

EIP review: Submission from ADEPT

September 2024

Executive Summary – the key priorities for a revised EIP should be:

- Greater emphasis on a place-based approach.
- Support for the development of Local EIPs to clarify the role of the local authority.
- Sufficient and sustainable funding for local authorities to play this role.
- Statutory duties and targeted funding for local authorities where appropriate.
- The EIP should be a framework for policy alignment across government strategies, departments, and funding streams.
- Green finance – building capacity to mobilise private investment at scale.
- Health and wellbeing.

The Association of Directors of Environment, Economy, Planning and Transport ([ADEPT](#)) represents place directors in county, unitary and combined authorities. Environmental functions include local climate action, waste and recycling, nature recovery, flood and water management, planning, energy, and air quality. These are all areas where the successful achievement of national and local policy ambitions depends on a place-based approach where local authorities (LAs) have the duties, powers, funding and capacity needed to deliver on the ground.

ADEPT has supported the Environmental Improvement Plan since its first iteration, and we value working with Defra and its agencies to press the case for local authorities to be effectively engaged, resourced and supported to deliver it. We want the EIP to work. LA are working hard to implement new duties such as biodiversity net gain, Local Nature Recovery Strategies and changes to waste and recycling operations. The EIP should be a framework for policy alignment across government strategies, departments and funding streams, ensuring that other plans and policies across transport, energy, health and others reflect and support environmental objectives. It should articulate the financial benefits of investing in the environment whilst highlighting costs saved including the health and wellbeing of people and communities (as acknowledged in the recent Darzi investigation into the NHS).

It is important the EIP review takes full account of the lessons already learnt and fed back to Defra over the last two years by ADEPT and individual LAs in terms of the barriers and enablers to delivery – including simplified and sustainable funding, tackling skills and capacity issues, national policy alignment, and improved partnership with government. Many of our comments below reflect and reinforce those lessons.

We welcome the stated objectives of the review to work collaboratively with stakeholders to co-create a revised EIP, and to lay the foundations for a more collaborative approach to the delivery of the EIP over the longer term. However, in any review of policy where LAs are seen as key delivery partners it is essential that government starts from a recognition of the crisis in local government finances. LAs are under severe financial strain due to long-term reductions in government grants, growing demand from and complex needs of vulnerable children and adults, and cost inflation in supply chains. Financial failure is becoming more common, and many LAs are having to cut any expenditure that is not required to meet statutory minimum service levels. County and unitary authorities now spend at least two-thirds of their service budgets on social care, with ever decreasing resources and capacity to support national priorities on the economy and environment.

If the revised EIP is to be delivered successfully, first of all we need a new partnership with government, and sufficient and sustainable funding. Funding for environmental improvement is still fragmented and short-term, making it impossible to build and maintain the capacity to deliver programmes over the medium and long term.

We recognise that public funding is finite and that collectively we need to be attracting new sources of finance and more private investment into environmental improvement. Green finance should be a key cross-cutting theme in the revised EIP, with a clear commitment to rapidly scaling up the Local Investment in Natural Capital (LINC) pilot to build and maintain the capacity that LAs need to mobilise investment at the scale required. LAs want to play a strong environmental leadership role, and small levels of enabling funding with the right mandates can leverage in significant additional external funding.

Other national policies must be aligned with the EIP. We have long highlighted the fragmentation resulting from a departmentalised government, and the insufficient priority given to environment and climate issues in other departments' plans and services. We welcome the messages from senior officials and Ministers that the new government is committed to effective cross-departmental working and to a more collaborative and positive relationship with local government. The EIP can make a big contribution to the government's wider objectives of economic growth, clean energy, good housing and improved health.

It is important that these other policies are aligned with the EIP and contribute to its delivery. For example, Mayoral Combined Authorities are currently being asked to agree "strategic growth priorities" as part of the Local Growth Plan – it is critical that environmental objectives and targets are properly reflected. The parallel review of the National Planning Policy Framework should be aligned to ensure it supports the objectives and targets of the EIP.

Devolution is a key mechanism for aligning policies at the local level. All devolution deals should require plans and funding to be agreed between LAs and government to cover climate and environment objectives and targets to be delivered at scale and pace. We have called for new Local Climate Action Agreements and a statutory framework and associated funding to enable LAs to prepare evidence-based Local EIPs (LEIPs) that deliver local environmental leadership and support appropriate planning and development decisions.

We worked with several LAs and the County Councils Network to get standard text about a LEIP included in the non-mayoral level 2 devolution deals for Surrey, Buckinghamshire and Warwickshire. This proposal is now being developed in more detail and we will continue to talk to Defra officials about how a LEIP can be articulated within existing policy and statutory frameworks. We strongly recommend that the revised EIP has a more explicit place-based approach with support for the principle of LEIPs as the mechanism for aligning policy, funding and partnership working at the local level. The existing network of LNRS Responsible Authorities provides a platform for developing the place-based approach, but we would see LEIPs having a far broader scope than nature recovery alone.

We are keen to engage in the EIP review process and contribute to its successful delivery. Whilst welcoming the opportunity to comment now, the timeframes were extremely short. This is not consistent with normal good practice for government consultations and does not give representative bodies sufficient time to engage with their members and provide good quality stakeholder input. We hope for a more collaborative approach going forwards.