-vegetarians.) <https://www.mdpi.com/2071-1050/12/13/5371>

Springmann 2024, A multicriteria analysis of meat and milk alternatives from nutritional, health, environmental, and cost perspectives, Proc. Natl. Acad. Sci. U.S.A. 121 (50) e2319010121, <https://doi.org/10.1073/pnas.2319010121>

QUESTION 9: No comment.



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)

Other. England has to release the land currently locked up by the activities of industrial scale farming of animals. A significant proportion of this land, including in Less Favoured Areas, can be used create and restore habitats – for example, as woodland and species-rich natural grassland – as well as to increase food supply through agroecological growing of crops for human consumption. This is because the environmental impacts of farming animals typically exceed those of growing crops for plant-based alternative foods to equivalently meet our nutritional needs (Poore and Nemecek 2018; Springmann 2024).

The effective, practical policy measures required to promote a transition to plant-based agriculture and diets are outlined in answer to Q4. A key need is for transitional financial and other support for land managers moving away from industrial scale farming of animals, as part of the plant-based agri-food transition. Securing sufficient flows of funding, with no inappropriate restrictions, will be key. Recent farmer-led research by The Soil Association found only one in five farmers are confident that financial and business factors will NOT be a barrier “to transitioning to farming systems that prioritise climate and nature” (2024).

References

Poore & Nemecek 2018, Reducing food’s environmental impacts through producers and consumers. 2018, Poore J and Nemecek T, Science 360,987-992 doi:10.1126/science.aag0216, <https://www.science.org/doi/10.1126/science.aag0216> (accessed 2025-04-10)

Soil Association 2024, addressing financial risk as a barrier to farm transition, p7, https://www.soilassociationexchange.com/_files/ugd/21f3ea_722f091a025243b89089e1f5290913e7.pdf

Springmann 2024, A multicriteria analysis of meat and milk alternatives from nutritional, health, environmental, and cost perspectives, Proc. Natl. Acad. Sci. U.S.A. 121 (50) e2319010121, <https://doi.org/10.1073/pnas.2319010121>



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

One important approach is community supported agriculture (CSA), focusing upon agro-ecological crop farming for direct community consumption. Urban areas particularly need more culturally appropriate vegetables and fruits, which are disproportionately unaffordable away from current horticultural areas of England.

Long-running rural CSA schemes such as Tolhurst Organic Partnership CIC (Tolhurst) provide a proven blueprint that can be adapted to peri-urban and urban areas. With no need for farmed animals, they can affordably supply most vegetable needs for over 50 households per hectare, with a carbon footprint up to 90% lower than conventional supermarket vegetables. Over 85% of their turnover goes directly back to the local community, which also brings significant environmental and social benefits. CSA also helps local residents learn more about how their food is grown, help people to start growing their own food, and diverse new entrants into growing.

Recent farmer-led research by The Soil Association found only one in five farmers are confident that financial and business factors will not be a barrier “to transitioning to farming systems that prioritise climate and nature” (Soil Association, 2024). These concerns also apply to CSA, so proper transitional funding will be important, especially where there is currently industrial scale farming of animals.

References

Soil Association 2024, Assessing financial risk as a barrier to farm transition
https://www.soilassociationexchange.com/_files/ugd/21f3ea_722f091a025243b89089e1f5290913e7.pdf

Tolhurst Organic <https://www.tolhurstorganic.co.uk/about-us/why-choose-us>, accessed 25 March 2025

QUESTION 12: No comment.

QUESTION 13: No comment.

QUESTION 14: No comment.

QUESTION 15: No comment.

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.

- Other (please specify)

Reducing production and consumption of animal-based foods and the corresponding land use changes bring important mitigation benefits (see Q1), reducing methane and nitrous oxide emissions from animals and slurry, and freeing up more land for sequestration (Climate Change Committee, 2025). It is essential that landowners, land managers and communities understand this in developing and planning for the impacts of climate change.

References

Climate Change Committee 2025, Seventh Carbon Budget

<https://www.theccc.org.uk/wp-content/uploads/2025/02/The-Seventh-Carbon-Budget.pdf>

QUESTION 17: No comment.

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

We need transparent farming and food supply chain data, to make plain where land use and the associated harms are being 'exported' by activities associated by industrial scale farming of animals.

Currently, our understanding of land stewardship is deeply distorted by so-called 'ghost acres': land outside of a holding that is vital for the enterprise (Lymbery). This includes the c. 40% of land within England plus the land out with England degraded to grow crops to feed the animals used in industrial-scale systems. We need to accurately report on this exported land use for each holding, so that we can ensure our land stewardship in farming creates and restores habitat to the greatest extent practicable.



Reference

Lymbery 2023, 'Ghost food waste' is another reason why the UK must ban rearing of farm animals in cages, Lymbery P 2023, The Scotsman, <https://www.scotsman.com/news/opinion/columnists/ghost-food-waste-is-another-reason-why-the-uk-must-ban-rearing-of-farm-animals-in-cages-philip-lymbery-4376557> (accessed 2025-04-07)

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

The Agricultural Land Classification system needs to transparently record the rate at which the land, and the habitats which it should support, are being degraded by the current patterns of use. We need to be able to identify and measure changes in the land and associated habitats for free-living animals which is being degraded by the industrial-scale farming of animals. This refers not just fully enclosed systems, nor the crop land diverted to grow feed, but also farms with large numbers of animals which prevent the restoration of species-rich grassland, the regrowth of woodlands, and the regeneration of water habitats, for example.

QUESTION 20: No comment.

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)

Transition of land away from animal use towards either plant-based food production or alternative land uses such as rewilding and reforestation requires the development of new skills. Land managers currently engaged exclusively in animal farming tend to have very little of the necessary knowledge for sustainable, healthy plant-based food production and all farmers may have limited knowledge of effective rewilding. In addition, any transition in business model requires advice and skilling-up on relevant business considerations, such as access to finance (both private and public, such as ELMs) and financial planning. Similarly, those wishing to return to, or enter, agro-ecological crop farming need to learn all the associated skills.



In regard to land use specifically, knowledge gaps are likely to include sustainable arable, silvo-arable, agroforestry and horticultural farming, for example, as appropriate. They will also need to develop a detailed understanding of the micro-climates, local soils and other local habitats of the specific land which they will be farming.

Experts in sustainable, habitat-restoring plant-based farming, such as Iain 'Tolly' Tolhurst of Tolhurst Organic Partnership CIC, have developed their knowledge of their specific holdings over decades. Tolhurst now avoids any imported sources of soil fertility, instead using annual and perennial plants on their holding, which has significantly improved their soil quality whilst restoring habitats. Expert advice on transition is already available to farmers through organisations such as Stockfree Farming but appropriate support for this complex and challenging transition at the necessary scale requires government support (Stockfree Farming).

Developing these skills requires both formal provision of education and peer-to-peer support by existing land managers who are making or have made the transition.

References

Stockfree Farming <https://stockfreefarming.org/business-models/>, accessed 22 April 2025

Tolhurst Organic <https://www.tolhurstorganic.co.uk/about-us/biodiversity/>, accessed 4 April 2025

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

Agroecological farming practitioners, and existing, returning or new entrants to the practices, need to be able to invest time in sharing best practice. The fundamental need is to pay farmers the independently verified Real Living Wage to teach and learn their agro-ecological skills from one another, peer-to-peer. They will then be able to employ staff to continue the day-to-day work on their holdings, as they devote themselves to learning and innovation.

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

- Yes, another frequency or approach.

The Land Stewardship Framework for England needs to be a living document, so that serious short-comings can be addressed at any time. As acceptance for the necessary transition away from the activities associated with industrial-scale



farming of animals grows year-on-year, the Framework is likely to need significant concurrent improvements.

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

Agree.

We agree that land use is a cross-cutting issue that requires to be addressed across government departments and agencies. Effective oversight and guidance requires consideration encompassing all aspects and consequences of land use, including some not directly addressed in the consultation: health considerations arising from diet, necessitating a transition towards more plant-based diets; health considerations arising from animal agriculture, such as antimicrobial resistance; environmental impacts of land use for animal agriculture, such as nitrogen pollution; animal welfare (as required by the Animal Sentience Act).

This means that research, consultation and advice should be commissioned and sought from a wide range of stakeholders and experts. A case may also be made that overall oversight should belong with the Cabinet office, rather than Defra, to ensure that any potential inconsistencies or conflicts between promoting public health and promoting the food or agricultural industries are managed appropriately.

-END-