

The Rt Hon Dr Thérèse Coffey MP
Secretary of State for Environment, Farming and Rural Affairs
Seacole Building
2 Marsham Street
London
SW1P 4DF
United Kingdom

13 July 2023

Subject: Resourcing of Natural England

Dear Secretary of State,

I am writing to you on behalf of members of the Chartered Institute of Ecology and Environmental Management (CIEEM). CIEEM is the professional body that supports over 7,000 ecologists and environmental managers from across the UK and Ireland. As senior members of the profession, many Fellows and Full Members are personally involved in taking projects through the planning process. These projects are anything from nuclear power stations to large residential developments and renewable energy schemes, to small leisure development or single unit residential development and barn conversions. Many of these projects require engagement with Natural England either as a statutory consultee on Habitats Regulations Assessment, protected species licensing or during public inquiries when the inspectors seek advice from the Government's advisor on nature conservation.

Natural England's funding has been reduced from a high of £265 million in 2008-09 to just £89 million in 2021-22ⁱ – a reduction of over 65% in the last 14 years. Not only has this had a significant impact on Natural England being able to perform its statutory duties, but more specifically – and despite the many passionate and committed staff – we have seen a dramatic decline in the quantity and quality of advice that is being provided^{ii,iii,iv,v}.

Natural England cannot be expected to deliver a high-quality service if its funding is being reduced year on year. CIEEM members have personally had to deal with occasions when Natural England's advice is inaccurate, which has led to situations where some features of a site are not afforded the required protection or where features which are not listed as an interest feature of a site receive unnecessary attention. It would also appear that additional funding that was meant to be created from pre-submission screening and the discretionary advice service has not been used to support and improve related delivery of services.

In other cases, Natural England does not have the expertise nor the resources to provide anything other than a 'tick box' approach, again leading to either protection not being applied properly or over precautionary application of the law. In some instances, advice has contradicted that previously given when a new case officer is appointed for the same development. We even have examples of where Natural England has not responded to questions raised directly by inspectors at public inquiries on issues that are fundamental to the grant of permission.

Some of our more senior and experienced members recall in times gone by being able to have one-on-one conversations with National subject area specialists at Natural England and of working collaboratively to solve environmental problems and deliver much-needed development. However, as funding cuts began to bite many experienced staff at Natural England were lost, and this is when service levels began to decline. Many case officers that members work with now are very junior indeed, and lack the experience to scrutinise projects effectively and make risk-based judgements, meaning that they tend to

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revert to an overly precautionary position that more often frustrates development than supports its delivery. Based on this first-hand experience of Natural England's levels of service we are firmly of the view that the underfunding of Natural England is counterproductive, and that the service has deteriorated with the decline in funding.

Rather than creating financial savings, the lack of funding is instead holding back economic development and at the same time damaging the protection of the natural environment. Projects are being turned down on grounds of environmental protection which are in fact benign, and equally in other cases wildlife that should be protected is not being properly considered.

CIEEM members are able to provide detailed examples if required.

Natural England is aware that it is underpaying staff^{vi}, and from personal correspondence we are aware that its staff are paid less than equivalent roles in other government agencies. In order to perform its duties, Natural England must be able to attract and retain staff across the range of experience and expertise^{vii,viii,ix,x}. Underpaying Natural England staff sends the message that the Government does not value the natural environment.

The natural environment is highly valued by the public and England has a long history of providing legal protection to wildlife which extends back to the late 1940s. England once led European nations when it came to the protection of the Natural Environment (it was British naturalists and politicians who were very largely responsible for the Birds Directive), but with the current domestic state of affairs we are at risk of falling behind our European neighbours and failing to take advantage of the freedom that we now have to forge ahead with our own world-leading environmental agenda. However, the legal protection of wildlife must also include proper funding of the regulatory body that oversees that protection. Without a strong regulator, properly funded, and trained and accountable staff the private sector cannot function properly, which is damaging to economic development.

Furthermore, a fully functioning Natural England is necessary for the Government to fulfil its ambitions on nature recovery, as stated in the Environment Act 2021, the latest Environmental Improvement Plan and as agreed in the UN Kunming-Montreal Global Biodiversity Framework.

CIEEM is calling for urgent action from the Government to review the funding of Natural England so that it has the necessary resources to apply the law properly and provide sound advice and services correctly and in a timely manner. A fully resourced Natural England that can clearly and decisively engage with ecologists and developers is good for nature, people and business.

Yours sincerely,



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ⁱ <https://www.gov.uk/government/collections/natural-england-annual-reports-and-accounts>

ⁱⁱ <https://www.theguardian.com/environment/2020/nov/10/natural-england-cut-to-the-bone-and-unable-to-protect-wildlife-staff-claim-aoe>

ⁱⁱⁱ <https://prospect.org.uk/news/broken-pay-system-at-natural-england-poses-risks-net-zero-and-biodiversity-targets>

^{iv} <https://policymogul.com/key-updates/12286/natural-england-is-at-risk-because-its-funding-has-been-slashed-and-its-workforce-reduced-says-prospect-report>

^v <https://www.countrylife.co.uk/news/natural-england-under-fire-amid-near-total-collapse-of-confidence-among-farmers-and-landowners-254963>

^{vi} <https://www.endsreport.com/article/1747952/natural-england-acutely-aware-staff-salaries-not-match-cost-living-says-chief>

^{vii} <https://www.endsreport.com/article/1747952/natural-england-acutely-aware-staff-salaries-not-match-cost-living-says-chief>

^{viii} <https://www.theguardian.com/environment/2022/mar/01/low-pay-natural-england-conservation-uk-net-zero-target-risk-prospect-union-report-aoe>

^{ix} <https://prospect.org.uk/news/broken-pay-system-at-natural-england-poses-risks-net-zero-and-biodiversity-targets>

^x <https://www.civilserviceworld.com/professions/article/broken-pay-at-natural-england-putting-net-zero-goals-at-risk>



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Dear Jason

Thank you for your letter of 13 July to the Secretary of State about resourcing for Natural England (NE). I am replying as the Ministerial lead for NE.

Firstly, I would like to correct the funding figures you quoted in your letter. NE received £162 million in Defra funding in 2021-22. This increased to £260 million in 2022-23 in recognition of its key role in delivering the Government's ambitious environmental targets.

The number of staff working for NE has risen by almost a third in the last three years. Pay is determined by the Civil Service pay remit guidance, which is published on an annual basis. Within that guidance, NE has always sought to pay the maximum increase to the pay bill that is possible.

I am sorry that you feel the quality and quantity of service you receive in relation to planning advice has not always been satisfactory. I encourage you to raise these specific issues with NE directly using its [complaints procedure](#), so it can use this feedback to improve its services. I suggest you also discuss this with Mike Burke, NE's Sustainable Development Programme Director, who would be happy to talk to you. You can contact Mike Burke by email at: mike.burke@naturalengland.org.uk.

Defra and NE recognise the challenges facing public sector organisations in retaining the skills needed to deliver statutory planning consultation work. We are working closely with the Department for Levelling Up, Housing and Communities and the Department for Energy Security and Net Zero to ensure that the right people with the right skills are recruited, as this is essential for delivering Government aims on energy, housing and net zero.

Through the Levelling Up and Regeneration Bill, NE will have new powers to recover costs for its statutory planning services. This will allow its service to respond better to demand. As stated in the recent [consultation on operational reforms to the Nationally Significant Infrastructure Planning system](#), we are developing performance monitoring arrangements to accompany the charging system and will engage with stakeholders as these are developed.

Yours sincerely

TRUDY HARRISON MP