

Broads Authority

19 September 2025

Agenda item number 10

Local Nature Recovery Strategy final draft

Report by Environment Policy Adviser

Purpose

Norfolk County Council and Suffolk County Council have prepared final Local Nature Recovery Strategies (LNRSs) for Norfolk and Suffolk, with input from the Broads Authority. The Strategies have gone through public consultation. As a ‘Supporting Authority’, the Broads Authority is being asked to approve the publication of the final LNRSs.

Broads Plan context

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

Recommended decision

To approve the final Norfolk LNRS and Suffolk LNRS.

Contents

1.	Introduction	1
2.	Approval of the LNRS prior to publication	2
3.	LNRS timetable – next steps	3
4.	Engagement	3
5.	Local Habitat Map	5
6.	Planning	6
7.	Next Steps	6
8.	Financial implications	7
9.	Risk implications	7

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 LNRs. Broads Authority officers take part in the NSNRP.

- 1.2. The core purposes of LNRs 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.
- 1.3. The inclusion of land in a LNRs is not a statutory designation so does not confer any protection or prevent land uses. Instead, the LNRs maps are opportunity maps intended to guide and inform planning and nature recovery activities.
- 1.4. The Broads Authority is a Supporting Authority and has been actively involved in the preparation of the LNRs. Officers have advised the Responsible Authorities to ensure that the LNRs align with local planning processes, comply with Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (LURA), as reported to the Broads Authority on 24 January 2025, [Draft Local Nature Recovery Strategy](#) and complement the Broads Nature Recovery Strategy, its targets, focus, and ambitions. For example, officers reviewed the mapping, helped define irreplaceable habitats and species, reviewed early drafts, and provided case studies.
- 1.5. Under the Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023, Norfolk and Suffolk County Councils must submit the final LNRs to all Supporting Authorities during the pre-publication stage. A Supporting Authority may raise an objection within 28 days of receiving the pre-publication LNRs if they believe it doesn't meet the requirements of the Environment Act 2021 or the supporting guidance, or if it lacks necessary information or consultation.

2. Approval of the LNRs prior to publication

- 2.1. On 15 September 2025, the Broads Authority will receive the consultation drafts (see Appendix 1). The formal pre-consultation period will run from 15 September to 13th October 2025.
- 2.2. At this stage, Norfolk and Suffolk County Councils are not requesting detailed comments on the pre-publication LNRs, these have been provided by officers during the process, but rather whether Supporting Authorities are satisfied for the publication to proceed.
- 2.3. Officers have reviewed the documents and recommend that the Broads Authority confirm in writing its agreement for the publication to proceed, noting that:
 - The LNRs 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 LNRs have been collaborative, involving the Broads Authority and other stakeholders.

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 LNRSs publication

Activity	Date
Supporting Authorities' consultation (2) final version Including all local planning authorities, Broads Authority and Natural England	15 September to 13 October
Cabinet reports by Responsible Authorities Suffolk County Council	9 September
Norfolk County Council	13 October
Release of LNRSs	31 October
Launch Event Carlton Marshes	6 November

- 3.2. The current role for the Broads Authority as a Supporting Authority includes:
- Contributing to a partnership focused on LNRS delivery, building on existing governance and partnerships.
 - Making links with other parts of the Authority, Responsible Authority and Supporting Authorities to promote use of the LNRS in other decision making (for example Spatial Development Strategies, Local Growth Plans, public health, climate resilience and adaptation).
 - Identifying, developing and publicising projects that will contribute to LNRS delivery, along with the Broads Nature Recovery Strategy.

4. Engagement

- 4.1. The LNRSs have been developed following Defra's statutory guidance, with a series of events, workshops, and surveys throughout 2024 and 2025 to engage a wide audience. Norfolk and Suffolk County Councils have worked together to engage a wide range of stakeholders. The public consultation has indicated strong support for the LNRSs and the priorities and measures in it, as well as providing further useful feedback and information. Much of the feedback has been taken on board in the final draft LNRSs, with the themes of the main changes set out in 4.5..
- 4.2. During the consultation engagement reached over 8,205 people in Norfolk and 28,000 in Suffolk, including involving both digital and in-person engagement.

- 4.3. The response to the public consultation Norfolk's draft LNRS included 655 responses compared to 530 from Suffolk: The responses are shown from Norfolk and Suffolk respectively (for example Norfolk/Suffolk): 288/210 online survey responses, 15/21 detailed stakeholder responses and 352/299 comments on the Local Habitat Map.
- 4.4. The survey responses reflected strong support for and engagement with both the draft strategy and the Local Habitat Map. The responses demonstrated a high level of local knowledge throughout. The public consultation has provided evidence that there is consensus with the draft LNRSs. The percentage responses are shown from Norfolk and Suffolk respectively (for example 78% Norfolk/78% Suffolk):
- 78%/78% agreed or strongly agreed that the purpose and aims of the Norfolk/Suffolk LNRS are clear.
 - 78%/73% agreed or strongly agreed that the strategy explains what nature recovery could take place in each area.
 - 74%/71% agreed or strongly agreed that the draft strategy was easy to understand.
 - 69%/64% agreed or strongly agreed that the mapping was easy to understand, with 63%/57% agreeing or strongly agreeing that the mapping was easy to use.
 - 92%/87% agreed or somewhat agreed with the proposed priority habitats and recovery measures, with only 8%/7% expressing disagreement.
 - 89%/86% agreed or somewhat agreed with the identified priority species and associated recovery measures, and just 11%/8% disagreed.
- 4.5. Both Norfolk and Suffolk County Councils, are integrating feedback from the public consultation as far as possible into the final LNRSs and Local Habitat Map. The main changes included:
- Document Accessibility and Length: Document too long, resulting from needing to comply with required guidance. Clarity, navigation, and signposting is improved.
 - Mapping, Data & Evidence: Usability and accessibility of the mapping has improved and a dashboard will be created. There are limitations with the accuracy and strength of the data sets that have been used to create the map. These are beyond the control of the LNRS process.
 - Nature Recovery Scope: The wording within the document has been strengthened based on comments including further details of the public body duty to support statutory purposes of Protected Landscapes, landscape connectivity and greater alignment with Landscape Recovery Schemes.
 - Implementation, Monitoring and Governance: The purpose of the LNRS is the prioritisation, mapping and determination of appropriate measures for nature

recovery. LNRS statutory guidance did not require delivery plans or implementation structures to be incorporated into the document. LNRS delivery plans will develop through the NSNRP. The Environment Act states that once published, a LNRS will be reviewed no sooner than 3 years after that date, and no longer than 10 years.

- Development and Land Use Pressures: LNRSs are not designed to be a barrier to development but a tool to identify the best opportunity for integrating nature recovery practices within planning systems. Relevant legal documents will need to 'have regard' to LNRSs. LNRSs will not create new designations or protect pieces of land as the ultimate decision lies with the landowner. Clarification on the LNRSs and planning policy, has been further highlighted in the documents.
- Environmental Pressures and Climate Change: Further detail on water quality and the impacts of pollution and the changing climate on our aquatic environment is included.
- Benefits and Co-Benefits of Nature Recovery: statements and assigned benefits from habitat specific actions are strengthened and clarified, with for example improved cross referencing.
- 'Social Engagement and Inclusion', 'Funding, Incentives and Feasibility': Comments will help shape the next stage of work to develop delivery of nature recovery.
- Habitats and species: Expert input has resulted in amendment of the potential measures for species, assemblages and habitat and some flagship species have been removed as recovery is dependent on long-term investment including for instance a significant reduction in aerial nitrogen. Changes do not affect the Broads.

5. Local Habitat Map

- 5.1. The latest version of the LNRSs Local Habitat Map is not available for inclusion in this paper. The Broads Areas of Particular Importance for Biodiversity (APIB) is 31% of the Broads. The Areas that Could Become of particular importance (ACB) is 56%.
- 5.2. ACIB is where importance for biodiversity has already been recognised and protected, it includes protected and designated sites and known areas of irreplaceable habitats (for example fen). ACB is where areas have been identified for habitat creation, enhancement and protection. These are a direct result of ecological rules-based modelling and stakeholder engagement.
- 5.3. Measures for creation and restoration of habitats are also mapped and are advisory only. They are not legally binding, but are intended to:
 - Guide and inform local decision-making.

- Help target funding (e.g. through ELMS or Biodiversity Net Gain).
- Support voluntary action by landowners, communities, and planners.
- Influence strategic planning and land management priorities.

6. Planning

- 6.1. LNRSs carry strategic weight. Local planning authorities must ‘have regard’ to LNRSs to comply with their duty to conserve and enhance biodiversity and the natural environment. By supporting the best opportunities to create or improve habitats to conserve and enhance biodiversity, including where this may enable development in other locations.
- 6.2. The [Planning Policy Guidance](#) PPG explains the LNRSs are a material consideration in the planning process. This means a planning application may need to demonstrate how it aligns with the LNRS, typically within a planning or design statement alongside other local policy considerations. While an LNRS is unlikely to block development, it could influence the need for mitigation or compensation measures. Ultimately, the weight given to an LNRS in decision-making will depend on the specific circumstances of the application and the evolving planning case law.
- 6.3. If a habitat is created or enhanced in an LNRSs identified area, landowners may benefit from a 1.15x Biodiversity Net Gain (BNG) uplift (a 15% increase in units). This “strategic significance multiplier” can make BNG delivery more valuable by generating more units from the same land. This incentivises developers and landowners to prioritise work where it aligns with local nature recovery goals.

7. Next Steps

- 7.1. Following the Supporting Authorities pre-publication consultation, if there are no objections to publication received, the LNRSs will be published and submitted to Defra by the end of October 2025.
- 7.2. A Norfolk and Suffolk Nature Recovery Partnership Conference, focusing on next steps and implementation, was held in July 2025, and attended by around 90 stakeholders from across sectors and areas, including the Broads Authority’s Environment Policy Adviser. Their enthusiasm and engagement in delivery of the LNRS outcomes was evident. Future plans include the County Councils working with specific stakeholders with a focus on maximising the delivery of priorities and measures in the LNRSs.
- 7.3. It is expected that the County Councils will continue to have a role at least to April 2026, for which Defra funding has been confirmed. This includes:
 - Leading and convening a partnership focused on LNRS delivery, building on existing governance and partnerships, including Local Nature Partnerships

- Making links within the county councils and Supporting Authorities to promote use of LNRSs in other decision making (for example Spatial Development Strategies, Local Growth Plans, public health, climate resilience and adaptation)
- Identifying, developing and publicising projects that will contribute to LNRS delivery
- Track activities or projects that are delivering LNRS priorities that are being funded outside of public funding schemes and sharing this information with Natural England

8. Financial implications

- 8.1. There are no direct financial implications for the Authority, apart from officer time related to the attending of LNRSs 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 LNRSs.

9. Risk implications

- 9.1. Broads Authority interests not suitably included in the LNRSs: The Broads Authority is fully engaged in the LNRS process through being included in both Norfolk and the Suffolk LNRSs Supporting Authority meetings, multiple theme working groups, including Planning, and the NSNRP, which has mitigated this risk.
- 9.2. The Broads Authority Biodiversity Duty report does not consider the LNRSs: The Broads Authority has:
- Considered what we can do to conserve and enhance biodiversity by 1 January 2024;
 - Agreed policies and specific objectives based on their consideration as soon as possible after 1 January 2024; and;
 - Will act to deliver the policies and achieve these objectives and report on them by 1 January 2026, which will include delivery of the LNRSs.
- 9.3. Information on the LNRSs 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 LNRSs preparation. Broads Authority supports communication of progress through relevant communication channels.

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Date of report: 28 August 2025

Background papers: [Draft Local Nature Recovery Strategies](#) and [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 – Pre-publication draft Suffolk Local Nature Recovery Strategy

Appendix 2 - [Norfolk Local Nature Recovery Strategy pre-publication consultation](#) (published 15 September 2025)

Appendix 3 - [Suffolk Local Nature Recovery Strategy pre-publication consultation](#) (published 15 September 2025)