



Devolution Priority Programme Consultation
The Ministry of Housing, Communities and Local Government
By email only

10th April 2025

To whom it may concern,

RE: Norfolk and Suffolk devolution consultation

In March this year, the CEOs of Norfolk Wildlife Trust and Suffolk Wildlife Trust, together with the RSPB in Norfolk and Suffolk, River Waveney Trust, and Norfolk Rivers Trust, wrote to the Minister of State for Local Government and English Devolution, Jim McMahon MP, along with local council leaders and CEOs in Norfolk and Suffolk, to share our recommendations for how Norfolk and Suffolk devolution and local government reorganization could realise the opportunity for nature-positive growth and development to help achieve national and local government commitments to biodiversity and nature recovery.¹

Summary of the recommendations made in our letter:

1. Funding settlements for the new Mayoral and unitary authorities must include ring-fenced funding for nature recovery and the delivery of Local Nature Recovery Strategies currently being developed across England, including in Norfolk and Suffolk.²
2. The new authorities must be able to secure meaningful contributions to nature recovery from major development, including Nationally Significant Infrastructure Projects like Sizewell C, offshore wind, solar farms, and National Grid transmission infrastructure.
3. New Mayoral and unitary authorities should have a duty to publish a coordinated action plan (or plans) for meeting local targets to contribute to achieving The Government's commitments to nature recovery, including:
 - Protecting, restoring, and expanding nature reserves and other wildlife sites, such as SSSIs and County Wildlife Sites
 - Halting declines in the abundance of species by 2030
 - Protecting 30% of our land and ocean by 2030
 - Restoring our rivers to good ecological health.³

We were grateful to receive a reply from the Minister encouraging us to share our views and recommendations in response to this consultation. The comments below are made on behalf of Norfolk Wildlife Trust and Suffolk Wildlife Trust and relate primarily to Question 6. Parts of our response are also relevant to Questions 3, 4 and 7 due to the important role of the natural environment in supporting the economy, social outcomes, and the interests and needs of local communities.

¹ [Open Letter re Devolution and Nature Recovery, March 2025.pdf](#)

² [Norfolk and Suffolk Nature Recovery Partnership](#)

³ The West of England Combined Authority's [Climate and ecological action plan](#) is an example of a Combined Authority action plan for nature recovery.

We hope these comments will aid The Government in their consideration of how a Mayoral Combined County Authority for Norfolk and Suffolk can maximise the benefits from Norfolk and Suffolk's natural environment and deliver meaningful improvements to the natural environment that would significantly enhance the health and economic wellbeing of the people who live and work in our two counties.

Yours faithfully,

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Q6: To what extent do you agree or disagree that working across the proposed geography through a Mayoral Combined County Authority will improve the local natural environment and overall national environment?

It is difficult to assess the likely effects of the establishment of a Mayoral Combined County Authority (MCCA) on the local natural environment and overall national environment from the information in the consultation and English Devolution White Paper. This is because very little detail is provided on the powers, functions, and funding an MCCA would have to enable it to make meaningful improvements to the natural environment. In fact, no specific funding is identified to enable the MCCA to fulfil its role in leading on the delivery of local nature recovery and contributing to national targets and Government commitments in the Environmental Improvement Plan.⁴

Looking at the Norfolk and Suffolk devolution proposals in isolation, the extent to which working across the proposed geography through a Mayoral Combined County Authority (MCCA) will improve the local natural environment and overall national environment depends on how effectively the English Devolution Bill empowers the MCCA through its powers, functions, and funding to fulfil its role in leading on nature recovery, including through the delivery of the emerging Local Nature Recovery Strategies for Norfolk and Suffolk.

We note though that the Norfolk and Suffolk devolution proposals do not exist in a vacuum, and Government policy initiatives such as proposals to streamline the planning system through the Planning and Infrastructure Bill and reform environmental regulations, as well as decisions on the allocation of public funding to support environmental delivery, will have a significant impact on whether or not the establishment of a MCCA for Norfolk and Suffolk is likely to improve the natural environment.

Notwithstanding this, it is our view that **the English Devolution White Paper and Norfolk and Suffolk devolution consultation do not adequately recognise the importance of the natural environment for our economic prosperity, social and physical wellbeing, and resilience to climate change.** As a result, they do not take full advantage of the potential for nature recovery to help deliver sustainable nature-positive growth and development – and vice versa – and the wealth of associated social, economic, and environmental benefits this could provide to people living and working in Norfolk and Suffolk.

We agree with the statement that *“A strong role for the Mayoral Combined County Authority, such as playing a leading role in local nature recovery strategies, could help maximise the benefits from Norfolk and Suffolk’s natural environment.”*

Despite this statement though, the Devolution consultation lacks essential detail on *how* a Norfolk and Suffolk MCCA would fulfil this role and maximise the benefits of the natural environment in supporting economic productivity, social and environmental wellbeing, and resilience of communities and businesses to climate change. The consultation recognises the counties’ strengths in agriculture, natural capital and biodiversity, but fails to identify the opportunities for investment in these strengths to deliver economic, environmental and social gains for the area. For example, restoring nature can help to protect homes and businesses from flooding while improving water quality and locking up carbon in soils and habitats that support wildlife and biodiversity and provide opportunities for people to access and enjoy nature that are the foundation for much of the counties’ combined £5.4bn tourism economy.

⁴ [Environmental Improvement Plan 2023 - GOV.UK](#)

Nature-based solutions to flood risk management alone have been shown to deliver benefits in terms of reduced flood risk worth £10 over 30 years for every £1 invested.⁵

If the recommendations we have made in our letter to the Minister of State, and our comments in response to this consultation, are taken on board and result in the strengthening of powers, functions and funding of a Norfolk and Suffolk MCCA in relation to nature recovery, we believe that it *could* improve the local natural environment and make a significant contribution to Government objectives and targets for restoring the natural environment in England.

However, the ability of an MCCA to help realise the potential benefits of nature recovery for people, businesses, and the environment could be undermined if the measures in the Planning and Infrastructure Bill or reforms to environmental regulations following the Corry Review weaken existing protections for the natural environment and allow development to damage the natural environment without providing safeguards to ensure that impacts will be adequately mitigated and compensated for to prevent an overall loss of nature.

We continue to advocate for the recommendations we made in our letter to the Minister for Local Government and English Devolution as essential for enabling a Norfolk and Suffolk MCCA to improve the natural environment and deliver meaningful progress on nature recovery.

In addition to this we have provided further comments and recommendations below that support and build on the recommendations in our letter to the Minister.

MCCA powers, functions and funding for nature

Powers

Norfolk and Suffolk will host a significant proportion of the UK's energy generation and transmission infrastructure over the next 50 years. Coupled with proportionately high housing growth rates this represents an unprecedented level of development in the counties.

We understand the MCCA will have responsibility for strategic planning for both energy infrastructure and housing, including a duty to produce a Spatial Development Strategy (SDS) and strategic development management powers once the SDS is in place. We welcome the commitment to strategic spatial planning for housing and infrastructure as vital for planning for nature-positive growth and development.

To ensure this growth is positive for nature and local communities, the MCCA must be able to maximise the contribution of development to nature recovery and its associated nature-based goods and services. The strategic planning and development management power of the MCCA should enable it to:

- a. require specific contributions to strategic nature restoration projects that benefit the people, communities, and businesses where new housing and infrastructure is being proposed,⁶
- b. increase the minimum level of biodiversity gain expected from certain types of development in certain locations where this is deemed to be appropriate.

⁵ [New research finds that Wildlife Trust natural flood management schemes deliver £10 of benefits for every £1 invested | The Wildlife Trusts](#)

⁶ With reference to and informed by the relevant Local Nature Recovery Strategy.

Functions

Section 2.4 of the consultation lists the functions that the Devolution Framework would give an MCCA greater local control over including “*transport, adult education and skills, and housing to enable improvements in local connectivity, educational outcomes, economic development, driving economic growth and improved social wellbeing.*”

The natural environment, nature recovery and climate change are notably absent from this list.

This omission of mention of a function for the MCCA in protecting and restoring the natural environment, leading on the delivery of local nature recovery, and mitigating and adapting to the impacts of climate change must be redressed in the English Devolution Bill to enable the MCCA to improve the natural environment for people who live and work in the area, and to contribute to national targets and commitments on nature recovery and climate in the Environment Act 2021 and Climate Act 2008 respectively.

It is important that at the same time as creating a central role for the MCCA in driving local action on nature recovery and climate change, the Devolution Framework does not take away from the ability of the MCCA’s constituent members to also drive delivery in these areas in their respective geographies.

Funding

Section 3.1 of the consultation sets out the types of funding available to MCCAs, including for:

- *Housing and regeneration*
- *Local growth*
- *Adult skills (except apprenticeships)*
- *Local transport*

Again, funding to enable the MCCA to perform the role that has been identified for it in leading on the delivery of local nature recovery is not identified in the consultation or the English Devolution White Paper. Without funding to support the MCCA’s role in leading on local nature recovery, it will not improve the local natural environment for the people who live or work in the area. This point is addressed in our previously shared recommendation for ring-fenced funding in the Integrated Settlement for the MCCA to support nature recovery and the delivery of the Local Nature Recovery Strategies.

Further to this, we note that the recently published independent review of Defra’s regulatory landscape (‘The Corry review’) recommends that Defra ‘*explore launching a Nature Market Accelerator to bring much needed coherence to nature markets and accelerate investment.*’⁷ Other mayoral strategic authorities have pioneered the establishment of natural capital investment funds, such as the Greater Manchester Environment Fund, which seeks to ‘*encourage investment in the natural environment to secure financial and social returns through a range of innovative finance models including habitat banking and carbon trading.*’⁸

⁷ [Delivering economic growth and nature recovery: an independent review of Defra’s regulatory landscape - GOV.UK](#)

⁸ [Greater Manchester Environment Fund | Greater Manchester Environment Fund](#)

There are already several pilot projects in Norfolk and Suffolk that are developing natural capital and ecosystem services-based approaches to funding Nature-Based Solutions, including the Suffolk Wildlife Trust-led Waveney and Little Ouse Recovery project and Wendling Beck in Norfolk.⁹ We encourage The Government to consider the opportunity for the establishment of a Norfolk and Suffolk MCCA to support the creation of a natural capital investment plan and fund for Norfolk and Suffolk, potentially as part of a Defra Nature Market Accelerator.

A nature recovery duty

We have called for the MCCA (along with any new unitary authorities) to have a duty to produce a plan for meeting local targets to contribute to achieving The Government’s commitments to nature recovery. This should be a legal duty that requires the MCCA to set local targets for nature recovery, agreed with its constituent members, and implement a plan for achieving these targets. This would represent a necessary strengthening of the weak duty on public bodies under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 to ‘conserve and enhance biodiversity,’ which does not require local authorities to set or meet specific targets for delivering nature recovery.

Environmental Principles

The consultation states that

“Ministers will also consider all factors in the round when taking the decision on whether to proceed with the necessary implementing legislation, including an equalities impact assessment and an *environmental principles policy statement*.”

[our emphasis]

There is no further mention in the consultation though of the environmental principles statement or what principles might be included.

A set of environmental principles for the MCCA should reflect the environmental principles enshrined in law through the [Environment Act 2021](#):

- (a) the principle that environmental protection should be integrated into the making of policies,*
- (b) the principle of preventative action to avert environmental damage,*
- (c) the precautionary principle, so far as relating to the environment,*
- (d) the principle that environmental damage should as a priority be rectified at source, and*
- (e) the polluter pays principle.¹⁰*

In addition, the environmental principles policy statement should be supported by an environmental impact assessment, equivalent to the equalities impact assessment.

⁹ [Waveney and Little Ouse Landscape Recovery | Suffolk Wildlife Trust](#) and [Wendling Beck - Nature recovery project in Norfolk](#)

¹⁰ [Environment Act 2021](#)

Improving nature through a ‘nature in all policies’ approach

We are calling on The Government to implement a ‘nature in all policies’ approach for the MCCA (and other Strategic Authorities) that would replicate the ‘health in all policies’ approach The Government is supporting to drive progress in improving health and addressing (reducing) health inequalities,¹¹ by introducing a new bespoke duty in relation to nature improvement and nature inequalities.

Access to nature and high-quality natural greenspaces is a significant factor in health outcomes.¹² Introducing this duty and a ‘nature in all policies’ approach would ensure Strategic Authorities (including the MCCA for Norfolk and Suffolk) have regard to the need to improve the natural environment, and the need to reduce inequalities in access to nature and high-quality natural greenspace and the health and social wellbeing benefits thereof, in the exercise of their functions, and give them a clear stake in improving the local natural environment.

A voice for nature in the MCCA

It is essential for the effective leadership of the MCCA on nature recovery and achievement of its goal to improve the natural environment that the voice of nature is present and heard in the MCCA’s governance.

To ensure this will be the case, we recommend:

1. One of the MCCA’s constituent members, or the Deputy Mayor, should have specific responsibility for overseeing the delivery of the authority’s environment and climate change functions, and the ‘nature in all policies’ approach.
2. That the non-constituent and associate members of the MCCA include at least one representative drawn from Norfolk’s and Suffolk’s environmental NGOs to provide expert knowledge and advice to the MCCA on the performance of its functions and meeting its duties in relation to the natural environment.

Closing remarks

Without the implementation of these recommendations we are not confident that an MCCA will have the powers, functions, and funding necessary to address the major challenges and pressures faced by the natural environment in Norfolk and Suffolk and deliver meaningful improvements to the natural environment that would significantly enhance the health and economic wellbeing of the people who live and work in our two counties.

With them, we believe that the establishment of an MCCA could help to provide a nature-positive future that benefits people and businesses in Norfolk and Suffolk.

¹¹ Section 3.7 Health, wellbeing, and public service reform – [Norfolk and Suffolk devolution consultation - GOV.UK](#)

¹² [Nature for health and well-being | The Wildlife Trusts](#)