

Broads Authority

24 January 2025

Agenda item number 11

Draft Local Nature Recovery Strategies

Report by Environment Policy Adviser

Purpose

Norfolk County Council and Suffolk County Council have prepared draft Local Nature Recovery Strategies (LNRSs) for Norfolk and Suffolk, with input from the Broads Authority. The draft is ready for public consultation. As a 'Supporting Authority', the Broads Authority is being asked to approve the public consultation of the draft LNRSs.

Broads Plan context

Theme B - Improving landscapes for biodiversity and agriculture. Other themes in the Broads Plan will also benefit.

Recommended decisions

- i. To approve the public consultation of the draft Norfolk LNRS and Suffolk LNRS.
 - ii. Because of the timescale, to delegate authority to the Chief Executive, in consultation with the Chair of the Authority, to approve the final versions of the LNRSs.
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1. Introduction

- 1.1. The Local Nature Recovery Strategies (LNRSs) are statutory plans, required by the [Environment Act 2021](#). The Broads is covered by two LNRSs: the Norfolk and Suffolk strategies, led by Norfolk County Council and Suffolk County Council respectively. Both Councils are working with the '[Norfolk and Suffolk Nature Recovery Partnership](#)' (NSNRP) which supports the work associated with the development of the LNRSs. Broads Authority officers take part in the NSNRP.
- 1.2. The core purposes of LNRSs are to agree priorities for nature's recovery, map the most valuable existing areas for nature, and map specific proposals for creating or improving habitat. Appendix 2 sets out the detailed uses of the LNRSs.
- 1.3. The Broads Authority is a Supporting Authority and has been actively involved in the preparation of the LNRSs. Officers have advised the Responsible Authorities to ensure that the LNRSs align with local planning processes, comply with Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (LURA), and complement

the Broads Nature Recovery Strategy, its targets, focus, and ambitions. For example, officers reviewed the mapping, helped defined irreplaceable habitats and species, reviewed early drafts, and provided case studies.

- 1.4. Under the Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023, Norfolk and Suffolk County Councils must submit a consultation draft of the LNRS to all Supporting Authorities. A Supporting Authority may raise a 'pre-consultation objection' within 28 days of receiving the consultation draft, addressing either the content of the LNRS or the process by which the draft has been prepared.
- 1.5. A detailed briefing about LNRSs was presented to Broads Authority members at a meeting on 9 December 2024, where officers responded to comments and questions.
- 1.6. A policy update about the uses of LNRS was published in December 2024 (see Appendix 2). It presents the uses for LNRS that are based in law, other ways in which LNRSs will be used, ways in which LNRSs might be used in future, and how LNRSs will not be used.

2. Approval of the draft LNRS prior to public consultation

- 2.1. On 15 January 2025, the Broads Authority received the consultation drafts (see Appendix 1). The formal pre-consultation period will run from 15 January to 11 February 2025.
- 2.2. At this stage, Norfolk and Suffolk County Councils are not requesting detailed comments on the draft LNRSs, but rather whether Supporting Authorities are satisfied for the public consultation to proceed. Authorities are encouraged to submit detailed feedback during the 6-week public consultation period, which is scheduled from 3 March to 13 April 2025.
- 2.3. Officers have reviewed the documents and recommend that the Broads Authority confirm in writing its agreement for the public consultation to proceed, noting that:
 - The draft LNRSs include all required elements under Section 106 of the Environment Act, including a statement of biodiversity priorities and a local habitat map.
 - The development of the draft LNRSs have been collaborative, involving the Broads Authority and other stakeholders, and no objections to the broad content or preparation of the draft LNRSs are anticipated.
- 2.4. Officers will submit detailed feedback to the draft LNRSs by the deadline of the public consultation on behalf of the Authority, which will include Members' feedback received at the 24 January meeting.

3. LNRS timetable – next steps

- 3.1. Approval of LNRSs must follow certain stages. The Norfolk and the Suffolk LNRSs have the same timetable, as detailed in Table 1 below.

Table 1 – Expected timetable towards Norfolk & Suffolk LNRs publication

Activity	Date
<p>Supporting Authorities’ consultation (1) draft version</p> <p>Including all local planning authorities, Broads Authority and Natural England</p>	<p>15 January 2025 to 11 February 2025</p>
<p>Public consultation of draft LNRs</p>	<p>March 2025</p>
<p>Supporting Authorities’ consultation (2) final version</p> <p>Including all local planning authorities, Broads Authority and Natural England</p>	<p>19 June 2025 to 16 July 2025</p>
<p>LNRs Publication</p>	<p>Summer 2025</p>

- 3.2. Because of the LNRs timeline and the timing of Broads Authority meetings for 2025, officers are requesting delegated authority to the Chief Executive, in consultation with the Chair of the Authority, to submit a response to Norfolk County Council and Suffolk County Council on the final version of the LNRs, which is required by 16 July 2025.

4. Engagement

- 4.1. The LNRs have been developed following Defra's statutory guidance, with a series of events, workshops, and surveys throughout 2024 to engage a wide audience. Norfolk and Suffolk County Councils have worked together to engage a wide range of stakeholders.
- 4.2. Feedback has shaped the LNRs, identifying key habitats and species in Norfolk, Suffolk and nationally. By October 2024, 150 engagement activities reached 6,594 people, including joint events between Norfolk and Suffolk.

5. Financial implications

- 5.1. There are no direct financial implications for the Authority, apart from officer time related to the attending of LNRs Supporting Authority meetings, theme working groups and the NSNRP. The Government has provided funding to the 48 ‘Responsible Authorities’ in England for the preparation of LNRs.

6. Risk implications

- 6.1. Broads Authority interests not suitably included in the LNRs - The Broads Authority is fully engaged in the LNRs process through being included in both Norfolk and the Suffolk LNRs Supporting Authority meetings, multiple theme working groups, including Planning, and the NSNRP, which should act to mitigate this risk.

6.2. Information on the LNRs not being disseminated effectively, leading to non-engagement with stakeholders - Norfolk and Suffolk County Councils are leading the engagement activities alongside the Norfolk and Suffolk LNRs preparation. Broads Authority supports communication of progress through relevant communication channels.

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Background papers: [The Authority's role in Local Nature Recovery Strategies and Biodiversity Duty Consideration](#)

[Broads Plan](#) strategic objectives: all strategic objectives in Theme B

Appendix 1 – Local Nature Recovery Strategies: [Draft Local Nature Recovery Strategy for Norfolk](#) and [Draft Local Nature Recovery Strategy for Suffolk](#)

Appendix 2 – Local Nature Recovery Strategies – uses

Appendix 2

Local Nature Recovery Strategies (LNRS) delivery – policy update December 2024

Background

The core purpose of LNRSs is to agree priorities for nature’s recovery, map the most valuable existing areas for nature, and map specific proposals for creating or improving habitat. They were originally designed to help habitat creation or improvement to meet Biodiversity Net Gain (BNG) requirements to be targeted where it will provide the most benefit. However, the Government intends for LNRSs to be put to wider use in helping to target action for nature recovery and use of nature-based solutions. Some of these uses are well established, while others are still under development.

This policy update provides more certainty about how LNRSs will be used, and how they link to different incentives and funding sources. This should help the responsible authorities currently preparing and finalising their LNRSs to ensure that their strategies are “fit for purpose”, and support better engagement with landowners and managers by providing a clearer understanding of what LNRS means for them and their land.

Defra will keep responsible authorities informed of the links between delivery mechanisms and LNRSs as they develop.

Uses for LNRS that are based in law

Targeting BNG – LNRSs will determine where habitat creation or enhancement for BNG will be of [‘high strategic significance’](#). This means that when habitat is created or enhanced to generate biodiversity units for the purposes of BNG, it gets a 15% uplift in the [biodiversity metric](#) if it follows what is set out in the LNRS.

Duty on public authorities to conserve and enhance the environment – LNRSs will inform how all public authorities in England meet their [legal duty to conserve and enhance biodiversity](#). The duty applies to a long list of national and local government organisations as well as some private utilities such as water companies. Public authorities must understand which LNRSs are relevant to them and how they can contribute. This could be through:

- managing areas of land that they are responsible for in a way that supports what the LNRS proposes
- using the LNRS to inform relevant regulatory decisions

Local Planning Authorities (LPAs) have a particularly important role to play in supporting the delivery of actions proposed in LNRSs. Government is required to publish guidance to explain how LPAs should use LNRSs to inform the preparation of Local Plans enabling them to more effectively identify, map and safeguard areas for nature recovery.

Planning law – [Changes to planning law](#), expected to come into force later in 2025, will make it a legal requirement for plan-makers to “take account” of LNRSs. Like the existing requirements on Local Plans, this will help the needs of nature recovery to be properly reflected in the planning system. It will also apply to a wider range of similar spatial plans, at larger and smaller scale than local plans.

Other ways in which LNRs will be used

LNRs will also be used:

- **to provide information to farmers and land managers** to help them choose which Countryside Stewardship and Sustainable Farming Incentive options are appropriate for their land
- **to help groups of farmers and land managers shape nature recovery priorities** for their area, and to encourage collaboration across holdings and landscapes
- **to identify opportunities for Landscape Recovery project proposals**, and to provide evidence to support their application and project development
- **to help Government when considering applications for funding** for specific nature recovery activities, by acting as criteria in applications
- **to help responsible authorities and/or local partnerships leverage and target funding for environmental projects** to areas where they could have the most impact for nature and the wider environment
- **to inform how Defra arms-length bodies carry out existing functions to better support nature recovery** – for example, by drawing on LNRs priorities and proposals when providing land management advice to farmers, or when selecting locations for nature-based solutions such as natural flood management and tree planting
- **to inform the development and implementation of Protected Landscape management plans**, by identifying locations and measures that will drive delivery of the agreed targets and outcomes set out in these plans

Ways in which LNRs might be used in future

Government is keen to add to the list above to provide further encouragement and support for the delivery of actions proposed in LNRs.

Below are some further opportunities for how LNRs could be used in future, but which require further exploration to determine whether this will be the case.

LNRs might be used:

- **to identify where funding could be made available** to encourage farmers and land managers to carry out the most environmentally impactful actions on their land
- **as required criteria in future government nature recovery funding schemes**, meaning that actions proposed in the LNRs would be eligible for funding
- **to inform the identification of areas that could potentially contribute towards Government's [30by30 commitment](#)** following appropriate action for nature recovery
- **to inform where private companies choose to provide corporate donations** for habitat creation or enhancement projects that deliver LNRs proposals
- **to guide private finance investments in nature and carbon markets** – for example, targeting action on tree-planting as part of the [UK Emissions Trading Scheme](#)

How LNRSs will not be used

LNRSs are not designed to be prescriptive. They are tools to drive forward action to recover nature.

The following list sets out the ways we don't intend LNRS to be used. We do not foresee this changing in the future.

LNRSs won't be used to:

- **require owners or managers of land to make specific proposed land use changes** – this will remain their choice
- **place new restrictions on developing land** – LNRSs will be one source of evidence used to inform the preparation of plans that will determine where development should occur (these plan preparation processes have their own consultation and engagement requirements so that different needs for land can be balanced by the plan maker)
- **identify areas to be given legal nature protections that create restrictions on how land can be used or managed** – LNRSs do not propose new nature reserves or any other kind of legal designation
- **prevent nature conservation work** in areas not prioritised by the LNRS (e.g. by restricting funding in areas that are not mapped)
- **determine regulatory decisions**, such as the result of Environmental Impact Assessments – LNRSs can be a source of evidence to inform decision making but determination must still be made on the basis of relevant legislation and statutory guidance