

GENERAL SYNOD**Protecting nature on Church Commissioners' land in line with the scale and urgency of the climate and biodiversity crises****Executive Summary**

1. This paper provides Synod with further background relevant to its consideration of the Revd Canon Val Plumb's Private Members' Motion. Significant and meaningful work is already under way across the Church Commissioners' estate to support nature, including through nature-friendly farming, sustainable forestry, habitat restoration and the improvement of protected sites, delivered in partnership with tenants. The Commissioners judge this to be consistent with their ambition to act as a responsible landowner.
2. As currently drafted, it would be difficult for the motion to be implemented. As trustees of an endowment, which is held on specific trusts for the generation of sustainable income now, and long-term capital growth for the future which supports the Church's mission and ministry, the Church Commissioners assess that the commitments proposed are not consistent with these responsibilities and would be expected to have a material negative impact on income and value.
3. This paper notes that "30 by 30" is one part of a wider framework for nature recovery and does not, on its own, capture the full range of ways in which nature can be supported across working landscapes, including nature-friendly farming and sustainable forestry to which activities the Church Commissioners already contribute.

The current motion and engagement to date

4. The Church Commissioners have stated that they support nature through a wide range of work and endeavour. But they consider that the commitments proposed by the motion are inconsistent with their legal obligations and would probably have a material negative financial impact on the value of their fund. This reflects the legal and financial framework within which they are required to operate, and the nature of the assets, rather than any lack of commitment to nature.
5. The motion proposes moving material elements of land into a narrow model of conservation and protection, rather than continuing to support nature-friendly farming and other appropriate uses. This does not reflect the nature of the portfolio, which is largely productive agricultural land and supports, among other things, nature-friendly farming and sustainable forestry.

The Church Commissioners' role and financial purpose

6. The Church Commissioners are a registered charity, regulated by the Charity Commission, and support the mission and ministry of the Church of England through stewardship of a permanent endowment. Trustees must ensure that they act single-mindedly in the best interests of that fund, and within the legal constraints which guide their investment obligations. It is not open to them to make financially disadvantageous decisions in this context.
7. The income generated supports a range of wider Church activity, including clergy pensions, parish ministry, work in dioceses and at a national level. Decisions on how distributions are applied are taken through the Church's established governance and

funding processes, including the Triennium Funding Working Group, which recommends priorities for allocation across the Church.

The Church Commissioners' Land portfolio

8. Within the UK, the Church Commissioners manage a rural portfolio of around 80,000 acres in England and 23,000 acres of sustainably managed forests, of which over 20% are managed primarily for biodiversity. In the rural portfolio, approximately 90 per cent is Grade 1 to 3 agricultural land, meaning it is productive to highly productive. Only around 6 per cent is lower grade, compared to around 45 per cent nationally. Their estate is therefore significantly more productive than the average for England. Unlike other landowners, they do not hold large areas of land designated as National Parks or nature reserves.
9. The rural portfolio is entirely tenanted, and they do not directly farm or manage land themselves. Most tenants hold long-term agreements, often with succession rights, and in some cases, families have farmed the same land for generations. The Commissioners work in partnership with tenants within these long-term arrangements to pursue outcomes that support nature whilst also generating a commercially prudent return via income or long-term capital growth. Many tenants are already working in incredibly challenging economic conditions.
10. As well as material work to support nature-friendly farming and sustainable forestry, the Commissioners are also seeking to deliver over 30,000 new homes and renewable energy to provide electricity for the equivalent of approximately 300,000 homes.

Commitment to nature and what is already being delivered

11. Within the constraints, the Commissioners say they are proud to be delivering significant outcomes for nature across the estate through practical delivery aligned with Government policy, their Environmental Policy and previous Synod Motions.
12. This includes supporting nature-friendly farming, enabling access to environmental schemes, improving the condition of Sites of Special Scientific Interest (SSSIs), sustainable woodland management, habitat creation and restoration, and work on the sustainable management of agricultural peat soils. These initiatives are delivered in partnership with tenants and external experts.
13. Across the estate, they are already delivering a wide range of meaningful outcomes for nature. This includes over 3,600 acres of land managed specifically for nature and habitat restoration, alongside supporting the transition to nature-friendly farming, with around 56% of equipped farms adopting or beginning to adopt regenerative practices. A significant majority of tenants are actively supporting biodiversity, with over 90% undertaking measures to enhance nature and around 80% participating in environmental schemes. Environmental assessments are undertaken across farmland to identify further opportunities for environmental improvement and over 8,000 acres have been completed to date. The forestry portfolio is sustainably managed, with biodiversity the primary objective on at least 20% of UK forests, including a doubling of native woodland. Across designated sites, 99% of the Sites of Special Scientific Interest by acreage are in favourable or recovering condition or under active management, delivered in partnership with tenants and environmental organisations.
14. Further comprehensive details and examples are set out in the [Sustainability Progress Report](#) and [video series](#), which Synod members can review using the appropriate links to understand more about this work.



[Sustainability Progress Report](#)



[Spotlight on Nature](#)



[Episode 1: Forestry](#)



[Episode 2: Farmland and Nature](#)

Challenges with the motion as drafted

15. As trustees, the Church Commissioners are not permitted to take decisions that would materially undermine the long-term value of the endowment.
16. The motion calls for the Commissioners to protect or effectively conserve nature on 30 per cent of the portfolio, rather than for food production, nature-friendly farming or other activities. It also asks for significant changes to land use on agricultural peat soils that currently support a substantial share of UK fresh produce.
17. The Commissioners state that they have carefully considered and tested whether the proposals could be legitimately delivered within their portfolio, including with investment, legal and external experts, they are clear that they cannot. Value is directly linked to its productive use, maintaining flexibility, and alternative uses such as housing. Constraining land use in this way, for at least 20 years, would be expected to materially reduce value, weaken the income generated by the estate, and in turn reduce long-term financial support for the Church's ministry.
18. Whilst the Commissioners acknowledge and support excellent examples of managed conservation, these have typically taken place on owner-occupied land, where the land is managed directly by the owner rather than let to tenants, and often in less productive landscapes with different constraints. The Commissioners say they have also delivered significant nature-based projects, as set out in their report and video series, and will continue to look for future viable opportunities that deliver positive outcomes for nature.

The Global Biodiversity Framework and 30 by 30

19. It is important to note that "30 by 30", the target to protect 30% of land for nature, is only one of 23 goals within the Global Biodiversity Framework (GBF). It focuses specifically on long-term conservation (over 20 years). It is a very important target but, on its own, does not reflect the full range of ways in which nature can be supported. Many important contributions to biodiversity, including nature-friendly farming, sustainable forestry, green spaces, water management and habitat enhancement within working landscapes, fall outside a single land allocation target.
20. Focusing only on a 30 per cent protected figure risks overlooking the importance of improving the wider landscape, where the Commissioners are best placed to contribute. It is also a national target rather than one for individual landowners, and the

Land Use Framework recognises the importance of other uses, including food production, housing and renewable energy.

21. The Government, through the [National Estates for Nature](#), has been clear that it does not expect individual [landowners to set a specific 30 by 30 target](#) on their holdings, and the criteria for additional land to contribute is not yet fully defined. Where the Commissioners do have land that contributes directly to 30 by 30 outcomes, through their SSSIs, they committed to ensuring it is in favourable condition or managed towards that objective. They believe they have made meaningful progress in this respect.
22. Therefore, in addition to financial constraints, they do not consider an explicit 30 per cent conservation target to be appropriate. The Commissioners have set meaningful targets to support nature-related activity across a range of outcomes, as set out in their [Sustainability Report](#) and through their work as part of the [National Estates for Nature](#). These include targets to increase nature-friendly farming, deliver nature projects, manage forests sustainably and deliver biodiversity net gain.

Next steps

23. The Commissioners have stated that their desire is to engage with this issue in a way that can be supported and implemented in practice, reflecting both ambition for nature recovery, their collective values and the realities of the Commissioners' role and portfolio.
24. This includes the ambition further to increase nature-friendly farming, to deliver new nature projects alongside environmental organisations, to improve the condition of SSSIs, to deliver biodiversity net gain, to work with farm tenants to identify environmental opportunities, and to continue the sustainable management of woodland and habitats.

William Nye, Secretary General

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