# Written evidence submitted by Annette Exley

Environment, Food and Rural Affairs Committee — Land use and nature inquiry

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Submitted *in a personal capacity* by a member of the public who completed the Government's Land Use Framework consultation in full. By way of relevant interest, my husband and I own approximately 15 acres in North Yorkshire, comprising grazing land (for horses), mixed woodland, three wildlife garden ponds and a larger pond of around 40 metres across in the field. I have no other financial or professional interest to declare. I am content for this submission to be published.

## 1. Summary

1. I write as a member of the public with a direct interest in how England's land is used, and as one of the relatively few private individuals who completed the Land Use Framework consultation in full. My concern is not with the goals of nature recovery or net zero, but with the integrity of the process by which 30by30 and the Land Use Framework have been developed and are being delivered.

2. In summary: the one genuine public consultation was so complex that it effectively excluded ordinary respondents; its results were overwhelmingly the product of a single organised campaign and barely reached the farmers and landowners most affected; the criteria, the Delivery Plan and the headline figures rest on modelling and stakeholder input that have never been published; and official land-use statistics understate the loss of food-producing land, because land used for energy crops, solar, battery storage and biodiversity offsetting is still counted as “agricultural”. Despite a sequence of replies from Defra over several months, none has addressed these points.

## 2. About me and why I am submitting

3. I am a resident of North Yorkshire. My husband and I own around 15 acres locally — grazing land for horses, mixed woodland, three wildlife garden ponds and a larger pond of around 40 metres across in the field — which we have managed to attract and support local wildlife for some thirty years, long before 30by30 existed. Our own records note the range of wildlife this now supports, including house and tree sparrows, goldfinches and nuthatches; red kites, sparrowhawks and little owls; herons, moorhens, ducks and oystercatchers at the water; and newts, frogs, bats, deer and hedgehogs (which we release on the land). This is precisely the kind of voluntary, practical nature recovery the policy claims to want.

4. I therefore write as someone who actively supports nature recovery: my concern is with the integrity of the process, not the aim. I also have a direct, practical interest in how land-use and nature policy affects small landowners and woodland. I took part in the Land Use Framework consultation (31 January – 25 April 2025) as a private citizen, completing it in full. That first-hand experience is the basis of much of what follows, and it is a perspective the Committee is unlikely to receive often: most individuals who began the consultation did not finish it.

## 3. The consultation was extremely difficult to complete

5. The consultation document was 36 pages long, dense and highly technical, with 24 mostly closed-ended questions. Having worked through it myself, I can tell the Committee that it was demanding even for someone determined to respond. As is so often the case, the questions were effectively pre-determined — closed, tightly framed, and structured around positions the Government appeared already to have settled on — leaving little room to express a genuine view. A consultation designed in this way does not invite the public in; it filters most of them out.

6. This matters because accessibility is not a courtesy — it is central to whether a consultation is fair. If only the highly organised and well-resourced can realistically complete an exercise, the resulting "public view" is skewed from the outset. If the Government genuinely wished to understand representative views, it could have approached those who took part directly — the respondents whose details it already holds, and the landowners in its own 30by30 pilots — rather than relying on who happened to find and finish a difficult form.

## 4. The results were dominated by a single campaign

7. The published Summary of Responses records 7,429 responses received, reduced to 7,381 valid after checks. Of these, 6,095 — roughly 83% — came from a single organised campaign run by Rewilding Britain, submitted by email. Only 1,286 responses were independent (1,065 online, 218 by email, 3 by post).

8. Of the 562 organisational responses, the sectors most directly affected were strikingly under-represented: agriculture and horticulture 71, other landowners 14, and forestry and land-reliant industries 21 — roughly 100 in total. When a consultation is this hard to complete, only the highly organised get through, which is precisely what the figures show. The Government's claim of public engagement rests largely on the amplified voice of one campaign, while the people whose livelihoods are most affected were barely present.

## 5. Key decisions were taken with little or no open consultation

9. In fairness, there was an earlier public consultation touching on 30by30 — the 2022 Nature Recovery Green Paper. I acknowledge that. But the Green Paper was broad and widely criticised, and several of its proposals were not taken forward. The *confirmed* 30by30 criteria were not settled until October 2024, through a closed stakeholder working group whose members have never been publicly named, and the Delivery Plan (July 2026) was developed through "piloting with stakeholders" rather than open consultation. On Defra's own account, the Land Use Framework consultation contained only "a question on accelerating the delivery of 30by30" — a single question, not a dedicated consultation.

10. The net effect is that the decisive choices — what counts toward the target, how it will be delivered, and on what economic assumptions — were made with very limited public visibility of who shaped them.

## 6. Transparency gaps

11. Three gaps make independent scrutiny unusually difficult. First, the integrated modelling behind the Land Use Framework's headline hectare projections (productivity assumptions, electricity-mix scenarios, sensitivity analysis) has not been published; Defra has indicated the methodology will follow later in 2026, but it is not yet available for scrutiny, so the figures cannot currently be independently tested. Second, HM Treasury — which controls the spending and economic assumptions underpinning all of this — has published no specific documentation setting out its role, so its influence is invisible. Third, the stakeholder group that shaped the criteria was never named, and even the Forestry Commission, which manages around 250,000 hectares of public land, published no response to the Land Use Framework consultation; its input went in privately. The most influential voices are precisely the ones the public cannot see.

## 7. The burden on farmland — and land counted as "agricultural" that grows no food

12. The practical burden of nature recovery and renewables falls disproportionately on privately owned farmland. The Land Use Framework projects around 155,000 hectares of new renewable energy, the vast majority on private agricultural land, while the public estate — the Forestry Commission's

~250,000 hectares and the Ministry of Defence's ~140,000–160,000 hectares — is expected to contribute very little. No full public audit of that public land for nature or energy potential has been published.

13. I also want to draw the Committee's attention to a classification problem that distorts the food-security picture. A significant area of land counted as "agricultural" is not producing food at all:

14. **(a) Energy and biofuel crops.** Land used for bioenergy and biofuel feedstock — for example maize for anaerobic digestion, oilseed rape for biodiesel, and miscanthus or short-rotation coppice — remains agricultural land but produces no food. Defra's own "Bioenergy Crops in England and the UK" statistics confirm this is a substantial and growing area.

15. **(b) Solar, battery storage and biodiversity offsets.** Ground-mounted solar and Battery Energy Storage System (BESS) developments are routinely sited on agricultural land, and that land — together with the Biodiversity Net Gain (BNG) habitat that accompanies such schemes — frequently continues to be classified as agricultural even though it is no longer in food production.

16. The consequence is that headline "agricultural land" figures overstate genuine food-growing capacity and understate the cumulative loss of food-producing land to energy, storage and offsetting. I would ask the Committee to press Defra on how much land classified as agricultural is in fact used for non-food purposes, and whether its food-security assessments correct for this.

## 8. Whether the consultation met the legal standard

17. Judged against Gunning's Principles — the legal test for a fair consultation — the Land Use Framework consultation met only one principle cleanly (adequate time, at 12 weeks). It was weak on providing sufficient information (the modelling was withheld), questionable on being at a genuinely formative stage (the figures already looked advanced), and it is not possible to verify from what has been published that responses were conscientiously taken into account. For a policy of this magnitude, that is not a reassuring record.

## 9. Defra's response to my concerns

18. I first raised these matters with Defra in July 2026, within days of the Government publishing its 30by30 Delivery Plan, and have pursued them consistently since, both directly and through my Member of Parliament. The responses have followed a consistent pattern: they do not answer the substance. Across successive replies, Defra has declined to produce a "You Said, We Did" account, has given no figure for the proportion of consultation responses from farmers and landowners, and has said the modelling methodology would be published "later this year" without yet doing so. Two requests I made under the Environmental Information Regulations were refused in full.

19. The most recent reply, dated 12 October 2026 and sent through my MP, answered only the question of what consultation had been run — pointing to the single Land Use Framework question and the 2022 Nature Recovery Green Paper — and restated that 30by30 is "purely voluntary". It did not address whether evidence gathered in 2022 is an adequate basis for a 2026 Delivery Plan, nor what proportion of the land counting toward 30by30 is currently agricultural. The "voluntary" point is true only of the narrow act of submitting land for assessment; it does not answer concerns about the cumulative effect of planning weight, funding conditionality, Biodiversity Net Gain obligations and long-term covenants. I would be glad to provide the Committee with the full correspondence.

## 10. What I ask the Committee to do

20. I ask the Committee to press the Government to: (a) publish the full modelling and assumptions behind the Land Use Framework's hectare projections; (b) produce a clear "You Said, We Did" account

showing how consultation feedback shaped the final policy; (c) ensure that future consultations on delivery are genuinely accessible and open, rather than complex and pre-framed; (d) publish an audit of the public estate for nature and renewables before pressing further on private farmland; (e) clarify how much land classified as agricultural is in fact used for non-food purposes, and whether food-security assessments account for this; and (f) seek evidence directly from those who actually took part — the individuals and organisations who responded to the consultation, and the landowners participating in 30by30 pilots and schemes — rather than relying on self-selecting responses to calls that are not widely publicised.

**21.** I would welcome the opportunity to provide further detail, including my fuller written review of these documents and the Defra correspondence referred to above.

**Annette Exley**
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