

An open letter to Norfolk and Suffolk Local Authority Leaders (CEOs and elected Council Leaders), Members of Parliament, and The Minister of State for Local Government and English Devolution, on the need and opportunity for nature-positive Norfolk and Suffolk devolution and local government reorganisation.



4th March 2025

Dear [NAME],

With Norfolk and Suffolk on the fast-track for devolution and local government reorganisation (LGR), we are urging local and national government leaders to ensure these processes support the delivery of the counties' Local Nature Recovery Strategies and contribution to the government's commitments to nature restoration and nature-positive growth.^{1,2}

We hope you will support and advocate for three key recommendations to put nature recovery and nature-positive economic growth at the heart of devolution and LGR in Norfolk and Suffolk:

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.³
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% our land and ocean by 2030
 - Restoring our rivers to good ecological health.^{4,5}

Nature is essential to Norfolk and Suffolk's prosperity, the wellbeing of our communities, and the ability of our businesses and economy to grow. Growth and nature recovery can and must go hand in hand. Implementing

¹ [Norfolk and Suffolk devolution consultation - GOV.UK](#)

² [Environmental Improvement Plan](#) and [Environment Act 2021](#)

³ [Norfolk and Suffolk Nature Recovery Partnership](#)

⁴ [Guidance](#) on the NERC Biodiversity Duty already states that consideration of biodiversity by public bodies should seek to make a significant contribution to the achievement of the commitments made by government in its Environmental Improvement Plan but does not require them to set or meet targets.

⁵ The West of England Combined Authority's [Climate and ecological action plan](#) is an example Combined Authority action plan for nature recovery.

these recommendations will help to deliver devolution that sets Norfolk and Suffolk on the path to nature recovery and a thriving economy built on a healthy and resilient natural environment.

Devolution and LGR represent a once in a generation opportunity to give local government the resources and powers to deliver genuinely environmentally-positive growth that helps restore nature – an opportunity we can ill afford to miss in the face of climate change, biodiversity loss, and the urgent need to turn things around for our natural environment.

The time to act is now and getting the right devolution deal for nature, people, businesses, and communities in Norfolk and Suffolk must be a priority for local and national government.

We would greatly appreciate your support for the recommendations above and our efforts to secure meaningful engagement with the Norfolk and Suffolk devolution and LGR proposals to ensure they deliver on their potential to support nature recovery and nature-positive growth.

Further detail on the need and opportunity for nature-positive devolution is provided below.

Yours sincerely,

Christine Luxton – Chief Executive, **Suffolk Wildlife Trust**

Eliot Lyne – Chief Executive, **Norfolk Wildlife Trust**

Martha Meek – Director, **River Waveney Trust**

Ed Bramham-Jones – Chief Executive, **Norfolk Rivers Trust**

Adam Rowlands – Area Manager Suffolk, **RSPB**

Steve Rowland – Area Manager Norfolk and Lincolnshire, **RSPB**

The need and opportunity for nature-positive devolution

Jobs, growth, economic resilience, and the wellbeing of individuals and communities are underpinned by the natural environment.

Investing in nature and ‘nature-based solutions’ to deliver goods and services such as improved water quality and flood risk mitigation provides excellent value for money. For example, analysis by Water Resources East found that each £1 invested in nature-based solutions in Norfolk would deliver £6.70 in benefits.⁶ Devolution presents an opportunity to put local government in a position to secure investment in nature that will support growth and nature recovery.

Norfolk and Suffolk’s local authorities recognise the value of nature and their role in protecting and maintaining it, and they have ambitious objectives and policies that aim to support nature recovery.⁷ Without specific duties, powers, and resources though, they have not been able to catalyze the scale of local action needed to restore our natural environment. That is *why* so many organisations, including the local authorities, have invested so heavily of their time in contributing to the creation of Local Nature Recovery Strategies currently being developed for Norfolk and Suffolk. These will come to nothing though if they are not properly funded to deliver the nature recovery opportunities they identify.

Devolution will give a new Mayoral Combined County Authority a leading role in delivering the Local Nature Recovery Strategies, but it will only be effective in this role if it, and the new unitary authorities proposed by the LGR process, have sufficient resources, backed up by specific, target-driven nature recovery duties and delivery plans. In this way, devolution and LGR could *build on* the foundations provided by existing local authority ambitions, strategies, policies, plans and activities for nature recovery.

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. To make this growth positive for nature and local communities, the new combined and unitary authorities must be able to maximise the contribution of development to nature recovery and its associated nature-based goods and services. One way to do this could be to increase the minimum level of biodiversity gain expected from certain types of development in certain locations. Another would be to require specific contributions to strategic nature restoration projects that benefit the people, communities, and businesses where new housing and infrastructure is being proposed. In both cases, the Local Nature Recovery Strategies can help to target measures to have the greatest benefit for nature and people.

Devolution and LGR on their own will not be able to deliver all the changes needed to realise these positive outcomes for nature and people from growth and development in their entirety. The Planning and Infrastructure Bill will be essential for delivering nature-positive reform of planning to underpin local nature recovery, and wider government growth strategies and policies must be developed with nature in mind. But it is also true that achieving national growth and nature restoration goals depends on delivery at the local level, and that requires proper support for local government’s role in nature recovery and nature-positive growth.

⁶ [Norfolk Water Strategy Programme - Water Resources East](#)

⁷ East Suffolk Council has made restoring ecosystems and biodiversity a [strategic priority](#); Suffolk County Council has a policy aim to deliver an additional 10% Biodiversity Gain across its housing programme on top of the minimum 10% required by the Environment Act. In Norfolk, Great Yarmouth Borough Council and The Broads Authority both have 20% Biodiversity Gain policies in their draft emerging Local Plans.