

To: Mary Creagh CBE MP  
Parliamentary Under-Secretary of State (Minister for Nature)  
Department for Environment, Food and Rural Affairs

cc: Rt Hon Steve Reed OBE MP  
Secretary of State for Environment, Food and Rural Affairs

5<sup>th</sup> November 2024

Dear Minister,

**Carrying out an ‘Ecological Domesday Survey’:  
requiring large landowners to report publicly on how they are stewarding land**

For decades, the public has paid billions of pounds to landowners to be good stewards of nature. In fact, over the past three decades (1992-2022), landowners and farmers have been [paid over £9 billion](#) in environmental and countryside stewardship payments. In some cases this has worked well – but some landowners and farmers have failed to deliver, leaving habitats and wildlife in near-terminal decline. [Just 40%](#) of Sites of Special Scientific Interest (SSSIs) in England are in favourable condition, for example; many are still declining as a result of current land management practices.

We fully support the transition to the new Environmental Land Management schemes (ELMs) and for the ELMs budget to not only be protected, but increased. But we also think there is a pressing need for landowners to be made more accountable for how they manage land – to ensure that public money is being well spent, nature restored, carbon sinks repaired, and that our National Parks and National Landscapes are being properly cared for. Indeed, if the Government is to meet its 30x30 commitment, Environment Act targets, and carbon budgets, new policies are urgently needed to encourage more landowners to take effective action.

Less than 1% of the population owns half of England: DEFRA data shows that around 16.7 million acres (6.8m hectares) is managed by just 25,000 landholdings<sup>1</sup>. A small number of landowners, therefore – both private and institutional – have a particular responsibility to care for the land on behalf of the wider public. So it is entirely reasonable for the public to see the results.

Almost a thousand years ago, the Domesday Survey of 1086 asked landowners to report on what land they owned. We propose the Government carries out an Ecological Domesday Survey, requiring large landowners to report on what they are doing to steward the land: their duty to nature and the public. This will help meet 30x30 and other environmental targets.

We propose that large landowners – those in possession of 1,000 acres (400 hectares) or more – should be required every 5 years to send to DEFRA:

- 1) A map of their landholdings;
- 2) A baseline ecological survey (updated in subsequent reports);
- 3) A plan for how the landowner intends to restore habitats, species and carbon over the next five years – including how they would support any tenant farmers on their land to deliver this.

These would all then be published by DEFRA online, so the public can view them (for example, as a layer on [MAGIC Map](#); viewers could then click on a landholding to view the survey and plan.) Greater transparency will help ensure public money is spent cost-effectively.

The Government already has powers to require landowners to make such reports, under the Agriculture Act 2020 (sections 23-28 on collection and sharing of data). Ministers would simply need to table a statutory instrument detailing the specific information required. Verification of which

landowners meet the threshold for reporting can be done through analysis of HM Land Registry and Farm Survey data, ensuring that only large estates with ample resource and capacity for reporting would be required to do so, and that the vast majority of small-to-medium farms would be exempt.

We would be delighted to meet with you and your officials to discuss this further.

Yours sincerely,

Guy Shrubsole, campaigner and author, *The Lie of the Land* (point of contact for letter)

Dr Rose O'Neill, Chief Executive, Campaign for National Parks

Roger Mortlock, Chief Executive, CPRE, the Countryside Charity

Richard Benwell, Chief Executive of Wildlife and Countryside Link

Professor Alastair Driver, Director, Rewilding Britain

Chaitanya Kumar, Head of Environment & Green Transition, New Economics Foundation

Professor Sir John Lawton CBE FRS; Chair of [Making Space for Nature](#)

Professor Mark Tewdwr-Jones, UCL Bartlett Professor of Cities and Regions; Lead Expert, Government Office for Science [Foresight Land Use Futures Project](#)

Sue Sayer MBE, Founder and Director, Seal Research Trust and Seal Alliance

Dr Sarah Whild, Chair, National Forum for Biological Recording

Thomas Widrow, Head of Campaigns, John Muir Trust

Nicola Hodgson, Case Officer, Open Spaces Society

Steve Oram, Biodiversity Officer, People's Trust for Endangered Species

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<sup>1</sup> DEFRA, Structure of the agricultural industry in England and the UK at June (latest data for 2023), <https://www.gov.uk/government/statistical-data-sets/structure-of-the-agricultural-industry-in-england-and-the-uk-at-june>