

Historic England's response to the Department for Environment, Food & Rural Affairs call for evidence: Expanding the role of the private sector in nature recovery

About Historic England

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners, and communities to help ensure our historic environment is properly understood, enjoyed, and cared for. Historic England is firmly committed to supporting national and local government, and homeowners/occupiers and their advisors to deliver energy and carbon efficiency improvements in historic buildings.

Summary

Historic England welcomes greater investment from the private sector to boost nature recovery. As mentioned in the call for evidence, a 'whole economy' approach will be essential to tackle the crisis of nature decline and biodiversity loss that is unfolding worldwide in tandem with the climate crisis. However, we believe that the approach set out in this call for evidence needs amending in order to deliver the best outcomes for people, planet, and businesses. Our two main recommendations are as follows:

1) Approaches to nature recovery and the natural environment should recognise that heritage and the historic environment are intrinsically linked to nature

It is important that impacts on the historic environment are carefully considered, as our shared natural and cultural heritage are integral and mutually dependent elements of the places and landscapes that will benefit from nature recovery. Indeed, the economic benefits reaped from nature recovery will be greater if policy expressly recognises that our environment is a product of both human and natural influences. In urban areas, heritage forms the backbone of green infrastructure, such as parks, cemeteries, canals, and disused railway lines. In rural areas, lower intensity land use favours both nature and heritage, as pockets of survival in otherwise intensively managed landscapes and more extensively in wetland and upland areas. As a consequence, 19% of Scheduled Monuments coincide with Sites of Special Scientific Interest, as do 24% of Registered Battlefields and 16% of Registered

Parks and Gardens. Other historic features, such as traditionally constructed buildings (i.e., pre-1919), hedgerows, and dry-stone walls are also important as habitats. In the coastal environment, historic structures such as harbour walls, jetties, and piers provide better habitats for marine life than monolithic modern structures and are vital to people's access to blue space (Baxter et al. 2022) (Baxter et al. 2023). Further offshore, historic wrecks are biodiversity hotspots and serve as de facto Marine Protected Areas by restricting trawling (Hickman et al. 2024).

The most effective, efficient, and sustainable approach is to ensure that programmes and projects consider climate action, nature recovery, and heritage together. Historic England therefore endorses the principles of the emerging Land Use Framework (as stated in our recent consultation response on the topic) which proposes that an appropriate balance and an integrated, multi-functional approach should be taken for the provision of desired land uses, including for infrastructure and for the wider environment (HE, 2025). The integrated nature of the historic, cultural, and natural environments is demonstrated through the Joint Statement between Natural England, Historic England, and the National Lottery Heritage Fund, which recognises the complex interplay of habitats, species, geology, landscape, historic features, and cultural connections, as well as the crucial role that heritage management practices can play in nature recovery (NE, HE, NLHF, 2025).

Furthermore, Historic England recommends drawing on the Natural England publication 'Nature recovery and the historic environment', which details four principles for integration of the historic environment into plans for nature recovery: consider the historic environment from the outset; maximise environmental benefits (including the historic environment); follow legal requirements, policy, and guidance; and avoid harm, minimise impacts and mitigate (NE, 2023). Initiatives involving private investment in nature recovery should be encouraged to integrate the ideas and principles outlined above – carefully thought-out projects can benefit both nature and heritage.

2) The process for delivering privately funded nature recovery projects should be expanded upon and strengthened

To deliver effective nature recovery, funded by burgeoning private sector investment, we believe it is important that a process to monitor and maintain nature recovery projects is devised. It is also important to provide clarity around the timescales for these schemes and around who will oversee and ensure the effective spending of private sector investment to maximise benefits. A similar, well-established approach is already implemented in the

planning system whereby conditions attached to a planning permission can include, for example, a maintenance plan for a specified number of years to ensure appropriate aftercare of landscaping schemes. Such an approach would provide clarity for private sector investment and ensure long-term nature recovery benefits are achieved. Such arrangements may fall outside the remit of this call for evidence, but it is crucial that they are flagged early to ensure that the nature recovery which private businesses are funding is delivered effectively.

References

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Question 1 – Do you agree with the 4 intended objectives for policy to increase investment in nature set out above?

- **Do you agree with each of the 4 objectives?**
- **Any further comments including other factors the government should consider?**

Historic England believes that more focus should be given to the quality of nature recovery in the objectives. As mentioned in our summary, it is essential that mechanisms are put in place to ensure that private sector investment delivers real value. This should include not only specific details on what investment should be targeted towards (e.g., achieving the 13 environmental targets in the Environment Act 2021), but should include a process for oversight and evaluation to ensure that investment effectively delivers towards those intended targets.

Additionally, instead of making economic growth the first objective, Historic England believes that a better alternative would be ensuring investment in nature recovery supports the transition to a circular economy, and this role for private investment should also be built into the upcoming Circular Economy Strategy. Historic England is in full support of the principles of a circular economy – the elimination of waste and pollution, circulation of products and materials at their highest value, and the regeneration of nature (Ellen MacArthur Foundation, 2013). By promoting these core values and the transition to the circular economy, we can have greater confidence that investment from the private sector will lead to action that effectively drives the regeneration of the natural world.

References

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Question 2 – Is there evidence from existing domestic or international policies which the government can learn from regarding:

- **the benefits of policy action to increase private sector investment in nature?**
- **the policy actions that are most effective and efficient at increasing private sector investment in nature?**
- **the risks of policy action to increase private sector investment in nature?**

Efforts to boost investment in nature recovery should recognise the importance of the historic environment as an intrinsic part of our environment, as explored in further detail in the above summary. As a whole, the heritage sector is a highly valuable part of the UK economy, contributing £44.9 billion in Gross Value Added (GVA) in 2022 (HE, 2024a). More specifically, the heritage sector can offer many co-benefits in other areas beyond economic value, such as improved wellbeing outcomes.

Investing in the development/preservation of existing heritage assets can offer many community wellbeing benefits, such as nurturing a connection to place, and strengthening feelings of identity, belonging, and social connection – such effects are explored in detail on a recent Historic England webpage (HE, 2023). Heritage assets are not passive – they are unique symbols of local identity and can perform vital roles as community hubs, youth centres, and service/health activity providers. Such assets also offer a sustainable pathway to low-carbon solutions and community wellbeing through social prescribing, mental health support, and placemaking; heritage is also particularly successful in supporting people affected by poor mental health, loneliness, and dementia.

The potential contribution of heritage to wellbeing is profound. The Historic England report ‘Heritage Capital and Wellbeing: Examining the Relationship Between Heritage Density and Life Satisfaction’ showed that the overall wellbeing value for people’s day-to-day encounters with heritage is estimated to be worth £29 billion every year in England. The report demonstrated that, as with the positive impact of green spaces on wellbeing, the very presence of nearby historic places benefits residents’ quality of life (HE, 2024b).

Therefore, the wellbeing impacts of heritage provides a compelling example of the benefits that can come from investing in the historic environment, thus strengthening the case for the historic and natural environments to be understood as an integrated whole in this initiative to boost private investment in nature recovery.

References

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Outcome 1: Clean and plentiful water – cleaning up rivers, lakes and seas

Historic England believes that the phrasing of this outcome presents limitations. Although Outcome 1 encompasses 'cleaning up rivers, lakes and seas', the accompanying text and questions are limited to the land-based water sector, and there appears to be no reference to marine sources or their management. This should be addressed expressly as this conversation proceeds. Historic England would like to draw attention to measures relating to 'legacy wrecks' that present risks of pollution from hydrocarbons and munitions, and measures to remove abandoned recreational boats as a source of pollutants and particles. Heritage data and expertise can play a significant role in addressing the pollution risks from historic wrecks and old vessels.

Question 4 – What are the barriers to incentivising sectors that depend on the water system to invest in water outcomes? What actions are needed by government to address these barriers?

Historic England welcomes the opportunity to contribute/advise on potential water outcomes to ensure the historic environment is fully considered and that any co-benefits are identified early in the process. This will ensure that the heritage sector will be seen not as a

barrier, but as a partner in the effort to boost investment in nature recovery in marine spaces.

Question 5 – What activities by water companies that support nature recovery have potential to attract additional private-sector investment?

Additional private sector investment could be achieved through taking an integrated approach to nature recovery. This could be achieved by, for example, investing in outcomes that consider benefits to the historic environment, and/or help address climate change, flooding, and increase recreational activities. Natural England's publication 'Nature recovery and the historic environment' provides advice on where co-benefits can be achieved (NE, 2023).

References

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Question 6 – What should our priorities be when assessing the benefits of environmental enhancement measures proposed by the water sector?

As part of an integrated approach to the environment, an understanding of historic changes in land use and management, including an understanding of historic water management and opportunities, can help support nature-based recovery at a catchment and local scale. It is also important that heritage is considered and engaged with early during the design of nature recovery schemes, so that co-benefits for nature and heritage can be maximised and any conflict minimised at an early stage of project planning.

Question 7 – How can the water sector ensure that opportunities to deliver multiple benefits are considered from the start of investment planning and decision-making?

Here again, the importance of an integrated approach is of paramount importance. Given the inseparable nature of the natural and historic environment, there is the potential for

multiple co-benefits if the heritage sector is engaged early, information is shared, and possible solutions and timescales for outcomes are made clear. Historic England welcomes the opportunity to engage with the water sector to explore the possibilities.

Outcome 2: Nature-based carbon reductions and removals

As in the case of Outcome 1, Historic England believes that Outcome 2 has limitations. The text seems focused by a narrow range of nature-based solutions, namely woodland creation and peatland restoration. This neglects the opportunities for drawing private investment into other forms of carbon reduction and removal on land (e.g. through grassland and meadow restoration), but it also seems to overlook the contribution of marine-based carbon reduction/removal. These include measures to reduce pressures on existing carbon stores, such as intertidal and subtidal peat deposits which are also important as habitats, geological sites, and significant heritage interests. Relevant measures also include conserving and restoring marine and coastal habitats, such as saltmarsh, seagrass, and kelp.

As on land, the marine and coastal environment is the product of human as well as natural factors. Heritage can contribute to marine and coastal habitat restoration, which Historic England is exploring through its membership of the ReMeMaRe Partnership. Celebrating the historic human dimension of priority habitats for carbon reduction and removal could be a powerful draw for private investment into nature recovery measures in coastal communities.

Question 11 – Which sectors could be further incentivised to use, reuse and recycle timber as a low-carbon material?

Historic England believes that the construction sector, and more specifically those working on the retrofit and reuse of existing buildings, should be incentivised to use, reuse, and recycle timber as a low-carbon material.

The built environment sector is the second largest source of emissions in the country, producing 17% of the UK's total emissions in 2022 (76 MtCO₂e). If the indirect emissions produced by electricity consumption are included, this proportion rises to 23% of the UK's emissions in 2022 (CCC, 2023). In England, 21% of domestic buildings and 32% of non-domestic buildings were built before 1919 (VOA, 2023), (Whitman et al, 2016). Since traditionally constructed buildings (i.e., pre-1919) make up such a large part of the built

environment, and the built environment accounts for such a large part of the UK's emissions, it follows that any approach to achieving built environment/national Net Zero by 2050 will be a challenge if traditional buildings aren't retrofitted (meaning the reduction of emissions and the boosting of climate resilience).

There is a similar environmental imperative to reuse buildings. The Government has set the target of creating 1.5 million new homes during this Parliament, but constructing new builds on such a large scale will have a significant embodied carbon cost, which are the emissions produced by construction, maintenance, the manufacturing and transport of building materials, and demolition. Such emissions form a major part of the carbon footprint of the built environment, but they can be significantly avoided if reuse is prioritised over building new. Recent Historic England research has demonstrated the tremendous potential of repurposing historic buildings that are currently vacant and disused – repairing and repurposing vacant buildings built before 1919 would provide 560,000 – 670,000 new homes in England (HE, 2025).

Having made the case for the need to retrofit historic buildings and refurbish them for new purposes wherever possible, there is a clear role for timber to play. According to a 2023 study that examined the carbon emissions of retrofit interventions, using natural materials when retrofitting can bring down overall embodied carbon by 7-14% (Mohammadourkarbasi et al, 2023). More specifically, as a low-carbon material that frequently served in the construction of traditionally constructed buildings, timber ought to be prioritised as a compatible building material in efforts to retrofit and refurbish traditional buildings. This value is demonstrated further by a study from CE Delft, which used a Life Cycle Assessment to compare the carbon emissions produced by different approaches to a softwood window frame: repairing the frame, replacing it with a hardwood frame or a uPVC frame, and adding glazing. The study found that installing a hardwood frame would produce 17.18 KgCO₂e over 25 years, while installing a uPVC frame would produce more than twice that: 38.45 KgCO₂e over 25 years (CE Delft, 2023).

Therefore, organisations in the construction industry that work on traditionally constructed buildings, whether retrofitting or refurbishing them, should be incentivised to use timber, as a low-carbon alternative to more modern materials.

References

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Outcome 3: Access to nature – supporting tourism, recreation and wellbeing

Historic England welcomes the recognition in Outcome 3 of the benefits associated with heritage in Protected Landscapes, though we would note that these benefits are not

confined to National Parks and National Landscapes. In the coastal sphere, funding will be increased and diversified by broadening Outcome 3 to encompass coastal World Heritage Sites, Heritage Coasts, and National Marine Parks (the first of which is operational in Plymouth Sound). Further out to sea, Outcome 3 should encompass Marine Protected Areas (MPAs).

Important benefits accrue to these land- and seascapes from the role of heritage in supporting access, tourism, recreation, and wellbeing. DEFRA's Ocean Literacy survey underlines the importance of heritage in enabling access to marine and coastal environments: the places most visited for leisure were coastal/seaside towns whose character and facilities are often attributable to heritage assets, and visiting a coastal heritage site was the third most popular recreational activity after walking and photography (DEFRA, 2022).

References

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Question 17 – In order to support access to green spaces in more urban settings, what measures could be used to increase and diversify funding for local parks and natural spaces?

Historic parks, gardens, and other green and blue spaces such as cemeteries, public walks, and canals provide the core of accessible green space in our towns and cities and are vital to people, nature, and the environment. It is important that we maintain what we have as we also make necessary improvements to existing green spaces, create new ones, and increase access to green spaces for people and nature. Historic England published research in 2016 on the History of Public Park Funding and Management (1820-2010), which showed a long history of funding issues for parks and green spaces but also highlighted the important role of local authorities in developing (often rescuing) and delivering public parks for over 170 years (Layton-Jones; HE, 2016). Nesta, the National Lottery Community Fund, and the National Lottery Heritage Fund explored approaches to the use and financial sustainability of the UK's parks through the Rethinking Parks initiative, the outcomes of which provide useful insight into funding for parks and green spaces (Nesta, 2016).

References

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Outcome 4: Flood management

Historic England would welcome clarification to the effect that Outcome 4 on Flood management encompasses flooding from the sea and also other coastal risks such as erosion.

It is essential that private investment is channelled into flood resilience because flooding is set to become a growing hazard in the UK, as this call for evidence recognises. Historic England provided evidence on flood resilience in England as part of an Environmental Audit Committee call for evidence in January of this year, during which we stated that the historic environment has an important role to play in learning from experience and ensuring that appropriate materials and methods are used to facilitate the speed of drying. For example, a 2017 study showed that buildings which retained their traditional materials were able to recover faster and with less disruption than those repaired with modern materials (HE, 2017). Paleoenvironmental reconstruction can also support our understanding of how landscapes, waterways, and coasts were managed historically, but much of this evidence is at risk of loss due to flood defence schemes potentially impacting this class of archaeological remains (HE, 2025).

Therefore, a more holistic approach is required to consider the cumulative and larger-scale impacts of projects on flooding. A piecemeal approach to flood defence schemes or to wider development can be problematic in this respect, as usually these decisions are made at a county level and do not always consider the wider catchment area at risk. Again, it is essential that the natural and historic environment are considered together and at scale (HE, 2025).

An effective example of the kind of flood resilience scheme that considers both the natural and historic environment is the Severn Valley Water Management Scheme (also cited in our 2025 call for evidence submission). The Severn Valley Water Management Scheme (SVWMS) is a developing example of an approach to sustainable and holistic water management across a catchment to reduce flooding and enhance climate resilience. The scheme aims to combine traditional engineering solutions with nature-based solutions that support the natural environment, reconnecting people with the landscape, and economic benefits. The scheme also included cultural heritage as a key part of the sustainability appraisal (HE, 2025).

There are opportunities in schemes such as these to take an integrated approach that is mutually beneficial for the natural and historic environment. Heritage assets can be protected from the damaging impacts of flooding and can help to support nature-based solutions and the wider benefits they can provide to communities. It is important that the potential opportunities for and impacts on heritage are accounted for as part of a sustainable approach to developing flood management schemes (HE, 2025).

References

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Question 19 – What mechanisms could best enable this?

As mentioned in our 2025 call for evidence submission, we encourage the insurance industry to work with the heritage sector to ensure that appropriate materials and methods are used in repairs to traditionally constructed buildings (i.e., pre-1919) and that they seek to identify alternative adaptation options where resilience or resistance measures are not appropriate

(HE, 2025). Such sectors should be considered when devising mechanisms to boost funding for nature recovery that delivers flood resilience.

References

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Question 20 – How can mechanisms such as these account for and adapt to the local nature of natural flood management?

Mechanisms for funding natural flood management (NFM) measures will be better able to account for and adapt to the local character of NFM if said measures are informed by an understanding of the historic environment. Many aspects of flooding are related to historic interventions and management practices in watercourses, floodplains, and coastal areas, often stretching back many centuries. These systems are not ‘natural’, so NFM measures are unlikely to be fully effective (and may even be counterproductive) if the human history of places is not understood. Historic England would encourage DEFRA to examine the potential contribution of historic environment disciplines to the practical effectiveness of NFM and to provide guidance accordingly.