

# A review of Local Nature Recovery Strategies and their role in contributing to nature recovery commitments in England



# **A review of Local Nature Recovery Strategies and their role in contributing to nature recovery commitments in England**

**Laid before Parliament pursuant to section 29 of the Environment Act 2021**

**June 2025**

The Office for Environmental Protection is a non-departmental public body, created in November 2021 under the Environment Act 2021. Our mission is to protect and improve the environment by holding government and other public authorities to account. Our work covers England and Northern Ireland. We also cover reserved matters across the UK.

[www.theoep.org.uk/about-what-we-do](http://www.theoep.org.uk/about-what-we-do)



© Copyright The Office for Environmental Protection 2025

Contains public sector information licensed under the Open Government Licence v3.0. To view this licence, visit [www.nationalarchives.gov.uk/doc/open-government-licence](http://www.nationalarchives.gov.uk/doc/open-government-licence).

This publication is available at [www.gov.uk/official-documents](http://www.gov.uk/official-documents)

Any enquiries regarding this publication should be sent to us at:

The Office for Environmental Protection

Wildwood

Wildwood Drive

Worcester

WR5 2QT

[www.theoep.org.uk](http://www.theoep.org.uk)

03300 416 581

[enquiries@theoep.org.uk](mailto:enquiries@theoep.org.uk)

ISBN: 978-1-5286-5668-9

E03345027 06/25

Printed on paper containing 40% recycled fibre content minimum

Printed in the UK by HH Associates Ltd. on behalf of the Controller of His Majesty's Stationery Office

# Contents

Foreword.....	6
Executive summary and recommendations.....	8
1. Introduction .....	14
2. Background and context .....	16
3. Research methods .....	30
4. Barriers and enablers .....	36
5. Review of Local Nature Recovery Strategies .....	44
6. Findings and recommendations .....	56
Annex A: Responsible Authorities involved in our review .....	66
Annex B: Other stakeholders involved in our review .....	70



# Foreword



# Foreword

Government has stated its commitment to nature's recovery alongside delivering its ambitions for growth. The need to balance the two is pressing and this pressure is felt, perhaps most acutely, at local and regional levels. Although challenging, this balance can be struck, so long as the environment is considered in policy and in practice, as it must be, and so long as action for nature's recovery is ambitious, coherent, and focuses on delivery and pace.

The same Environment Act that provides for statutory targets to halt and reverse nature's decline also requires the creation of Local Nature Recovery Strategies (LNRS). Nature's recovery depends not just on central government initiatives but on local actions, organised, incentivised and effectively implemented. LNRS can bring statutory targets alive at a local level, setting out plans and actions that together add up to achieving environmental goals for the nation as a whole. LNRS create a powerful mechanism for national and local government to link national ambitions with local endeavours, and to enable effective delivery on the ground.

If implemented promptly and effectively, LNRS could and should make a material difference to government's prospects of meeting nature recovery targets and goals.

Local authorities, other public bodies, landowners and occupiers, developers and those in the environment sector must all play their part in nature's recovery, and many stand ready to do so. With an increased focus on local leadership and decision-making, the important national role for these local strategies should be plain to see.

Much has been achieved in developing LNRS so far. These are not easy tasks. But with nature's needs so pressing, it is deeply regrettable that only two of 48 LNRS had been published by March 2025, as originally intended. With every further delay, it becomes ever more important that government now drives a rapid transition from strategy development into swift delivery. To do so, government will need to commit to these strategies for the long term, ensuring they have effective governance and, critically, are adequately resourced.

Local Nature Recovery Strategies must not, once completed, sit, unheeded and under-resourced on local authority shelves.

So much of the potential for win-wins for the environment and for growth relies on local nature recovery. LNRS have a pivotal role to play, in steering local priorities for nature. We trust that our report proves useful and timely, as national and local government, public bodies and stakeholders now take action to realise this potential, to implement the strategies and drive nature's recovery.

We are grateful to those who have given generously of their time and expertise to inform our thinking.

A handwritten signature in black ink, appearing to be 'G Stacey'.

Dame Glenys Stacey  
Chair, Office for Environmental Protection





# Executive summary and recommendations

# Executive summary and recommendations

Local Nature Recovery Strategies (LNRS) are the first statutory, spatial strategies for nature, which together will cover the whole of England. As such, they have significant potential in terms of translating national environmental objectives and spatial priorities into a local context, whilst addressing local needs. They should underpin delivery of government's national commitments for nature's recovery, including the legally-binding targets set under the Environment Act 2021, and the Environmental Improvement Plan (EIP).

LNRS aim to identify where the most important biodiversity resources are, where there is greatest opportunity for restoring or creating new places for biodiversity, and where the enhancement of biodiversity would provide wider environmental benefits. Alongside this spatial element, each LNRS will seek to identify local priorities for wildlife, and consider the wider environmental benefits that can be delivered as part of plans for local nature recovery. They are intended to be strategies that act as an enabling mechanism for delivery of on-the-ground action and decision-making.

## What have we considered in our review?

We looked at the role that LNRS play in delivering the legally-binding species abundance targets and how they support broader ambitions for 'thriving plants and wildlife' in the EIP. We have considered the barriers and enablers faced by the Responsible Authorities (RAs) charged with their production, as well as undertaking an assessment of a sub-set of 12 LNRS.

To do this we engaged with 38 of the 48 RAs producing LNRS, as well as a wider community of stakeholders. In reviewing the sample of 12 LNRS, we assessed their ambition, their coherence with other relevant plans and strategies, and, whilst noting that LNRS are not delivery plans, the extent to which they are set up to enable on-the-ground delivery.

Our review is intended to provide early insight and practical recommendations, such that improvements might be made to increase prospects of LNRS enabling nature recovery, as intended. Our findings and recommendations are principally strategic in nature and focus on actions to be taken at a national scale. However, we note that at the local level, the success or otherwise of LNRS will largely be driven by effective local leadership, partnerships, and action.

## What have we found?

Simply having LNRS in place across the whole country, once they are all published, will be a big step forward. It is clear to us that a significant amount of work has gone into the production of these first LNRS. We saw an evident desire to create something that is genuinely significant for local nature recovery.

Our findings and recommendations focus on the strategic lessons learned, where we consider action can be taken to improve the prospects of LNRS delivering for national nature recovery commitments, as intended. Our findings are summarised below.

Concerted effort is needed to address delays and publish all LNRS as soon as possible. Only two out of the total 48 LNRS had been published by the target date of March 2025.

We consider that this delay is likely to affect LNRS' ability to contribute to the more proximate national goals and targets for nature recovery, in particular government's 2030 target to halt the decline in species abundance. It also leaves a gap for some authorities in their local decision-making, such as that for mandatory Biodiversity Net Gain (BNG). It is, therefore, important that a concerted effort is made first to complete the outstanding LNRS and then to move quickly into delivering their ambitions. This will help them play a fuller role in meeting the 2042 species abundance target.

Greater clarity is needed over the contribution LNRS are expected to make to nature recovery and their relative significance. We found it is not currently possible to quantify the contribution that LNRS could or should make towards relevant national goals and targets. This requires improved input, and governance, at the national level. Defra, Arm's Length Bodies (ALB), and RAs will need to work together to determine how LNRS, both individually and collectively, will 'stack up' and make a meaningful contribution to national nature recovery commitments. Defra should also clarify the significance of LNRS in relation to other nature recovery mechanisms, both locally and nationally.

Greater clarity and certainty are needed in terms of government's long-term commitment to LNRS. We heard many times about the lack of clarity around future resourcing and governance for LNRS, once they are produced. LNRS will need to transition into delivery and this will require coordination, oversight, monitoring and evaluation. The roles and responsibilities in respect of these need to be set out, alongside a commitment to sustainable long-term resourcing.

Greater certainty is needed over how LNRS will transition into delivering coherent on-the-ground action for nature recovery. We found that links to key delivery and funding mechanisms (such as agri-environment schemes, nature markets and green finance, and planning) are not clear or strong enough. This undermines confidence that these mechanisms will be sufficient and will function coherently to support local and national nature recovery ambitions at the pace and scale required. We also found a lack of meaningful coherence with relevant plans and strategies. Clarity on what delivery mechanisms will be used, and how they will work coherently together will be vital for providing assurances as to how LNRS will deliver for nature recovery.

Provisions in the planning system need to be strengthened. There are currently no specific legal duties that require LNRS to be implemented. Therefore, it is important that other relevant legal duties are exercised in a way that actively supports delivery wherever possible. In particular, the duty placed on public authorities under section 40 of the Natural Environment and Rural Communities Act 2006 ('the NERC Act'), along with other requirements in the planning system, play a key role. Whilst we welcome these existing provisions, more should be done to strengthen how LNRS are considered in plan-making and decision-taking. For example, the National Planning Policy Framework (NPPF) does not currently include sufficient information on LNRS. Here, LNRS need to be given greater weight, and clarity around that weighting should be provided to assist local planning authorities and others.

Issues around data access, quality and establishing a common baseline need to be addressed. RAs have faced practical challenges that need to be addressed at a national level, such as with data access and quality. These have contributed to delays in preparing LNRS and, in some instances, have affected the underpinning evidence base of, and ultimately the coherence between, individual LNRS. This means there will be variability of

LNRS such that they cannot be easily aggregated to present a single, national picture. This may present challenges if boundary changes result from plans for English devolution. It is also an issue in terms of being able to effectively assess and monitor LNRS' contribution to relevant national goals and targets.

Early review of LNRS, and more flexibility to allow for updating individual LNRS, is needed. Requirements for review of LNRS are currently ambiguous. We consider that early review of LNRS (within the 3 to 10 year time frame required by law), and flexibility to enable local updates outside of the formal review process, will be important to ensure LNRS become a credible and authoritative long-term strategy for informing nature recovery action. Early, full review of all LNRS should start with the important lessons learned from this first round of LNRS and should ensure that LNRS are informed by and keep pace with relevant national, strategic and local strategies and plans.

## **What do we recommend?**

Our recommendations focus on actions that should be taken to improve the prospects of LNRS contributing to national nature recovery commitments. These broadly split across those things that should happen now, actions that should be taken to improve the prospects of this first suite of LNRS, and then looking ahead to future review of LNRS.

### **Recommendation 1: Publish all strategies at the earliest possible opportunity.**

Responsible Authorities should, together with Supporting Authorities and Defra, implement course-corrective action to ensure that all LNRS are published at the earliest opportunity.

### **Recommendation 2: Define how LNRS contribute to national nature recovery commitments.**

Defra, in consultation with its Arm's Length Bodies and Responsible Authorities, should define and clearly explain the role that each LNRS will play in contributing to national nature recovery commitments – in particular, what each LNRS will deliver for legally-binding targets and a revised EIP. This should be quantified wherever possible and include an understanding of how LNRS stack up at the national level.

Defra should also explain the significance of LNRS in relation to other national and local mechanisms for nature recovery.

### **Recommendation 3: Establish the long-term governance and resourcing arrangements for LNRS.**

Defra should, as soon as possible, establish a long-term approach to LNRS governance and resourcing. This should set out the roles and responsibilities (particularly for coordination, oversight, monitoring and evaluation), and its commitment to sufficient long-term resourcing.

#### **Recommendation 4: Clarify funding streams and delivery mechanisms for coherent on-the-ground nature recovery action.**

Defra should work with its Arm's Length Bodies and Responsible Authorities to determine the most appropriate funding and delivery mechanisms. This should detail how much funding is associated with each delivery mechanism, assess whether this is sufficient, and set out how they will work coherently together to deliver local and national nature recovery commitments.

In addition, Defra's Arm's Length Bodies should set out how they will use LNRS to inform the exercise of their functions.

#### **Recommendation 5: Update the National Planning Policy Framework (NPPF).**

MHCLG should, as soon as possible, update the NPPF to describe the weight that should be given to LNRS when plan-making and in making planning decisions. This should set out how that weighting applies to different component parts of LNRS.

#### **Recommendation 6: Establish a baseline for the spatial components of LNRS.**

Defra should establish a baseline for the spatial component of all LNRS.

Defra and Natural England should also consider where they might best intervene to support improved access to data relevant to LNRS.

Defra should ensure key nationally significant datasets are updated (e.g. the Priority Habitat Inventory and Agricultural Land Classification) to inform LNRS.

#### **Recommendation 7: Require early review of LNRS and clarify the process for 'exceptional' amendments.**

The Secretary of State should require early review of all LNRS. This should be no later than three years following publication of the last LNRS.

Defra should define the 'triggers' for when full review of LNRS will be required, and the intended purpose of such review. It should also set out when and how Responsible Authorities might undertake local 'exceptional' amendments to LNRS outside of the formal review process.



# 1. Introduction

# 1. Introduction

## 1.1 Focus of this report

The legal requirement for LNRS was introduced by the Environment Act 2021 ('the Environment Act'), establishing them (once created) as the first statutory spatial strategies for nature in England.

Given the depleted state of nature in England,<sup>1</sup> the need for nature's recovery is reflected in legally-binding targets set under the Environment Act, with targets to first halt the decline of species by 2030 and then increase species abundance by 2042. This also forms a focal point in the government's Environmental Improvement Plan (EIP), where 'thriving plants and wildlife' forms the apex goal (noting that the EIP is under review by Defra at the time of writing).

LNRS are an important mechanism for identifying not only where the most important biodiversity resources are, but also where there is greatest opportunity for restoring or creating new places for biodiversity, and for enhancing biodiversity where this might provide wider environmental benefits. Alongside this spatial element, each LNRS will identify local priorities for wildlife and consider the wider environmental benefits that can be delivered as part of the plan for local nature recovery.

LNRS themselves are not intended to be delivery plans, instead they are an 'enabling mechanism' that target where action can best happen to aid nature recovery and bring local stakeholders together to work toward a shared vision. LNRS have the potential to act as a powerful cohering force to inform decision-making, and drive local ambition, action and delivery.

In March 2023, government formally set out the process by which LNRS would be drawn up in statutory guidance.<sup>2</sup> In April 2023 the Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023 ('the LNRS Regulations') came into force. In June 2023, Defra confirmed the intention that they be in place across England by March 2025.<sup>3</sup>

We consider it important to look at the development and early implementation of LNRS to determine the role they can play in delivering the legally-binding species abundance targets, and to address the wider ambitions for thriving plants and wildlife in the EIP. In this report, we refer to these collectively as government's national nature recovery commitments. Whilst we recognise LNRS can contribute to wider environmental benefits, these form the focus of our research.

Our focus is on sharing lessons learned through this first round of LNRS development, and identifying where there are strategic opportunities for improvement that could maximise their effectiveness for delivering nature recovery and wider environmental benefits.

---

1 State of Nature Partnership, 'State of Nature' (2023) <[www.stateofnature.org.uk/](http://www.stateofnature.org.uk/)> accessed 8 April 2025.

2 Defra, 'Local Nature Recovery Strategy Statutory Guidance: What a Local Nature Recovery Strategy Should Contain' (2023) <[www.gov.uk/government/publications/local-nature-recovery-strategy-what-to-include](http://www.gov.uk/government/publications/local-nature-recovery-strategy-what-to-include)> accessed 9 October 2024.

3 Defra, 'Local Nature Recovery Strategies' (30 June 2023) <[www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies](http://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies)> accessed 9 October 2024.



## 2. Background and context

## 2. Background and context

### 2.1 Background

LNRS sit within the broader context of nature recovery, the concept for which is largely underpinned by principles described in the 2010 report ‘Making Space for Nature’ (‘the Lawton Review’).<sup>4</sup>

The Lawton Review set out the need for a landscape scale approach to biodiversity conservation, articulating its essence in four words: “more, bigger, better, and joined-up”, underpinned by the following five key approaches (‘the Lawton Principles’):

- Improve the quality of current sites by better habitat management.
- Increase the size of current wildlife sites.
- Enhance connections between, or join up, sites, either through physical corridors, or through ‘stepping stones’.
- Create new sites.
- Reduce the pressures on wildlife by improving the wider environment, including through buffering wildlife sites.

The Lawton Review informed the 2011 Natural Environment White Paper,<sup>5</sup> and subsequent 2020 Biodiversity Strategy.<sup>6</sup> The latter established a mission: “to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people”. In 2019, an evaluation of the Biodiversity Strategy was published.<sup>7</sup> This evaluation identified a number of findings, including the identification of gaps that were impacting upon the ability to achieve Biodiversity Strategy ambitions.

LNRS build on learning from these earlier policies, as well as initiatives such as the Nature Improvement Areas, which were introduced by the Environment White Paper and other local and regional approaches, including biodiversity opportunity mapping undertaken in the South East<sup>8</sup> and Nottingham.<sup>9</sup> However, unlike these earlier examples, together, LNRS will cover all of England and have the potential to aggregate to create a comprehensive spatial, statutory plan for nature recovery – one that considers key principles for nature recovery and learning from earlier, related initiatives.

---

4 John Lawton, ‘Making Space for Nature: A Review of England’s Wildlife Sites and Ecological Network’ (2010) <<https://webarchive.nationalarchives.gov.uk/ukgwa/20130402151656/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf>> accessed 9 October 2024.

5 Defra, ‘The Natural Choice: Securing the Value of Nature’ (2011) <[www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature](http://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature)> accessed 13 November 2024.

6 Defra, ‘Biodiversity 2020: A Strategy for England’s Wildlife and Ecosystem Services’ (2011) Policy paper <[www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services](http://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services)> accessed 18 May 2025.

7 Charlotte Hawkins and others, ‘Evaluation of Biodiversity 2020’ (Centre for Ecology and Hydrology and ICF 2019) <<https://nora.nerc.ac.uk/id/eprint/527921/>> accessed 18 May 2025.

8 South East England Biodiversity Forum, ‘South East England Biodiversity Opportunity Mapping’ (2016) <[www.gov.uk/government/publications/nature-improvement-areas-improved-ecological-networks/nature-improvement-areas-about-the-programme](http://www.gov.uk/government/publications/nature-improvement-areas-improved-ecological-networks/nature-improvement-areas-about-the-programme)> accessed 13 November 2024.

9 Nottinghamshire Biodiversity Action Group, ‘Biodiversity Opportunity Mapping’ <[www.nottsbag.org.uk/projects/biodiversity-opportunity-mapping/](http://www.nottsbag.org.uk/projects/biodiversity-opportunity-mapping/)> accessed 14 November 2024.

In October 2020, the previous government published a policy paper entitled ‘the Nature Recovery Network’ (last updated in February 2024).<sup>10</sup> This set out commitments in respect of establishing partnerships, policies and funding to strengthen and grow a national Nature Recovery Network in England – again, underpinned by the Lawton Principles. The current status of the Nature Recovery Network is unclear, as is its relationship to LNRS.

## 2.2 Legal context

### LNRS within the wider legal picture

Legally-binding targets for the natural environment were established under the Environment Act, including those to halt species decline by 2030, and to increase species abundance by at least 10% and to exceed 2022 levels by 2042 (‘the species abundance targets’).<sup>11</sup> The Environment Act sets out the legal requirements and mechanisms that government has stated are intended to achieve nature’s recovery and meet those targets, which include:

- The publication of an EIP that must be reviewed every five years. This must set out the steps the government intends to take to improve the natural environment.
- A review of the targets must also be carried out by government every 5 years. The purpose of the review is to determine how the targets set under the Environment Act, as well as other relevant environmental targets, work together to significantly improve the natural environment in England.
- The introduction of a new, England-wide system of LNRS. Government’s stated intention was that the system of LNRS would “agree priorities, and work with partners and stakeholders to map actions for nature recovery where they will have the greatest environmental benefit”.<sup>12</sup>
- The creation of duties and incentives for land managers, developers and local planning authorities to take action for nature recovery, including biodiversity net gain, protected site strategies, species conservation strategies and conservation covenants.
- Strengthening of the biodiversity duty on public bodies in the NERC Act.

### Statutory requirements for LNRS

Requirements for LNRS are set out in the Environment Act,<sup>13</sup> with further detail on the procedure for developing LNRS detailed in the LNRS Regulations<sup>14</sup> and statutory guidance.<sup>15</sup>

LNRS are to cover the whole of England, and the Secretary of State (for Environment, Food and Rural Affairs) must determine the areas to which individual LNRS should relate.<sup>16</sup> They

---

10 Defra, ‘The Nature Recovery Network’ (2024) <[www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network](https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network)> accessed 12 November 2024.

11 The Environmental Targets (Biodiversity) (England) Regulations 2023

12 Defra, ‘The Nature Recovery Network’ (n 10).

13 Environment Act 2021, ss 104-108.

14 Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023

15 Defra, ‘Local Nature Recovery Strategy Statutory Guidance: What a Local Nature Recovery Strategy Should Contain’ (n 2).

16 Environment Act 2021, s 105(1) and s 105(2); Defra, ‘Map of Local Nature Recovery Strategy (LNRS) Areas and Responsible Authorities’ (2024) <[www.gov.uk/government/publications/local-nature-recovery-strategies-areas-and-responsible-authorities](https://www.gov.uk/government/publications/local-nature-recovery-strategies-areas-and-responsible-authorities)> accessed 9 October 2024.

must be prepared and published by RAs,<sup>17</sup> in association with Supporting Authorities. RAs have been appointed by the Secretary of State,<sup>18</sup> and Supporting Authorities are defined within the LNRS Regulations.<sup>19</sup>

LNRS need to be tailored to local areas, and there is scope for them to differ in how they look and what they include, but the Environment Act specifies that all LNRS must include a local habitat map, and a statement of biodiversity priorities for the LNRS area.<sup>20</sup>

Further to the initial development and consideration of LNRS, the Secretary of State must give notice to individual RAs, on a periodic basis, requiring them to review their LNRS.<sup>21</sup> These reviews must consider the statement of biodiversity priorities and local habitat map, and include assessments of actions taken and progress made towards the biodiversity priorities set out in the LNRS.

The Secretary of State must serve such review notices every 3 to 10 years from the date that the LNRS Regulations came into force on 13 April 2023. However, there is no statutory deadline for RAs to publish their first LNRS – just a stated policy intention that they were expected to be in place by March 2025.<sup>22</sup> RAs may not change a published LNRS other than in accordance with the process set out in the LNRS Regulations or with written agreement of the Secretary of State.<sup>23</sup>

Further information about the legislative requirements associated with the preparation and review of LNRS, is set out at section 2.5.

## Interaction of LNRS with other legal duties

Section 40 of the NERC Act requires public authorities to consider what action they can take, consistent with the proper exercise of their functions, to conserve and enhance biodiversity in England. In complying with this duty, the authority must “in particular have regard to any relevant local nature recovery strategy”.<sup>24</sup> The government has provided general guidance for public authorities on complying with this biodiversity duty,<sup>25</sup> and specific guidance for local planning authorities on having regard to LNRS in plan making and planning decision taking.<sup>26</sup> This planning guidance is covered in more detail in section 2.4.

In practice, most RAs are County Councils which gives rise to a potential mismatch, at least within the Town and Country Planning regime, between the body responsible for developing the LNRS and those most involved in its delivery through plan-making and planning decision taking (the Local Planning Authority). This exemplifies the reason, and need, for effective engagement with those identified as Supporting Authorities in the regulations.<sup>27</sup>

---

17 Environment Act 2021, s 105(1) and s 105(2).

18 Defra, ‘Map of Local Nature Recovery Strategy (LNRS) Areas and Responsible Authorities’ (n 16).

19 Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023, reg 3.

20 Environment Act 2021, s 106(1).

21 Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023, reg 20.

22 Defra, ‘Local Nature Recovery Strategies’ (n 3).

23 Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023, reg 19(5).

24 Natural Environment and Rural Communities Act 2006, s 40(2A)(a).

25 Defra, ‘Complying with the Biodiversity Duty’ (2023) <[www.gov.uk/guidance/complying-with-the-biodiversity-duty](https://www.gov.uk/guidance/complying-with-the-biodiversity-duty)> accessed 15 May 2025.

26 MHCLG, ‘Guidance: Natural Environment’ (*Guidance: Natural environment*, 19 February 2025) <[www.gov.uk/guidance/natural-environment](https://www.gov.uk/guidance/natural-environment)> accessed 24 February 2025.

27 Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023, reg 19(5).

The Levelling Up and Regeneration Act 2023 introduced prospective amendments to various planning Acts that would require local planning authorities to take account of LNRS when preparing and renewing spatial plans.<sup>28</sup> However, the relevant provisions are not yet in force, and the commencement date has not been appointed at the time of writing. In addition to this, LNRS will play a role in the location of off-site mandatory BNG, by determining the ‘strategic significance multiplier’ of the statutory biodiversity metric<sup>29</sup> which must be used to comply with BNG requirements under the Town and Country Planning Act 1990.

Further to this, the Planning and Infrastructure Bill, which was introduced on 11 March 2025,<sup>30</sup> contains provisions for LNRS. This is discussed further in section 2.4.

## **Other relevant legal duties and powers of local authorities**

Further to the specific statutory requirements for LNRS, there are a number of other legal duties and powers of local authorities that are relevant to LNRS. We have sought to summarise some of those that we consider of greatest relevance here.

Power to designate local nature reserves – county, district and unitary councils have the power to designate land as a local nature reserve.<sup>31</sup> In addition to mapping existing reserves within their LNRS, RAs may also wish to consider pro-actively identifying new areas for designation during the development and implementation process.

Duty to further the conservation of Sites of Special Scientific Interest (SSSIs) – local authorities have a statutory duty when exercising any functions which are likely to affect flora, fauna, geology or physiographical features of a SSSI to take reasonable steps to further the conservation and enhancement of the relevant features of the SSSI.<sup>32</sup> There is clear potential for overlap between steps taken to satisfy this duty and the priorities identified in relation to protected sites under LNRS.

Duty to have regard to species conservation strategies – all public authorities, including RAs, must have regard to any relevant species conservation strategies prepared by Natural England when exercising their functions.<sup>33</sup> Consideration of such strategies will be highly relevant to informing RAs’ production and implementation of LNRS.

Duty to contribute to mitigation and adaptation to climate change – local planning authorities have a duty to ensure that development plan policies are “designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change”.<sup>34</sup> There is a significant overlap between climate mitigation and adaptation and nature recovery, and the potential for local development plans and LNRS to intersect in this respect.

Duty to have regard to the National Air Quality Strategy – local authorities must have regard to the national air quality strategy when exercising any function of a public nature

---

28 Levelling Up and Regeneration Act 2023, s 95, s 98(3) and sch 7.

29 Defra, ‘Statutory Biodiversity Metric Tools and Guides’ (21 February 2025) <[www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides](https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides)> accessed 9 April 2025.

30 Planning and Infrastructure Bill, Bill 196 2024-2025 (as introduced).

31 National Parks and Access to the Countryside Act 1949, s 21; and Local Government Act 1972, sch 17 para 34.

32 Wildlife and Countryside Act 1981, s 28G.

33 Environment Act 2021, s 109.

34 Planning and Compulsory Purchase Act 2004, s 19(1A).

which could affect the quality of air.<sup>35</sup> As LNRS have potential to enable improvements in air quality, this means that RAs need to consider the national air quality strategy in the design, review and implementation of LNRS.

Duties relating to local air quality management – local authorities must assess and report levels of air pollution against set air quality standards and objectives. They are under a duty to designate ‘air quality management areas’ where those standards are not being met and prepare action plans setting out how the local authority will ensure they are achieved.<sup>36</sup> There is potential overlap between air quality action plans and LNRS with respect to nature-based solutions to local air pollution problems. Information relating to pollution levels and their impacts on biodiversity is also likely to be highly relevant to informing LNRS priorities.

Duties relating to waste and litter – local authorities have duties as designated waste collection authorities and waste disposal authorities.<sup>37</sup> Local authorities also have a statutory duty to keep relevant land free of litter and refuse<sup>38</sup> and have a range of associated enforcement powers.<sup>39</sup> There is opportunity for authorities to exercise these functions with nature recovery in mind and in support of LNRS priorities.

Contaminated land duties – local authorities have a duty to manage historic land contamination in their areas that could present unacceptable risks to human health and the environment.<sup>40</sup> In addressing this duty, the local authority may identify remediation options that present opportunities for nature recovery.

Mineral planning functions – unitary authorities, or county councils in two-tier local authority areas, have various powers and duties as designated mineral planning authorities. These include responsibilities relating to the grant of planning permission for mining operations.<sup>41</sup> Such permissions may be granted subject to various environmental conditions, including those requiring steps to be taken to restore soil on the mining site to a standard required for agricultural, forestry or amenity use.<sup>42</sup> There is opportunity for RAs to exercise these mineral planning functions with nature recovery in mind and in support of their LNRS priorities.

Duty to have regard to river basin management plans – all public bodies must have regard to river basin management plans when exercising any of their functions affecting a river basin district.<sup>43</sup> This means that, for those LNRS areas that include relevant river basins, RAs will need to consider these management plans when carrying out their LNRS functions.

Duty to develop and implement local flood risk management strategies – the lead local flood authority for an area in England (being the unitary authority or county council) is under a legal duty to develop and apply a strategy for local flood risk management in its area dealing with risk from surface runoff, groundwater and ordinary watercourses.<sup>44</sup> This strategy must specify how it contributes to the achievement of wider environmental objectives, and when a lead local flood authority is exercising any function which may affect flood risk it must have regard to the strategy. There is a significant potential overlap

---

35 Environment Act 1995, s 81A.

36 Environment Act 1995, Part IV.

37 Environmental Protection Act 1990, Part II.

38 Environmental Protection Act 1990, s 89.

39 Environmental Protection Act 1990, Part IV.

40 Environmental Protection Act 1990, Part IIA.

41 Town and Country Planning Act 1990, s 55(1) and s 97(5).

42 Town and Country Planning Act 1990, s 72(5) and sch 5 para 2.

43 The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, s 33.

44 Flood and Water Management Act 2010, s 9.

between measures designed to promote biodiversity gains and nature-based solutions to flood risk. Where an RA is also a designated lead local flood authority, it will therefore need to consider its local flood risk management strategy.

## 2.3 EIP and species abundance targets

The current EIP was published in January 2023.<sup>45</sup> In July 2024, government announced it would undertake a rapid review of the EIP, with a view to introducing a revised EIP in 2025.<sup>46</sup> For the purposes of this report, we consider the current EIP, and our most recent monitoring report ‘Progress in improving the natural environment in England 2023/24’.<sup>47</sup>

The Environment Act established the need for the Secretary of State to set long term, legally-binding species abundance targets. These now exist in the Environmental Targets (Biodiversity) (England) Regulations 2023. The EIP is government’s principal vehicle for setting out its environmental commitments and ambitions, and how it intends to achieve them – including those legally-binding targets.

Further, the EIP has partially adopted commitments from the Convention on Biological Diversity, as set out in the Kunming-Montreal Global Biodiversity Framework. Particularly relevant to LNRS are the 30 by 30 commitments. The EIP lists a single commitment for ‘30% of global land and 30% of global ocean to be protected by 2030’. However, this doesn’t fully reflect the UK’s wider international commitments under this convention, which include 2030 targets for the effective restoration of degraded ecosystems, as well as for effective conservation and management.

In recognition of the urgent need for nature recovery in England, government made ‘thriving plants and wildlife’ the apex goal of the EIP, which incorporates those measures intended to meet the species abundance targets. The EIP considers LNRS to be an important enabling mechanism for actions to deliver the apex goal. Here, they are intended to “...better target and support the join up of local actors to restore nature across the whole of England”.<sup>48</sup> As such, the EIP identifies LNRS as one of the measures that will help to deliver legally-binding targets.

In our most recent report on progress against EIP goals, we conclude that government remains largely off-track to meet its environmental commitments. For the ‘thriving plants and wildlife’ apex goal area specifically, our assessment is that opportunities to maximise nature recovery have not been realised. A lack of strategic plans prevents stakeholders from effectively contributing to delivery. We highlight that spatial prioritisation continues to be a significant gap.

LNRS, the anticipated Land Use Framework (LUF), and marine spatial prioritisation are all expected to play important roles in implementing key policies on land, freshwater and at sea. We consider LNRS to be a potential key enabling mechanism that will allow for better targeting of action needed to drive nature recovery and better harmonisation of activity at the local and national scale.

---

45 Defra, ‘Environmental Improvement Plan 2023’ (2023) <[www.gov.uk/government/publications/environmental-improvement-plan](https://www.gov.uk/government/publications/environmental-improvement-plan)> accessed 10 February 2025.

46 Defra, ‘Press Release – Government Launches Rapid Review to Meet Environment Act Targets’ (30 July 2024) <[www.gov.uk/government/news/government-launches-rapid-review-to-meet-environment-act-targets](https://www.gov.uk/government/news/government-launches-rapid-review-to-meet-environment-act-targets)> accessed 2 April 2025.

47 Office for Environmental Protection, ‘Progress in Improving the Natural Environment in England 2023/24’ (2025) <[www.theoep.org.uk/report/government-has-chance-get-track-meet-legal-environmental-commitments-window-opportunity](https://www.theoep.org.uk/report/government-has-chance-get-track-meet-legal-environmental-commitments-window-opportunity)> accessed 10 February 2025.

48 Defra, ‘Environmental Improvement Plan 2023’ (n 45).



## 2.4 LNRS – policy context

In recent months, and whilst RAs have been creating their LNRS, there have been a number of policy developments that either are, or will be, of relevance. The key developments are summarised here.

### NPPF and planning practice guidance

Following public consultation on specific aspects of the NPPF, to which the OEP responded,<sup>49</sup> it was updated and published on 12 December 2024. Whilst section 15 of the NPPF deals specifically with ‘conserving and enhancing the natural environment’, this update to the NPPF brought in reference to LNRS in section 13 ‘protecting green belt land’, where it says (paragraph 159): “where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes”.<sup>50</sup>

Further to this, planning practice guidance was updated and published on 19 February 2025.<sup>51</sup> This includes updates that we understand are intended to fulfil the legal obligation on the Secretary of State in section 40 of the NERC Act, to provide guidance to local planning authorities as to how they should have regard to LNRS (see section 2.2 of this report ‘interaction of LNRS with other legal duties’). This includes the addition of a new section ‘Local Nature Recovery Strategies’ (paras 044-048), which sets out:

- What are LNRS? – provides background information.
- What is the role of local planning authorities in preparing LNRS? – sets out the role of local planning authorities as supporting authorities to be involved in LNRS development.
- How should local planning authorities have regard to LNRS in plan making? – establishes that local planning authorities should consider the priorities set out in the relevant LNRS when determining how their local plan should contribute to and enhance the local and natural environment. It also states that LNRS can inform preparation of Neighbourhood Plans and Spatial Development Strategies.
- How should local planning authorities have regard to LNRS in planning decision making? – sets out that LNRS contain information that may be a material consideration in planning, in particular where development plan documents pre-date the LNRS for an area. It also clarifies that a draft LNRS, which has been consulted upon, but not yet finalised and published, may also be used to support decision making.
- What is the relationship between LNRS and BNG? – sets out the role of LNRS in helping to identify suitable sites for offsite biodiversity gain.

---

49 Office for Environmental Protection, ‘OEP Response to National Planning Policy Framework Consultation’ <[www.theoep.org.uk/report/oep-response-national-planning-policy-framework-consultation](https://www.theoep.org.uk/report/oep-response-national-planning-policy-framework-consultation)> accessed 17 March 2025.

50 MHCLG, ‘National Planning Policy Framework’ (7 February 2025) <[www.gov.uk/government/publications/national-planning-policy-framework-2](https://www.gov.uk/government/publications/national-planning-policy-framework-2)> accessed 22 March 2025.

51 MHCLG, ‘Guidance: Natural Environment’ (n 26).



## English Devolution White Paper

The English Devolution White Paper was published on 16 December 2024.<sup>52</sup> This set out proposals in terms of devolution of power, the establishment of Strategic Authorities in England, and the creation of Spatial Development Strategies, which will be the responsibility of the newly created Strategic Authorities.

The White Paper establishes the expectation that Strategic Authorities will play a crucial role in environmental and climate leadership. It explicitly states that the roles and functions of RAs for LNRS will be enhanced, and that Strategic Authorities will take on a leadership role for LNRS and wider environmental delivery. However, the paper contains little further detail as to what the enhanced role might be in respect of LNRS, what wider environmental delivery might encompass, and how these elements might work together. It is envisaged that over time Strategic Authorities will be appointed the RA for LNRS, where they are not already in this role.

## Land Use Framework

On 31 January 2025, government published its Land Use Consultation. This is framed as being a ‘national conversation’ on land use, with government seeking views on its vision for land use in England to inform development of a national LUF.

The final framework will be published later in 2025, and will include three components:

- Principles that Government will apply to policy with land use implications.
- A description of how policy levers will develop and adapt to support land use change.
- A release of land use data and analysis to support public and private sector innovation in spatial decision making.<sup>53</sup>

Where this consultation relates to the establishment of a framework for coherent land use decision-making in England, there will need to be an ongoing relationship with LNRS. Understanding this relationship, as it emerges and is defined, will be important. The OEP responded to Defra’s Land Use consultation on 6 May 2025.<sup>54</sup>

## Planning reform

The current planning reform is largely being driven by commitments made by government in its ‘Plan for Change’.<sup>55</sup> Government has committed to re-building Britain, which includes the target of building 1.5 million new homes over the next five years, fast-tracking planning decisions on at least 150 major economic infrastructure projects, and commitments to making Britain a clean energy superpower.

---

52 MHCLG, ‘English Devolution White Paper’ (2024) <[www.gov.uk/government/publications/english-devolution-white-paper-power-and-partnership-foundations-for-growth/english-devolution-white-paper](https://www.gov.uk/government/publications/english-devolution-white-paper-power-and-partnership-foundations-for-growth/english-devolution-white-paper)> accessed 18 March 2025.

53 Defra, ‘Land Use Consultation’ (2025) <[www.gov.uk/government/consultations/land-use-in-england](https://www.gov.uk/government/consultations/land-use-in-england)> accessed 12 March 2025.

54 Office for Environmental Protection, ‘OEP Response to the Land Use Framework Consultation’ (2025) <[www.theoep.org.uk/report/oep-response-land-use-framework-consultation](https://www.theoep.org.uk/report/oep-response-land-use-framework-consultation)> accessed 12 May 2025.

55 Prime Minister’s Office, ‘Plan for Change: Milestones for Mission Led Government’ (2024) <[www.gov.uk/government/publications/plan-for-change](https://www.gov.uk/government/publications/plan-for-change)> accessed 19 May 2025.

In addition to the revisions to the NPPF, in December 2024 government produced a Planning Reform Working Paper on ‘Development and Nature Recovery’.<sup>56</sup> This was one of a number of working papers published to inform the Planning and Infrastructure Bill, which was subsequently introduced on 11 March 2025.<sup>57</sup>

The Planning and Infrastructure Bill sets out provisions for Environmental Delivery Plans, to be created by Natural England for the purposes of mitigating, at a strategic scale, the environmental impacts of development. In preparing an Environmental Delivery Plan, Natural England must have regard to LNRS (as well as the EIP, species conservation strategies, and protected sites strategies) so far as Natural England considers them to be relevant.

Expanding on provisions made elsewhere in respect of how LNRS should be taken account of in planning (see section 2.2), the Bill makes provisions for new Spatial Development Strategies. It specifies that these too must take account of any LNRS, including, in particular, areas of particular importance for biodiversity, or areas where the recovery or enhancement of biodiversity could make a particular contribution to other environmental benefits.

## The Corry review

On 2 April 2025, government published Dan Corry’s independent review into Defra’s regulatory landscape (the regulators and regulations) and whether it is fit for purpose in driving both economic growth and nature recovery.<sup>58</sup>

The review is broadly sceptical as to the extent to which current regimes are effectively delivering for growth or nature recovery, and presents 29 recommendations for how this could be rectified, two of which are of direct relevance to LNRS. In recognising the significant role that LNRS might play, the review makes the following recommendations:

Recommendation 8: Use Local Nature Recovery Strategies across the 48 strategy areas as a basis for building and embedding ‘local Environmental Improvement Plans (EIPs)’ which cover all elements of the national EIP, which Combined Authorities can work with local partners to deliver. This consolidation of various local plans and strategies is a major task which should build on the opportunities of the Devolution White Paper to set out clear environmental plans at a local level.

Recommendation 9: Review the funding streams connected to place-based delivery, for example biodiversity net gain, to ensure they can be used as flexibly as possible to help local authorities and regulators deliver the Government’s Environmental Improvement Plan and Local Nature Recovery Strategy ambitions.<sup>59</sup>

---

56 MHCLG, ‘Planning Reform Working Paper: Development and Nature Recovery’ (2024) <[www.gov.uk/government/publications/planning-reform-working-paper-development-and-nature-recovery/planning-reform-working-paper-development-and-nature-recovery](https://www.gov.uk/government/publications/planning-reform-working-paper-development-and-nature-recovery/planning-reform-working-paper-development-and-nature-recovery)> accessed 18 March 2025.

57 Planning and Infrastructure Bill, Bill 196 2024-2025 (as introduced).

58 Dan Corry, ‘Delivering Economic Growth and Nature Recovery: An Independent Review of Defra’s Regulatory Landscape’ (2025) <[www.gov.uk/government/publications/delivering-economic-growth-and-nature-recovery-an-independent-review-of-defras-regulatory-landscape](https://www.gov.uk/government/publications/delivering-economic-growth-and-nature-recovery-an-independent-review-of-defras-regulatory-landscape)> accessed 4 April 2025.

59 *ibid.*

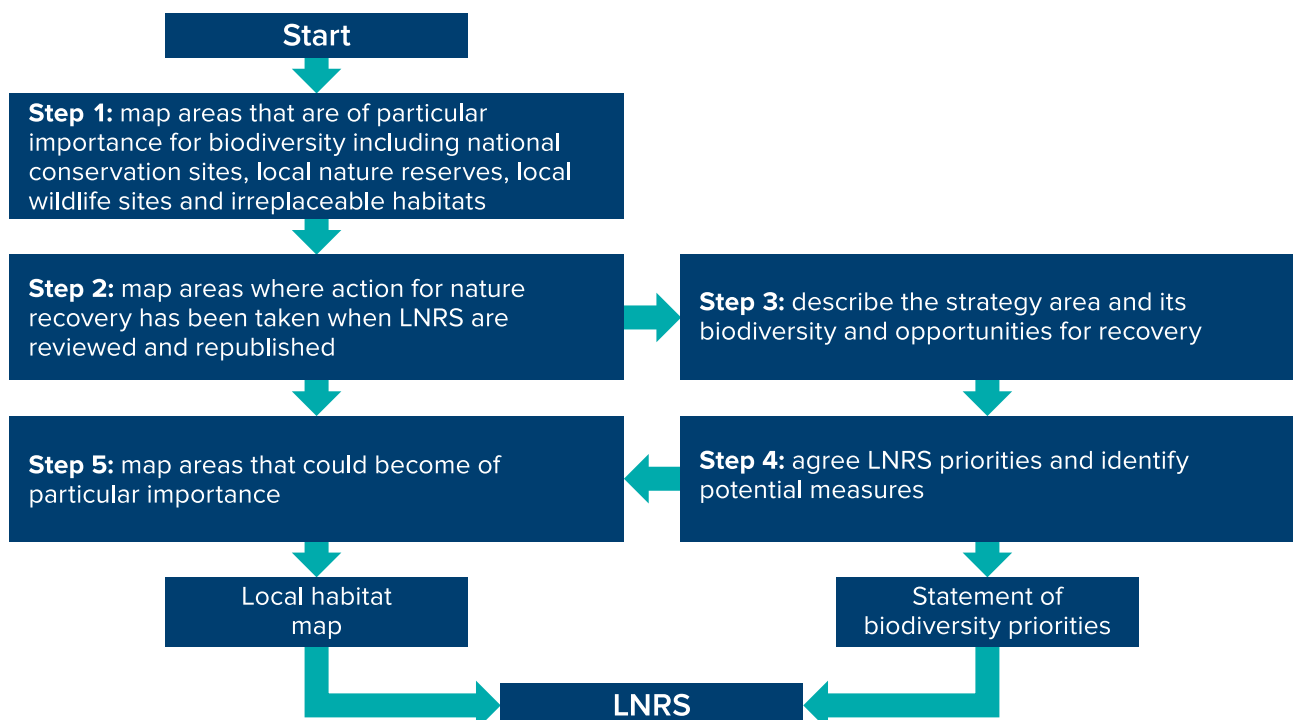
## 2.5 LNRS – the process

As described in section 2.2, the detail of the process and procedure for producing LNRS is covered in the Environment Act, statutory guidance and the LNRS Regulations. Here we summarise the key elements of the process to set our report in context.



**Figure 1 – The overarching cycle for LNRS production, publication and review. Figure is replicated from the statutory guidance.<sup>60</sup>**

In terms of the overarching process set out in Figure 1, RAs are responsible for preparing, publishing, reviewing and then republishing the LNRS for their area.<sup>61</sup>



**Figure 2 – The process of LNRS preparation. Figure is replicated from the statutory guidance.<sup>62</sup>**

60 Defra, 'Local Nature Recovery Strategy Statutory Guidance: What a Local Nature Recovery Strategy Should Contain' (n 2).

61 Environment Act 2021, s 105.

62 Defra, 'Local Nature Recovery Strategy Statutory Guidance: What a Local Nature Recovery Strategy Should Contain' (n 2).

Figure 2 sets out the key steps common to all LNRS. However, step two is only relevant when it comes to LNRS review. Whilst this is arguably of less relevance to the LNRS being produced now, it is important to consider the extent to which LNRS are being produced in a way that enables meaningful subsequent review and ensures their longevity and ongoing relevance for nature recovery.

A strong degree of focus is placed on the importance of working with local stakeholders throughout the LNRS process. Whilst, as the names suggests, RAs bear the main burden of responsibility for LNRS production and review, the LNRS Regulations also make provision for the roles of others who are key to the process. In particular, they set out the role of Supporting Authorities, who include Natural England, local authorities, combined authority mayors, and National Park authorities related to the relevant LNRS area.

For Supporting Authorities, RAs must take reasonable steps to involve them in the preparation of the LNRS.<sup>63</sup> RAs must also take reasonable steps to involve others who they consider to be appropriate to their LNRS development.<sup>64</sup>

To support such involvement, RAs must provide Supporting Authorities with a consultation draft of their LNRS, and the LNRS Regulations set out a formal process by which Supporting Authorities may then raise objections regarding the LNRS or its preparation.<sup>65</sup> Subject to meeting various other pre-consultation requirements, the RA must then publicly consult on its draft LNRS and publish all responses to that consultation.<sup>66</sup>

The RA must provide Supporting Authorities with a final version of their LNRS and inform them and the Secretary of State of their intention to publish it.<sup>67</sup> Having met these and all other pre-publication requirements, the RA must publish their LNRS.<sup>68</sup>

When serving notice on an RA requiring review of its LNRS, the Secretary of State must set out the date by which the RA must begin its review, as well as an indicative timeline for completion of the review and publication of the LNRS.<sup>69</sup> As explained in section 2.2 above, the Secretary of State must give their first review notice between 3 and 10 years after the date when the LNRS Regulations came into force. An RA may not change a published LNRS other than via this review process, without the written agreement of the Secretary of State.<sup>70</sup>

## 2.6 LNRS – the story so far

A pilot for five LNRS ran from August 2020 to May 2021, with lessons learned informing policy development.<sup>71</sup> The process to prepare LNRS started in June 2023 with the Secretary of State having identified RAs for each of the LNRS areas.<sup>72</sup> Government committed to provide the 48 RAs with around £14 million between April 2023 and March 2025 to be spent on preparing their strategies.<sup>73</sup>

---

63 Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023, reg 4(1).

64 *ibid*, reg 4(3).

65 *ibid*, regs 7-10.

66 *ibid*, reg 12.

67 *ibid*, regs 13 and 17.

68 *ibid*, reg 19.

69 *ibid*, reg 20.

70 *ibid*, reg 19(5).

71 Defra, 'Local Nature Recovery Strategy Pilots: Lessons Learned' (2021) <[www.gov.uk/government/publications/local-nature-recovery-strategy-pilots-lessons-learned/local-nature-recovery-strategy-pilots-lessons-learned](https://www.gov.uk/government/publications/local-nature-recovery-strategy-pilots-lessons-learned/local-nature-recovery-strategy-pilots-lessons-learned)> accessed 9 October 2024.

72 Defra, 'Map of Local Nature Recovery Strategy (LNRS) Areas and Responsible Authorities' (n 16).

73 Defra, 'Local Nature Recovery Strategies' (n 3).

By March 2025, LNRS were intended to be in place across the whole of England.<sup>74</sup> However, only two of the 48 LNRS were formally approved and published by this date.

Whilst the relevant legal requirements (see sections 2.2 and 2.5) set out what LNRS should include and who should be involved in their preparation, there is flexibility such that RAs have taken different approaches. For example, in some areas, Local Nature Partnerships (LNP)<sup>75</sup> have taken on the principal role of LNRS development, whereas elsewhere RAs have used pre-existing staff, taken on fixed-term staff, or made use of external contractors.

The first LNRS was published by the West of England Mayoral Combined Authority on 7 November 2024.<sup>76</sup> The second was the North Northamptonshire LNRS, which was published on the 5 March 2025.<sup>77</sup> The status of the remaining LNRS, at the time of writing is set out below in Table 1. This information is based on Natural England's discussions with RAs and subject to change. The expectation is that the remaining LNRS will continue to be developed and published throughout 2025 with seven not expected to be published until 2026.

Stage of the process	Number of LNRS
Published	4
Preparing for publication	11
Consultation	7
Preparing for consultation	7
At an earlier stage of preparation	19
<b>TOTAL</b>	<b>48</b>

**Table 1 – Summary of the status of 48 LNRS at 23 May 2025. Data provided by Natural England.**

Whilst no formal or public announcements have been made (or are expected) in relation to the missed target date for most LNRS, this was not a statutory deadline and it is understood that flexibility is being allowed to accommodate local circumstances.

<sup>74</sup> Ibid.

<sup>75</sup> Defra, 'Role of Local Nature Partnerships: An Overview' (2012) <[www.gov.uk/government/publications/role-of-local-nature-partnerships-an-overview](https://www.gov.uk/government/publications/role-of-local-nature-partnerships-an-overview)> accessed 29 April 2025.

<sup>76</sup> West of England Mayoral Combined Authority, 'The Local Nature Recovery Strategy and Toolkit – West of England Combined Authority' (9 May 2023) <[www.westofengland-ca.gov.uk/what-we-do/environment/the-local-nature-recovery-strategy/](https://www.westofengland-ca.gov.uk/what-we-do/environment/the-local-nature-recovery-strategy/)> accessed 11 March 2025.

<sup>77</sup> North Northamptonshire Council, 'Local Nature Recovery Strategy' (7 May 2025) <[www.northnorthants.gov.uk/conservation-and-protection/local-nature-recovery-strategy/](https://www.northnorthants.gov.uk/conservation-and-protection/local-nature-recovery-strategy/)> accessed 11 March 2025.



### 3. Research methods

## 3. Research methods

### 3.1 Our approach

During scoping stages and throughout the research phase of our project we engaged regularly with Defra and Natural England to ensure our work was complementary with their ongoing evaluation work, whilst avoiding duplication as far as possible and maintaining our independence. We would like to thank both Defra and Natural England for their constructive engagement throughout.

In the course of our work, we also engaged with other government departments, public bodies and stakeholders to understand the broader context and ensure our work was of wide relevance.

We established an advisory group (Annex B), drawing on members of the OEP's College of Experts, to inform and test our approach, to provide quality assurance, and to develop our findings and recommendations.

The research phase of our project commenced in June 2024 and concluded in March 2025. We commissioned external consultants, Treligan, to undertake research to explore the barriers and enablers experienced by RAs during preparation of their LNRS and to assess a purposively sampled selection of 12 LNRS under the broad assessment areas of ambition, coherence, and delivery.

We worked collaboratively with Treligan and public bodies throughout the research to raise awareness, facilitate engagement and gather information. For example, we published two blogs<sup>78</sup> and met with stakeholders to update on progress and to communicate emerging findings. This iterative approach to the research design meant we were able to develop and test the analysis, filling evidence gaps and triangulating evidence.

Treligan produced an independent report on the barriers and enablers experienced by RAs 'Barriers and Enablers to Local Nature Recovery Strategy development and their contribution to nature recovery commitments' (Treligan, April 2025). They also provided us with their independent assessment of 12 LNRS, 'An assessment of Local Nature Recovery Strategies and their contribution toward nature recovery commitments,' (Treligan, April 2025). These reports are published on our website. We combined these outputs from Treligan's research with our own insights from wider engagement and consideration of publicly available information to produce this report.

### 3.2 Barriers and enablers

The aim of this part of our research was to hear directly from those responsible for developing LNRS; to understand any practical barriers they faced, and any things that enabled them. A secondary aim was to facilitate the sharing of these experiences during the research to share solutions and best practice amongst the RA community.

---

78 Ellie Strike, 'How Will Local Nature Recovery Strategies Help Deliver Thriving Plants and Wildlife' (16 September 2024) <[www.theoep.org.uk/news/oep-blog-how-will-local-nature-recovery-strategies-help-deliver-thriving-plants-and-wildlife](https://www.theoep.org.uk/news/oep-blog-how-will-local-nature-recovery-strategies-help-deliver-thriving-plants-and-wildlife)> accessed 18 March 2025; Ellie Strike, 'Barriers and Enablers Faced by Responsible Authorities Creating Local Nature Recovery Strategies' (19 December 2024) <[www.theoep.org.uk/news/oep-blog-barriers-and-enablers-faced-responsible-authorities-creating-local-nature-recovery](https://www.theoep.org.uk/news/oep-blog-barriers-and-enablers-faced-responsible-authorities-creating-local-nature-recovery)> accessed 18 March 2025.



Working with Treligan, we carried out a series of four interactive workshops with RAs. The first three workshops were each four hours long and involved activities designed to explore barriers and enablers encountered during all stages of LNRS development. The fourth workshop was a shorter consolidation exercise used to seek feedback on emerging findings from the analysis, explore key barriers and enablers in more depth, and to discuss potential practical solutions. The workshops took place online, between August and December 2024, and 36 of the 48 RAs (75%) attended one or more workshop (a full list of the RAs that contributed to our work can be found at Annex A). Attendees were also invited to submit written feedback and information.

In addition to the workshops with RAs, we hosted a webinar with a wider audience of stakeholders from a range of organisations (Annex B). We presented a summary of our work and emerging findings, and received feedback on the barriers and enablers they had directly experienced. Webinar attendees also received a follow-up survey inviting them to provide additional written feedback.

Our blog on barriers and enablers<sup>79</sup> invited readers to share their experiences and information with us. Our regular engagement with public bodies and wider stakeholders also enabled us to gather experiences and information about barriers and enablers to LNRS development.

The evidence gathered through the workshops, correspondence and wider engagement activities was used to develop the findings and recommendations of this report. Initially, the workshop discussions and written responses were thematically analysed to identify common experiences and to organise evidence about what this has meant for LNRS development. These initial findings were then tested for accuracy with RAs and triangulation was sought through reference to information received from public bodies and wider stakeholders. Treligan's independent report was combined with ongoing stakeholder engagement and analysis of new publicly available information by the OEP, in consultation with our advisory group, to further refine our key findings and recommendations to government.

### 3.3 LNRS review

To explore how LNRS will contribute to national nature recovery commitments, we undertook a review of 12 LNRS to assess their level of ambition, coherence with other environmental plans and strategies, and the extent to which they define the delivery mechanisms and processes that will lead to improvements in the environment.

Treligan reviewed relevant policy documents and government publications to provide a foundational understanding of how LNRS fit within the current policy and legal context in England and how they could be expected to influence ecological systems. Building on this, and previous work by the OEP, we developed operational definitions for three components of an effective LNRS:

- **Ambition:** We assessed how the strategies align with national nature recovery commitments, whether these commitments are measurable, the extent to which collaborative stakeholder relationships have been established, and the approach to long-term resourcing.

---

79 Ellie Strike, 'Barriers and Enablers Faced by Responsible Authorities Creating Local Nature Recovery Strategies' (n 78).

- Coherence: We assessed how well the strategies aligned with other relevant spatial and non-spatial plans and strategies, and whether local nature recovery is integrated into wider policy objectives to achieve greater impact regionally and nationally.
- Delivery focus: We assessed the clarity of delivery routes and whether the strategies provide insight into the actions that will have the greatest impact on national nature recovery commitments.

These components formed the basis of the three broad assessment areas for this work. The full assessment framework for testing these components – including research questions, required evidence sources, and analytical process – was then developed iteratively and collaboratively.

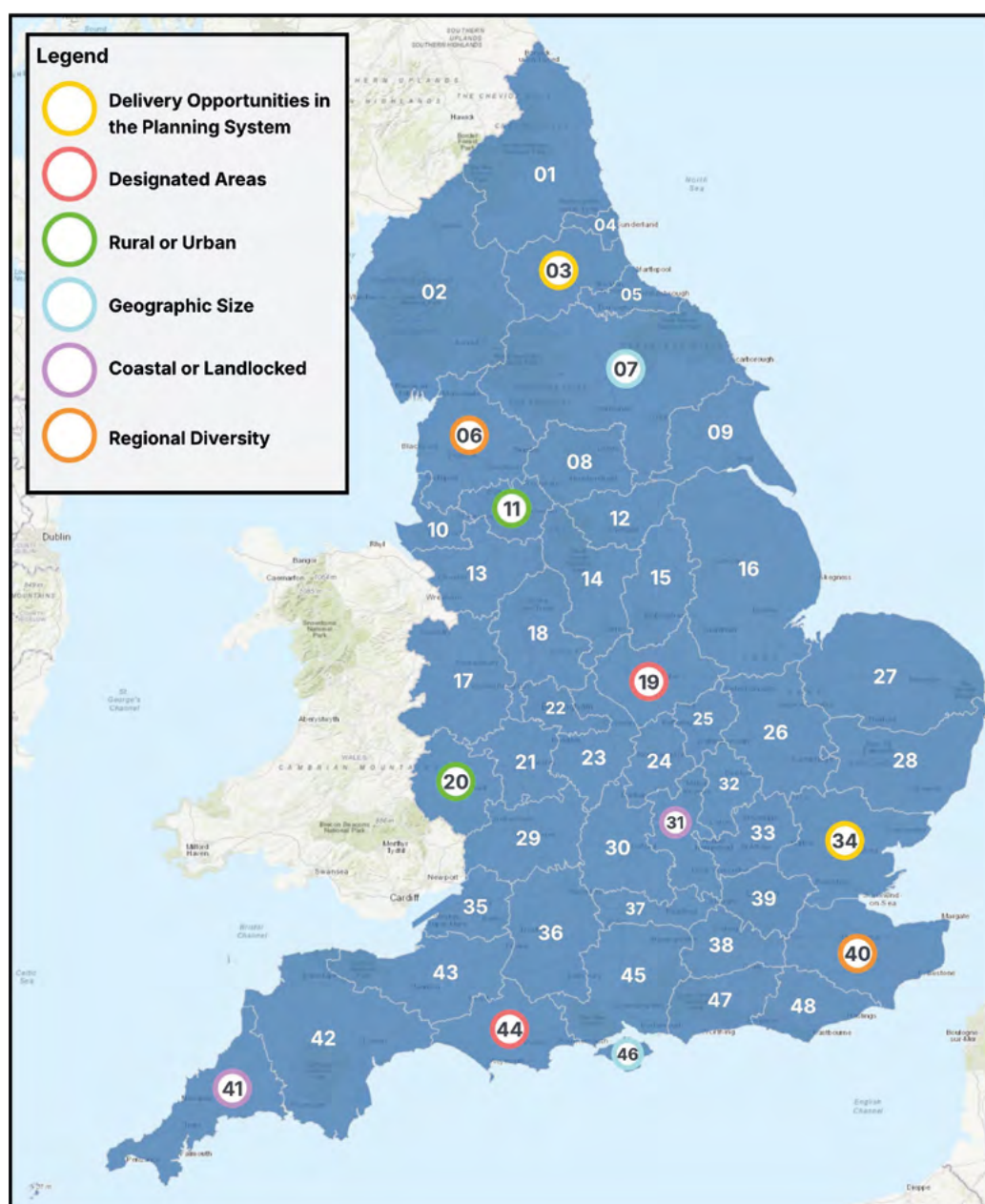
At the first three RA workshops (see section 3.2) we sought feedback on each of the broad assessment areas in turn, checking their suitability for addressing the fundamental question of how LNRS will contribute to national nature recovery commitments as well as the likely availability of evidence sources to inform the assessment. This feedback informed the next iteration of the assessment framework, which was tested with an example LNRS and then shared with the project advisory group for further scrutiny and refinement.

The final version of the assessment framework was applied to a sample of 12 LNRS, selected for their diversity, to provide insights about their potential to drive nature recovery in varied contexts; not to provide ranking or comparative analysis.

Together, the 12 LNRS constitute 25% of the total 48 and are of sufficiently varied contexts to provide a representative sample for our overall conclusions (see Figure 3).

Within the sample, the LNRS were chosen to include two contrasting examples of the following criteria:

- Development opportunities in the planning system
- Extent of designated areas (proportionate to LNRS area)
- Rural or urban
- Geographic size
- Coastal or landlocked
- Regional diversity



- |                                     |  |                                       |
|-------------------------------------|--|---------------------------------------|
| North of Tyne (01)                  | Shropshire and Telford & Wrekin (17)       | Hertfordshire (33)                    |
| Cumbria (02)                        | Staffordshire and Stoke-on-Trent (18)      | Greater Essex (34)                    |
| County Durham (03)                  | Leicestershire, Leicester and Rutland (19) | West of England (35)                  |
| South of Tyne and Wear (04)         | Herefordshire (20)                         | Wiltshire and Swindon (36)            |
| Tees Valley (05)                    | Worcestershire (21)                        | Berkshire (37)                        |
| Lancashire (06)                     | West Midlands (22)                         | Surrey (38)                           |
| North Yorkshire and York (07)       | Warwickshire (23)                          | Greater London (39)                   |
| West Yorkshire (08)                 | West Northamptonshire (24)                 | Kent and Medway (40)                  |
| Hull and East Yorkshire (09)        | North Northamptonshire (25)                | Cornwall and the Isles of Scilly (41) |
| Liverpool City Region (10)          | Cambridgeshire and Peterborough (26)       | Devon (42)                            |
| Greater Manchester (11)             | Norfolk (27)                               | Somerset (43)                         |
| South Yorkshire (12)                | Suffolk (28)                               | Dorset (44)                           |
| Cheshire (13)                       | Gloucestershire (29)                       | Hampshire (45)                        |
| Derbyshire (14)                     | Oxfordshire (30)                           | Isle of Wight (46)                    |
| Nottinghamshire and Nottingham (15) | Buckinghamshire and Milton Keynes (31)     | West Sussex (47)                      |
| Greater Lincolnshire (16)           | Bedfordshire (32)                          | East Sussex and Brighton & Hove (48)  |

**Figure 3 – Map showing the 12 LNRS selected to inform our review.<sup>80</sup>**

<sup>80</sup> Taken from 'An assessment of Local Nature Recovery Strategies and their contribution toward nature recovery commitments' (Treligan, April 2025). List of RAs shown at Annex A.

Ahead of completing our assessments, Treligan used GIS to compile layers of information to help characterise and summarise key environmental information for each LNRS. Further summary information about each of the LNRS areas can be found in the report 'An assessment of Local Nature Recovery Strategies and their contribution toward nature recovery commitments' (Treligan, April 2025). In addition, Natural England provided us with monthly 'tracker' information for all LNRS, so we had an accurate and up to date picture of their progress.

Our assessment was intended to be primarily desk-based and where possible we sought to use information that was in the public domain. However, given that the LNRS were at different stages of development and publication, we also asked RAs to provide unpublished information that could be used as a source of evidence for application of our assessment framework.

The assessment uses a qualitative confidence rating of high, medium, or low confidence, based on the extent to which supporting statements are met for each question within the three overarching themes of ambition, coherence and delivery.

Following completion of the desk-based assessment, we approached RAs for fact-checking and with clarification questions to inform our analysis.

We did not seek to assess compliance with requirements for LNRS and our report does not make any findings or conclusions relating to individual LNRS' satisfaction of relevant legal requirements. We have not sought to duplicate any tracking, monitoring or evaluation being undertaken by Natural England or Defra. Each LNRS was assessed on its own merits against our self-defined assessment criteria. It should also be noted that, because the LNRS were at different stages in their development, this was considered and reflected in our assessment. Consequently, if a strategy was not sufficiently developed for us to find evidence for a particular supporting statement, the results were tailored accordingly. This means that our findings are not always out of 12.

Our assessment has been, almost exclusively, completed based on review of documentation and engagement with RAs. We have not engaged with or sought direct input from Supporting Authorities in those LNRS areas.

## 4. Barriers and enablers

## 4. Barriers and enablers

We assessed the barriers and enablers faced by those involved in producing LNRS. Barriers were described as any obstacle that hindered progress, or which may affect the prospects of LNRS contributing to the national nature recovery commitments. Enablers were described as factors that aided success. We found that the barriers and enablers broadly split into those which affected the production of the LNRS (the process), and those which could affect the implementation of the LNRS (the outcome).

Five themes emerged from our research. These were:

- i. Guidance and advice
- ii. Data
- iii. Mapping
- iv. Resources and timescales
- v. Engagement

Several of these themes are strongly interlinked. We have separated them to clarify the different points of emphasis made by stakeholders.

In this section, we summarise what we heard from our engagement with RAs and wider stakeholders. We do not make any judgement in this section as to what we have heard, instead this research informs our overarching findings and recommendations in section 6. Further detail can be found in the report ‘Barriers and Enablers to Local Nature Recovery Strategy development and their contribution to nature recovery commitments’ (Treligan, April 2025).

### 4.1 Guidance and advice

The Environment Act established the need for LNRS, and Defra set out further detail on what information they should contain in statutory guidance.<sup>81</sup> Over the next two years, further advice and guidance followed on a range of topics. Defra told us that the need for additional advice was identified during LNRS development and was intended to assist RAs in their interpretation of the statutory guidance. The advice has not been published and was provided directly to RAs.

---

<sup>81</sup> Defra, ‘Local Nature Recovery Strategy Statutory Guidance: What a Local Nature Recovery Strategy Should Contain’ (n 2).

	Topic of advice / guidance	Who	Date
1	What an LNRS should contain (statutory guidance) <sup>82</sup>	Defra	March 2023
2	Governance and working with partners	Natural England	May 2023
3	Species recovery	Natural England	August 2023
4	Engaging the land management sector	Natural England	October 2023
5	Identifying priorities	Natural England	Nov 2023
6	National environmental objectives	Defra	January 2024
7	Data standards	Natural England	Feb 2024
8	Mapping potential measures	Natural England	March 2024
9	Irreplaceable habitats (guidance) <sup>83</sup>	Defra	Sept 2024
10	LNRS policy update	Defra	Dec 2024
11	Updates to planning guidance <sup>84</sup>	MHCLG	Feb 2025
12	Data requirements and Local Environmental Record Centres	Natural England and the Association of Local Environmental Record Centres	April 2025

**Table 2 – LNRS advice and guidance produced by government departments and Natural England.**

In addition to the statutory guidance and written advice, Natural England allocated a Senior Officer to each LNRS in its role as a Supporting Authority (see section 2.5). However, in some circumstances, each Senior Officer may have to cover more than one LNRS.<sup>85</sup> The Senior Officer supported the RA and its stakeholders to produce the LNRS by providing more tailored advice.

We heard conflicting views about the provision of guidance and written advice over a long period of time.

The flexibility that is inherent in guidance and advice was welcomed, with RAs reflecting that it allowed for regionally tailored approaches depending on factors such as the geographic area, the stakeholders involved, and data availability. However, this topic was the most frequently mentioned barrier. RAs told us they were sometimes confused by the different documents, and inconsistent terminology made it difficult for them to explain their LNRS to stakeholders.

Some RAs disagreed with points in the documents, for example the definition of irreplaceable habitats was highlighted several times, as was the mapping advice. RAs found that the recommended mapping approach caused friction with stakeholders engaging with both LNRS and BNG. Stakeholders felt that the data was not at a sufficient resolution to be able to identify where BNG could deliver a specific measure (linked to delivering priorities in the LNRS).

82 *ibid.*

83 Defra, 'Irreplaceable Habitat' (2024) <[www.gov.uk/guidance/irreplaceable-habitats](https://www.gov.uk/guidance/irreplaceable-habitats)> accessed 28 March 2025.

84 MHCLG, 'Guidance: Natural Environment' (n 26).

85 For example, there are 2.8 Natural England Full Time Equivalents covering the four Yorkshire LNRS.



A strong theme to emerge was the perceived ‘drip feed’ of these documents, which it was felt created uncertainty on how to proceed at certain points, and work having to be redone once guidance and advice was issued. We heard this led to some inefficiency and adversely affected timescales. Again, the mapping advice was highlighted as it was provided late in the process. The approach to proposing potential measures for the recovery and enhancement of species was also considered to have been provided quite late in the process (August 2023). Some ‘frontrunner’ RAs commented that it was difficult to integrate this approach with the work already undertaken. We also heard that this advice was interpreted in different ways. When these differences between LNRS were discovered, further advice was provided which resulted in some RAs feeling there was a shift in expectations.

Another point raised by RAs was their desire for further guidance on key areas such as how LNRS should interact with agri-environment schemes and the planning system.<sup>86</sup> Concerns were also expressed about a lack of understanding regarding the link between LNRS and the EIP, the absence of a requirement to set quantifiable targets, as well as insufficient clarity on future monitoring and measures of success.

Some of these barriers were mitigated through the support provided by Natural England’s officers, and through Q&A sessions hosted by Defra, as well as by RAs making decisions based on local circumstances and in collaboration with neighbouring LNRS.

## 4.2 Data and evidence

LNRS require data to ensure they are underpinned by sound, but proportionate evidence. Data needs include species distributions, habitat type and condition, land use, soil type, geology, and flood or erosion risk. Comprehensive data allow nature recovery actions and wider environmental benefits to be targeted to the right places, in the right way, and at the right time. The standardisation of data allows for consistency across LNRS, and the ability to compile them.

RAs told us that they valued the LNRS data viewer,<sup>87</sup> which used data from a number of sources including Natural England, the Environment Agency and the Forestry Commission, particularly when this was used in conjunction with data provided by Local Environmental Record Centres (LERCs). Many RAs were able to use data from previous initiatives such as Nature Improvement Areas, Green Infrastructure plans and biodiversity opportunity mapping. This not only prevented duplication of effort, but also gave some RAs a valuable head start in identifying important areas for biodiversity.

We heard that data gaps and data quality were among the most significant barriers to the LNRS process. They created both time and resource challenges for RAs as they sought to locate, validate and interpret data. We were told of some significant data gaps which are likely to affect the accuracy and, therefore, the effectiveness of some final strategies.

Two key areas identified were species data, and issues with Natural England’s Priority Habitat Inventory. Regarding species data, it was reported that RAs had to rely on anecdotal information to overcome some data gaps. Some species groups are under-surveyed, and challenges also arose from the availability of local species experts whose contribution to the

---

<sup>86</sup> Planning guidance has now been issued, see MHCLG, ‘Guidance: Natural Environment’ (n 26).

<sup>87</sup> Defra, ‘LNRS Data Viewer’ <[www.experience.arcgis.com/experience/7c5242fdec7f433aa4ee4510383e3909](https://www.experience.arcgis.com/experience/7c5242fdec7f433aa4ee4510383e3909)> accessed 2 March 2025.



LNRS process was constrained by the voluntary nature of their involvement. This variability in data and expert participation is likely to affect how species have been considered in different LNRS. We also heard that the Priority Habitat Inventory was not always up to date and some mapped areas lacked any detail of the specific habitats present.

Data accessibility is a well-known barrier.<sup>88</sup> While RAs recognised the value and assistance provided by LERCs, both they and wider stakeholders highlighted difficulty in obtaining and then using certain data. This was because the commercial nature of the LERC data conflicted with the requirement for LNRS outputs to be published under an Open Government Licence.<sup>89</sup> This allows information to be used and reused freely and flexibly.<sup>90</sup> LERC owned data on local wildlife sites<sup>91</sup> was flagged as a particular issue as this data could not be used for some LNRS. This has the potential to impact upon areas identified as being of particular importance for biodiversity, which in turn may have implications for how LNRS are considered in planning, such as how decisions are made in respect of BNG.

RAs also highlighted challenges in accessing data on agri-environment schemes, citing delays in receiving information from the Rural Payments Agency. They also noted that the data, once received, sometimes lacked sufficient detail for it to be useful.

We heard that data gaps and a lack of effective data standardisation is likely to present significant challenges for the effective implementation of LNRS. Without comprehensive baseline data, it will be difficult to monitor and assess progress. This could leave RAs unsure of what has been achieved and where further action is needed.

## 4.3 Mapping

LNRS are spatial strategies and so mapping has a crucial role. Therefore, whilst mapping is strongly connected to data and evidence, we have considered the barriers and enablers separately.

Each LNRS must include a local habitat map.<sup>92</sup> The map must identify existing areas of importance for nature conservation, and areas that could become of particular importance for biodiversity and wider environmental benefits.<sup>93</sup>

Flexibility in the scope and scale of mapping allowed RAs to determine their own level of granularity, integrating data such as land use information, ecological network maps, and the recommendations of the Lawton Review.<sup>94</sup> We heard this enabled them to identify and prioritise sites with the greatest potential for nature's recovery. RAs were also able to use the mapping requirement to develop interactive maps that engaged stakeholders. For example, some RAs created online maps that allowed stakeholders to provide direct input to their LNRS.

---

88 See for example, Office for Environmental Protection, 'A Review of the Implementation of Environmental Assessment Regimes in England' (2023) <[www.theoep.org.uk/report/environmental-assessments-are-not-effective-they-should-be-due-practical-barriers](https://www.theoep.org.uk/report/environmental-assessments-are-not-effective-they-should-be-due-practical-barriers)> accessed 2 March 2025.

89 Stated in the Natural England advice note: 'Data standards for Local Nature Recovery Strategies Advice for RAs.' (February 2024).

90 The National Archives, 'Open Government Licence for Public Sector Information' <[www.nationalarchives.gov.uk/doc/open-government-licence/version/3/](https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/)> accessed 3 March 2025.

91 For an explanation of Local Wildlife Sites see The Wildlife Trusts, 'Local Wildlife Sites' <[www.wildlifetrusts.org/local-wildlife-sites](https://www.wildlifetrusts.org/local-wildlife-sites)> accessed 2 March 2025.

92 Environment Act 2021, s 106.

93 Defra, 'Local Nature Recovery Strategy Statutory Guidance: What a Local Nature Recovery Strategy Should Contain' (n 2).

94 John Lawton (n 4).

Conversely, we heard that this flexible approach meant that RAs were required to determine an appropriate spatial granularity for priority areas and measures, which proved complex. Some opted for a finer, more detailed mapping scale to support site-specific planning, however this required significant effort. Others chose a broader, landscape perspective which would provide more flexibility for implementation but less precision. We were told that the challenge was further compounded by the breadth of practical actions – some site-specific, others landscape-scale – making these mapping decisions and their communication difficult.

The mapping element of LNRS required specific technical skills and resources (such as specialist software), which created challenges to varying degrees. RAs with in-house expertise or access to GIS consultants told us they were able to produce high-quality maps aligned with the advice notes and effectively identify and prioritise areas. Having skilled staff internally meant that time and resources could be spent elsewhere in the LNRS process. Where RAs lacked this expertise, it was difficult for them to determine the appropriate format and level of detail for mapping, which resulted in challenges creating accurate and usable outputs. We heard that one RA did not have the ability to create downloadable maps.

## 4.4 Resources and timescales

The government provided the 48 RAs with around £14 million to develop their strategies. It was expected that they would take 12 to 18 months to prepare, and by March 2025 LNRS were expected to be in place across the whole of England.<sup>95</sup>

The funding allowed RAs to recruit in-house staff, primarily on fixed-term contracts, or to hire contractors with specific expertise to develop parts of the strategy. For example, several RAs hired GIS experts. For some RAs, we heard that recruiting the right skills and expertise took time, which delayed the commencement of their LNRS development, or certain elements of it.

Additionally, funding grants were secured for ongoing data collection and post-implementation monitoring. Some RAs directed funding into LNPs, capitalising on their established networks across the public, private, and third sectors to enhance the effectiveness of LNRS development.

The LNRS process has been resource intensive, and some RAs felt that the funding provided was insufficient. The need to engage with a large and diverse range of stakeholders presented significant challenges for RAs, requiring effort to ensure that all perspectives were captured. Several RAs told us that they felt overwhelmed by their workload, highlighting issues with data licensing and their ability to create a sufficient evidence base.

In addition to the resources expended by RAs, LNRS development relied heavily on the contributions of stakeholders, many of which participated on a voluntary basis. While this was appreciated, RAs noted that the level of input from external experts was less than they would have liked. Volunteer stakeholders found it difficult to dedicate significant time to the process which, in some cases, resulted in unmet commitments. These challenges affected project plans and caused delays.

---

<sup>95</sup> Defra, 'Local Nature Recovery Strategies' (n 3).

The need for more sustainable resourcing approaches was a recurring theme highlighted by RAs, in particular the lack of clarity regarding long-term funding. This uncertainty not only has significant implications for LNRS implementation, but we heard it also affected the LNRS development process.

RAs told us that ambiguity on delivery mechanisms, such as agri-environment schemes, posed challenges to meaningful engagement. Key stakeholders needed future funding clarity to justify the time and effort required to contribute meaningfully. For others, we heard that confidence in participation and data sharing could have been improved if RAs had adequate funding to sustain ongoing relationships. The development of priorities and measures was also complicated by this funding ambiguity. RAs found it difficult to define practical and realistic actions without a clear understanding of the scale and focus of future funding mechanisms.

In relation to LNRS implementation, future monitoring and success metrics were key themes. RAs told us that they felt unable to develop monitoring proposals due to an absence of guidance on the level of resources appropriate for this purpose. The fixed term nature of many LNRS staff means that RAs have already begun to lose some of the significant expertise acquired through the LNRS process. In a small number of instances, RAs have committed to converting fixed-term positions into permanent roles to address this challenge.

## 4.5 Stakeholder engagement

Stakeholder engagement is a requirement of the LNRS process (see section 2.5). An RA must “take reasonable steps to involve all supporting authorities...in the preparation of [its LNRS]”.<sup>96</sup> It must also “take reasonable steps to involve such persons and organisations as appear to the responsible authority to be appropriate in the preparation of its [LNRS]”.<sup>97</sup>

The importance of stakeholder engagement was illustrated by the fact that the first advice note issued after the publication of the statutory LNRS guidance, covered working with partners. It highlights the importance of collaborating with diverse stakeholders – including other local planning authorities, farmers and land managers, environmental non-government organisations, and local communities – to develop strategies that are inclusive, representative, and well-informed. This approach ensures local knowledge and expertise is incorporated into the LNRS process. RAs should also aim to secure support from potential delivery partners, such as local landowners and land managers, and those already involved in nature recovery efforts.

Stakeholder engagement has been at the heart of LNRS development. We heard it has been appreciated for its genuine value to the process. Many RAs told us that their stakeholder engagement was a significant enabler. The high level of engagement and the enthusiasm of stakeholders has contributed significantly to shaping strategies that should be inclusive and reflective of local ambitions for nature recovery.

We heard that Natural England and LERCs provided strong support, for example, providing advice, expertise and the ecological data used to inform the mapping process. Early engagement with Supporting Authorities established robust working relationships and identified further opportunities for collaboration. Partnerships with LNPs and biodiversity

---

<sup>96</sup> Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023, reg 4(1).

<sup>97</sup> *ibid*, reg 4(3).

partnerships provided expertise and support, reducing the workload for RAs. Additional local insights came from sources such as Wildlife Trusts, local authority ecologists, and public consultations. Alongside local knowledge, many RAs commissioned experts so that they could incorporate high-quality specialist knowledge into their strategies.

Whilst hugely valuable, the nature and extent of stakeholder engagement has not been easy. Unsurprisingly, many RAs highlighted the significant resources required to achieve effective stakeholder engagement and consensus, with some questioning the extent to which consensus could realistically be achieved within the available time frame.

We heard that engaging specific communities such as farmers, landowners, and land managers was a particular challenge and was one of the most prominent barriers to emerge. Despite their critical role in the success of LNRS, some RAs felt poorly equipped to engage meaningfully with these groups. We heard that this was because there was insufficient time, limited guidance on tailored engagement mechanisms, and a lack of information on LNRS delivery, funding, or its interaction with Environmental Land Management Schemes.<sup>98</sup> These challenges often hindered constructive dialogue.

RAs also faced difficulties accommodating farmers' busy schedules. We heard of some successful approaches such as hosting informal engagement events such as a 'pie and a pint', farm walks and farm cluster meetings. Some RAs employed Farm Liaison Officers with farming backgrounds for peer-to-peer outreach. Involving organisations such as the National Farmers' Union, the Country Land and Business Association, and the Farming and Wildlife Advisory Group also proved effective in building trust and fostering collaboration. In February 2025, Defra published a blog encouraging farmers and land managers to get involved in the development of their local LNRS so that it can be developed with their priorities in mind.<sup>99</sup>

---

98 Defra, 'Environmental Land Management Update: How Government Will Pay for Land-Based Environment and Climate Goods and Services' (2023) <[www.gov.uk/government/publications/environmental-land-management-update-how-government-will-pay-for-land-based-environment-and-climate-goods-and-services](https://www.gov.uk/government/publications/environmental-land-management-update-how-government-will-pay-for-land-based-environment-and-climate-goods-and-services)> accessed 9 March 2025.

99 Defra's Farming and Countryside Programme, 'Local Nature Recovery Strategies: Have Your Say – Farming' (5 February 2025) <<https://defrafarming.blog.gov.uk/2025/02/05/local-nature-recovery-strategies-have-your-say/>> accessed 2 April 2025.

# 5. Review of Local Nature Recovery Strategies

## 5. Review of Local Nature Recovery Strategies

The EIP states that LNRS are one of the measures that will help deliver government's nature recovery commitments. As described in section 3.3, we developed an assessment framework to evaluate the potential of LNRS to achieve this by assessing 12 LNRS under these broad assessment areas:

- Ambition: We assessed how the strategies align with national nature recovery commitments, whether these commitments are measurable, the extent to which collaborative stakeholder relationships have been established, and the approach to long-term resourcing.
- Coherence: We assessed how well the strategies aligned with other spatial and non-spatial plans and strategies, and whether local nature recovery is integrated into wider policy objectives to achieve greater impact regionally and nationally.
- Delivery focus: We assessed the clarity of delivery routes and whether the strategies provide insight into the actions that will have the greatest impact on national nature recovery commitments.

While RAs may not have been explicitly tasked to deliver these assessment areas, the purpose of our framework was to assess a representative sample so that we could gain insights into the potential of LNRS, as a whole, to contribute to government's nature recovery commitments. The framework was not designed or used to assess compliance with statutory requirements or to compare or rank individual LNRS.

In this section, we summarise the findings from our assessment. Further detail can be found in the report 'An assessment of Local Nature Recovery Strategies and their contribution toward nature recovery commitments' (Treligan, April 2025).

### 5.1 Ambition

The statutory guidance states that “the main purpose of the strategies is to identify locations to create or improve habitat most likely to provide the greatest benefit for nature and the wider environment”.<sup>100</sup> We assessed how ambitious the strategies were, focusing primarily on their alignment with national nature recovery commitments, as well as the elements that support their ability to deliver these, such as stakeholder collaboration and long-term funding mechanisms.

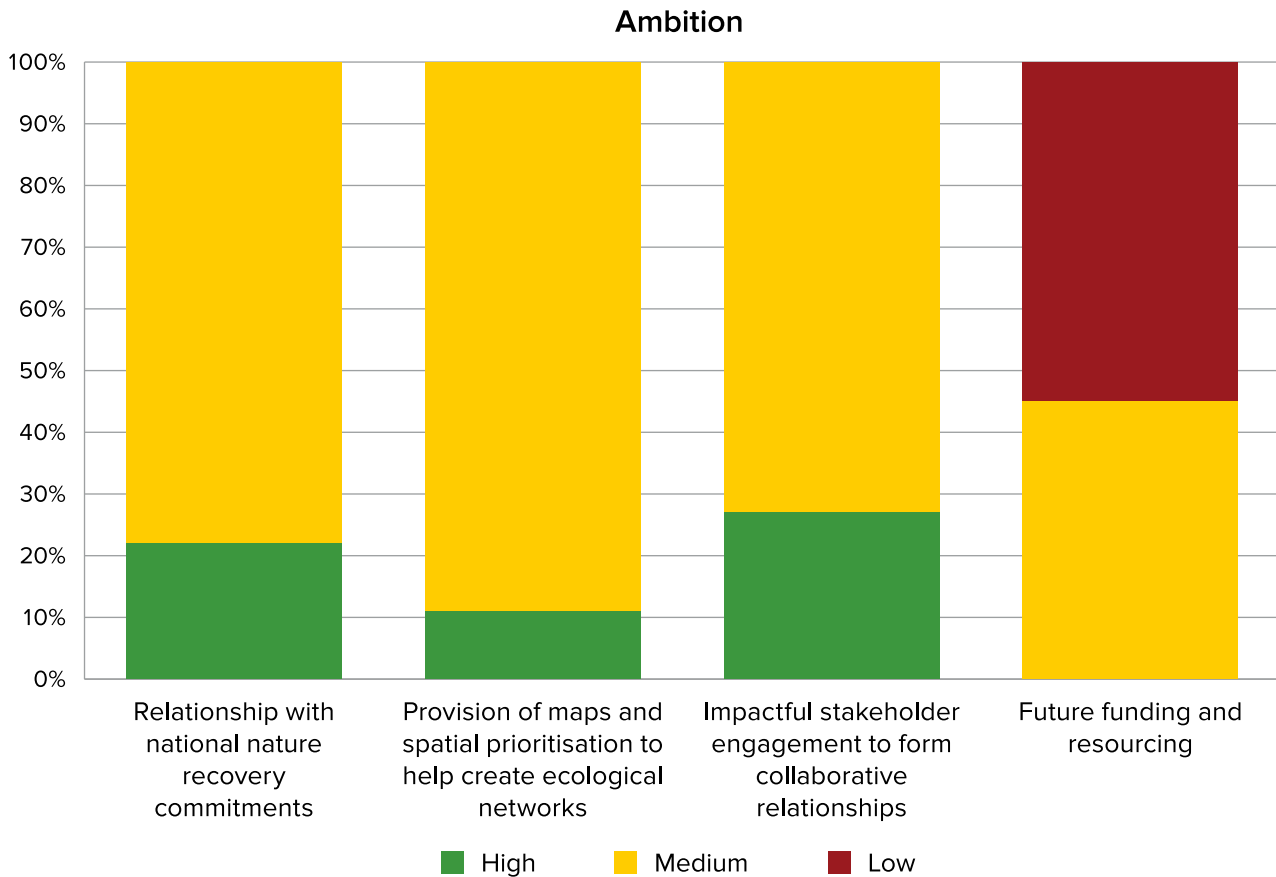
In developing our assessment framework for ambition, RAs and wider stakeholders highlighted that the LNRS development process – in particular the timescales and resources – was challenging. It is important to clarify that we did not define ambition as going further than what was required, although instances where this occurred were captured. Instead, our focus was on understanding the extent to which RAs were able to work within the established LNRS development process and translate this into strategies that are ambitious at a local level and in their contribution to national nature recovery.

---

<sup>100</sup> Defra, 'Local Nature Recovery Strategy Statutory Guidance: What a Local Nature Recovery Strategy Should Contain' (n 2).

We found that the LNRS collectively demonstrated broad ambition for nature recovery in England. They aligned their priorities and measures with national nature recovery commitments and demonstrated extensive stakeholder engagement aimed at achieving consensus. This has resulted in strategies that provide users with a comprehensive array of effective place-based actions.

However, significant challenges persist. We found that the long-term resourcing needed for strategy implementation was absent, and limited guidance on how to manage trade-offs means that users are directed to site-based assessments at the delivery stage. Introducing specific, quantifiable targets would further strengthen the strategies’ ambition.



**Figure 4 – Qualitative confidence ratings (high, medium or low) based on the extent to which supporting statements were met for the assessment area for ‘ambition’.**<sup>101</sup>

**Relationship with national nature recovery commitments**

The statutory guidance committed government to producing more detailed, up-to-date advice on the specific national environmental objectives to which each LNRS should contribute.<sup>102</sup> This followed in the form of a two-page table that set out the national objectives under two headings; national targets set under the Environment Act, and what Defra perceived as the relevant commitments from the EIP. The advice did not attribute any weighting to the different national objectives, referring to the statutory guidance in terms of how they should be used in strategy development. The statutory guidance states that RAs should use the national environmental objectives to guide their LNRS’ scope and identify

101 Created using information from ‘An assessment of Local Nature Recovery Strategies and their contribution toward nature recovery commitments’ (Treligan, April 2025).  
102 Defra, ‘Local Nature Recovery Strategy Statutory Guidance: What a Local Nature Recovery Strategy Should Contain’ (n 2).



locally relevant priorities which align with them where possible. It states that “[not every] strategy must contribute to every national objective”.<sup>103</sup>

Our assessment found that the LNRS collectively aimed for broad ambition in nature recovery, particularly in their alignment with national nature recovery commitments. Many strategies explicitly referenced the EIP goal of ‘thriving plants and wildlife’, either as a central theme within the strategies themselves or within appendices. Many strategies drew from prior work to better understand the natural landscape and environmental conditions. However, the specific evidence used varied considerably, reflecting disparities in data availability and consistency. There were also some gaps, for example, national environmental objectives for the marine environment were not well covered. All strategies applied the principles of the Lawton Review<sup>104</sup> to their local context.

There is no requirement to set targets in the LNRS, and RAs have not been advised to do so by Defra or Natural England. Therefore, most strategies did not include specific, quantifiable targets. There were some exceptions, for example Greater Essex commits to achieving 16.5% tree canopy cover and reaching 30% blue and green habitat coverage by 2030. Greater Manchester commits to expanding its tree canopy cover from 15% to 17%.

In some cases, although targets were specified, they were generally single isolated targets without defined timelines. In others, targets reflected pre-existing commitments rather than introducing new ones through the LNRS process. Instead, the strategies conveyed broad expressions of ambition, aligning with the EIP’s overarching goals such as commitments to halting biodiversity loss, supporting species populations, and creating a vision for abundant and resilient nature by 2035.

## **Provision of maps and spatial prioritisation to help create ecological networks**

We assessed the LNRS maps to determine whether existing ecological networks had been mapped, in addition to identifying areas that can contribute to delivering connected landscapes to support biodiversity. To do this, we used the principles from the Lawton Review.<sup>105</sup> As expected from our findings in section 4, inconsistent methodologies and presentation styles posed challenges for evaluation as the varied approaches presented a complex picture. However, we found that few strategies produced maps supported by robust evidence of both current and future biodiversity importance. While climate change was identified as a significant pressure and strategies highlighted vulnerable aspects of the natural landscape, spatial mapping of future predicted changes – such as those affecting the coast – was rare.

The strategies were not directive in helping to establish coherent ecological networks. While Lawton’s concept of “more, bigger, better, and joined” nature was frequently referenced, it was not consistently supported by detailed or directive mapping.

We found that management of trade-offs was inconsistent. Trade-offs between different nature recovery measures were occasionally addressed, with some strategies also identifying synergies where multiple priorities could align. However, there was limited

---

<sup>103</sup> *ibid.*

<sup>104</sup> John Lawton (n 4).

<sup>105</sup> *ibid.*



guidance in the strategies on how to manage trade-offs, with RAs often directing users to site-based assessments during delivery stages.

### **Impactful stakeholder engagement to form collaborative relationships**

Strong stakeholder engagement was evident across the strategies, reflecting a commitment to achieving consensus and incorporate diverse views into strategy development. Evidence suggested that the engagement process significantly shaped the content of the strategies, ensuring they reflect a wide range of perspectives and priorities. Achieving consensus should aid successful implementation.

Our research on barriers and enablers revealed challenges in engaging certain communities that were not highlighted in the strategies themselves. This is not surprising, but it does underscore the value of conducting both aspects of our research. Without the earlier stakeholder engagement, we may have been unaware of the issues in engaging key groups, such as farmers and landowners. Regarding long-term stakeholder participation, many strategies emphasised broad engagement through activities such as updating webpages or hosting educational events. However, none included definitive plans for maintaining long-term stakeholder collaboration.

Cross-boundary collaboration was acknowledged as an important aspect, with all strategies recognising the importance of cooperation between neighbouring areas. However, the evidence on aligning outputs was mixed. For example, different mapping approaches, inconsistent terminology for priorities and actions, and different 'measure' formats created challenges. Some RAs also noted that differing timelines made meaningful cross-border alignment and join up difficult.

### **Future funding and resourcing**

Our assessment of funding and resources revealed significant challenges related to the long-term resourcing required for strategy implementation. None of the strategies were assessed as providing high confidence in this area of our assessment.

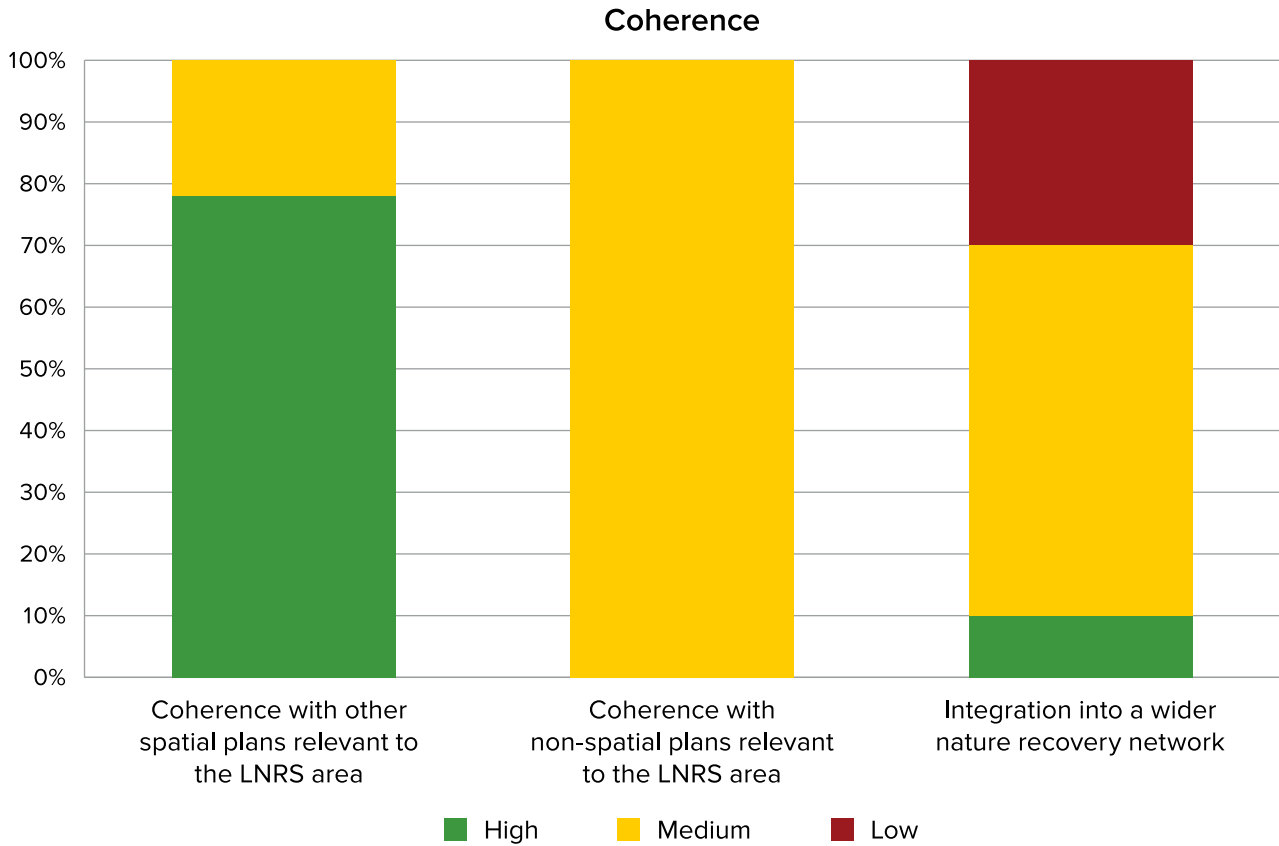
During development, most RAs reported limited use of additional funding or resourcing, and some were unaware of alternative funding options. Some RAs used existing staff from within their authority or the Supporting Authority, sometimes on an almost 100% basis. Two broad approaches to future resourcing were identified: central coordination by RAs, or commissioning LNPs (where they exist) to oversee delivery and monitoring. However, we found there was almost universal reluctance for the RAs to commit to long-term coordination, monitoring, and evaluation due to uncertainty over future funding. Although RAs expressed a desire to retain fixed-term LNRS staff, only one confirmed that it would.

## **5.2 Coherence**

This assessment area considered the extent to which the LNRS were consistent with other plans and strategies, both spatial and non-spatial. We assessed how well the intended outcomes of the LNRS aligned with relevant national, regional, or local initiatives. Strong alignment suggests that LNRS can integrate into existing plans and strategies, leading to enhanced and coordinated outcomes.

We have assessed coherence with existing plans and strategies but note that the anticipated national LUF,<sup>106</sup> as well as the ‘spatial development strategies’ and ‘environmental delivery plans’ proposed under the Planning and Infrastructure Bill,<sup>107</sup> are key initiatives that will need to be considered in future reviews of LNRS. Land use and land management implications of the Seventh Carbon Budget<sup>108</sup> will also be of relevance.

We found that while the LNRS considered and reflected other spatial and non-spatial plans which influence decision-making within the same geographic areas, active integration was limited. Coherence was often achieved through conflict avoidance rather than by demonstrating how nature recovery would have weight and be embedded in future decision making. Cross-boundary collaboration and alignment efforts were evident, however, inconsistencies and practical challenges in integration mean that aggregation to present a single, national picture will be difficult.



**Figure 5 – Qualitative confidence ratings (high, medium or low) based on the extent to which supporting statements were met for the assessment area for ‘coherence’.**<sup>109</sup>

### Coherence with other spatial plans relevant to the LNRS area

The statutory guidance highlights the importance of aligning LNRS with other relevant spatial plans, such as local plans, river basin management plans, nutrient, flood risk and water management plans. For coastal RAs, it states that they should consider how to factor

106 Defra, ‘Land Use Consultation’ (n 53). At the time of writing, this was a consultation which will inform the development of a land use framework.

107 Planning and Infrastructure Bill, Bill 196 2024-2025 (as introduced).

108 Climate Change Committee, ‘The Seventh Carbon Budget’ (2025) <[www.theccc.org.uk/publication/the-seventh-carbon-budget/](https://www.theccc.org.uk/publication/the-seventh-carbon-budget/)> accessed 8 April 2025.

109 Created using information from ‘An assessment of Local Nature Recovery Strategies and their contribution toward nature recovery commitments’ (Treligan, April 2025).

in adjacent marine areas, as linking LNRS and marine spatial planning will enable them to identify where land management changes could benefit the marine environment.

The strategies demonstrated significant consideration of, and apparent coherence with, other spatial plans that influence decision-making within the same geographic area. Most strategies adopted a consistent approach to considering spatial plans with some demonstrating how this had been done systematically and had informed LNRS development. Local plans were most commonly referenced, with RAs clarifying that LNRS integration into these plans was already underway in some cases.

Mapping outputs were not easily comparable due to limited inclusion of non-LNRS map layers. A notable exception was Dorset's intention to include LNRS layers in the DorsetExplorer,<sup>110</sup> a mapping tool featuring a wide range of spatial datasets.

We also observed instances of potential conflict where LNRS proposed land for one use, while another plan allocated the same area for another use. Given the strategic nature of the LNRS, the RAs considered these overlaps manageable.

## **Coherence with non-spatial plans relevant to the LNRS area**

We also assessed the alignment of the LNRS with priorities in non-spatial plans within their area, evaluating whether this alignment was general or specific. This helped us understand how LNRS might fit within the landscape of priorities relevant to RAs, Supporting Authorities and other key organisations.

While no LNRS scored high confidence in this assessment area, the strategies did identify synergies with non-spatial plans and explained how nature recovery measures contribute to these. For example, they clearly stated how investment in nature recovery locally could have benefits for economic growth, improved health and wellbeing, and reduced public spending. The LNRS within or near urban areas highlighted the health and wellbeing benefits of access to nature, as well as air quality improvements.

We found that the strategies did not include sufficient information to understand the relative prioritisation of nature recovery alongside other priorities. There was limited detail on resolving potential conflicts or establishing decision-making hierarchies. RAs clarified that LNRS are not intended to restrict activity or development, and that a balance would need to be struck between competing demands.

While the strategies demonstrated a clear intent to integrate with other plans and strategies, particularly those related to planning, the process and commitment to achieve this was unclear and it was difficult to determine how the LNRS will have weight in future decision making. Dorset was the only LNRS where a clear approach to integrating its LNRS into other relevant plans and strategies was explained.

## **Integration into a wider nature recovery network**

The statutory guidance encourages RAs to take a collaborative approach near strategy boundaries, supporting cross-boundary efforts across landscapes shared by multiple LNRS.

---

<sup>110</sup> Dorset Council, 'DorsetExplorer' <[www.gi.dorsetcouncil.gov.uk/dorsetexplorer#map=10.78/50.79691/-2.31539/0&basemap=1/100/100](http://www.gi.dorsetcouncil.gov.uk/dorsetexplorer#map=10.78/50.79691/-2.31539/0&basemap=1/100/100)> accessed 18 March 2025.

We assessed how each LNRS considered neighbouring areas, referenced the national Nature Recovery Network,<sup>111</sup> and established connections with this broader framework.

Only one LNRS scored high confidence in this assessment area. While the strategies identified cross-border landscapes, such as National Parks, and expressed general support for the potential for joint action, they lacked evidence of specific efforts to integrate with neighbouring LNRS. We acknowledge that challenges such as differing preparation timelines, complexities in data and mapping, and stakeholder engagement may have constrained efforts to achieve effective alignment.

Few strategies demonstrated a clear connection to a broader nature recovery network. While some referred to a network in conceptual terms, a functional national Nature Recovery Network extending beyond the aggregation of individual strategies was not clearly articulated.

### 5.3 Delivery

Our review of this assessment area was based on the understanding that LNRS are an enabling mechanism, not a delivery plan. The statutory guidance<sup>112</sup> refers to two mechanisms established by the Environment Act that will support delivery of LNRS: BNG and the strengthened biodiversity duty on public bodies. It also states that government intends for LNRS to inform the local planning process.

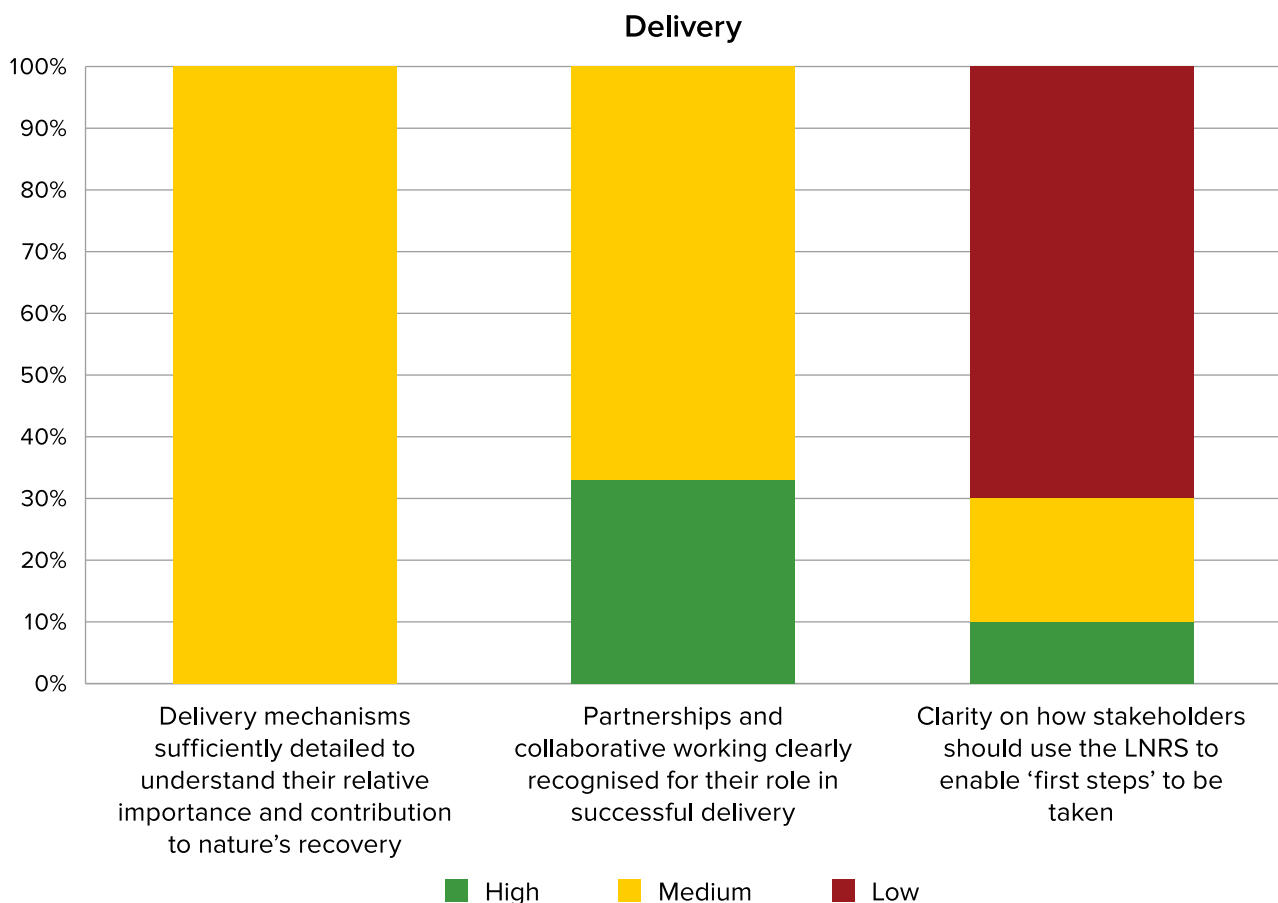
Our assessment considered whether the strategies set out possible delivery mechanisms that are sufficiently clear and actionable, enabling a diverse range of stakeholders to implement them effectively. Essentially, we evaluated whether the strategies were designed to maximise the translation of their ambition into tangible outcomes within a meaningful time frame. We also assessed whether they maintained flexibility to accommodate new delivery mechanisms that may emerge during their implementation.

We found that the LNRS included a broad range of potential delivery mechanisms and demonstrated good awareness of the local stakeholder landscape relevant to future implementation. However, there was a lack of clarity on which mechanisms will prove most impactful for individual LNRS and responsibility for implementation is undefined. Although the priorities and measures in the LNRS are clear in their intentions for nature recovery, most lacked detail regarding the practical tools, information sources or funding mechanisms needed to initiate on-the-ground action.

---

<sup>111</sup> Defra, 'The Nature Recovery Network' (n 10).

<sup>112</sup> Defra, 'Local Nature Recovery Strategy Statutory Guidance: What a Local Nature Recovery Strategy Should Contain' (n 2).



**Figure 6 – Qualitative confidence ratings (high, medium or low) based on the extent to which supporting statements were met for the assessment area for ‘delivery’.**<sup>113</sup>

### **Delivery mechanisms sufficiently detailed to understand their relative importance and contribution to nature’s recovery**

We assessed both explicitly named, and implied, delivery mechanisms, noting whether any were more prominent than others, as well as whether any expected delivery mechanisms were absent. None of the strategies scored high confidence in this assessment area. While they demonstrated a good general understanding of the range of possible delivery mechanisms, these were not prioritised or quantified in terms of which were more likely to help deliver specific aspects of the national nature recovery commitments.

All the strategies included the expected delivery mechanisms for LNRS, such as BNG, the planning system, and agri-environment schemes. Private funding and green finance were also mentioned. BNG, however, was highlighted without acknowledging its limitations – specifically, that it offsets biodiversity impacts with only a minimal net uplift if successful. Durham LNRS included its intention to bring forward new Local Wildlife Sites as a delivery mechanism.

None of the strategies set out the relative importance of delivery mechanisms for different LNRS priorities. While the relationships between delivery mechanisms and on-the-ground actions for nature recovery are complex, it might be expected that the delivery mechanisms would be tailored to reflect the unique characteristics of each area, such as land cover,

<sup>113</sup> Created using information from ‘An assessment of Local Nature Recovery Strategies and their contribution toward nature recovery commitments’ (Treligan, April 2025).

population density, ecological pressures. For instance, LNRS with large rural areas, did not specify that agri-environment schemes are expected to dominate their delivery approaches.

In addition, none of the strategies clearly established connections between their delivery mechanisms and government's commitments to nature recovery. The strategies did not set out that specific delivery mechanisms are more strongly aligned with achieving the 'thriving plants and wildlife' goal area, or a particular legally-binding target. While this does not mean that LNRS will fail to contribute to these commitments, the lack of traceability in their delivery mechanisms is likely to make it challenging to assess both their individual and collective contributions.

## **Partnerships and collaborative working clearly recognised for their role in successful delivery**

The statutory guidance states that whilst RAs should contribute to the delivery of their strategy, they are not solely responsible.<sup>114</sup> For LNRS to succeed, delivery must extend beyond RAs and Supporting Authorities, with many of the more impactful, but challenging, measures requiring collaboration across organisations and sectors. While RAs noted that there is no requirement to assign delivery responsibility, the significant stakeholder engagement undertaken in the LNRS development process meant that we found a strong understanding of the importance of partnerships for achieving effective delivery at scale. However, the strategies were less clear on how these partnerships will address competing priorities such as achieving both economic and nature recovery goals.

The strategies consistently demonstrated good awareness of the local stakeholder landscape relevant to future delivery. Some strategies included dedicated sections on the stakeholder groups expected to contribute to delivery, while others implied future collaboration. RAs frequently positioned themselves in ongoing delivery roles, particularly for monitoring, though they emphasised this would be dependent on future funding. LNPs (where they exist) were often seen as central to stakeholder coordination.

Most of the LNRS demonstrated that relevant partnerships have been formed or were in development, often with frameworks for collaborative decision-making and sustained engagement. While some strategies presented broad visions to create new partnerships, others were more specific. For example, Lancashire has a priority area for 'engagement and collaboration to promote nature recovery'. This includes measures for ongoing engagement and consultation with key stakeholder groups. Where strategies fell short in this area, it was primarily due to a lack of detail on governance or decision-making structures, rather than an absence of intent to create and maintain partnerships.

Assessing the ability of the identified partnerships to collaborate on land use decisions proved challenging. While most strategies set out plans for future engagement with landowners, farmers, and other key stakeholders, they lacked detail on how these partnerships would overcome barriers to land management changes. Similarly, there was limited exploration of how partnerships could help mitigate risks for land managers and facilitate innovative approaches to nature's recovery.

---

114 Defra, 'Local Nature Recovery Strategy Statutory Guidance: What a Local Nature Recovery Strategy Should Contain' (n 2).

## **Clarity on how stakeholders should use the LNRS to enable ‘first steps’ to be taken**

The strategies will need to be accessible to a wide range of stakeholders. We assessed whether there is clarity at a ‘priority’ and ‘measure’ level to help stakeholders begin to implement the strategies, identify who needs to be involved, and determine appropriate tools and methods for delivery. Only one LNRS was rated as high confidence in this area, indicating uncertainties regarding how ‘delivery ready’ the strategies are. There is no requirement for delivery plans to be produced and so it is unclear how the gap between the strategy ambition and meaningful action on the ground will be bridged.

We found that the strategies lacked guidance for stakeholders on how to begin delivery. There was an absence of first steps, calls to action, or signposts to resources such as possible funding opportunities or existing partnerships. One specific example to counter this was the Buckinghamshire and Milton Keynes LNRS. This included a measure related to river restoration techniques which then referred to specific active projects where more information could be obtained. We understand this LNRS also plans to provide further signposting to advice for action and first steps during the launch and delivery phases of the LNRS.

While strategies identified a wide range of stakeholder groups who would be able to use the LNRS, they did not identify specific stakeholder involvement in particular actions, even where this would be expected. For instance, species measures did not reference special interest groups or environmental NGOs that might be well-placed to assist with delivery. RAs clarified that they were not required to target specific stakeholders and that measures are intended for general implementation.

The priorities and measures in the LNRS are clear in their intentions for nature recovery, but most lacked detail on practical tools, information sources or funding mechanisms to support delivery. RAs told us that making measures more specific risks the strategies becoming outdated, given review periods of up to 10 years. This concern was highlighted by the closure for this year of the Sustainable Farming Incentive scheme, which several strategies mention as a delivery mechanism.





## 6. Findings and recommendations

## 6. Findings and recommendations

As described in section 3, the overarching findings in this section are based on evidence from both the barriers and enablers work (section 4), assessment of a sub-set of LNRS (section 5), and our wider research.

Here we focus on the strategic lessons learned and where we consider action can be taken at both a national and local level. This will improve the prospects of LNRS delivering for national nature recovery commitments, as intended.

Our recommendations broadly split across those things that should happen now, actions that should be taken to improve the prospects of this first suite of LNRS, and then looking ahead to future review of LNRS.

### 6.1 Getting the strategies in place

Only two LNRS were published by the original target date of March 2025. Two more have since been published (at the time of writing), but many remain significantly delayed. Whilst we appreciate the practical constraints faced by some RAs, if LNRS are to make a meaningful contribution to national nature recovery commitments, they need to be in place and informing delivery as soon as possible.

We consider that every effort should be made by RAs to get the remaining LNRS completed and published. Where LNRS are delayed, there should be transparency as to the reasons for that delay, and a timebound plan for their publication. Defra should consider imposing a realistic deadline. It would be deeply regrettable if they were not all published by March 2026, which would be a year after the date they were originally intended to be in place.

Opportunities should be maximised to consider lessons learned from ‘front-runner’ LNRS, and for consideration of wider policy developments, such as English devolution, planning reform, a revised EIP and emerging LUF. Development of an active community of RAs could greatly assist here – where those who are responsible for LNRS consider how best they join together to take collective responsibility.

Delayed LNRS should play their full part in helping to drive and underpin nature’s recovery. Wherever possible, these LNRS should inform policy making and decision taking, and RAs and others should press ahead with action that will contribute to national goals and targets.

#### **Recommendation 1: Publish all strategies at the earliest possible opportunity**

Responsible Authorities should, together with Supporting Authorities and Defra, implement course-corrective action to ensure that all LNRS are published at the earliest opportunity.

### 6.2 Contributing to national nature recovery

Advice from Defra set out the specific national objectives to which each LNRS was expected to contribute. These were the national targets under the Environment Act and additional relevant commitments from the EIP. In total 17 different national environmental objectives were included in the advice.

Our assessment of LNRS found that there was generally incomplete coverage of nature recovery requirements (such as those for freshwater and marine). This was likely influenced by the advice on national objectives, which incorrectly categorises some targets as ‘biodiversity on land’ despite their relevance to freshwater, coastal and marine habitats.

The advice provided to RAs gave little additional steer in terms of how national objectives should be considered in individual LNRS, for example through weighting or prioritisation based on their bio-geographic diversity.

We consider that the advice does not provide sufficient detail as to how RAs are expected to quantitatively and spatially take account of national objectives in the drafting of their LNRS. Also, some key national objectives are missing, such as the commitment to support 65-80% of landowners and farmers to adopt nature friendly farming on at least 10-15% of their land by 2030.

We recommend that Defra, its Arm’s Length Bodies (ALBs), and RAs establish a clear understanding of the extent to which LNRS will come together and contribute to nature recovery – showing how they ‘stack up’ to meet commitments in the EIP and using this as a basis for monitoring progress against those commitments. Defra should also establish the relative significance of LNRS in the context of other mechanisms that will contribute to nature’s recovery.

Clarity is also needed in terms of the status of the national Nature Recovery Network,<sup>115</sup> and its relationship to national nature recovery commitments and LNRS. This should make clear the links to requirements under section 107(5)(b) of the Environment Act, whereby the Secretary of State must inform RAs of any part of their LNRS area that could contribute to the establishment of a network of areas across England for the recovery and enhancement of biodiversity in England as a whole. The explanatory notes for this section of the Act state that “[LNRS] should not exist in isolation but should aggregate together,” and make clear that LNRS are intended to provide the basis on which to build an England-wide network for the recovery and enhancement of biodiversity.<sup>116</sup>

With Defra currently undertaking its own evaluation of LNRS, this presents an opportunity to review guidance and advice – providing more detail on the role of LNRS in achieving national nature recovery commitments. This should align with the EIP review, any EIP delivery plans, and wider contextual change, such as that coming through English devolution, planning reform and the anticipated LUF.

## **Recommendation 2: Define how LNRS contribute to national nature recovery commitments**

Defra, in consultation with its Arm’s Length Bodies and Responsible Authorities, should define and clearly explain the role that each LNRS will play in contributing to national nature recovery commitments – in particular, what each LNRS will deliver for legally-binding targets and a revised EIP. This should be quantified wherever possible and include an understanding of how LNRS stack up at the national level.

Defra should also explain the significance of LNRS in relation to other national and local mechanisms for nature recovery.

<sup>115</sup> Defra, ‘The Nature Recovery Network’ (n 10).

<sup>116</sup> Explanatory notes to the Environment Act 2021, para 979.

## 6.3 Resourcing and governance

There has been considerable uncertainty and unease from stakeholders during the LNRS preparation phase regarding the long-term commitment of government to LNRS, in particular in relation to clarity around governance, and resourcing. This uncertainty has meant some RAs have struggled to recruit and / or retain staff working on LNRS. This will have impacted upon LNRS development and could hinder implementation once the strategies are published.

We found a lack of clarity over the roles and responsibilities key to effective governance of LNRS once produced. Whilst it is understood that LNRS are strategies and not delivery plans, they will need to transition into delivery of the ambitions they contain, and it is not yet clear how this is intended to happen.

For effective implementation of LNRS, there will need to be robust governance to provide coordination and oversight of delivery, which will need to be sufficiently resourced. As part of this, consideration will need to be given to roles and responsibilities in respect of monitoring and evaluation of LNRS. Without this, it remains uncertain who will track the success (or otherwise) of LNRS. For example, what has been delivered, where, when, and how effective those actions have been. This will need to be set in the context of English devolution and any implications this may have for the roles and responsibilities of RAs.

Defining these aspects is essential not only for ensuring effective delivery, but also to enable a robust review process to evaluate the progress and impact of LNRS against national nature recovery commitments.

### **Recommendation 3: Establish the long-term governance and resourcing arrangements for LNRS**

Defra should, as soon as possible, establish a long-term approach to LNRS governance and resourcing. This should set out the roles and responsibilities (particularly for coordination, oversight, monitoring and evaluation), and its commitment to sufficient long-term resourcing.

## 6.4 Delivery and coherence

We found a lack of clarity around how LNRS ambition will be translated into practical, on-the-ground delivery of nature recovery action. In particular, the various delivery mechanisms and how they should work together coherently.

There is no single funding stream for the delivery of LNRS ambitions. This means it is difficult to determine what funding (for action) is available, whether it is sufficient, and how it will be mobilised to deliver practical nature recovery. Uncertainty around the various delivery and funding mechanisms, and how they might work together, presents a barrier in terms of being able to provide assurance over LNRS potential for delivering nature recovery at the scale and pace needed.

Further to this, we assessed the coherence of LNRS with other relevant plans and strategies. Many of the plans and strategies we looked at related to those wider Local Authority powers and duties summarised in section 2.2, for example, local air quality management areas, species conservation strategies, river basin management plans and

local flood risk management strategies. We found that whilst such spatial and non-spatial plans and strategies were referenced in the LNRS we assessed, there was little meaningful integration with them. Instead, the achievement of coherence has principally been through conflict avoidance, rather than actively weighing and prioritising competing land use demands.

A recent report by the Local Government Association<sup>117</sup> highlights the value of a place-based approach, with LNRS as the cornerstone of nature protection and restoration. The report recommends making LNRS the primary framework to ensure that local planning and investment contribute to biodiversity and nature recovery goals.

Whilst LNRS are not delivery plans, we consider it important that they are used to coordinate and drive delivery of the actions needed for nature recovery. Without certainty around what delivery looks like, and how it will be funded, LNRS risk becoming strategies that sit on a shelf with limited impact.

Under the NERC Act, public authorities have a duty to have regard to LNRS in fulfilling their general biodiversity duty. As such, we recommend that ALBs set out how they will use LNRS to inform the exercise of their functions, in particular how the strategies will guide the various funding streams they administer and provide advice on, such as the Environmental Land Management Scheme, England woodland creation, and the natural flood management programme.

In addition, Defra and its relevant ALBs should work together to identify the available public funding through the different delivery mechanisms, while also exploring options for non-government funding. Here, we echo the recent recommendation in the Corry Review<sup>118</sup> that calls for a review of the funding streams for place-based delivery to ensure they can be used as flexibly as possible to help local authorities and regulators deliver the EIP and LNRS ambitions.

We consider that Defra, its relevant ALBs, and RAs should work together to ensure the various delivery mechanisms are used coherently and efficiently. For example, by:

- clarifying the relationship between LNRS and the LUF in terms of their respective roles in land use prioritisation and decision making;
- clarifying how LNRS will support the implementation and targeting of agri-environment schemes;
- clarifying how nature markets and green finance, including but not limited to BNG, can help provide sustainable long-term funding for LNRS delivery;
- setting out how LNRS will be used in the exercise of their functions; and
- clarifying the role of LNRS in bringing coherence to the discharge of local authorities' wider duties and powers relevant to nature recovery (see section 2.2 'other relevant legal duties and powers of local authorities').

---

<sup>117</sup> Local Government Association, 'Empowering Local Climate Action: Advice to Government' (2025) <[www.local.gov.uk/publications/empowering-local-climate-action-advice-government](https://www.local.gov.uk/publications/empowering-local-climate-action-advice-government)> accessed 8 May 2025.

<sup>118</sup> Dan Corry (n 58).

#### **Recommendation 4: Clarify funding streams and delivery mechanisms for coherent on-the-ground nature recovery action**

Defra should work with its Arm's Length Bodies and Responsible Authorities to determine the most appropriate funding and delivery mechanisms. This should detail how much funding is associated with each delivery mechanism, assess whether this is sufficient, and set out how they will work coherently together to deliver local and national nature recovery commitments.

In addition, Defra's Arm's Length Bodies should set out how they will use LNRS to inform the exercise of their functions.

## **6.5 LNRS and the planning system**

There are no specific legal duties that require LNRS to be implemented. However, there are legal provisions that are intended to ensure they are given consideration in a range of circumstances. It is important for these provisions to be exercised in a way that actively supports LNRS delivery wherever possible. For example, the Levelling Up and Regeneration Act 2023 introduced amendments to various planning Acts that would require local planning authorities to take account of LNRS when preparing and renewing spatial plans.<sup>119</sup> These amendments have not yet been commenced. The NERC Act also places a duty on all public authorities to consider how they can conserve and enhance biodiversity, and in doing so, they must have regard to any relevant LNRS.<sup>120</sup>

The update to the planning practice guidance on the natural environment advises how local planning authorities should have regard to LNRS.<sup>121</sup> In relation to plan making, it explains that local planning authorities should consider the priorities set out in relevant LNRS when determining how their local plan should contribute to and enhance the local and natural environment. For planning decision-making, the guidance states that LNRS serve as an evidence base, containing information that may constitute a 'material consideration'. However, it notes that it is the responsibility of the decision-maker to determine what constitutes a relevant material consideration, depending on the specific circumstances of each case.

Our work found that the strategies we reviewed did not include sufficient information to understand the relative prioritisation of nature recovery alongside other priorities. There was limited detail on resolving potential conflicts or establishing decision-making hierarchies, with RAs often directing users to conduct site-based assessments when they commence delivery. RAs clarified that a balance would need to be struck between competing demands.

The planning process has a key role to play in managing these trade-offs. However, the interpretative nature of the legal provisions and the planning practice guidance creates uncertainty. To address this, we recommend amending the NPPF<sup>122</sup> to provide greater clarity, reflecting the important role LNRS are expected to play in meeting national nature recovery commitments. The House of Lords Land Use in England Committee also

---

<sup>119</sup> Levelling Up and Regeneration Act 2023, s 95, s 98(3) and sch 7.

<sup>120</sup> Natural Environment and Rural Communities Act 2006, s 40(2A).

<sup>121</sup> MHCLG, 'Guidance: Natural Environment' (n 26).

<sup>122</sup> MHCLG, 'National Planning Policy Framework' (n 50).

recommended that LNRS should be given greater weight with amendments made to the NPPF.<sup>123</sup>

The NPPF should:

- Define the weight that should be afforded to LNRS in neighbourhood plans, local plans, spatial development strategies, and individual planning decisions.
- Clarify how the weighting varies across the different components – spatial versus non-spatial, and areas mapped as being of importance or potential importance for biodiversity.
- If the proposed planning reforms are enacted, explain how Environmental Delivery Plans (proposed through the Planning and Infrastructure Bill) will align to LNRS and support their delivery, and ensure that the Nature Restoration Fund is deployed consistently with LNRS priorities.

### **Recommendation 5: Update the National Planning Policy Framework (NPPF)**

MHCLG should, as soon as possible, update the NPPF to describe the weight that should be given to LNRS when plan-making and in making planning decisions. This should set out how that weighting applies to different component parts of LNRS.

## **6.6 Data, evidence and mapping**

LNRS should ultimately be compatible and be able to integrate to present a comprehensive national picture. Achieving this will require clear data standards and mapping outputs. Sound data will be particularly important for LNRS to inform planning policy and planning decisions. For example, where LNRS will be used to inform decisions in respect of local plans, BNG, and strategic approaches to mitigation and compensation for environmental impacts from development.

We found that RAs faced challenges with data standardisation, availability, and quality in preparing their LNRS. Without intervention from government, these issues will persist, hindering the delivery of specific actions and complicate LNRS reviews when they are required. Data accessibility is a well-known issue and addressing it is not only important for LNRS but also because it underpins the successful implementation of many other government policies.<sup>124</sup>

Further, it means that the LNRS are inconsistent with each other, and some will potentially have issues in terms of the accuracy of underlying evidence. This means that they may not provide the best baseline for monitoring progress, and for evaluating how progress could be improved. Currently they cannot be easily aggregated into a cohesive national picture that allows tracking of how LNRS, as a whole, will contribute to national nature recovery commitments.

<sup>123</sup> House of Lords Land Use in England Committee, 'Making the Most out of England's Land: Land Use in England Committee Report' (2022) <[www.committees.parliament.uk/publications/33168/documents/179645/default/](http://www.committees.parliament.uk/publications/33168/documents/179645/default/)> accessed 11 April 2025.

<sup>124</sup> See, for example, section 5 where Natural England highlights the role of LNRS in planning reform: HMT, 'New Approach to Ensure Regulators and Regulation Support Growth' (2025) <[www.gov.uk/government/publications/a-new-approach-to-ensure-regulators-and-regulation-support-growth/new-approach-to-ensure-regulators-and-regulation-support-growth-html](http://www.gov.uk/government/publications/a-new-approach-to-ensure-regulators-and-regulation-support-growth/new-approach-to-ensure-regulators-and-regulation-support-growth-html)> accessed 24 April 2025.



To enable improved tracking of nature recovery efforts and a clearer understanding of how LNRS stack up, Defra should establish a baseline for the spatial components of all LNRS. This should allow for LNRS to go further than what is required, but should establish a minimum standard, such that there are common elements that allow all LNRS to be aggregated into a meaningful national picture. This will enable a clear spatial representation of how LNRS will come together collectively to contribute to national nature recovery.

Issues with relevant national datasets and access to key data sources will need to be rectified ahead of LNRS review. This will ensure that any necessary updates are based on the best available evidence and will establish a common baseline for monitoring progress. It will also provide benefits in terms of LNRS informing and being used alongside other national spatial plans such as the LUF.

These are strategic matters that require national-level intervention. Although retrospective fixes are not possible for the current LNRS, there is an opportunity to address these issues ahead of any LNRS review. This will improve the quality and consistency of future iterations of the strategies.

### **Recommendation 6: Establish a baseline for the spatial components of LNRS**

Defra should establish a baseline for the spatial component of all LNRS.

Defra and Natural England should also consider where they might best intervene to support improved access to data relevant to LNRS.

Defra should ensure key nationally significant datasets are updated (e.g. the Priority Habitat Inventory and Agricultural Land Classification) to inform LNRS.

## **6.7 Review**

There is currently much ambiguity around future LNRS review. This ambiguity is unhelpful for those with ongoing responsibility for LNRS who will need to plan for any such review.

We consider that, for this first round of LNRS, review needs to be sooner rather than later (within the 3 to 10 year time frame required by law – see section 2.2) and should be for all LNRS collectively to drive consistency and coherence. There is a clear opportunity to use lessons learned from this first round of LNRS to inform early improvement. Whilst any such review is now unlikely to influence achievement of the 2030 target to halt species decline, it would improve the prospects of LNRS contributing to the 2042 target to increase species abundance.

The purpose of this full review should be clear. Our view is that it should resolve the issues we have observed, such as those relating to data and mapping, a lack of quantified targets in respect of the contribution that LNRS should make to national nature recovery commitments, and any other issues that have arisen in the implementation phase. It should also allow LNRS to take account of any changes resulting from a revised EIP, English devolution, the LUF and planning reform. Our expectation is that the review will be as full as possible to ensure LNRS meet their full potential.

Given the anticipated time lag between publication of the first LNRS and last LNRS, consideration will need to be given to how long they will have been in their implementation



phase before they are reviewed. We consider that review should be no later than three years after the publication of the last LNRS.

It would also be helpful if further detail were made available as to what might trigger the need for review of LNRS either individually or collectively, and what relationship this review cycle might have with the review of other relevant plans and strategies, such as the EIP, spatial development strategies and local plans.

There is currently no detail as to whether changes may be made to LNRS by RAs outside of formal review process, or the process for making such changes. Allowing for these kind of ‘exceptional’ changes could enable more timely local updates to individual LNRS to occur (for example to incorporate new protected site designations, or to iterate with local plans and strategies), separate from any wholesale review of all LNRS across England.

We consider that this is an area where Defra should provide more detail. This should describe the circumstances under which it may be appropriate to update an LNRS, the types of administrative amendments that could be made, and the checks and measures to be considered to avoid unintended consequences of piecemeal updates.

### **Recommendation 7: Require early review of LNRS and clarify the process for ‘exceptional’ amendments**

The Secretary of State should require early review of all LNRS. This should be no later than three years following publication of the last LNRS.

Defra should define the ‘triggers’ for when full review of LNRS will be required, and the intended purpose of such review. It should also set out when and how Responsible Authorities might undertake local ‘exceptional’ amendments to LNRS outside of the formal review process.



The background of the page features a repeating pattern of stylized, symmetrical leaves or feathers in a light gray color, set against a slightly darker gray background. The pattern is dense and covers the entire page.

# Annex A: Responsible Authorities involved in our review

## Annex A: Responsible Authorities involved in our review

We would like to thank the following Responsible Authorities for their interest and participation in our review – without their contributions this work would not have been possible. See also Figure 3, Section 3.3 – Map showing the 12 LNRS selected to inform our review.

Responsible Authority (Listed alphabetically)	One of our 12 ‘assessed’ LNRS
Berkshire	
Buckinghamshire and Milton Keynes	✓
Cheshire	
Cornwall and the Isles of Scilly	✓
County Durham	✓
Cumbria	
Derbyshire	
Devon	
Dorset	✓
East Sussex and Brighton & Hove	
Greater Lincolnshire	
Greater Manchester	✓
Greater Essex	✓
Greater London	
Hampshire	
Herefordshire	✓
Hertfordshire	
Hull and East Yorkshire	
Isle of Wight	✓
Kent and Medway	✓
Lancashire	✓
Leicestershire, Leicester and Rutland	✓
Norfolk	
North Northamptonshire	
North of Tyne	
North Yorkshire and York	✓
Nottinghamshire and Nottingham	
Oxfordshire	

Responsible Authority (Listed alphabetically)	One of our 12 'assessed' LNRS
Shropshire and Telford & Wrekin	
Somerset	
Staffordshire and Stoke-on-Trent	
Suffolk	
Warwickshire	
West Northamptonshire	
West of England	
West Yorkshire	
Wiltshire and Swindon	
Worcestershire	



The background of the page features a repeating pattern of stylized, symmetrical leaves or feathers in a light gray color, set against a slightly darker gray background. The pattern is dense and covers the entire page.

# Annex B: Other stakeholders involved in our review

## Annex B: Other stakeholders involved in our review

We are grateful to these individuals for their valuable contribution to our work through the provision of expert advice and scrutiny throughout the course of our review, and / or for their review of our draft report:

Jonathan Ayres CEnv MCIEEM FLS

Dr Elizabeth Cooke

Ric Eales

Kaley Hart

James Marsden

We would also like to thank the following organisations for their interest and participation in our review. One or more representatives from the following organisations took part in our webinar on 19 December 2024, and/or provided written feedback or spoke to us to inform our work:

Amphibian and Reptile Conservation Trust

Bat Conservation Trust

Biological Recording Company

Bumblebee Conservation

Cambridgeshire and Peterborough Environmental Records Centre

Chartered Institute of Water and Environmental Management

Cotswolds National Landscape

Department of Environment, Food and Rural Affairs

Devon Wildlife Trust

Enable Leisure and Culture

Environment Agency

Forestry Commission

Gloucestershire County Council

Historic England

Joint Nature Conservation Committee

Local Government Association

National Farmers' Union

National Infrastructure Commission

National Landscapes Association

Natural England

NatureScot

Office for National Statistics



People's Trust for Endangered Species  
Planning Advisory Service  
Plantlife  
Royal Society for the Protection of Birds  
South Downs National Park Authority  
South Oxfordshire & Vale of White Horse District Councils  
The Rivers Trust  
University of Hull  
UKHab  
The Wildlife Trusts  
Wildlife and Countryside Link  
Woodland Trust



