SUBMISSION IN RESPONSE TO LAND USE CONSULTATION

REWILDING BRITAIN

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SCAN FOR MORE ON OUR RESPONSE

INTRODUCTION

Rewilding Britain welcomes the UK Government's Land Use Consultation (LUC), which will inform its development of a Land Use Framework (LUF) for England. This is the first time that a comprehensive proposal for managing land use has been developed at this scale for the nation.

The LUF provides an exciting and timely opportunity to create a coherent, long-term blueprint for land use management and future decision-making that responds to and accounts for the multiple demands on our land. It is one of the defining challenges of the 21st century to not only restore nature to our landscapes and protect our communities from the worst impacts of climate change, but also to produce the food, timber and other resources upon which we all depend.

Our land is a vital resource. From it can come climate change mitigation and resilience, nature recovery, food, timber and fibre production, clean air and water, and energy provision. It can be the linchpin of our economy, and be integral to our collective health and personal wellbeing. But for it to serve these purposes we must use it more efficiently and productively, through an integrated, multi-tier approach.

We have reached a critical point: our old thinking will no longer meet our current and future requirements of land. To ensure the wellbeing of future generations we need instead to reframe our land use system and our management of it. Ultimately, we must decide how we as a society use our land and how our government guides, enables and supports this. The development of the LUF is an important opportunity to think holistically and plan for the long term.

Rewilding Britain has long called for a legally binding national LUF that is supported by and integrated into local land use plans. These local plans must balance nature, net zero, food and timber production targets with a commitment to rewilding 30% of Britain. We are therefore pleased to see that the LUC recognises the need for action and that there are *"increasing opportunities and demands on our land, requiring land use to be more dynamic than ever. Across both rural and urban landscapes, we must maintain food security in a time of global uncertainty, protect communities from the impacts of a warming climate, host growing infrastructure networks and settlements, and make room for healthier natural ecosystems to reverse nature's decline"*[1].

Launched by Rewilding Britain in 2021, the Rewilding Network now has over 1,000 members. Network member Hepple Wilds, shown here, is driving transformation of the land from partitioned fields, woods and moor to a more connected, single ecosystem.

Competing demands mean we must make informed decisions about how we best use our land and natural resources to achieve our long-term economic, environmental and social aims. Measures to accelerate the transition are essential and we welcome the proposed LUF's acknowledgement that significant land use changes are needed to meet these multiple challenges, and the Government's recognition that, for example, to *"make space for nature, water, and emissions reduction, while also delivering new infrastructure and housing and maintaining food production, there will need to be a range of different land use changes by 2050. These changes are critical to make agriculture and food production more resilient to climate change. They are also necessary to meet our statutory Carbon Budgets under the Climate Change Act and statutory environmental targets under the Environment Act"*[2].

The LUF should set out a clear and coherent long-term approach that guides land use decision-making across England for the next 25 years. Currently, however, the LUF only covers and considers change across 12.7% of our land (19% of UAA – Utilised Agricultural Area), leaving the remaining 87% 'out of scope'. If we are to achieve the vision laid out in the LUF to "*deliver our missions for Growth and Clean Energy, boost food security, and meet our statutory climate and nature targets"* we will need a comprehensive framework for land use across **all** of our land. This does not need to prescribe what individual landowners do on their land, but it should provide clarity and guidance as to how we can most effectively balance the competing demands of society.

The basis of this Framework should reflect what we are asking of the land. **It's time to define land use by what it is for, not by what it is not for**. The LUF currently categorises land as agricultural, non-agricultural and urban (see Figure 5, p17). If the LUF is to genuinely guide decision-making and future land use planning we need clearer categories that better reflect the multiple outcomes needed by society.

In particular, we need to act at pace and adopt new approaches to land management if we are to meet the criteria[3] set by our legally binding commitment of restoring 30% of our land by 2030 (30by30). We believe that committing to *"halting the decline of nature"*, as set out in the Environment Act, is no longer good enough. The LUF and the (to be published) rapid review of the Environmental Improvement Plan[4] must set out meaningful pathways to meet the commitment of a 10% increase in species abundance by 2042[5]. England and the wider British Isles have experienced decades of biodiversity loss, and we now need to restore the living world on which we all depend.

The UK Government's Food Security Report states that *"the long term decline in the UK's natural capital is a pressing risk to UK food production. Both productivity and sustainability of food production rely on ecosystem services provided by biodiversity, healthy soil and clean water"*[6].

Grazing animals at Knepp Estate help to create a mosaic of grassland, scrub and woodland, attract tourists and support income through the sales of wild meat.

Rewilding — the large-scale restoration of nature — across 30% of England is critical if we are to respond effectively to the interconnected nature and climate emergencies **and** ensure sustained food, fibre and timber production. Without nature, there will be no farming and no food, and we must recognise that in some areas prioritising environmental and climate benefits over food production is a viable, important and productive use of the land.

The LUF has the opportunity to ensure that rewilding is central to our future land use approach. Delivering both net zero and a richer, wilder England abundant in life is possible. This will create an England where the large-scale restoration of natural processes, habitats and species works hand in hand with sustainable farming, forestry and leisure to the benefit of us all. The people-led approach to rewilding that we propose can and should be achieved alongside a just rural transition that allows nature to heal and flourish while supporting prosperous communities. Our own analysis reveals, for example, that projects led by our Rewilding Network members have doubled the number of local jobs compared to those created by previous land use.

We therefore propose that the following classifications replace the Consultation's current categories for defining land use. These would better reflect the primary outcomes society seeks and recognise the wide-ranging benefits of all land uses[7]:

- Agricultural land – divided into arable and pasture land (food production)
- Forestry land (timber and wood products)
- Natural process-led land (healthy natural ecosystems, climate mitigation and adaptation, plus co-benefits and co-products)
- Built environment (homes, infrastructure).

We want 'natural process-led land' to be a new land use category because the LUF's proposed scale of change, and land areas considered, takes us nowhere near the Government's commitment of "*effectively conserving and managing 30% of the UK's land by 2030 (30by30) to support delivery of the Environment Act biodiversity targets*". We need areas where the acknowledged primary outcomes are nature, climate and environment benefits, in line with 30by30 commitments. In these areas, the focus of management practices and restoration interventions would be reinstating natural processes such as free-flowing rivers, natural grazing patterns, habitat succession and predation, and allowing these areas to create dynamic, constantly changing habitat mosaics while helping to revitalise local rural economies and communities. Within the 30% natural process-led land area would be the creation of:

- **Semi-wild Areas**, comprising 25%, with a broad and diverse range of natural process-led land uses and enterprises, generating local economic benefits while allowing nature to flourish, through, for example, high-nature-value food and timber production, ecotourism and nature-based enterprises.
- **Core Rewilding Areas**, comprising 5%, where nature is allowed to fully recover. These areas will focus on restoring and reinstating as wide a range of natural processes, habitats and native species as possible, forming healthy mosaics of, for example, native woodlands, peatlands, heaths, species-rich grasslands, wetlands and saltmarshes — with only low-key and sustainable human intervention.

What this would mean for our landscapes and the people who live, visit and work in them is explained and illustrated in our Rewilding Journeys infographic.

WHAT IS REWILDING?

Rewilding is the large-scale restoration of nature until it can take care of itself — and of us — again. Our world is threatened by biodiversity loss, habitat destruction and climate breakdown, but rewilding can replenish nature's remarkable web of life — restoring habitats, natural processes and the diversity and abundance of native species. Rewilding is a means of tackling the interconnected nature and climate emergencies and empowering people to act. It offers a wealth of economic and social benefits for all of us and for our local communities.

Rewilding can take many forms and can be delivered at different scales, depending on the extent to which nature takes the lead and on local context and culture. This connectivity provides wildlife-rich corridors from the heart of towns and cities to surrounding wilder landscapes, and provides stepping stones across intensively managed areas where needed. Our national parks and other protected areas should lead the way on this approach.

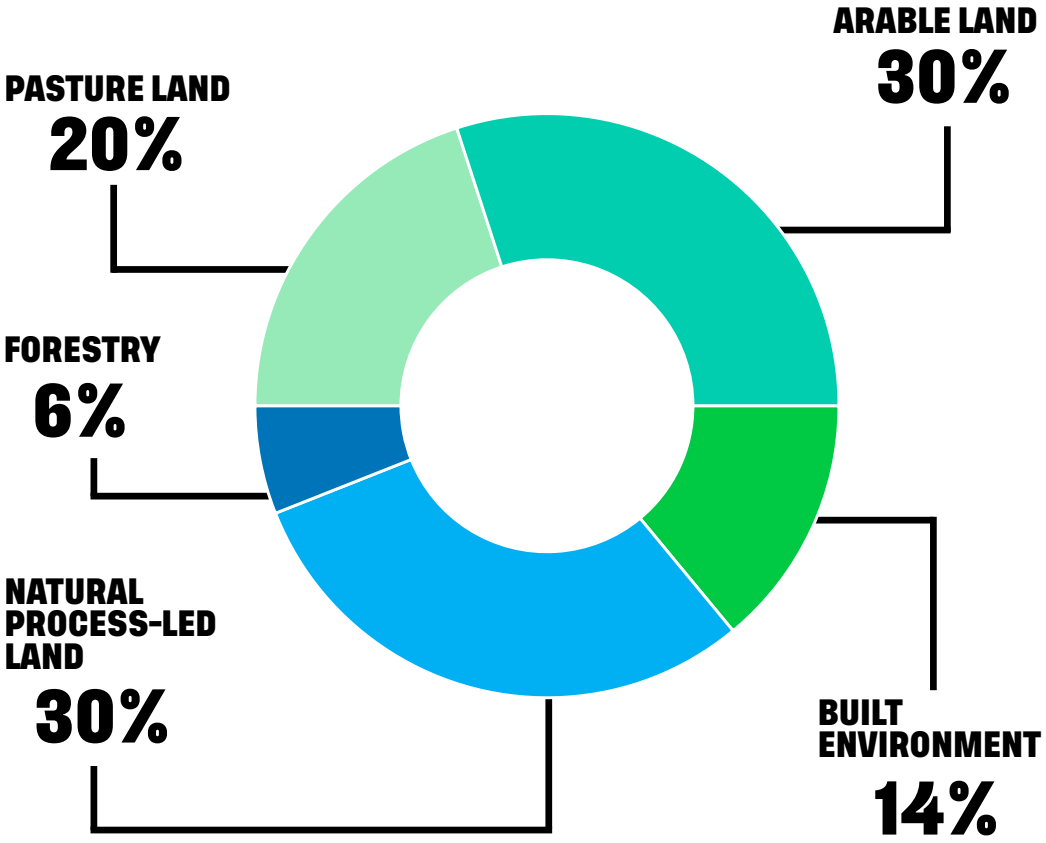
Today, 1% of Britain's land is in rewilding schemes. The Rewilding Network that we support, which now comprises 1,005 projects and over 181,128 hectares of land, is rapidly growing. We are proud that as part of this we support a wide range of community groups, farmers, landowners and conservationists across England.

Members of the Rewilding Network including Wild Ennerdale, Wild Haweswater and Wild Exmoor are leading the way by working in partnership to create a mosaic of core rewilding within our national parks.

AN ALTERNATIVE FRAMEWORK FOR LAND USE IN THE 21ST CENTURY

We have modelled land use across England and know that prioritising natural process-led land management and the restoration of nature across 30% of the country is possible. We have the opportunity to live in a country rich with a diverse, inspiring mosaic of species-rich habitats that are protected, restored and rewilding. These areas can deliver an array of benefits for people — such as climate mitigation, including for severe weather events, vibrant green economies, healthier air, water and soils, nature-led production of food and timber, improved health and wellbeing, a sense of place and a closer connection to nature, and more opportunities for us all to simply enjoy wild nature. These areas will also generate economic value for, and provide connectivity through, the higher resource-use areas and built environments that would cover the remaining 70% of England.

REWILDING BRITAIN PROPOSED PERCENTAGE BY 2030



In Table 1 we explain this proposition and show why prioritising nature across 30% of Britain is a highly productive use of land that will help us transition to a nature-rich, low-carbon future and deliver local benefits. Our responses to the LUC questions themselves provide details of the pathways and actions that will bring about these benefits.

Table 1: An alternative framework for land use

<table>
<tr><th>PREVIOUS CLASSIFICATION</th><th>PROPOSED CLASSIFICATION</th><th>MAIN RESULTING OUTCOME</th><th>CURRENT AREA %</th><th>LUF PROPOSED % BY 2050 (FIG 5)</th><th>RB PROPOSED % BY 2030</th></tr>
<tr><td rowspan="3">Agricultural land</td><td colspan="5">Proposal to split this overall category into two – arable land and pasture land, as follows:</td></tr>
<tr><td>Arable land</td><td>Food production</td><td>38%</td><td>~30%</td><td>~30%</td></tr>
<tr><td colspan="5">Arable land is vital for the bulk of our domestic food production. The LUC indicates a proposed reduction in total croppable area of ~8% – about 1,000kha of land – by 2050. It should be within the scope of the LUF to guide and support the land management changes that are needed for arable land, with a focus on minimising environmental harm and avoiding the further offshoring of food production. Options to consider include:
■ Reducing the area of arable land used to produce animal feed. Growing plants for human consumption generates around 12 times more calories per hectare than using land for meat production (National Food Strategy; NFS). In the UK, as the Consultation points out, 85% of our farmland is used for feeding livestock, through grazing or through arable crops used as feed.
■ Phasing out the use of productive land for growing biofuels. A report by Green Alliance shows that the food used to make the biofuels used in the UK could feed 3.5 million people.
■ Focusing the transition needed for environmental outcomes to grades 3b-5 agricultural land. Arable outputs on lower grade agricultural land are marginal, and lower grade agricultural land is where there is greater societal value from prioritising natural process-led land management approaches that deliver nature, environmental and climate benefits.
■ Prioritising the transition to natural process-led management of arable land that is prone to flooding. “Extreme weather events continue to have a significant effect on domestic production, particularly arable crops, fruit and vegetables” (UK Government Food Security Report). We can choose to allocate some of the land that is already prone to flooding land to nature in order to retain water and safeguard remaining arable land.
■ Reducing the area of grass leys by introducing other crops in the rotation. For example, local varieties of peas, beans or lentils can be grown for human consumption. Currently 874kha (17%) of agricultural land is temporary grassland.
■ Halving food waste. Although this is not directly within scope of the LUF, action on this could save 800,000ha of cropland and release 12% of land by 2040.
■ Boosting domestic production of fruit and vegetables through better support of smallholdings, market gardens and community spaces (including allotments). Increasing domestic production on a very small area of land can reduce our reliance on imports, support local economies, reduce greenhouse gas emissions relating to agriculture, improve diets and help get people moving.
■ Directing research funding, innovation and technology. By investing in research and technological innovation we can develop more efficient farming practices across England’s arable land that enhance soil health, reduce carbon footprints and improve crop yields. By integrating technologies that promote agroecological approaches that help preserve natural resources, such as water, we can increase biodiversity and create a more resilient agricultural system.</td></tr>
</table>

PREVIOUS CLASSIFICATION	PROPOSED CLASSIFICATION	MAIN RESULTING OUTCOME	CURRENT AREA %	LUF PROPOSED % BY 2050 (FIG 5)	RB PROPOSED % BY 2030
Agricultural land	**Pasture land**	**Food production – forage and fodder for livestock**	**29%**	**~28%**	**~20%**
	Pasture refers to improved grassland that is managed to increase productivity for grazing livestock. We are proposing a reduction from 29% to 20% pasture land, which would reduce the overall area of improved pasture by about 1,100kha. Most of the reduction would result from re-categorising semi-natural/natural grassland to natural process-led land and managing it accordingly. This would include some semi-wild and wild meat production (e.g. venison). The NFS states that reducing meat and dairy consumption is one of the most effective ways of improving the overall productivity of our land. The 7th Carbon Budget builds on this, recommending a reduction of 27% in cattle and sheep numbers between 2023 and 2040, and indicates that the necessary changes in diet are generally accepted by the public. Rewilding Britain's naturalness-potential mapping indicates that there is a similar amount of improved pasture within the 30% of England with the highest potential for nature restoration. The areas we have identified with the highest naturalness potential correlate closely with those identified in the NFS as being best suited to nature restoration and carbon removal. If these areas were allowed to regenerate into natural grassland and woodland mosaics, our calculations indicate that, while there would still be some semi-wild and wild meats produced, the reduction in stocking density needed would only require a reduction of ~12% in total cattle numbers and ~27% in total sheep numbers. Since as a nation we are eating far less of these meats (37% less beef and 54% less lamb between 2008 and 2019), this will have little impact on food security but could lead to significant nature and climate benefits.				
Non-agricultural land	**Forestry land**	**Timber, fibre and wood products**	**~3%**	**Not included**	**~6%**
	Forestry provides important timber, fibre and wood products but is not included as either a specific land use outcome or category of land use change within the LUF Consultation. Forestry land is currently included as part of 'non-agricultural land'. While there is a commitment to 'increase tree canopy and woodland cover to 16.5% of total land area in England by 2050' neither forestry as a land use category nor timber production are clearly mentioned in the vision, principles or main resulting outcomes. To set a clear frame for future land use we would like to see forestry land – defined as land where the primary outcome is timber, fibre and wood products – as a separate land use category, with a clear indication of the optimal area and establishment of sustainable forestry practices and standards. We estimate that 'forestry land' should increase to ~6% of England's land area in order to support the forecasted increase in demand for timber and wood products. This is within the context of our call for a doubling of overall woodland cover across England from 10% to 20%. The remaining 14% of woodland cover is covered within the 30% 'natural process-led land' section, because its primary outcome is nature, climate and environment benefits with some timber, fibre and wood as co-products.				

PREVIOUS CLASSIFICATION	PROPOSED CLASSIFICATION	MAIN RESULTING OUTCOME	CURRENT AREA %	LUF PROPOSED % BY 2050 (FIG 5)	RB PROPOSED % BY 2030
Non-agricultural land (+ some land previously defined as agricultural)	**Natural process-led land**	**Nature, climate and environment benefits with social and economic co-benefits.** **Food, timber, fibre and wood products are also co-products in some areas.**	**N/A**	**Not included**	**30%**

Prioritising nature through rewilding and natural process-led management can be a highly productive use of land that helps us transition to a nature-rich, low-carbon future while delivering real, locally generated benefits. These benefits include carbon storage, climate resilience, thriving biodiversity, vibrant local economies, employment opportunities, flood mitigation, cleaner air and water, healthier soils, education and enrichment opportunities for children and adults, and improved health and wellbeing, all in support of the delivery of 30by30, net zero and Environment Act targets.

Rewilding and natural process-led approaches work to restore full ecological function to our landscapes. The primary outcome is to restore ecosystems by allowing natural processes – such as water movement, decomposition, plant succession and soil regeneration – to shape the landscape. Rewilding can happen across a gradation of approaches, and depends on the extent to which nature takes the lead. Decisions around this should be determined by the local community, and are in large part dependent on both local context and culture. Nature-based enterprise and natural process-led production, for example of meat, timber and non-timber forest products, can be important co-products of rewilding and natural process-led areas. We describe this spectrum of rewilding in more detail in our Rewilding Journeys infographic. Our 30% naturalness-potential mapping indicates that this can be achieved by:

Pathway 1: Rapidly committing to and delivering 30% rewilding and natural process-led land by 2030

- Allow improved pasture to regenerate into natural grasslands and woodland/scrub mosaics (~1,100kha)
- Support nature's recovery as a primary purpose across our national parks and other protected landscapes (~1,900kha)
- Double the area of broadleaf/mixed woodland and transitional scrub (from 700kha to 1,400kha) using natural regeneration as the default option wherever possible
- Ensure the sustainable management of deer numbers to support both natural regeneration of woodland and recovery of ground flora
- Re-wet and restore peatlands (~320kha)
- End moor burning and the other environmentally damaging activities associated with driven grouse shooting (>330kha)
- Set legally binding targets for the restoration of Sites of Special Scientific Interest using a rewilding-first approach when appropriate to do so
- Streamline legislation for vital reintroductions of missing native species to help rebuild functioning ecosystems
- Support land managers in becoming our river restoration heroes and expand riparian restoration and natural flood management across flood zones 2 and 3 (>270kha)
- Restore our rivers, water bodies, inland marshes, saltmarshes, intertidal flats, coastal lagoons and estuaries (~160kha)
- Ensure local land use plans are developed and supported, through integrated regulatory processes with simple performance standards and effective enforcement and monitoring, integrating them wherever relevant, such as with local nature recovery strategies.

PREVIOUS CLASSIFICATION	PROPOSED CLASSIFICATION	MAIN RESULTING OUTCOME	CURRENT AREA %	LUF PROPOSED % BY 2050 (FIG 5)	RB PROPOSED % BY 2030
Non-agricultural land (+ some land previously defined as agricultural)	**Pathway 2: Incentivise and invest in nature-based economies across 30% of England as part of a just green transition** ■ Unleash a wave of nature-based business innovation including natural process-led food and timber production, for example through legal frameworks that support natural grazing, market creation and wild meat food chains, through support for small, local abattoirs to enhance local food markets, and by expanding natural process-led forestry practices and ecotourism ■ Establish 'nature-based enterprise zones' with associated packages of business development support ■ Support a thriving ecosystem of employment linked to nature-based enterprise, food and timber production, and rewilding ■ Deliver a skilled green workforce by fast-tracking the development and accreditation of training and apprenticeships to fill skills gaps. **Pathway 3: Place people and communities at the heart of decisions about our land** ■ Enable and empower locally and community-led partnerships to co-design and upscale rewilding initiatives ■ Diversify public, private and community ownership models that enhance localised decision-making, for example through supporting community rights to buy for nature restoration, as well as effective community benefit-sharing mechanisms ■ Clarify commoner and tenancy rights for carbon and biodiversity to ensure they unlock and share benefits from nature restoration. **Connection with LUF change categories:** We propose that all of the categories proposed within the LUF be included along with the 30% natural process-led area as follows: ■ Category 2: These areas provide connectivity through and stepping stones within agricultural land as well as riparian buffer strips ■ Category 3a: By focusing on semi-natural silvopastoral systems such as wood pasture, these areas can restore natural processes and sequester carbon while still producing semi-wild/wild meats ■ Category 3b: The creation/restoration of species-rich grassland habitats, including associated scrub and responsible management of peat, and some forms of coppicing, fits well with natural process-led management ■ Category 4: As land that is fully dedicated to delivering environmental and climate benefits, this fits well with the Core Rewilding Areas that we propose. The proposed restoration and maintenance of peat-forming and peat-dependent habitats (including wetlands and upland heath), the creation/restoration of coastal and lowland heathland habitats, including associated scrub, and the creation of woodland are compatible with this, as is the reintroduction of missing species.			

PREVIOUS CLASSIFICATION	PROPOSED CLASSIFICATION	MAIN RESULTING OUTCOME	CURRENT AREA %	LUF PROPOSED % BY 2050 (FIG 5)	RB PROPOSED % BY 2030
Urban	**Built environment**	**Homes and infrastructure**	**13%**	**~14%**	**14%**
	Urban rewilding has the potential to create novel ecosystems that can support a wide range of species, boost human wellbeing and help deliver the UK Government's commitment to increasing access to nature. We would like to require and incentivise cities, towns, local government and developers to integrate urban rewilding into their plans through the inclusion of large wilder areas within new and redeveloping urban areas (>50kha).				

ANSWERS TO INDIVIDUAL 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 / 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.

We disagree.

We welcome the recognition in the LUC that significant land use changes are needed, including to "*make space for nature, water, and emissions reduction, while also delivering new infrastructure and housing and maintaining food production*". As we've mentioned, the finalised LUF is a huge opportunity to set the direction of land use change needed in England over the next 25 years.

However, despite recognising the scale, urgency and ambition of the change required, currently the LUF only covers change across 12.7% of our land (19% of UAA). This means that the great majority of the land – 87% – is 'out of scope'. This excludes large areas where more productive uses of the land could and should be considered.

In addition, the scale and type of land use change proposed should reflect the outcomes we are asking of the land. The LUF currently categorises land as agricultural, non-agricultural and urban (see Figure 5). If the LUF is to genuinely guide future decision-making we need clearer, more fit-for purpose, categories of land use. We propose the redefinition of land use categories, with their associated primary outcomes, below and as explained in Table 1.

- Agricultural land – divided into arable and pasture land (food production)
- Forestry land (timber and wood products)
- Natural process-led land (healthy natural ecosystems, climate mitigation and adaptation, plus co-benefits and co-products)
- Built environment (homes, infrastructure).

We also need to do far more if we are to meet the criteria set by the pledge to deliver 30by30. The proposed scale of change takes us nowhere near the Government's commitment, repeated in this Consultation, of "*effectively conserving and managing 30% of the UK's land by 2030 (30by30) to support delivery of the Environment Act biodiversity targets*". This challenge is underlined in the LUC, which recognises that "*On the ground, our natural world is under threat, with England now one of the most nature-depleted countries in the world.*"

According to the Government's policy paper, '30 by 30 on land in England: confirmed criteria and next steps', only 7.1% of England meets the criteria for the 30 by 30 target. Other estimates suggest that even this dire figure is inflated. For example, Wildlife and Countryside Link puts the true figure at 3%. This is why we're proposing that 30% of land be redefined as natural process-led land as described in Table 1 and in our answer to Question 10.

We would like to see all the proposed land use change categories in the LUF be included in this area as follows and that this be achieved by 2030 not 2050:

- **Category 2:** These areas provide connectivity through and stepping stones within agricultural land as well as riparian buffer strips.
- **Category 3a:** By focusing on semi-natural silvopastoral systems such as wood pasture these areas can restore natural processes and sequester carbon while still producing semi-wild/wild meats.
- **Category 3b:** The creation/restoration of species-rich grassland habitats, including associated scrub, the responsible management of peat and some forms of coppicing fits well with natural process-led management. Natural process-led production of semi-wild/wild meats and timber and wood products can be co-products.
- **Category 4:** As land that is fully dedicated to delivering environmental and climate benefits this fits well with the Core Rewilding Areas that we propose. The proposed restoration and maintenance of peat-forming and peat-dependent habitats (including wetlands and upland heath), the creation/restoration of coastal and lowland heathland habitats, including associated scrub, and the creation of woodland are compatible with this, as is the reintroduction of missing species.

To achieve the scale of change proposed we need corresponding land use-potential mapping, using up-to-date data – including soil type, climate, current biodiversity, tree growth potential, naturalness potential, carbon removal potential – to allow for an accurate assessment of the most productive use of each area of land. Local communities, farmers, foresters, businesses and public bodies then need to come together using participatory processes to develop local place-based land use plans. The nature recovery network and local nature recovery strategies being developed that underpin the network[8] are examples of useful data sources.

We also need to ensure that nature, climate and environment benefits achieved in one area aren't achieved through increasing environmental harm in more intensively managed areas or by offshoring production and damage.

The goal at Rewilding Network member Wild Kielder is to ensure the long-term sustainability of the forest through diverse and sustainable timber production, education and engagement opportunities and nature experiences.

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 agree, but with a number of caveats.

The five land use principles proposed – Co-design, Multifunctional land, Playing to the strengths of the land, Decisions fit for the long-term and Responsive by design – we believe are fundamentally sound. However, they should be applied by default to 100% of the land area in England, not just to the 12.7% considered in the Consultation.

Alongside these principles we need an enhanced categorisation of land uses, as described by our response to Question 1. The principles should be explicitly linked to the delivery of the overall vision, which prioritises making space for nature and creating resilient economies, alongside sustainable and resilient food production.

In relation to each of the principles:

Principle 1– Co-design: Support for participation and leadership at the local and regional scale to develop and align spatial strategies and assess the fairness of changes in land use.

- Strongly agree but would change to: Active *support for open and inclusive participation and leadership at the local and regional scale to develop and align spatial strategies and to assess the fairness of changes in land use. There should be greater public and community participation in land use decision-making, which often has a critical impact on local people's quality of life, and particular efforts should be made to involve hard-to-reach communities that may benefit most from the changes proposed.*

Principle 2 – Multifunctional land: Enable multiple benefits on land, targeted according to opportunity, societal needs (such as the health benefits of co-locating new homes and nature), and environmental pressures (such as reducing pollution).

- Agree in principle but would change to: *Enable and balance multiple land uses to maximise shared environmental, economic and social benefits and minimise harm, for example to maintain food and timber production, protect communities from the impacts of a warming climate, host developing infrastructure networks and settlements, and make room for healthier, connected natural ecosystems to reverse nature's decline.*

Principle 3 – Playing to the strengths of the land: Support and spatially target land use change to locations where benefits are greater and trade-offs are lower. Give priority to land uses that are more scarce or spatially sensitive (for example grid capacity places restrictions on new renewable generation sites or protecting land that is best suited for food production).

- Agree in principle but would change to: *Support and spatially target land use change to maximise shared environmental, economic and social outcomes and minimise harm. Give priority to balancing the benefits of agricultural land (food production), forestry land (timber and wood products), natural process-led land (healthier natural ecosystems, climate mitigation and adaptation plus co-benefits) and the built environment (homes, infrastructure).*

Principle 4 – Decisions fit for the long-term: Take a long-term view of changing land suitability, prioritising resilience (including to the impacts of climate change). This could include planning for new homes that are resilient to climate impacts, such as flooding and overheating.

- Strongly agree

Principle 5 – Responsive by design: Land use policy, including spatial prioritisation and targeting, needs to be responsive to new data, opportunities and pressures.

- Strongly agree

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)**

Combined and local authorities – Yes: We are pleased that the LUF recognises that local authorities are crucial to its delivery and that *"a more joined-up, strategic approach to land use strategy and planning" is needed. We would like to see local authorities supported in creating integrated land use plans that are shaped by local communities. However, their capacity to apply these principles is currently greatly hampered by funding cuts and resourcing limitations, which must be addressed to ensure optimal delivery outcomes.*

Landowners and land managers – Yes: The five land use principles should be adopted by landowners and land managers (encompassing public, private, corporate and third sector landowners and managers). We would like to see landowners/managers with land areas of over 100ha in size, comply with a set of rights and responsibilities that balance the rights of landowners, managers, local communities and society at large and that follow the example of the Scottish Land Rights and Responsibilities Statement. We also support the provision, being proposed through a private members bill, for a statutory objective requiring public bodies, particularly those that own land, to contribute to the delivery of targets set under the Environment Act.

We would also add:

Community groups/local anchor institutions: Local people and communities should be at the heart of any decisions about land use change. We welcome the intention to introduce a strong new 'right to buy' for valued community assets through the English Devolution Bill. This isn't just about community spaces but about involving communities in the way the land is managed. We would like the right to buy to include the development of new models for the community ownership and management of land. Local land use plans are best generated by place-based organisations that have an interest in the local area. Tarras Valley Nature Reserve showcases how local residents can have a direct impact on land management through community land purchase. A total of £6 million was raised to purchase 4,249ha, and nature recovery plans are now being completed with the direct input of local communities.

Agencies and regulators: Many agencies and regulators are crucial to implementing the LUF including the Environment Agency, Natural England, Forestry England, the Rural Payments Agency and Office of Environmental Protection. The LUC states that "*investors, farmers and other businesses want certainty*" about government policy. To make long-term plans, land managers need funding but also a solid regulatory framework and well-funded regulators that have the capacity to monitor and enforce. There is no mention in either the Consultation paper or the analytical annex of the need to strengthen, support and ensure adequate funding for these organisations. There is also much talk about deregulation to enable housebuilding and growth.

To integrate LUF within a needed wider strategic vision for England's land and seas, taking into consideration ecosystems connectivity and

interactions, it will be critical to work with the Marine Management Organisation to ensure coherence between LUF and marine spatial plans in England.

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?

Included in answer to Question 7.

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?

Included in answer to Question 7.

QUESTION 6

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

Included in answer to Question 7.

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?

This is in answer to questions 4–7 and 8.

We need a framework for land use change across England that is guided by a land use classification system focused on the primary outcomes of the land (see Table 1) and an accurate assessment of land use potential.

The Langholm Initiative completed the largest-ever community buyout of land in southern Scotland, creating the Tarras Valley Nature Reserve - one of the biggest projects of its kind in the UK for people, nature and climate.

We need land use-potential mapping using up-to-date data, including soil type, climate, current biodiversity data, tree growth potential, naturalness potential and carbon removal potential, to allow an accurate assessment of the most productive use of each area of land. In relation to natural process-led land we have modelled areas, working with the University of Leeds, with the highest potential for nature recovery. This considers habitat type and extent, as well as connectivity with the wider landscape (based on the potential species flow within 5km). While it is indicative only, it has been developed as a tool to encourage local prioritisation of rewilding using participatory mapping to improve its accuracy and utility.

All incentives, advisory support, taxation, research, financing and technology development should be aligned in a coherent and integrated way to support the multifunctional outcomes that society is looking for. This will include supporting some land managers to transition from one primary outcome (e.g. food production) to another (e.g. natural process-led land management and rewilding). This does not need to prescribe what individual landowners do on their land, but should provide guidance and steer approaches used to deliver the greatest potential while lowering trade-offs. We provide more detail on these in Table 1 but they should include:

- Delivering 30% rewilding and natural process-led land by 2030. Our 30% naturalness potential model indicates that this can be achieved with minimal impact on the production of food, timber and other resources. We provide a detailed response on how this can be delivered in Question 10 and in Table 1.
- Focusing the production of crops on those intended for human consumption. Where agricultural land is fertile and productive, we should focus on ensuring it produces food for humans rather than being used for other purposes. Growing plants for human consumption generates around 12 times more calories per hectare than using land for meat production (NFS). In the UK, as the Consultation paper points out, 85% of our farmland is used for feeding livestock, either through grazing or through arable crops used as feed. This is a highly inefficient way of using one of our critical resources; reducing meat consumption is the "*single most effective lever we can pull to improve the productivity of our land*" (NFS).
- Phasing out the use of productive land for growing biofuels. A report by Green Alliance shows that the food used to make the biofuels used in the UK could feed 3.5 million people.
- Guidance on the land best suited for forestry use. Forestry provides important timber, fibre and wood products and yet it is not included as either a specific land use outcome or category of land use change within the LUC. Forestry land is currently included as part of 'non-agricultural land'. To set a clear frame for future land use we would like to see 'forestry land' – where the primary outcome is timber, fibre and wood products – made a separate land use category with a clear indication of the optimal area and establishment of sustainable forestry practices and standards. This is within the context of our call for a doubling of overall woodland cover across England from 10% to 20%. The remaining 14% of woodland cover is covered within the 30% natural process-led land (see Table 1), as its primary outcome is nature, climate and environment benefits with timber, fibre and wood as co-products.

This scale of land use change needs to be supported by:

- Strong, sustained and reliable financial and regulatory incentives in areas that are unproductive for agricultural purposes, especially in the uplands, for farmers and land managers to support the restoration of ecosystems. As the NFS points out, much of this poorer agricultural land produces negligible amounts of food, the production of which inflicts a very high and disproportionate amount of ecological damage.

- Accessible data and information that supports land use decision-making and aligns with the land use categories proposed.
- A planning system that integrates all land uses and helps to set and guide priorities and principles for land use at the national level. Such a system needs to be integrated into a strategic vision for land and seas, connected to marine spatial plans.
- Local land use plans led by place-based organisations that are invested in the local area. These should be developed in collaboration with local communities and should lead to shared economic, social and environment benefits (detailed in our Nature-based Economies report).
- Diversification of public, private and community ownership models that support localised decision-making, for example the Community Right to Buy that is proposed.
- A fair and equitable way of settling disputes over land use.

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)**

Included in answer to Question 7.

QUESTION 9

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

We need increased, diversified and stable financing streams to support land use change and give practitioners and investors the confidence to make long-term investment decisions. To support a transition to 30% rewilding and natural process-led land we have laid out recommendations including the definition of a set of financing rewilding principles. Most critically, nature markets won't materialise to fund land use change on their own. The UK Government cannot simply rely on private finance to achieve its legally binding targets but must invest public money. Our recommendations are detailed in our Financing Rewilding report but in summary:

Recommendation 1: The UK Government should build long-term confidence and stability in land use change through secure public funding and policy that underpins investment in nature and rewilding. Recent developments in public payment for public goods schemes, nature market frameworks and funding mechanisms by the UK Government have been positive. But they have yet to provide the long-term certainty and stability that landowners, land managers, communities and investors need. UK governments need to make a bolder political commitment to high-integrity and scalable models for financing nature's restoration. Clear and coordinated incentives are needed over at least 15–20 years, within well-enforced regulatory frameworks that support and safeguard investments and ensure that they bring shared value for nature, the economy and local communities.

Actions:

- *Commit to long-term public funding and payment schemes that provide stability to and reward land managers for their vital role in balancing food and timber production, climate action and nature restoration*, and to meet 30by30, net zero and Environment Act targets.
- Provide and adequately fund ELM scheme options that support 30% natural process-led areas and rewilding, including mass restoration of ecosystems, natural grazing and meat production, species reintroductions, and natural regeneration of scrub and woodlands.
- Accelerate the stability, maturity and clarity of high-integrity carbon and nature markets that support a rewilding approach.
- Expand public innovation funding for large-scale rewilding initiatives that demonstrate high-integrity and scalable models for nature's restoration and that place local communities at the forefront of a just rural economic transition.

Recommendation 2: The private and philanthropic sectors should accelerate high-integrity investment in large-scale rewilding initiatives that deliver nature's recovery alongside thriving local communities. We need to fast-track a portfolio of high-quality, large-scale, investable rewilding projects that build confidence and demonstrate the holistic benefits that a rewilding approach can achieve for people, nature and local communities.

Actions:

- Provide early-stage start-up capital through compliance markets, Corporate social responsibility, philanthropy or provision of in-kind services.
- Demonstrate diversified, investable, integrated business models that act to attract and scale up further investments.
- Nurture nature-based business innovation that puts engaged and empowered rural communities at the forefront of a green and just economic transition.
- Demonstrate equitable environmental, economic and social benefits for, and with, local communities, for example through diversified asset-sharing models.
- Exemplify the additional 'charismatic carbon' and holistic benefits that rewilding projects can offer.
- Ensure that investors seeking a return (financial, carbon, nature) can participate as projects develop.
- Give investors confidence in risk-adjusted returns and mitigate the uncertainties that are a barrier to investment.

Recommendation 3: Diverse locally and community-led partnerships should be enabled to upscale rewilding and co-design investable propositions. Rewilding practitioners are a diverse group, including community, private, public, and charity owners and managers, and many work collaboratively at a landscape scale as part of multi-stakeholder and community-led partnerships. Achieving equitable and sustainable financial benefit sharing across these stakeholders can be challenging, and their governance structures represent complex and unfamiliar ground for investors. High transaction costs often limit access to financing, as does the lack of clarity on benefit-sharing models between landlords and groups such as tenants and commoners. Building the capacity of trusted locally and community-led partnerships or 'anchor institutions' to co-design large-scale investable rewilding initiatives will help to attract and coordinate significant inward investment.

Recommendation 4: A network of brokers and market builders should be brokered to provide an effective connection between rewilding initiatives and investors/funders. Despite a plethora of

networks, knowledge platforms, funding brokers, project accelerators, directories, registries and trading platforms, the market infrastructure for nature restoration and rewilding funding remains fragmented. It lacks the standardisation and commonly recognised definitions and frameworks that investors typically need when assessing new opportunities, and doesn't yet adequately support the specific characteristics of successful rewilding.

Enabling entrepreneurial networks of brokers and market builders could support the development of a market infrastructure that would more effectively facilitate multi-outcome rewilding projects. These should bring actors in the market together to discuss and produce knowledge, and help projects, buyers and investors to connect more effectively to achieve long-term meaningful change. Ensuring adherence to common standards by accrediting these roles could accelerate confidence across all stakeholders.

Recommendation 5: High-level principles for investing in rewilding should be agreed and adhered to. The current lack of agreed high-level principles and standardisation across rewilding investments risks the emergence of low-quality poor practice. This damages the integrity and credibility of investments and the effectiveness of nature markets. We need to see rewilding practitioners, investors, governments, brokers and other stakeholders coalesce around common goals and navigate financing opportunities effectively. That's why we've developed a set of principles for financing rewilding, which we believe will help ensure quantifiable and equitable environmental, economic and social benefits for — and with — local communities and wider society.

QUESTION 10

What changes are needed to accelerate 30 by 30 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 30 by 30 criteria23**
- **Resources: such as funding or guidance for those managing Protected Landscapes for nature**
- **Other (please specify)**

We want to see natural process-led land as a new land use category because the LUF's proposed scale of change takes us nowhere near the Government's commitment of "*effectively conserving and managing 30% of the UK's land by 2030 (30by30) to support delivery of the Environment Act biodiversity targets*".

We need an area where it is recognised that the primary outcomes are nature, climate and environment benefits with a target of 30% in line with 30by30 commitments. In these areas the focus of management practices and restoration interventions should be on reinstating natural processes wherever possible — for example free-flowing rivers, natural grazing patterns, habitat succession and predation — and allowing them to create dynamic, constantly changing habitat mosaics while helping to revitalise local economies and communities.

Across the 30% natural process-led land area this would see the creation of:

- **Semi-wild Areas**, comprising 25%, with a broad and diverse range of natural process-led land uses and enterprises, generating local economic benefits while allowing nature to flourish, through, for example, high-nature-value food and timber production, ecotourism and nature-based enterprises.
- **Core Rewilding Areas**, comprising 5%, where nature is allowed to fully recover. These areas will focus on restoring and reinstating as wide a range of natural processes, habitats and native species as possible, forming healthy mosaics of, for example, native woodlands, peatlands, heaths, species-rich grasslands, wetlands and saltmarshes — with only low-key and sustainable human impact.

What this would mean for our landscapes and the people who live, visit and work in them is explained and illustrated in our Rewilding Journeys infographic. We would include the land use change categories 2–4 outlined in the LUC, with the caveats outlined in our answer to Question 1. Our 30% naturalness-potential mapping indicates that this could significantly accelerate the 30by30 delivery through a combination of:

- Allowing improved pasture to regenerate into natural grasslands and woodland/scrub mosaics (~1,100kha). This should focus on the development of wood pastures rather than the more formalised silvopastoral systems suggested in the LUC, which have far less ecological value. The Knepp Estate in Sussex is a key example of how wood pasture mosaics can be established. An example in our uplands is a grassland, wood and woodland mosaic being established at Wild Haweswater. Both of these projects continue to produce meat and support jobs.
- Supporting nature's recovery as a primary purpose across our national parks, national landscapes and protected areas (>1,900kha) to restore ecosystems, help arrest climate breakdown and drive vibrant nature-based economies. Mandate all national park authorities and other protected area bodies (national landscapes) to create locally led integrated management plans that support natural process-led land management, rewilding and nature-based economies. These areas correlate with the areas of highest potential for nature restoration and carbon potential. Therefore, ensuring that the land within them is primarily natural process-led is the most productive use of that land.

  Many rewilding projects are already operating within national parks at scale. Exmoor National Park, for example, is supporting an ELM Landscape Recovery project and working with a range of landowners to restore nature and reintroduce key missing species. This is in partnership with a National Trust project spanning West Exmoor, which is restoring at landscape scale a mosaic of scrub, heath, woodland and wetlands.
- Doubling the area of broadleaf/mixed woodland and transitional scrub (from 700kha to 1,400kha) using natural regeneration as the default option wherever possible and ensuring the sustainable management of deer numbers, guided by a new deer strategy. We describe how this can be done in more detail in our Reforesting Britain report.
- Ending moor burning and the other environmentally damaging activities associated with driven grouse shooting and intensive moorland management (>330kha). Driven grouse shooting is the intensive management of land for recreational purposes and includes damaging management practices such as drainage, burning and mass killing of predators. It destroys ecological diversity, function and integrity and is an activity with little public support[9]. Several rewilding projects, such as RSPB Geltsdale, are restoring moorland formerly managed for driven grouse so that they support an abundance of nature and habitats These projects are storing more carbon and water, and supporting more

biodiversity, than under their former intensive management. They are also producing some meat through cattle grazing.

- Rewetting and restoring peatlands (~320kha). This is already happening across many upland and lowland peatland areas, including rewilding projects Kingsdale Head and Wicken Fen, and where restoration takes place it stores more water and carbon.
- Streamlining legislation for vital reintroductions of missing native species to help rebuild functioning ecosystems.
- Supporting land managers to become our river restoration leaders and expanding riparian restoration and natural flood management across flood zones 2 and 3 (>270kha).
- Restoring our rivers, water bodies, inland marshes, saltmarshes, intertidal flats, coastal lagoons and estuaries (>160kha). Schemes such as Steart Marshes are now acting as key natural flood defences while storing up to 19 tonnes of carbon per hectare per year[10].

We would also like these land use changes to be linked to a diversified, resilient and just economic transition led by local communities.

This is explored in more detail in our Rewilding and the Rural Economy report, which includes the following delivery pathways:

Incentivise and invest in nature-based economies across 30% of England as part of a just green transition

- Unleash a wave of nature-based business innovation including natural process-led food and timber production, such as supportive legal frameworks for natural grazing, creating markets and food chains for wild meats, supporting small local abattoirs to enhance local food markets, expanding natural process-led forestry practices and ecotourism.
- Establish nature-based enterprise zones with associated packages of business development support.
- Support a thriving ecosystem of employment linked to nature-based enterprise, food and timber production and rewilding.
- Deliver a skilled green workforce by fast-tracking the development and accreditation of training and apprenticeships to fill skills gaps.

Nature-based tourism where visitors can take guided tours is just one of the private revenue streams available to rewilding projects.

Place people and communities at the heart of decisions about our land

- Enable and empower locally and community-led partnerships to co-design and upscale rewilding initiatives.
- Diversify public, private and community ownership models that enhance localised decision-making, for example through supporting community rights to buy for nature restoration and effective community benefit-sharing mechanisms.
- Clarify commoner and tenancy rights for carbon and biodiversity to ensure that they unlock and share benefits from nature restoration.

Rewilding projects across England are supporting more jobs and nature-based enterprises. Our data is showing that rewilding can double the number of jobs compared to previous land uses, and create a number of diversified funding streams for land managers. Organisations such as Nattergal are showcasing how rewilding can support more jobs and private investment.

QUESTION 11

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

Urban rewilding has the potential to create novel ecosystems that can support a wide range of species and boost human wellbeing. Improving ecological networks across urban areas to facilitate dispersal (e.g. riverscapes, wild corridors) also enhance ecosystem functions (e.g. pollination).

We would like to require and incentivise cities, towns, local authorities and developers to integrate urban rewilding into their plans, including wilder areas. The work done by the London Rewilding Taskforce is a very good example of how rewilding principles can be integrated into highly populated urban environments. Rewilding projects such as Wild Tolworth in London and Wild Ouseburn in Newcastle are showcasing how urban areas can be transformed into wildlife havens, for the benefit of nature and urban communities.

"We've received feedback saying it's changed people's lives. How do you quantify that?"
Cain Scrimgeour, Wild Intrigue, Wild Ouseburn.

Many of these projects are located in areas with disadvantaged and minoritised communities, giving those communities access to higher quality nature areas.

Considering land managed for recreation, golf courses take up about 96,300ha of England, according to Ordnance Survey's Greenspace dataset. As the popularity of golf declines, more golf courses are transitioning to rewilding and natural process-led public spaces. More should be encouraged to do so in order to deliver multiple benefits for society.

However, the most land-hungry recreational use of land in England is intensively managed grouse shooting estates, which is barely discussed in the LUF. They take up an estimated 550,000ha – all in areas of least productive land. One of the most effective and consequential interventions the Government can make on land managed for recreation is to ban driven grouse shooting. These areas could then be managed much more productively as natural process-led land for nature, climate and environment benefits which would revitalise local communities and provide space for richer nature-based experiences for society as a whole.

Local authorities should also ensure there are allotment spaces, green spaces, verges and street trees, and wilder areas within new developments. Funding for councils to enforce new and existing planning decisions in this regard must be a priority.

QUESTION 12

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

We have chosen not to answer this Question.

QUESTION 13

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

We support a Right to Access Wild Nature for everyone in England, and recognise that we need to put in place accessible and affordable solutions, including public transport infrastructure and provision, to deliver this right to all citizens. If new or wilder natural spaces are only accessible to those with cars, it will increase existing inequalities and deprivations in UK society, and contribute to greenhouse gas emissions and pollution.

We believe there is a need for significant investment in national and local public transport infrastructure, particularly rural bus services because these are often poorly supported and can separate communities from places of employment, recreation and experiences of wilder nature. An LUF that sees increased green employment opportunities, and the expansion of natural process-led land management as we envisage, also needs government policy that supports improved and affordable access to these areas.

We would also like to see the extension of the National Cycle Network, including the creation of more 'quiet' or 'green' lanes that are safe for walking and cycling, that connect urban areas to wilder areas in the wider countryside and that are themselves rich in biodiversity (high-ecological quality corridors). Such an extension would help improve users' mental and physical health.

QUESTION 14

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

We need to create LUF in a coherent way. Current land use planning is largely confined to the built environment. The planning systems were set up to control urban sprawl and help protect rural areas from development and industrialisation. When the 1947 Town and Country Planning Act was passed, farming and forestry were explicitly excluded from its remit. However, the intensification of farming and expansion of commercial forestry in the second half of the 20th century caused significant habitat and species loss.

Planning authorities are increasingly recognising the need to influence wider land use beyond the built environment. This is evidenced by the declarations of climate and ecological emergencies made by many local councils, and the growing number of national park authorities putting nature recovery and carbon sequestration at the heart of their management plans and strategic visions.

Involving communities in rewilding can contribute to their education and health and wellbeing.

The UK Government's Environment Bill set up new local nature recovery strategies (LNRSs), that are currently being developed and consulted on, and that will feed into a national nature recovery network[11]. These new maps will identify areas of land where nature is helped to flourish and where connectivity between nature reserves and habitats can be strengthened.

Their weakness, however, is that these new measures are often complex and are at risk of being isolated from other, more powerful drivers of local land use. LNRSs are likely to be subordinate to local plans and infrastructure targets and provision, which allocate land for building homes, roads and other developments.

To deal with this we need overarching local land use plans that involve local people deciding how the spaces we live, work and play in are used for nature, economy and society, as described in our Rewilding and the Rural Economy report.

Within the 30% natural process-led land areas that we propose are needed to deliver the 30by30 targets, these plans should integrate nature's recovery with economic diversification to reinvigorate rural communities. Relevant proposals and precedents already exist, for example:

- Scotland's proposed Regional Land Use Partnerships are in their early stages but could provide a model that inspires similar approaches in other parts of the UK.
- The NFS recommends the creation of a national Rural LUF.
- The Food, Farming & Countryside Commission is exploring and trialling local LUFs.
- The Well-being of Future Generations (Wales) Act provides a legal framework for public bodies to take a joined-up approach to improving social, cultural, environmental and economic wellbeing.

- Community-led land use plans, such as those developed by the Langholm Initiative are increasingly integrating economic regeneration, ecological restoration and carbon capture.

A key function of local land use plans must be to arbitrate between competing uses, whether for housing, infrastructure, agriculture, forestry, rewilding or carbon capture. Prioritising a particular outcome in certain areas – sometimes called 'zoning' – is one way of doing this. There are ways to introduce zonal planning that maintain and even extend public participation in how land is used beyond the built environment. For example, a local land use plan could invite public deliberation over where to establish new natural process-led rewilding areas, which economic activities should support this, and how to support local farmer clusters to create new catchment natural flood management schemes.

The system of metro mayors and combined authorities (CAs) in England, being developed by the Government, offers opportunities for implementing land use plans. CAs already have a greater responsibility for spatial planning than individual councils, because of their need to plan more strategically across wider areas. For example, Greater Manchester CA has shown interest in how the Peak District is best managed, particularly following the devastating Saddleworth Moor fire in 2018. The Greater London Authority established a Rewilding London Taskforce to explore potential opportunities for rewilding in London, to help support nature recovery and respond to the climate emergency while bringing benefits to Londoners.

In any land use planning process it is essential to avoid looking at economic sectors in isolation and to prioritise the creation of shared value. We are heartened by the involvement of the various relevant government departments in the development of the LUF, but this must not be the end of the process, otherwise government policy risks becoming disjointed and ultimately ineffective. For example, we may have one department looking to increase carbon sequestration and renewable energy provision, another focusing on biodiversity, and another on the availability of affordable housing. At various times it is possible for these different departments to actively contradict each other's objectives. In the future we propose that these different departments collaborate more effectively on the delivery of integrated land use plans. Collaboration across government departments needs to become the norm.

This requirement for a strategic vision also needs to expand beyond sectors and onto ecosystems. The LUF needs to be integrated within a vision for our land and seas, connecting planning frameworks across the various habitats. Given how connected ecosystems are and how impacts can range across habitats, the Framework needs to explicitly state how it connects with marine spatial plans.

These plans ultimately need to be locally generated, have a legally binding influence on decision-making and be supported by an equally integrated regulatory framework.

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]

Yes – we support this suggestion. However, we would like it to go further. The ARP only covers climate adaptation reporting; the Government should also be requiring major landowners to report on climate mitigation and nature restoration efforts.

The Scottish Government, for example, has proposed that landowners in Scotland with estates of over 3kha should publish land management plans that include ownership structure, long-term vision and objectives (including potential sale), and compliance with the Outdoor Access Code and Deer Management Code, and how the owner is managing or intends to manage the land in a way that contributes to achieving net zero emissions, adaptation to climate change, and increased or sustained biodiversity. While this is currently being considered as part of their ongoing legislative process, there are proposals that may see this expanded to cover all estates over 1,000ha.

We must be at least as ambitious in England. Understanding how landholdings are adapting (or not) to climate change and what work is being done by landowners to help meet our climate and biodiversity targets should be an immediate priority of the Government. It is particularly critical in England, given that 1% of our population owns half of our land, that 124 landowners own 60% of our deep peat areas, and that 1,000 landowners own a third of our woodlands[12]. In short, our largest carbon sinks are the responsibility of a relative few, and huge areas of our national parks, our uplands and land with the most potential to transition to areas of natural process-led land management are in the hands of private owners of often large estates, meaning that we as a country are too reliant on them if we are to meet our climate and nature recovery commitments.

It is critical that we not only keep track of what action, or inaction, is being taken via the ARP process but that we do so in a way that empowers local communities to understand their local environment and what steps they may take to ensure public and private landowners are held accountable. One solution in this regard would be considering an English version of the Scottish Land Rights and Responsibilities Statement.

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 Projections29 into what these mean in terms of on-the-ground impacts on farming, buildings, communities and nature)**
- **Providing improved tools and guidance for turning climate information into tangible actions (for example, how to produce an adaptation plan for different sectors)**
- **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 scenario30)**
- **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)**
- **Other (please specify)**

We support all of these activities and would prioritise providing better information and improved tools, in other words, both points 1 and 2 as part of an integrated process.

We would also like to see addressed evidence gaps in the data collection that supports national climate modelling. For example, the 7th Carbon Budget produced by the Climate Change Committee identifies "*additional measures that could support further emissions reduction and help nature*" (p199), including the recovery of natural ecosystems at scale (i.e. rewilding) and the natural regeneration of trees and vegetation, which

has "*significant potential to build carbon via the expansion of trees and scrub across landscapes*". These are currently excluded from the modelling of the most effective pathways for achieving net zero commitments because *"challenges remain regarding quantifying their potential impact"*. This is a major omission and in our answer to Question 19 we identify how Rewilding Britain is developing monitoring and impact frameworks that address the challenges of gathering evidence on the ecological, social and economic impacts of rewilding.

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**
- **Changes to support use through private sector tools, apps or websites**
- **Bringing data from different sectors together into common portals or maps**
- **Increasing consistency across spatial and land datasets**
- **More explanation or support for using existing tools, apps or websites**
- **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**
- **Other (please specify)**

With a wealth of secondary data available for England, there is a significant spatial and temporal misalignment for the different types of data available. For example, the different geographies in which different data are collected, analysed and presented makes combining datasets difficult without specialist knowledge.

A key example of this would be trying to understand the health benefits associated with nature (particularly wilder nature), where the longitudinal datasets associated with health and wellbeing data are in different spatial units (LSOAs, km2, hectares, postcode) over longer periods (time series) compared to ecological data that is often patchy in time and space. This offers only snapshots of time that often lack the resolution required to make meaningful inferences. "Bringing data from different sectors together into common portals or maps" and "Increasing consistency across spatial and land datasets" may help to address some of these challenges of using data in this way.

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**

As indicated in our answer to Question 17 we need consistent time series data of meaningful ecological metrics relevant to restoring or maintaining natural processes (e.g. ecological connectivity and structural complexity). Greater use and publicly available high-resolution satellite imagery and LiDAR surveys using consistent metrics would support understanding of change over time.

We would also like to see a commitment to regular Environment Agency LiDAR surveys, because these are a valuable resource with multiple uses and a standardised method, making future datasets comparable. The Environment Agency LiDAR dataset is hugely valuable, but would benefit from accompanying GIS / R workflows to guide users through key analyses, for example by producing canopy heights from DTM/DSMs, or basic workflows for quantifying vegetation change over time. This could support better use of this technology for carbon assessments or for identifying opportunities to enhance connectivity.

Data collected by volunteers is extremely valuable, but these data are often collected with an absence of spatial sampling structure (i.e. non-random sampling site locations) and can lead to sampling bias and over/under estimation of species occurrence. Despite this, these datasets are often held within local records centres and are routinely used in making planning decisions. Providing guidance on appropriate sampling approaches and surveys where they don't already exist may improve the long-term quality of these valuable datasets. This would support comparable long-term datasets over time (see Baker et al. 2021, for example).

QUESTION 19

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

We need a framework for land use change across England that is guided by a land use classification system focused on the primary outcomes of the land and an accurate assessment of land use potential. At the moment we have an outdated Agricultural Land Classification (ALC) system using outdated data (see report). Outdated as this data is, it is also not fully accessible to the public at present (e.g. it is not currently possible to distinguish between grade 3a and 3b soils from public data). We also only have forestry maps, based on the potential growth rates of various tree species, which prioritise areas where trees grow fastest. There are three problems with this: it maximises the competition with agricultural land; devalues any woodland growth on marginal land where it is highly valuable to nature; and potentially ignores legitimate ecological reasons to prioritise the planting of slower-growing species.

What we should have is easy and open access to data that allows us to make informed decisions on land use at national and local levels based on the most productive potential use (or combination of uses). We would like to see this align with the new land use classification system that we are proposing – agricultural (arable and pasture), forestry, natural process-led and built environment (see Table 1). Across these categories we need land use-potential mapping using up-to-date data, including soil type, climate, current biodiversity data, tree growth potential, naturalness potential and carbon removal potential.

In support of natural process-led land we need to develop integrated data collection systems that ensure the quality, availability and accessible data on this land use classification. Rewilding is an open-ended, process-led approach to repairing degraded ecosystems. With a primary focus on reinstating natural processes rather than specific species or habitats, it works alongside other nature recovery approaches to build back complex systems to support nature and people together. The absence of fixed species or habitat targets and a reduction in ongoing human intervention/ management creates uncertainty of outcomes. Therefore, long-term monitoring of key indicators of change across the ecological, economic and social impacts of rewilding is critical. Rewilding Britain increasingly provides advice to rewilding projects on what to monitor and how to monitor changes attributable to rewilding.

While recent steps have been made to assess rewilding progress[13,14,15], to date there has been no guidance on appropriate and measurable metrics for monitoring rewilding progress and outcomes. Working with other experts across academic, practitioner and public sectors, Rewilding Britain is responding to this challenge by developing a practical, scientifically sound monitoring framework and recommendations of standardised metrics and indicators that are comparable over time.

These new metrics need to be embedded within standardised data collection processes linked to land use, such as the June Agricultural Survey that farmers and other landowners are required to complete annually.

Rewilding Britain's practical monitoring framework will identify trends emerging from the landscape as a result of rewilding.

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?

We welcome the proposal in the Consultation to make more of the data held by HM Land Registry *"free to access"*. Accessing the detailed survey reports and management plans agreed with landowners for designated sites would be hugely valuable, because currently there is only limited information available regarding why the condition of sites might transition from unfavourable declining, to unfavourable recovering.

We would further recommend that a comprehensive list of government subsidies being received by areas of land are displayed as additional layers in MAGIC. This should pull together information from other relevant sectors and data sources (e.g. Land Registry, DEFRA's England Farm Accounts). Additionally we would ask that information presented in MAGIC be presented in a more holistic and user-friendly way.

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)**

As a nation, we are asking land managers to make choices that benefit nature while continuing to produce food, timber and other resources. This requires knowledge of natural process-led land management to be a cornerstone of training and professional development. Skill provision is essential to the ability to scale up activity and outcomes to meet our nature and climate targets.

To achieve this we need to support training and professional development in natural process-led land management by:

- Fast-tracking the development and accreditation of vocational training and apprenticeships to fill skills gaps in key areas across, for example nature restoration and rewilding; natural process-led food, timber and fibre production (including skills for local abattoirs and sawmills); community engagement; and nature-based enterprise and tourism.
- Supporting the development of the National Nature Service to encourage the creation of green, sustainable jobs and volunteering opportunities and help drive forward local nature-based economies.
- Expanding our advisory services to support a transition to natural process-led land management approaches alongside providing support in community engagement and governance to ensure effective localised decision-making.
- Cross-government and relevant agency understanding and training provision, both of natural process-led land management and of the overall land use transition required to enable appropriate planning and delivery.

QUESTION 22

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

In order to deliver the scale of nature recovery required to achieve national 30by30, Environment Act and species abundance targets, we need to place innovation at the forefront of land use. Rewilding is one of these innovative approaches, and as such practical knowledge exchange is essential across the sector. The Rewilding Network is one example of a mechanism for knowledge exchange – a free-to-join, peer-to-peer network that hosts webinars and produces practical resources to share knowledge and detail approaches that have worked and that haven't. The ongoing knowledge exchange meetings, blogs and resources resulting from the emerging ELM scheme, especially the Landscape Recovery tier, is another example of how we can share knowledge more widely.

Having advocated for wild beaver releases in England for a decade, we welcome the UK Gov's new licensing scheme - the reintroduction of missing species like beavers can help re-establish natural processes.

A further example of why embracing innovative approaches is important is the Wild Woodbury project in Dorset. Dorset Wildlife Trust implemented 'stage zero' river restoration on drainage ditches and at the headwaters of rivers across the site. The approach was new and untested – it was not designed in the standard way with fully engineered structures and channels. Drains were blocked with different materials, and water has been allowed to go where it wants. This has led to fields holding vast amounts of water, preventing pollution from entering Poole Harbour.

The project was completed in a cost-effective way (costs were a fraction of similar Stage Zero schemes), and did not require the same level of engineering as other schemes. The learning from this rewilding project can provide a blueprint to others on how to approach hydrological restoration in an effective way. Cost savings from this innovative approach will help to support the scaling-up of nature restoration. Innovation and experimentation needs to be at the heart of our land use strategy, and supporting and sharing learnings from these new approaches should be facilitated by Defra, Natural England and the Environment Agency.

We can also benefit from learning across devolved nations as well as within mainland Europe. We would like to see more cross-nation learning through events and joined-up practice notes, to ensure that knowledge exchange is effective and that we don't repeat studies. For example, we are hosting knowledge exchange events for key sectors such as forestry, to support innovation and changing practices.

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.**
- **No**
- **I don't know**

We suggest that a review of the full framework be carried out every 10 years with sufficient monitoring data and reporting to assess and review progress every five years.

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 with the proposed areas of focus. In particular we would emphasise the importance of integrating the LUF within a needed wider strategic vision for England's land and sea, taking into consideration ecosystem connectivity and interactions; it will be particularly critical to also work with the MMO to ensure coherence between LUF and marine spatial plans in England.

ENDNOTES

1 https://consult.defra.gov.uk/land-use-framework/land-use-consultation/supporting_documents/Land%20Use%20Consultation.pdf p4.
2 ibid p11.
3 https://www.gov.uk/government/publications/criteria-for-30by30-on-land-in-england
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6 https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2024/united-kingdom-food-security-report-2024-introduction
7 See Table 1 for more detail on the approach proposed, how it will help achieve the Government's vision and match its principles, and how it can be delivered.
8 https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network
9 https://raptorpersecutionuk.org/2016/10/11/new-yougov-poll-shows-strong-support-for-ban-on-driven-grouse-shooting/
10 https://nbshub.naturebasedsolutionsinitiative.org/casestudy/working-wetlands-at-steart-marshes/
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15 Segar, J., Pereira, H. M., Filgueiras, R., Karamanlidis, Al. A., Saavedra, D. and Fernánde (2021). Expert-based assessment of rewilding indicates progress at site-level, yet challenges for upscaling. https://doi.org/10.1111/ecog.05836

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