Offshore Wind Evidence + Change Programme

Local Application of Strategic Marine Net Gain (SMNG) Targets in the East Marine Plan Area

Final Report

THE CROWN ESTATE

Foreword

The United Kingdom (UK) is facing a significant marine biodiversity challenge and collaborative action is essential to restore the habitats and species that underpin the health of our coasts and seas. At the same time, there are ambitious plans for marine development, many of which are critical to addressing climate change. Marine Net Gain (MNG) is an opportunity which would lead to future development being delivered in a way that contributes to environmental improvement alongside existing requirements for environmental protection.

This report is the third from the Task and Finish Group (T&F Group) established to explore how a future obligation for MNG could be effectively implemented in coastal and marine environments. The work has been supported by funding and expertise from the Offshore Wind Evidence and Change (OWEC) Programme, for which the T&F Group is extremely grateful.

Phase One gathered evidence to develop strategic targets for MNG that, in the view of the many people who contributed their thinking, would help developers to meet obligations and deliver tangible conservation outcomes, addressing areas where national conservation targets are currently unmet. Broad support for these targets enabled the T&F Group to make recommendations to assist Defra in shaping policy and procedures for MNG delivery.

Phase Two reviewed existing restoration and recovery projects and examined what could be learnt to assist the prioritisation and implementation of strategic targets through practical mechanisms.

This third and final phase takes a deeper look at potential practical mechanisms and considers how strategic targets can be translated into regional priorities and align with national commitments. A bottom-up approach was taken to explore potential pathways for implementing MNG within the existing complex regulatory process. As before, this work has been informed by calls for evidence from practitioners engaged in marine and coastal restoration, whose knowledge and experience have been invaluable, and we are extremely grateful to all those who responded to our requests for their insights and contributions

The report presents a comprehensive set of recommendations, which, if fully applied, would ensure meaningful contributions to nature restoration and recovery. Throughout our work we have been very conscious that while we can develop recommendations that would benefit industry and the environment, the responsibility for developing policy and procedure for MNG rests with Government and we will continue to offer our help and support to them in making MNG a truly valuable mechanism to assist marine recovery.

The work of the group has only been possible with the commitment of members and especially the work carried out by Haskoning, and I would like to thank everyone for their input and thinking and the way that everyone has worked together so constructively to produce an outcome that we all agree can make a real difference. We hope this report provides useful insights and stimulates discussion on how statutory MNG could most effectively support the recovery of marine environments. We welcome feedback and ideas—please contact info@sudg.org.uk to share your views.

Peter Barham, MBE - Chair of the Task and Finish Group

Executive Summary

The UK faces a well-documented marine biodiversity crisis, with many habitats and species failing to meet conservation targets. At the same time, marine development is expanding rapidly, particularly to meet the need for sustainable energy through offshore wind, alongside other critical sectors such as ports and cables. There is growing recognition among industry and conservation bodies that development should contribute positively to nature recovery. In 2021, a Task and Finish Group (T&F Group) was established under the Offshore Wind Evidence and Change (OWEC) Programme to conduct extensive evidence and research gathering, aimed at supporting the effective delivery of Marine Net Gain (MNG) and maximising the impact of future net gain obligations. The concept for the T&F Group was developed collaboratively by the Seabed User and Developer Group (SUDG) and conservation bodies, including The Wildlife Trusts and the RSPB. Its collective aim was to design an approach for MNG that would deliver the greatest environmental benefit by targeting areas where intervention would have the most impact, while ensuring industry contributions were recognised through a proportionate and straightforward regulatory framework. From the outset, the group worked closely with the Department for Environment, Food & Rural Affairs (Defra), which participated in the T&F Group, with the clear understanding that while recommendations could be made, policy and implementation process decisions remained Defra's responsibility.

Since the T&F Group's establishment, two key phases of work have been completed. Both phases provided recommendations to assist Defra in developing principles and procedures for MNG. Since the beginning of 2025, a third phase (this phase) has been underway.

Phase One examined the current state of marine and coastal environments nationally and, through extensive stakeholder consultation, identified strategic targets which had the greatest potential to reverse marine and intertidal biodiversity loss. It also outlined key assumptions requiring further investigation, which were addressed in the final report published in October 2021 - Strategic Net Gain Targets for Coastal and Marine Environments (T&F Group, 2021)

Phase Two reviewed restoration and conservation initiatives across the UK and assessed future demand for MNG. This work analysed successes, challenges, and lessons learned to refine the previously developed strategic targets. It concluded that further work was needed to test the application of these targets at a local level through a pilot study. The report was published in October 2023 - Delivery Options for Strategic Marine Net Gain (T&F Group, 2023)

Phase Three, which began in early 2025, focuses on applying strategic MNG (SMNG) targets at a local level within the East Marine Plan (EMP) areas. This region was chosen due to its significant existing offshore development and anticipated future demand. The timing also aligns with the MMO's replacement of the EMP, herein referred to as the "replacement EMP", creating a potential opportunity for Phase Three findings to inform the evidence base behind the replacement EMP with practical MNG content.

Across all phases of the work, a consistent conclusion has emerged: a strategic approach to MNG is essential to deliver meaningful and lasting benefits for the marine environment. Without such an approach, MNG risks becoming fragmented, reactive, and misaligned with ecological priorities.

A strategic approach would enable MNG to focus on actions where conservation efforts are most urgently needed and, through linking with other work looking at MNG (such as Natural England's work on marine habitats), could have greater opportunity to be successful and sustainable. In addition, by identifying priorities at regional levels, interventions can support

broader environmental goals, including achieving Good Environmental Status (GES) under the UK Marine Strategy and restoring features within Marine Protected Areas (MPAs). While regional delivery is key, coordination beyond individual marine plan areas—across administrations and even between neighbouring countries—will be important and should be addressed through National Strategic Marine Net Gain Plans.

Strategic planning also facilitates better coordination across sectors and stakeholders, enabling pooled funding, shared delivery mechanisms, and large-scale projects that would be difficult to achieve through isolated, developer-led actions. This is particularly important in the marine environment, where restoration techniques are often novel and uncertain, and where pressure reduction measures, such as water quality improvements, require Government leadership.

This phase, consistent with previous phases, presents a package of recommendations intended to be considered collectively by Defra and other stakeholders. The recommendations aim to ensure that any future MNG policy is industry-backed, evidence-based, and supported by those directly and indirectly affected by its implementation. While each recommendation stands on its own, they should be viewed as an integrated package and are intended to be presented in a methodical order that reflects the steps required to support effective SMNG implementation. They were developed collaboratively by the T&F Group, informed by external consultation, and should be read alongside the supporting information in **Section 2** to **Section 5**.

The full list of 18 recommendations is also listed below.

Recommendations for Marine Net Gain Implementation

Marine Net Gain – Scope and Principles

Recommendation 1 - Marine Net Gain (MNG) should be mandatory and implemented as soon as possible.

Recommendation 2 - Sector capacity should be increased in order to ensure effective implementation of MNG.

Recommendation 3 - MNG should encompass intertidal and subtidal environments to recognise their ecological interdependence.

Recommendation 4 - MNG measures should be based on ecosystem recovery potential not only species-specific recovery.

Recommendation 5 - MNG should encompass mobile species.

Recommendation 6 - MNG should be deliverable within Marine Protected Areas (MPAs).

Recommendation 7 - Pressure reduction should be recognised as a MNG mechanism.

Recommendation 8 - A regular Monitoring, Reporting, and Verification (MRV) process should be undertaken to assess the effectiveness of measures in contributing to MNG.

Recommendation 9 - MNG should follow a strategic framework.

Strategic Marine Net Gain – Governance and Consenting

Recommendation 10 - A Strategic Marine Net Gain (SMNG) framework (herein referred to as SMNG) should be governed nationally but delivered nationally and regionally.

Recommendation 11 - A National SMNG Working Group, in collaboration with the Regional SMNG Working Groups, should develop a National SMNG Plan to deliver National SMNG measures and oversee fund allocation.

Recommendation 12 - Planning authorities should establish a streamlined consenting process for SMNG measures that have been developed under an approved SMNG framework, and MNG measures should be exempt from MNG obligations.

Recommendation 13 - Regional SMNG Working Groups should develop Regional SMNG Plans to deliver Regional SMNG measures that align with national and regional biodiversity priorities and targets.

Strategic Marine Net Gain - Finance mechanisms

Recommendation 14 - SMNG finance mechanisms should be simplified and transparent to support equitable and predictable contributions.

Recommendation 15 - Contributions should be pooled from multiple sources into a National SMNG fund, with independent oversight, and ring-fenced exclusively for both national and regional SMNG purposes.

Recommendation 16 - National funds should be used to deliver the National SMNG Plans which should include wider seascape recovery including highly mobile/migratory species, multi-habitat connectivity, research and development, and monitoring.

Recommendation 17 - National funds should be distributed equitably between the Regional Working Groups to deliver their Regional SMNG Plan and measures.

Recommendation 18 - A proportion of national and regional funds should be allocated to support a range of risk-based measures that encourage innovation and address uncertain outcomes.

Acronyms / abbreviations

Acronym	Definition
ALSF	Aggregate Levy Sustainability Fund
BNG	Biodiversity Net Gain
Defra	Department for the Environment, Food and Rural Affairs
CaSP Cymru	Wales Coasts and Seas Partnership
CEMP	Coastal, Estuary and Marine Partnerships
DLUHC	Department for Levelling Up, Housing and Communities
EDP	Environmental Delivery Plan
EEZ	Exclusive Economic Zone
EIP	Environmental Improvement Plan
ELM	Environmental Land Management
EMP	East Marine Plan
GES	Good Environmental Status
GPS	Global Positioning System
HM	His Majesty's
HMC	Howell Marine Consulting
HPMA	Highly Protected Marine Area
HRA	Habitats Regulations Assessment
ICES	International Council for the Exploration of the Sea
IFCA	Inshore Fisheries and Conservation Authority
INNS	Invasive Non-Native Species
ISEP	Institute of Sustainability and Environmental Protection
LMRP	Local Marine Recovery Plans
LNRS	Local Nature Recovery Strategies
MaRePo	Marine Restoration Potential
MEPF	Marine Environment Protection Fund
MHWS	Mean High Water Springs
MLW	Mean Low Water
MMO	Marine Management Organisation
MNG	Marine Net Gain
MoU	Memorandum of Understanding
MPA	Marine Protected Area
MRF	Marine Recovery Fund
MRV	Monitoring, Reporting, and Verification
NBS	Nature Based Solutions
NE	Natural England
NGO	Non-Governmental Organisation
nm	Nautical miles
NNL	No Net Loss

Acronym	Definition
NRF	Nature Restoration Fund
NTZ	No Take Zone
NRW	Natural Resource Wales
OSPAR	Convention for the Protection of the Marine Environment of the North-East Atlantic
OWEC	Offshore Wind Evidence and Change
ReMeMaRe	Restoring Meadow, Marsh and Reef
RSPB	Royal Society for the Protection of Birds
SCM	Strategic Compensatory Measures
SEA	Strategic Environmental Assessment
SMNG	Strategic Marine Net Gain
SNCB	Statutory Nature Conservation Bodies
SPA	Special Protection Area
SUDG	Seabed User and Development Group
T&F	Task and Finish
TCE	The Crown Estate
ToR	Terms of Reference
UK	United Kingdom
UKMS	United Kingdom Marine Strategy
UNEP	United Nations Environment Plan
WCVA	Wales Council for Voluntary Action
WFD	Water Framework Directive

Glossary

Some of these definitions have been tailored to align with the purpose of this work. However, where appropriate, certain definitions have been adopted from relevant external sources and are referenced accordingly.

Term	Definition
Biodiversity Net Gain	An approach to development which makes sure that habitats for wildlife are left in a measurably better state than they were before the development (Department for the Environment, Food and Rural Affairs, 2023).
Constraint	A limitation or barrier that restricts the potential for restoration to occur in a given area, often related to feasibility, resources, or physical conditions.
Enhancement	Improvement in the quality, size or geographic distribution of a habitat or species (Natural Resource Wales (NRW), 2022). Net gain is considered an enhancement concept.
Environmental Assessment	A decision support tool used by environment and sustainability professionals to ensure that relevant environmental information is available to a decision-maker (usually a local authority or government department), before they decide whether to grant consent for a future policy, plan, or development. Most countries around the world have environmental assessment requirements enshrined in legislation, focused on plans or projects likely to generate significant environmental effects (Institute of Sustainability and Environmental Protection (ISEP), 2025).
Habitat Creation	Interventions to establish habitat in areas where there has been no known historical presence of the habitat prior to the intervention (NRW, 2022).
Marine Net Gain	Marine Net Gain is a commitment to halting and reversing marine biodiversity loss by securing overall positive outcomes for marine biodiversity. It prioritises meaningful biodiversity benefits through a wide range of actions, whether direct ecological interventions or enabling measures that support healthier, more resilient ecosystems.
Marine Plan	In England, Marine Plans guide those who use and regulate the marine area to encourage sustainable development while considering the environment, economy and society. Marine plans apply only in their area, but if a proposed activity may affect the plan area, this should be acknowledged and considered in the application and decision making. The Marine Management Organisation (MMO) is responsible for preparing marine plans in England.

Term	Definition
Measure	A specific action or initiative, designed to support the delivery of national and regional Marine Net Gain plans by contributing to ecological recovery, habitat enhancement, or biodiversity improvement at a strategic scale.
Mitigation Hierarchy	A framework that guides the management of impacts on the environment from plans or projects of any sector. It is a sequential approach that prioritises avoidance, followed by minimisation, restoration, and finally offsetting residual impacts. The hierarchy is crucial for achieving No Net Loss (NNL). (ISEP, 2024)
National Strategic Marine Net Gain (SMNG) Plan	A nationally coordinated plan that sets strategic targets and priorities for delivering Strategic Marine Net Gain at a national level. It focuses on seascape-scale recovery, highly mobile species, multi-habitat connectivity, and research and development, and is developed by the National SMNG Working Group in collaboration with Regional Working Groups.
National Strategic Marine Net Gain Working Group	A multi-stakeholder group with national expertise responsible for developing the National SMNG Plan, setting Terms of Reference for Regional SMNG Working Groups, overseeing fund allocation, auditing progress, and ensuring consistency, transparency, and alignment with national marine policy objectives such as Good Environmental Status.
Pressure	Pressures are processes that degrade a receptor over time. They often result from human activities.
Pressure reduction	A mechanism designed to lessen ongoing pressures affecting a receptor.
Receptor	A physical or biological resource or user group that may affected by a proposed project, plan or development.
Recovery	The return of an ecosystem or species to a previous or stable state after disturbance or degradation. This includes the process that occurs when a pressure has been removed or restoration has been undertaken.
Regional Strategic Marine Net Gain Plan	A region-specific plan developed by a Regional SMNG Working Group that sets out regional priorities and a suite of pre-consented SMNG measures based on local ecological baselines, pressures, opportunities, and stakeholder input. The plan guides delivery of SMNG at a regional scale in alignment with national targets.
Regional Strategic Marine Net Gain Working Group	A multi-stakeholder group with regional expertise responsible for developing Regional SMNG Plans, leading regional engagement, identifying local priorities, designing and coordinating SMNG measures, and monitoring and reporting outcomes to the National Working Group.

Term	Definition
Restoration	Rebuilding habitats or reintroducing species where they have historically been found but are either functionally extinct now or where re-establishment could not occur without assistance. (NRW, 2022).
Species Introduction	Introduction of a species where there has been no known historical presence of the species prior to the intervention.
Strategic Planning	Planning for long-term aims and aspirations, considering wider temporal and spatial scales.
Strategic Marine Net Gain	Strategic Marine Net Gain is an approach to Marine Net Gain that incorporates strategic planning, coordination, and delivery of overall positive outcomes for marine biodiversity beyond statutory requirements, by identifying opportunities for coordinated seascape-scale interventions and regionally tailored targets that deliver long-term ecological benefits.
Strategic Marine Net Gain Framework	A nationally governed (through a single body), and nationally and regionally delivered framework for Strategic Marine Net Gain that provides the structure, processes, and governance needed to identify targets, develop national and regional plans, streamline consenting, coordinate funding, and deliver long-term, strategic ecological recovery at a seascape and regional scale through SMNG measures.
Threat	Threats are potential actions or actual events that pose a significant risk to the integrity of a habitat or species or to the success of its restoration or recovery. They differ from pressures in that they represent the impact of a pressure that has not yet occurred—or is only beginning to manifest—rather than an ongoing degrading process.

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Document Control

Version	Author	Checked	Approved	Date	Description of change
1	Haskoning	SUDG	Chris Adnitt	10/12/2025	First draft
2	Haskoning	April Welsh	Chris Adnitt	19/12/2025	Second draft
3	Haskoning	Task and Finish Group	The Crown Estate (OWEC)	22/12/2025	Third draft
Final	Haskoning	Haskoning	The Crown Estate (OWEC)	31/01/2026	Final draft

1. Foundations, Drivers and Policy Context

1.1 Establishing the Task and Finish Group

In 2021, the Task and Finish (T&F) Group were established to undertake research and evidence-gathering to inform the Department for Environment, Food & Rural Affairs (Defra) on how Marine Net Gain (MNG) could be delivered effectively and how its contribution to marine restoration and recovery could be maximised. All work undertaken by the T&F Group has been funded by The Crown Estate's (TCE) Offshore Wind Evidence and Change (OWEC) Programme and chaired by the Seabed User and Developer Group (SUDG). This report represents the third and final phase of work, building on the first two phases and bringing together over four years of accumulated learning, extensive consultation, and the collective insight and expertise gained throughout.

Since its establishment, the T&F Group has comprised a diverse membership, including industry representatives, statutory nature conservation bodies (SNCBs), wildlife conservation organisations, Government bodies and regulators, as well as invited experts from environmental consultancies and Coastal, Estuary and Marine Partnerships (CEMPs). Industry participation has been critical in maintaining a constructive approach to MNG, working alongside conservation organisations whose expertise has been invaluable in highlighting environmental needs. Defra and Natural England (NE) have also been involved throughout, ensuring strong alignment with their work on MNG policy development and regulation.

Each phase has concluded with the publication of a report containing recommendations to assist Defra in developing principles and procedures for MNG and to inform any future revisions to Biodiversity Net Gain (BNG). The previous two reports are available on The Crown Estate's Marine Data Exchange and are linked below:

- Phase One: Strategic Net Gain Targets for Coastal and Marine Environments (T&F Group, 2021)
- Phase Two: Delivery Options for Strategic Marine Net Gain (T&F Group, 2023).

A full list of T&F Group members involved in Phase Three is provided below:

- ABPmer
- British Ports Association
- Energy UK
- Defra
- Haskoning
- Howell Marine Consulting (HMC)
- Joint Nature Conservation Committee
- Lincolnshire Wildlife Trust
- Marine Management Organisation (MMO)
- NE
- Renewable UK
- Royal Society for the Protection of Birds (RSPB)
- SUDG
- TCE
- The Wildlife Trusts
- UK Major Ports Group

1.2 Drivers and Policy Context

1.2.1 Why Marine Net Gain is needed

The main driver for the T&F Group was the urgent need to restore the marine environment in response to ongoing biodiversity decline. This challenge sits alongside the climate crisis and the transition toward energy security and Net Zero, which have significantly shaped how marine industries operate and plan for the future. Marine industries play a key role in the transition to net zero, and there are many examples where marine industries are making significant positive contributions to the ecosystems in which they operate. These improvements are increasingly reflected in corporate sustainability reporting and long-term strategies, with many companies voluntarily undertaking marine recovery actions in partnership with conservation bodies.

The concept of Net Gain is widely supported across UK marine industries, with a shared understanding that it can play a vital role in delivering meaningful contributions to nature recovery and improve overall marine resilience. Net Gain has been identified as a key mechanism to help halt and reverse biodiversity loss, complementing action by Government, Non-Governmental Organisations (NGOs), and other stakeholders. From January 2024, following the Environment Act 2021 (UK Government, 2021), all in-scope terrestrial and intertidal developments must deliver a minimum 10% BNG (Department for Levelling Up, Housing and Communities (DLUHC), 2024). While there is currently no statutory MNG policy, Government has committed to developing one and has completed an initial consultation on its principles, which recognised the work carried out in the first phase by the T&F Group (Defra, 2022). The commitment to introduce MNG as a statutory obligation is clear, but detailed guidance on implementation and achievable outcomes is still in development.

The Global Biodiversity Framework (United Nations Environment Plan (UNEP), 2022), the Environment Act 2021 (UK Government, 2021), and the Environmental Targets (Biodiversity) (England) Regulations 2023 (UK Government, 2023) are just a few of the environmental commitments that drive the urgency of MNG implementation. Given that the UK is one of the most nature-depleted nations in the world, with an average reduction of 19% in species since 1970 and roughly one in six species now in danger of extinction, these commitments address the need to stop biodiversity loss (State of Nature Partnership, 2023).

This urgency was reinforced during the MNG consultation by the Chair of the Office for Environmental Protection at the time, Dame Glenys Stacey, who stated:

> *"The situation in our oceans is urgent and there is no time to lose. This programme is being consulted upon against a backdrop of risks of species extinction, ongoing degradation to the marine environment, and failure to achieve Government targets."*

The Government's Environmental Improvement Plan (EIP) (Defra, 2025) builds on the vision set out in the 25-Year Environment Plan (His Majesty's (HM) Government, 2018) and, together with new powers under the Environment Act and Fisheries Act 2020 (UK Government, 2020), was intended to lay the foundations for halting nature's decline by 2030. This was described as a "decade of delivery" with target-led actions to leave the environment in a better state. Yet, as of 2025, mandatory MNG has not been introduced, leaving no formal mechanism to support developers to deliver net positive outcomes for the marine environment.

1.2.2 Current policy landscape

Throughout all three phases of work undertaken by the T&F group, MNG policy has remained largely undefined by Defra. Since the release of the Principles of Marine Net Gain consultation from Defra in 2021 and publication of responses in 2023 (Defra, 2023), which were informed by phases one and two, there have been no significant policy updates or clear delivery mechanisms.

This consultation sought strategic outcomes and a "nature-first" approach that aggregates smaller interventions into meaningful regional or national improvements (Defra, 2023). To achieve this, MNG is considered most effective when framed as a proactive, strategic recovery instrument rather than a simple calculation tied to individual project footprints.

In March 2025, the Planning and Infrastructure Bill was introduced to Parliament, and it has since completed all parliamentary stages. As of November 2025, it received Royal Assent and is now the Planning and Infrastructure Act 2025 (UK Parliament, 2025). A key aspect of this legislation of relevance to MNG is the establishment of a Nature Restoration Fund (NRF), which enables a more strategic approach to environmental recovery out to 12 nautical miles (nm). The NRF aims to focus on an overall net positive outcome, rather than focussing on individual species and sites, but our understanding is that the fund will aim to address losses resulting from development in strategic ways. This is proposed to be implemented in practice through the creation of Environmental Delivery Plans (EDP) that would combine payments from developers and NE to provide conservation measures to address the environmental impacts of developments. The aim is that by pooling resources the process should be more streamlined and nature recovery will be on a greater scale and less fragmented, which would maximise environmental benefits. The delivery of conservation measures would be undertaken by NE and third parties, such as habitat banks, private landowners and Government NGOs.

Between March and May 2025, Defra consulted on the Marine Recovery Fund (MRF) (Defra, 2025a). On the 17th December 2025 it was established under section 292 of the Energy Act 2023 and implemented through The Marine Recovery Funds Regulations 2025 (SI 2025/1230) (UK Parliament, 2025). The fund is now operational and provides a voluntary mechanism for offshore wind developers to pay into a government-managed scheme that delivers strategic compensatory measures for unavoidable impacts on Marine Protected Areas (MPAs). The Government has confirmed that the MRF will enable compensation to be delivered at scale across multiple projects, through its approved library of strategic compensatory measures (SCMs) (Defra, 2025). The library currently includes MPA designation and / or extension, and in the future may include predator control for seabird recovery, and artificial nesting structures. At present, the MRF applies only to the offshore wind industry and covers compensation requirements under the Habitats Regulations, with no current commitment or timeline for expansion beyond this.

Both the MRF and NRF present potential framework options for marine environmental restoration and recovery that could inform how MNG may operate, particularly due to the focus on pooling funds into a central pot to deliver pre-determined strategic measures. This moves away from delivering site-specific measures and allows larger collated funds to deliver wider scale strategic marine recovery. However, it should be stressed that the MRF is designed solely to fulfil statutory Habitats Regulations Assessment (HRA) compensation obligations, rather than to deliver additional biodiversity gains above and beyond that statutory obligation. Whereas the NRF aims to deliver EDPs, which set out packages of conservation measures sufficient to address one or more environmental impacts of development and to secure an overall environmental uplift.

For the NRF, contributions will be set through a fixed levy, whereas for the MRF they are based on the specific SCM taken forward. Each SCM's cost reflects market-based procurement prices, full lifecycle expenses (including delivery, maintenance, monitoring, and decommissioning), and administrative and adaptive management overheads applied by the MRF Operator - Defra. For current measures, Defra has established a standardised cost expressed as £ per km² (Defra, 2025a). Like other environmental mechanisms, these approaches often operate in isolation within rigid, sector-specific or jurisdictional boundaries. When combined with mandatory terrestrial BNG requirements extending to Mean Low Water (MLW), this separation limits opportunities to address the interconnected nature of land–sea ecosystems.

Nonetheless, progress towards marine recovery in the UK is already underway, both indirectly through existing management initiatives such as managed realignment schemes, and fisheries byelaws, and directly through voluntary contributions to marine conservation and restoration projects, alongside initiatives such as The Crown Estate's requirement for "Positive Environmental Outcomes" in leasing rounds. Such positive steps toward improving biodiversity should be supported but should not detract from the need for a statutory mechanism to deliver MNG effectively.

Significant work is ongoing to address this, and the T&F Group's efforts across all three phases demonstrate clear synergies with a range of related workstreams currently underway. Multiple members of the T&F Group are actively engaged in these parallel initiatives, providing valuable insight into how emerging approaches are converging. This reinforces that these are not isolated or competing pieces of advice but collectively aligned contributions that point toward a coherent direction for MNG. These complementary initiatives that support the delivery of MNG are summarised in **Table** .

Table 1 - Key completed and ongoing workstreams that can support MNG delivery.

Title		Organisation Responsible	Description	Delivery Status
Marine Net Gain Assessment Framework		NE	This project delivered a structured framework for assessing MNG in England. It sets out clear principles, metrics, and governance considerations to translate policy ambition into practical assessment, addressing baselines, additionality, proportionality, uncertainty, and transparency. The framework aligns assessment with marine policy objectives, including Good Environmental Status (GES), and is designed to be usable by regulators and developers. It provides a consistent basis for decision-making and forms a foundation for linking MNG to funding, delivery, and monitoring mechanisms.	Published 26th January 2026
Marine Net Gain Evidence Programme	MNG and Wider Restoration Measures	NE	An evidence project that will inform the development of MNG and nature positive policy by collating a set of marine enhancement options for effective restoration delivery.	Throughout 2026
	Local Marine Recovery Plans (LMRPs)		Similar to Local Nature Recovery Strategies (LNRS), but for MLW and beyond, LMRPs would prioritise key habitats and pressures, co-ordinate funding and governance, support a range of recovery actions, incorporate natural capital valuation and include monitoring and adaptive evaluation.	
	Navigating MNG and Nature Positive		An advice piece covering a wide range of aspects such as Nature Inclusive Design, Marine Irreplaceable	

Title		Organisation Responsible	Description	Delivery Status
			Habitats that will continue to be developed as MNG and wider nature positive policy is developed.	
	Exploring MNG and Marine Enhancement Funding Mechanisms		This project is identifying and evaluating funding and finance options capable of supporting MNG delivery at scale. It reviews a wide range of public, private, voluntary, and blended finance models, assessing governance, sources of capital, scalability, monitoring, and long-term legacy. The work will clarify how developer contributions and private capital could be mobilised responsibly, while maintaining environmental integrity and public confidence. Outputs provide design considerations for future MNG funding models that align with emerging nature markets and sustainable finance principles.	
	MNG and Nature Restoration Demonstrator Project		This project is examining how marine recovery and restoration outcomes can be demonstrated in practice, a critical requirement for policy credibility and investor confidence. It reviews over thirty UK marine restoration and recovery initiatives, assessing delivery models, monitoring approaches, costs, and governance. The work identifies good practice and evidence gaps and sets out recommendations to improve how gain is evidenced and linked to MNG principles. Outputs support the development of robust monitoring and reporting approaches that can underpin future MNG policy and investment mechanisms.	

Title	Organisation Responsible	Description	Delivery Status
Marine Plan Updates	MMO	For example, the development of the EMP replacement, after the MMO's third three-year report. The next stage will see the draft EMP policies released for public consultation in summer 2026.	Q2 2026
Marine Delivery Routemap	The Crown Estate	A tool using spatial mapping, an overview of seabed demands across sectors and nature, and inputs from industry and stakeholders to digitally map the seabed resource needed to meet future objectives.	Q1 – Q3 2026
Marine Restoration Potential Plus (MaRePo+)	NE	Funded through the OWEC Programme, MaRePo+ built on the proof-of-concept study which assessed the restoration potential of threatened marine habitats (MaRePo). MaRePo+ further refined this work, including mapping additional habitats and developing pilot restoration guidance and identifying priority species for recovery.	Published October 2024
Marine Net Gain Market Analysis	Defra	The analysis provided insights into the costs to industry associated with the application of a potential MNG mechanism for England, and conclusions and recommendations were drawn. It also analysed the factors which would be likely to influence potential MNG supply and demand.	Published June 2024

2. Summary of Phases by the Task and Finish Group

Section 2 of this report provides an overview of the significant efforts the T&F Group have undertaken across all three phases.

2.1 Phase One

Phase One began with a gap analysis of existing legal and policy objectives to identify potential priorities for MNG. This was followed by 'calls for evidence' to gather views on opportunities and priorities for MNG.

To ensure a shared understanding, the T&F Group agreed on a set of assumptions to guide discussions. These assumptions were central to determining strategic targets and assessing their deliverability by industry under potential future MNG obligations. All discussions were based on the principle that the mitigation hierarchy would continue to apply to development.

The outcome of this work was a robust set of strategic targets (**Table 2**) for MNG "SMNG targets", developed with strong consensus across industry, regulators, and conservation bodies. These targets provided a clear direction for how developments could contribute to restoring and improving the marine environment, aligned with national strategic priorities. The findings informed the assumptions and recommendations for MNG obligations and priorities which fed into a final report - Strategic Net Gain Targets for Coastal and Marine Environments (T&F Group, 2021).

Table 2 - Strategic targets developed by the Task and Finish Group during Phase One.[1] (T&F Group, 2021)

Action Theme	Action Subject	Suggested Targets	Target Time Scales	Can and How Could Industry Contribute?
Climate change	Manage climate change impacts: • Protect blue carbon stores • Reduce emissions to meet net zero • Reduce ocean acidification	1. Limit temperature rise to 1.5^{o}C 2. Net zero emissions by 2050 3. Reverse biodiversity decline 4. Blue Economy Framework Action Plans	1. 5 - 20 years 2. 5–20 years 3. 5–20 years 4. within the next 5 years	**Yes.** Account for natural capital within the full supply chain of business practice, fund strategic monitoring work, consider nature-based solutions to development.
	Encourage renewable energy	1. 30% of the new Environmental Land Management (ELM) scheme dedicated to coastal sustainable activities	1. within the next 5 years	**No**. Government led.
Economic	Green jobs for communities	1. Fund employment in green jobs and research in Nature Based Solutions (NBS)	1. within the next 5 years	**Yes**. Provide funding.
Education/ Engagement	Educate: • Importance of natural coastal defences • Importance of coastal habitats • Importance of marine habitats	1. One 'Environmental, Habitat, Species and Awareness Raising Ranger' for every 100 overnight stays	1. 5–20 years	**Yes**. Provide funding.
	Engage stakeholders: restoration/ enhancement schemes	1. Media campaigns collaboratively with media outlets, national organisations and councils	1. 5–20 years	**Yes**. Provide funding for, or undertake, media campaigns to engage stakeholders.
Eutrophication	Habitat restoration: Reduce pressure on eelgrass	1. Start in one major estuary where eelgrass loss has been extensive	1. 5–20 years	**Yes**. Provide funding to pooled fund e.g. to reduce nutrients.
	Reduce pollution: • improve water quality • nitrogen and sediment • reduce nutrient pressure	1. Water Framework Directive (WFD) targets 2. xx % reduction in nitrogen and other pollutants (inc. sediment) 3. Restore eutrophic waterbodies to GES by 2050 4. Reduce nutrient runoff (land, sewage, diffuse) but 50% 5. Reduce waste to pre-1990 levels by 2030 6. Introduce alternative farming sites to cut down on nitrates	1. 5–20 years 2. 5–20 years 3. 20 + years 4. within the next 5 years 5. 5–20 years 6. -	**Yes**. Predominantly the responsibility of wastewater companies but industry could help offset nutrients by restoring/ creating habitats with a filtration capacity e.g. mussel beds.
	Reduce pollution: improve sewage works	1. Investment in sewage treatment infrastructure	1. 5–20 years	**No**. Led by water treatment companies.
Habitat restoration or creation	Restoration or creation of habitats	1. Consider restoration and enhancement in a transboundary context 2. Restore combinations of habitats, focus should not be around just one 3. Include climate change considerations in restoration 4. Development of a comprehensive strategic framework	1. within the next 5 years; 5-20 years 2. - 3. - 4. 5–20 years	**Yes**. Through net gain, habitat restoration and climate adaptation work and combined working e.g. offshore wind farms or farming/culturing facilities collaborating and providing new artificial habitat for biodiversity. artificial 3D structures. Provide funding to pooled fund to support restoration efforts e.g. to a nature recovery fund or environmental improvement funds.
	Identify restoration targets and priorities	1. Identify and map restoration possibilities and priorities 2. 10% net gain by 2025, 15% by 2030, 20 % by 2035 3. Use ecosystem services to determine the value	1. within the next 5 years 2. within the next 5 years 3. within the next 5 years	**Yes**. Government led however sharing of data might help or providing funding e.g. nature recovery fund. Undertaking net gain required as part of development.
	Improving existing infrastructure (enhancement/ greening the grey)	1. Government to produce guidance on nature-inclusive design/ determine appropriate enhancement measures 2. xx no. of structures 'greened'	1. within the next 5 years 2. within the next 5 years	**Yes**. No.1 is Government led however industry could provide funding for research. Ports, harbours, developers with coastal infrastructure could implement 'greening'
	General seabed habitats	1. Habitat creation 2. Create wetlands to prevent inland flooding and provide natural habitats 3. Creation of xx ha of benthic protected habitats or features 4. Restoration of coastal and subtidal habitats that provide carbon sequestration, coastal protection 5. Identify 5 areas for each priority habitat which has been lost in the UK and re-create half of this area for each habitat	1. within the next 5 years; 5-20 years 2. 5- 20 years 3. within the next 5 years 4. 20 + years 5. 5–20 years	**Yes**. Through net gain, habitat restoration and climate adaptation work. Intertidal creation through managed realignment. Provide funding to pooled fund to support restoration efforts e.g. to a nature recovery fund or environmental improvement funds.

[1] *To avoid proposing arbitrary targets before assessing what is realistically achievable, the T&F Group has used placeholder values (e.g. 'xx ha', 'xx%') where specific quantitative targets are suggested.*

Action Theme	Action Subject	Suggested Targets	Target Time Scales	Can and How Could Industry Contribute?
	Managed realignment to prevent rising sea level	1. Coastal realignment and controlled retreat (to rising seas) 2. By 2030 only develop brown coastal land 3. xx hectares of land reclaimed 4. xx number of Natural flood management schemes implemented in freshwater systems covering xx kms of waterbody	1. 5–20 years 2. within the next 5 years 3. within the next 5 years 4. within the next 5 years	**Yes**. Through direct habitat creation/ restoration e.g. managed realignment, net gain. Provide funding to pooled fund to support restoration efforts e.g. to a nature recovery fund or environmental improvement funds.
	Bivalve reefs (mussels, oysters)	1. Create/restore 1,000 ha oyster reef, 1,000 ha Modiolus beds and 1,000 ha mussel bed 2. 200 ha blue mussels + increased management of farming	1. 5–20 years 2. 5–20 years	**Yes**. Provide funding to pooled fund to support restoration efforts e.g. to a nature recovery fund or environmental improvement funds. Through direct habitat creation/ restoration e.g. managed realignment, net gain.
	Saltmarsh	1. Create 10,000 ha of saltmarsh (both restoring old poor habitat, and new) 2. 10,000 ha saltmarsh 3. 25,000 ha saltmarsh 4. 20,000 ha saltmarsh	1. 5–20 years 2. 5–20 years 3. 20 + years 4. 5–20 years	**Yes**. Provide funding to pooled fund to support restoration efforts e.g. to a nature recovery fund or environmental improvement funds. Through direct habitat creation/ restoration e.g. managed realignment, net gain.
	Seagrass	1. Create 100% more ha of both subtidal and intertidal seagrass 2. 10,000 ha seagrass 3. 5,000 ha seagrass 4. 1,000 ha seagrass (create or restore) 5. 5-10 ha in 2 years, 10-50 ha in 5 years, 500 ha within 20 years 6. Increase the extent of seagrass beds across the UK by 10% 7. Eco-friendly moorings within seagrass	1. 5–20 years 2. 5–20 years 3. 5–20 years 4. 5–20 years 5. within the next 5 years; 5-20 years 6. within the next 5 years 7. within the next 5 years	**Yes**. Provide funding to pooled fund to support restoration efforts e.g. to a nature recovery fund or environmental improvement funds. Through direct habitat creation/ restoration e.g. managed realignment, net gain.
	Mudflats	1. 10, 000 ha mudflats	1. 5–20 years	**Yes**. Provide funding to pooled fund to support restoration efforts e.g. to a nature recovery fund or environmental improvement funds.
	Maerl	1. Increase protection of maerl beds - Discrete Highly Protected Marine Areas (HPMA)/No Take Zone (NTZ)s for The Manacles, St Mawes, Helford River, Swanage Bay, Bembridge and other recognised beds	1. within the next 5 years	**No**. Government led.
	Kelp forests	1. Reduce damaging pressure on areas of historic forest	1. 5–20 years	**No**. Industry not able to reduce fishing pressure, must be government led. Potential options for industry: Provide funding to pooled fund to support restoration efforts e.g. to a nature recovery fund or environmental improvement funds.
	Estuaries	1. Good Ecological Potential (WFD objective in Highly Modified Water Bodies) 2. Reconnect estuary habitats to tributary catchments 3. Reducing the impact of water flow speed increases in estuaries	1. 20 + years 2. 20 + years 3. 20 + years	**Yes**. Provide funding to pooled fund to support restoration efforts e.g. to a nature recovery fund or environmental improvement funds.
	Cold-water coral reefs/ biogenic reef	1. 50% increase in current levels 2. Reduce damage by fishing and other activities 3. Increase the extent of biogenic reefs across the UK by 10%	1. 5–20 years 2. 5–20 years 3. within the next 5 years	**No**. Industry not able to reduce fishing pressure, must be government led. Potential options for industry: Provide funding to pooled fund to support restoration efforts e.g. to a nature recovery fund or environmental improvement funds.
	Subtidal mud (inc. sea pen and burrowing megafauna communities)	1. 30% of the subtidal mud habitat is either protected or subject to restorative measures, and a minimum of 15% under MPA protection	1. 5–20 years	**No**. Protection is government led and industry not able to reduce fishing pressure/ damage. Potential options for industry: Provide funding to pooled fund to support restoration efforts e.g. to a nature recovery fund or funding for research e.g. development of less destructive gear.

Action Theme	Action Subject	Suggested Targets	Target Time Scales	Can and How Could Industry Contribute?
Species restoration/ protection	Birds	1. Eradicate rat and fox predation as a significant pressure on seabird colonies 2. Create 10 new tern colonies using floating rafts 3. Ban UK sandeel fishery 4. Protect salt stacks as bird resting areas 5. Creation of artificial nesting habitat for seabirds e.g. kittiwake, gannet – 1,000 nesting pairs as a trial 6. eradicate all non-native invasive mammalian predators from all current and historically used breeding seabird islands	1. within the next 5 years 2. within the next 5 years 3. within the next 5 years 4. within the next 5 years 5. within the next 5 years 6. 5–20 years	**Yes**. Provide funding to pooled fund to support restoration efforts e.g. to a nature recovery fund or environmental improvement funds. Predator control at nesting sites. **No**. Industry not able to reduce fishing pressure, must be government led. Protection must be government led.
	Fish	1. Captive breeding and release of e.g. lobsters, eels, other fish 2. Restore salmon populations within conservation limits 3. Achieve silver eel escapement target 4. Restore breeding populations of allis and twaite shad and smelt in 10 estuaries	1. within the next 5 years 2. 5–20 years 3. 5–20 years 4. 5–20 years	**Yes**. Provide funding to pooled fund to support restoration efforts – develop farming/ rearing techniques or funding specific projects. Protection will be government led but could create nursery areas within wind farm arrays.
	Sandeel	1. Improve breeding and nursery grounds for sandeel and other key fish species by creating exclusion zones 2. Restore sandeel population 3. Reduce sandeel catches by 66% 4. Reduction to trawling in sandeel habitat 5. Area closures: whole of the UK Exclusive Economic Zone (EEZ), or as a minimum Dogger Bank and Scottish EEZ	1. within the next 5 years 2. 20 + years 3. within the next 5 years 4. within the next 5 years 5. within the next 5 years	**No**. Government led. Potential options for industry: collaborative reduction in cumulative pressures, reduce sandeel use in animal feed and find a more sustainable alternative (research), use wind farm arrays as fishing exclusion zones.
Human pressure	Shipping	1. Reduce the amount of disturbance in marine areas shipping, dredging, fishing activities – 10% of the world coastal areas as no access zones 2. Control large vessel anchorage/ implement safe anchorage points	1. 5–20 years 2. within the next 5 years	**No**. Government led.
Human pressure: Aquaculture	Sustainable aquaculture	1. Reduce open cage aquaculture, replacement options 2. Encourage establishment of sustainable aquaculture seaweed and shellfish farming	1. 5–20 years 2. within the next 5 years	-
Human pressure: Dredging	Aggregate extraction	1. Research to address impacts of sediment removal 2. Recycle aggregate material to reduce extraction requirement	1. 5–20 years 2. 5–20 years	**No**. Dredging management will be government led. Potential options for industry: collaborative reduction in cumulative pressures, fund research, share data.
Human pressure: Fisheries	Fisheries management • Sustainable fisheries • Bottom gear	1. Stop all bottom dredging in UK waters 2. Stop dredging within a 5-mile radius of the coast 3. Manage bottom towed fishing gear 4. Ban on scallop dredgers e.g. in Irish sea 5. Licence and reduce trawling effort in vulnerable habitats to zero 6. Reduce bottom trawling by 50%, develop no trawl zones which cover a minimum of 30% of marine area 7. Create xx ha per year of fishing exclusion zones 8. Reduce the extent of bottom impacting fishing activities within protected sites by 50% or more 9. Create at least 3 120,000 square mile NTZs 10. Biodegradable fishing net/ materials 11. Complete ban on super trawlers within the 12 nm limit	1. 5 - 20 years 2. within the next 5 years 3. within the next 5 years 4. within the next 5 years 5. within the next 5 years 6. 5–20 years 7. within the next 5 years 8. within the next 5 years 9. within the next 5 years 10. 5–20 years 11. 5–20 years	**No**. Preventing fishing/ dredging will be government led. Potential options for industry: collaborative reduction in cumulative pressures, research more sustainable methods/ materials, use wind farm arrays as fishing exclusion zones.
	Fisheries management: By-catch	1. Requirements for 75% of fishers to use biodegradable, traceable nets by 2030. 2. 100 % biodegradable gear by 2040 3. Reduce ghost fishing with Global Positioning system (GPS) tracking on gear and penalties 4. Monitoring improvements through rollout of Remote electronic monitoring (REM) with cameras	1. within the next 5 years 2. 5–20 years 3. within the next 5 years 4. within the next 5 years	**No**. Fishing industry and government led. Inshore Fisheries and Conservation Authorities (IFCAs) to support/ implement.
	Ecosystem based fisheries management	1. International Council for the Exploration of the Sea (ICES) approach amended to include key predator sp. and prey relationships	1. within the next 5 years 2. within the next 5 years	**No**. Government to define.

Action Theme	Action Subject	Suggested Targets	Target Time Scales	Can and How Could Industry Contribute?
		2. Fisheries management is at a scale that matches ecosystem processes (1-10 km, 3-6 months)		
	Fisheries management: reduce pressure on cetaceans	1. Remove major causes of cetacean loss including by catch in fishing nets – 10% prevention of loss 2. Implement noise guidance for seabed habitats 3. By-laws to implement rope-less creel fishing to reduce marine mammal entanglement (trial within windfarms)	1. within the next 5 years 2. within the next 5 years 3. within the next 5 years	**No**. Government led. Potential options for industry: support in implementation of guidance and windfarm industry could support trials (target 3).
Human pressure: Recreation	Manage recreational disturbance • paddle sport, bait digging, drones, jet skis, boats, trampling	1. Managing existing and new activities in the marine area 2. Introducing rangers and setting codes of conduct for recreational use 3. Environmental recovery tax for every overnight stay. All coastal commercial activities to be licenced funded by relevant industry 4. No disturbance to protected habitats – monitor number of visitors per year, observations of impact, wildlife surveys to report/reflect any changes 5. Change land habitat to take pressures off the coast; strategic alternative green space for recreation 6. All commercial water users to be accredited (e.g. WiSe) – funding used to monitor/ police activity 7. xx % recreational/other craft using "better" effluent disposal, xx signs erected to warn recreational users of impacts	1. within the next 5 years 2. within the next 5 years 3. within the next 5 years 4. 5–20 years 5. - 6. within the next 5 years 7. within the next 5 years	**No**. Government and tourist industry led. Potential options for industry: support in implementation of guidance or provide funding to pooled fund e.g. nature recovery fund or environmental improvement funds.
Invasive Non-Native Species (INNS)	Prevention and monitoring of INNS	1. Monitoring program in place by 2025 2. Action plan/ management options developed based on evidence	1. within the next 5 years	**Yes**. Implement management options to control invasive non-native species.
Litter	Reduce plastic/ litter	1. Remove 100 tonnes of marine litter per year 2. Total ban on use of micro plastics	1. within the next 5 years 2. within the next 5 years	**Yes**. Investing in plastic reduction policies and research. Reducing plastic use where possible. Government/ industry collaboration on carbon-pricing and credits.
	Reduce plastic: screening of effluents/ sewage	1. All sewage treatment works (STWs) to micro-screen final effluents to reduce plastics 2. Remedial action to crude sewage screens to reduce plastics 3. Screening combined sewage overflow to reduce plastics - greatest load (spill frequency and volume) 10%ile	1. within the next 5 years 2. within the next 5 years 3. 5–20 years	**No**. Wastewater/ sewage treatment company led. Potential options for industry: provide funding to pooled fund to support implementation.
Policy	Nature recovery and resilience in spatial planning, including: • Climate change considerations • Strategic approach • Integrated development	1. Medium/long-term ecosystem change considered in decision making, inc. climate change and ocean acidification impacts 2. Restoration policies that tackle biodiversity and climate change 3. Establish regional biodiversity credit or bank schemes, at least one per Marine Plan Area in England 4. Ensure net gain is equitable across all sectors	1. within the next 5 years 2. within the next 5 years 3. within the next 5 years 4. 5–20 years	**No**. All policy decisions will be government led. Potential for industry: Support development of strategic goals, provide data to inform decision making.
	Protect sensitive features/ areas from development	1. Create 100 ha per year of marine exclusion zones 2. No properties built or redeveloped in a coastal flood risk zone by 2030 3. No development in protected areas that have any impact or loss of habitats/species	1. within the next 5 years 2. 5–20 years 3. within the next 5 years	**No**. Government led.
	Development in low quality habitat	1. Derelict or non-occupied property vacant for more than 1 year should be demolished and reclaimed to habitat if within 100 m of an estuary or coastal edge	1. 5–20 years	**No**. Government led.
	Mitigation hierarchy to development NNL, net gain	1. Checklists to licencing/ policy developments to ensure mitigation hierarchy appropriately implemented 2. Restore 10 ha seagrass habitat 3. Re-use of abandoned buildings, include nature-based solutions	1. within the next 5 years 2. 5–20 years 3. within the next 5 years	**Yes**. Prevent destructive practices in sensitive habitats (e.g. no dredging in seagrass) and encourage development in low quality habitats, work alongside councils and stakeholders.
	NBS	1. Legislation to include NBS by 2030 2. 25% uplift on species/ habitat diversity by 2030	1. 5–20 years 2. 5–20 years	**Yes**. Elements government led but can incorporate ecosystem services into planning applications and incorporate net gain to achieve habitat uplift.

Action Theme	Action Subject	Suggested Targets	Target Time Scales	Can and How Could Industry Contribute?
Protection	MPA management, condition improvement	1. All MPAs to be in Favourable Condition 2. Bring all designated sites into favourable condition 3. Ensure MPAs are not seen as 'paper parks'	1. within the next 5 years 2. – 3. within the next 5 years	**Potentially**. Management of MPAs is government led. Potential for industry: Developers could deliver or financially contribute to measures to achieve favourable condition, subject to additionality considerations.
	MPA creation	1. Designate 10 further MPAs across the UK by 2030 2. Increase the numbers of NTZs/ HPMAs to cover 10% of English waters to 12 nm limit 3. 33% of UK waters to be fully protected (no fishing, aggregate extraction, oil and gas etc.)	1. 5–20 years 2. 5–20 years 3. 5–20 years	**No**. Government led.
	MPA creation: collaborative areas	1. Protect areas from fishing in partnership with cables or wind farms 2. Co-locate renewable energy arrays within protected areas	1. 5–20 years 2. 5–20 years	**No**. Government led. Potential for industry: Industry, in particularly offshore wind, could work with statutory bodies to consider opportunities.
	Other habitat/ species protection	1. Do not permit development on any existing priority habitat 2. Protection for keystone species 3. Classification of new Special Protection Areas (SPAs) to protect bird nesting habitats and prey species 4. Exclusion zones around shared cables	1. within the next 5 years 2. 5–20 years 3. - 4. within the next 5 years	**No**. Government led. Potential for industry: Industry could work with statutory bodies to consider opportunities.
Research	Delivery of enhancement/ environmental funding	1. Explore practical tools and mechanisms for delivery of enhancements through environmental enhancements funds 2. Commit £10 million per year to marine environmental research, specifically Net Gain opportunities 3. Improve research on restoration methods 4. Designate 5 quiet ocean areas around the UK for study 5. Marine industries funding post-mortems for 30% of all marine species stranding's 6. Explore whether existing marine works have environmental benefits 7. Fund scientific research on the cumulative impacts to habitats and species 8. Develop blended finance mechanisms to provide funding to development to achieve net loss/ net gain	1. within the next 5 years 2. within the next 5 years 3. within the next 5 years 4. within the next 5 years 5. 5–20 years 6. within the next 5 years 7. within the next 5 years 8. 5–20 years	**Yes**. Provide funding to pooled fund to support research.
	Industry innovation/ sustainability	1. Supporting innovation in the propagation of mariculture technology 2. Understand cumulative effects of offshore wind	1. within the next 5 years 2. within the next 5 years	**Yes**. Provide funding to pooled fund to support research. Government to define use but industry can support implementation.
Underwater noise	Reduce underwater noise	1. Implement noise guidance on all seabed (not just MPAs) 2. Funding grants to encourage boat manufacturers to develop quieter engines	1. within the next 5 years 2. within the next 5 years	**Yes**. Government to implement/ define levels but industry can support implementation.

2.2 Phase Two

For Phase Two the T&F Group explored how best to deliver the strategic targets identified in Phase One. A database of existing and planned marine restoration projects was compiled, allowing development of an initial spatial model to estimate potential future demand for MNG restoration based on forecast development activity and residual impacts.

The first call for evidence identified over 700 projects and proposals aimed at reducing pressures or restoring marine and coastal habitats. Most initiatives focused on pressure reduction, such as fisheries management measures and MPA management, which benefit seabed habitats and dependent species. Coastal projects frequently involved saltmarsh and mudflat creation, while restoration efforts increasingly targeted seagrass and saltmarsh habitats, alongside measures to reduce pressures on seabird and wading bird populations.

The second call for evidence provided insights into limitations of current restoration initiatives, ecological priorities, and potential mechanisms to support Strategic Marine Net Gain (SMNG) delivery. This work helped assess successes, challenges, and opportunities, refining the strategic targets and recommendations.

The refined strategic targets focused on ecosystem-based recovery and included:

- Restore and/or create intertidal and nearshore habitats, such as:
    - Mudflat and sandflat
    - Saltmarsh and reedbed
    - Seagrass beds
    - Native oyster habitats
    - Kelp forests
- Restore offshore habitats, including:
    - Native oyster reefs
    - Biogenic reefs (e.g., Modiolus and serpulid reefs)
    - Subtidal sands, muds, and gravels
- Support and restore fish populations, including essential fish habitats and forage fish species.
- Support populations of birds, particularly seabirds at risk from pressures such as offshore energy and Highly Pathogenic Avian Influenza.
- Support populations of marine mammals, improving resilience and reducing pressures such as underwater noise and bycatch.
- Reduce pressures on marine ecosystems, including:
    - Fisheries management measures
    - Pressure reduction on irreplaceable subtidal habitats (e.g., sandbanks, sea pen habitats)
    - Pollution reduction (e.g., sewage outflows, contaminants)

    - Removal of invasive species

- Enable research and innovation to develop and test novel restoration techniques and improve understanding of intervention success.

The T&F Group concluded that further work was needed to test the application of these targets at a local level through a pilot study. The East Marine Plan (EMP) areas (MMO, 2025) were selected for this pilot due to the significant ongoing inshore and offshore development and highest estimated future demand for MNG. The timing also aligned with the MMO process to replace the EMP, creating an opportunity to inform the evidence base for the replacement EMP with practical content on MNG.

As before, evidence gathering was central to shaping the outputs from Phase Two and the recommendations which were fed into a final report - Delivery Options for Strategic Marine Net Gain (T&F Group, 2023) and informed the evidence and research exercises undertaken in Phase Three.

2.3 Phase Three

Since the beginning of 2025, Phase Three has been focusing on applying the SMNG targets (**Table 2**) at a regional level through a pilot study. As concluded in Phase Two, the EMP areas (both inshore and offshore areas) were chosen as the pilot area. This phase examined how regional knowledge and practical experience can shape effective delivery of MNG and provide insights into on-the-ground requirements and implementation challenges. Combining this with the outcome of other work being undertaken on MNG by NE (**Table 1**), this created the opportunity to set out the key requirements for a successful SMNG framework; one that drives marine environmental recovery while supporting sustainable economic growth and accommodating marine industry and development within existing regulatory mechanisms.

The T&F Group use the term SMNG to describe an approach to MNG delivered through a strategic framework **(Section 3.2**), distinguishing it from MNG policy and MNG that may be implemented at an individual project level. However, this distinction does not prevent individual project level MNG (**Recommendation 9**) from contributing to, or aligning with, the broader principles of SMNG. Phase Three was structured around discrete tasks (milestones) that have significantly informed this report. Two key tasks include:

- Evidence and Research Gathering 1
- Evidence and Research Gathering 2

A summary of these milestones and their outputs are provided below. Collectively, all outputs by the T&F Group underpin the recommendations presented in the Executive Summary and throughout **Section 3**. These recommendations should be read alongside the supporting text that provides the justification, and supporting information regarding the proposed implementation, of the recommendations. It is important that the recommendations are considered as an integrated package, which the T&F Group believe would have the greatest impact on delivering MNG effectively—particularly through the SMNG framework.

Three "Navigational Charts" (**Section 4**) and step by step guidance has also been developed to visually guide the reader through the recommendations and strengthen their practical application when navigating this complex process and how it interlinks with existing regulatory obligations and initiatives.

2.3.1 Evidence and Research Gathering 1

The first evidence gathering exercise focused on building a baseline understanding of the EMP areas including the priorities, pressures, constraints, and opportunities for the marine and coastal environment. This was achieved through targeted consultation and comprehensive evidence gathering with key local stakeholders, including conservation bodies, fisheries regulators, marine industry representatives, and CEMPs.

To support this, a spatial data tool was developed to visualise and analyse key features of the area, their condition, and the level of connectivity between marine and coastal habitats and species. This tool helped to determine spatial constraints for MNG measures across the region. A set of questions guided stakeholder engagement and helped shape a holistic view of the EMP areas, complemented by a review of the MMO's progress in replacing the EMP. These steps provided valuable insight into the region's characteristics.

The exercise also sought to deepen the understanding of the ongoing demand for MNG and review existing and potential initiatives, assessing their pathways and barriers within the context of the EMP areas. Through this process, opportunities for biodiversity enhancement were identified and a 'long list' of 234 MNG measures with potential for both regional, and in some cases national application were produced to help inform subsequent tasks - Evidence and Research Gathering 2.

Crucially, stakeholders recognised the EMP areas significant potential for restoration and enhancement but also reported that this is constrained by fragmented governance, regulatory complexity, data gaps, and limited community engagement. The findings emphasise that successful delivery of MNG must be grounded in local knowledge, supported by robust evidence, and enabled through collaborative partnerships. Community acceptance, long-term funding, and capacity building emerged as essential factors for success.

Full details of the aims and outcomes of this exercise can be found in the Evidence and Research Gathering 1 report (T&F Group, 2025)

2.3.2 Evidence and Research Gathering 2

The second evidence gathering exercise built on the first and focused on qualitatively analysing the 'long list' of 234 potential measures identified during the consultation process in Evidence and Research Gathering 1, ranging from habitat restoration and species recovery to pressure reduction and policy engagement.

The long list was refined by removing duplications, excluding measures already funded through other mechanisms, and consolidating similar proposals. This process resulted in a 'short list' of 25 measures, which were then qualitatively assessed against a structured framework which included alignment with the strategic targets, the EMP areas habitat and species recovery needs, contribution to GES, provision of ecosystem services, feasibility, and potential constraints or risks. Other qualitative considerations included ecological trade-offs, socio-economic implications, and confidence in implementation.

The outcome of this exercise was to identify high-value opportunities for SMNG in the EMP areas including:

- Support towards the implementation of byelaws to manage fishing pressure in designated sites
- Managed realignment projects to create saltmarsh and bird habitats

- Support towards the implementation of Marine Recovery Zones[2]
- Marine Restoration Hubs to provide seed/nursery facilities for species such as oysters, seagrass, and saltmarsh
- Oyster restoration on rougher seabed
- Saltmarsh and saline lagoon creation
- Seagrass restoration

This exercise highlighted the importance of recognising the ecosystem services that a region provides. When considering the removal or reduction of activities that place pressure on the environment, actions that may be necessary to support the recovery of key habitats and species, it is essential to understand the potential implications for those whose livelihoods depend on these resources. Reflecting on these trade-offs, there is a need to identify and support viable alternatives that enable these essential services to continue while also facilitating ecological restoration. Such alternatives may involve helping affected groups transition toward lower-impact practices, adopt sustainable technologies, or diversify their activities so that ecosystem services can be maintained without compromising biodiversity recovery.

The evolution of the short list brought together a wealth of information for the EMP areas and enabled initial priorities to be derived to guide the development of SMNG for the region. This process also allowed an insight into what processes and considerations would be important for implementing SMNG and therefore helped to develop the recommendations to be taken forward.

Full details of the aims and outcomes of this exercise can be found in the Evidence and Research Gathering 2 report (T&F Group, 2025a). Some of the key lessons from both exercises included:

- Where possible, incorporate existing programmes and initiatives to enable efficiencies.
- Utilise the multiple spatial tools that already exist to inform regional baselines.
- More extensive consultation is needed to inform regional measures.
- Regional measures must be grounded in local knowledge.
- Community engagement and acceptance is key to successful delivery.

[2] *A conceptual idea for creating areas to be left for the recovery of nature and trialling species reintroduction.*

3. Recommendations for MNG Implementation

The following section details the recommendations that have been developed using several key inputs during Phase Three, including:

- Findings from Phase One and Two.
- Input from all members of the T&F Group including work that is associated with them or their organisations on MNG.
- Consultation with local stakeholders to inform the pilot study and develop the targets and priorities for the EMP areas.
- Findings from Evidence and Research Gathering 1 and 2.

The recommendations developed are designed to support Defra's decision-making in advancing MNG policy and an overriding consideration from the T&F Group is that they should be viewed as a cohesive package rather than individual options. The development of each recommendation and why they are important in their own right and as part of a comprehensive package is justified below, offering insight into their development and explaining how they could be applied in practice. Additional details on implementation processes for some recommendations are also provided in **Section 4**. The recommendations are divided into three sections to cover specific aspects of MNG including our recommended approach through a SMNG framework. These are as follows:

- MNG – Scope and Principles
- SMNG – Governance and Consenting
- SMNG – Finance Mechanisms

3.1 Marine Net Gain – Scope and Principles

The recommendations on the scope and principles of MNG are shown in **Box 1**. These are discussed in more detail below.

Box 1 – Recommendations 1 to 9 on the scope and principles of MNG

Recommendation 1 - MNG should be mandatory and implemented as soon as possible.

Recommendation 2 - Sector capacity should be increased to ensure effective implementation of MNG.

Recommendation 3 - MNG should encompass intertidal and subtidal environments to recognise their ecological interdependence.

Recommendation 4 - MNG should be based on ecosystem recovery potential not only species-specific recovery.

Recommendation 5 - MNG should encompass mobile species.

Recommendation 6 - MNG should be deliverable within Marine Protected Areas (MPAs)

Recommendation 7 - Pressure reduction should be recognised as a MNG mechanism.

Recommendation 8 - A regular Monitoring, Reporting, and Verification (MRV) process should be undertaken to assess the effectiveness of measures in contributing to MNG.

Recommendation 9 - MNG should follow a strategic framework.

Recommendation 1 –MNG should be mandatory and implemented as soon as possible.

While a formal policy or framework for MNG has not yet been defined, there is growing demand for its implementation as a mandatory, strategic, transparent, simple, and ecologically meaningful approach. A mandatory, Government-backed MNG policy is widely regarded as essential for effective MNG delivery, as it would increase investor confidence, reduce risk, and support innovation. This demand is partly driven by global efforts to address biodiversity decline and accelerate climate action, while ensuring marine development is not unnecessarily constrained. The T&F Group consider that, a strategic approach means focusing on long-term goals for marine biodiversity recovery in line with existing status assessment, implemented through a nature recovery plan that addresses what is needed to achieve these goals beyond project level impacts at a broader temporal and spatial scale.

In the UK, obtaining consent for activities within the marine area requires demonstrating that environmental impacts have been assessed in line with existing regulatory frameworks, such as Environmental Impact Assessment, HRA, and Marine Conservation Zone Assessment. These frameworks apply the mitigation hierarchy—avoid, reduce, and mitigate impacts—and require compensation for any residual impacts to achieve "NNL". While there may be debate about the

hierarchy and the effectiveness of compensation in delivering true NNL, that remains its intended purpose.

This recommendation suggests there should be no need to calculate ecological loss to determine gain, as is done under NE's BNG metric, as the environmental assessment process already addresses residual impacts through mitigation and compensation. Therefore, funding mechanisms for MNG should focus on determining the value of the gain and how much a developer should contribute to deliver net gain. This process could occur separately or in parallel with environmental assessment and consenting, further streamlining decision-making.

Introducing a metric similar to BNG for MNG would add unnecessary complexity and contradict industry feedback that any future approach should remain simple. Recent work by HMC on NE's Marine Net Gain Assessment Frameworks Project (HMC, 2025) supports this by highlighting the challenges of measuring ecological loss for marine habitats and species. These challenges underscore the need for a pragmatic, streamlined approach rather than a rigid metric-based system.

The need for MNG is critical with biodiversity loss at such high levels (**Section 1.2**). At the same time, there has been strong consensus across all three phases that premature implementation of a framework could undermine its objectives and lead to outcomes contrary to the overarching goal. However, prolonged debate over implementation details should not stall progress. Phases One and Two highlighted the value of strategic approaches and targets, and Phase Three has explored how a strategic framework could support their delivery. In the interim, MNG should be promoted as best practice, and the overarching principle at all levels—national, regional, and local—should be to place marine and intertidal ecosystems into recovery.

Recommendation 2 – Sector capacity should be increased to ensure effective implementation of MNG.

With the expansion of marine recovery initiatives and development activity, existing resources— particularly within regulators, SNCBs and NGOs—are increasingly stretched. Delivering MNG at scale may therefore require additional sector capacity, across planning, regulation, implementation, management, and monitoring. To support this, funding may need to be directed toward building the skilled workforce required for effective MNG delivery, including targeted training programmes and career pathways such as internships or entry-level schemes modelled on initiatives like the Marine Futures Internships supported by The Crown Estate. (The Crown Estate, 2025). Strengthening capacity in this way would help ensure that skilled practitioners are available to support long-term marine recovery efforts.

At the same time, it would be important to minimise the wider operational and procedural burden on those involved in such efforts. Where possible, synergies with existing programmes, processes, and initiatives should be actively sought to streamline requirements and avoid duplication, but should not be used to bolster, replace, or dilute any existing statutory duties. An example from Phase Three includes, utilising the extensive stakeholder and public consultation undertaken for the replacement of Marine Plans, to draw on existing local knowledge, expertise, and evidence. A simplified framework would further support this goal as less regulatory input is required, enabling more resources to be directed toward recovery and restoration.

Recommendations 3, 4 and 5 Scope and scale of MNG

To restore marine ecosystems effectively, an ecosystem-based approach is essential. Marine habitats and species are highly interconnected, and focusing only on isolated features may not

deliver long-term resilience. A holistic approach enables SMNG to deliver recovery at a seascape scale, enhancing connectivity between habitats and species, strengthening climate resilience, and supporting ecosystem functionality. This approach also improves genetic diversity, facilitates species migration and adaptation, and creates larger, more resilient habitat networks that can better withstand cumulative pressures such as climate change, pollution, and invasive species.

A strategic approach to MNG delivery should prioritise the most meaningful ecological improvements within a region, even where these may differ from impacted features. At the same time, MNG should also include measures that protect and enhance ecological connectivity for mobile species—linking breeding, foraging, and migratory areas—while safeguarding prey availability and anticipating climate-driven range shifts through adaptable spatial planning. This would be achieved by developing a framework based on regional priorities, informed by a multi-disciplinary group of stakeholders from within the region (**Recommendation 13**), and derived from ecosystem function, local pressures, and ecosystem services. Where disproportionate impacts occur on specific species, these should be reflected in regional priorities. Ultimately, strategic targets should not only meet regional priorities and objectives but also align with national indicators and contribute to achieving GES, creating clear opportunities to integrate MNG with the UK's Marine Strategy (UKMS) objectives, monitoring programmes, and measures (Defra, 2019).

To support recovery at a wider seascape scale, consideration should be given to redefining the jurisdictional scope of BNG, limiting its application to terrestrial environments only (including land down to Mean High Water Springs (MHWS). MNG would then cover all marine and coastal areas up to MHWS within national jurisdiction. While the land–sea connection remains critical, particularly for water quality improvements that underpin restoration success in nearshore areas, linkages could be maintained through terrestrial initiatives such as LNRS. It is also important to recognise that species using the intertidal zone are integral to the marine ecosystem, relying on the marine environment for key functions such as food supply and larval dispersal. Redefining jurisdictional scope would avoid duplication, reduce complexity, and ensure that interactions and transitions between marine and coastal habitats are properly addressed.

Recommendation 6 – MNG should be deliverable within Marine Protected Areas (MPAs)

Despite project-level mitigation and compensation, multiple and cumulative pressures mean parts of UK seas still fail to meet GES, and many protected features remain in "unfavourable condition". This is evident for several descriptors—such as marine birds, fish, and benthic habitats—in the latest UKMS (Defra, 2019) Cefas marine online assessment tool (Cefas, 2024), and Convention for the Protection of the Marine Environment of the North-East Atlantic (OSPAR)'s 2023 Quality Status Report (OSPAR, 2023).

Therefore, in an environment where competing spatial demands are high and opportunities for recovery are constrained, it is essential that MNG should be deliverable within MPAs.

However, it is recognised, and should be considered, that any measures should be above and beyond anything required under existing regulations, for example, for projects under the mitigation hierarchy. MNG should complement or add to (not replace or dilute) any project-specific compensation requirements, most of which are prioritised as 'like-for-like' initiatives to restore or create features that have been affected by a development. Compensation should address direct project residual impacts whilst MNG should and can deliver broader, long-term ecological recovery at a strategic scale.

MPAs contain high-biodiversity features and strategic locations for connectivity, making them critical to achieving meaningful ecological uplift. A carefully designed approach is needed through National and Regional SMNG Plans (see **Section 3.2** and **Section 3.3**), that recognise the nuances of additionality, ensuring gains at least meet baseline requirements and, where possible, exceed them. This approach can unlock significant restoration potential while safeguarding the integrity of protected sites.

It should also be considered, when determining priorities for SMNG, that the Conservation Objectives for MPAs are set to recover, restore, or maintain the extent, diversity, abundance, and structure and function of designated features relative to a predetermined baseline established at the time of designation. However, it is important to recognise that current seabed conditions may not reflect historical biodiversity or ecological potential of these areas. For example, locations that are now classified as mixed sediment may previously have supported complex habitats such as oyster reefs, which played a vital role in ecosystem functioning. MNG should therefore not be limited to preserving existing, or recent baseline conditions, but should also seek opportunities to enhance ecological richness and functionality, informed by an understanding of the feasibility of habitat and species restoration/creation opportunities, historical baselines, and the need to build future resilience. However, these opportunities would not be expected to include innovative or experimental methods with uncertain outcomes which may impact conservation objectives.

Delivering MNG within MPAs would also align with the UK Government's recent revision and commitments of its EIP (Defra, 2025) which states that, to manage the impacts of offshore wind development on MPAs, it will '*institute measures that support ambitions for both nature recovery and a clean energy future*.' Under Goal 1: Restored nature, this includes the target to ensure that at least 70% of protected features in MPAs are in favourable condition by the end of 2042, with the remainder in recovering condition.' Considering that as of 2024 Defra estimates that only 44% of features in the MPA network are in 'favourable' condition (Defra, 2024), the EIP commitment is unlikely to be achieved without delivering MNG within MPAs.

All of the above would require approval from the relevant SNCBs, who would be expected to be part of the Working Groups responsible for developing National and Regional SMNG Plans. As statutory consultees, they would also consider any proposed SMNG measures that could affect designated features within relevant MPAs, as part of the streamlined consenting process (**Recommendation 12**).

Recommendation 7 – Pressure reduction should be recognised as a MNG mechanism.

Within the EMP areas and other regions, marine biodiversity faces multiple pressures, including development, fishing, recreational activities, and inputs of contaminants and nutrients from catchments that often leads to poor water quality in coastal and marine environments. These pressures not only drive biodiversity decline but also limit the space available for restoration. Spatial analysis from the first evidence-gathering phase (T&F Group, 2025) highlighted that reducing these pressures is essential to unlock opportunities for effective MNG, particularly in nearshore zones. Where pressures are reduced or removed, ecosystems have demonstrated a remarkable ability to recover without active intervention. In some cases, prioritising pressure reduction over habitat or species restoration may be necessary, as the success of many initiatives is constrained by ongoing impacts.

It is also recognised that certain activities contributing to these pressures often provide valuable ecosystem services and support livelihoods. MNG should therefore consider these socio-economic dependencies and provide support for affected communities, including exploring alternative activities such as ecotourism and alternative, more sustainable, fishing

methods and equipment and / or aquaculture. This support could include guidance on accessing funding mechanisms like the Fishing and Coastal Growth Fund (Defra, 2025d) or assistance in establishing fisheries management measures. Addressing these issues is critical to reducing pressures and enabling ecosystem recovery.

Recommendation 8 – A regular Monitoring, Reporting, and Verification (MRV) process should be undertaken to assess the effectiveness of measures in contributing to MNG.

As industry would be contributing significant funds to MNG, together with other sources of funding (see **Section 3.3**), it is important that the success of the outcomes of measures is reported on regularly (annually) through an approved Monitoring, Reporting, and Verification (MRV) process. This process should show how the allocation of funds has been distributed and the benefits each measure has provided, both at a national seascape scale and regionally, for biodiversity and for ecosystem services.

MRV reports should clearly evidence the extent to which measures are delivering intended outcomes, identify where they are not (and reasons why), and capture lessons learned, including links to GES monitoring. They should also acknowledge the organisations and stakeholders who have contributed funding to support delivery. The MRV process should inform the refinement of existing measures and the development of new ones, with any changes explicitly documented in the reports. A proportion of the overall fund (with flexibility for anomalies) should be reserved for these functions, ensuring they complement the delivery of current and future measures rather than divert focus from them.

Recommendation 9 – MNG should follow a strategic framework.

In relation to this work, SMNG is an approach to MNG that follows the SMNG framework set out in this report. A strategically led framework focuses on delivering the most meaningful ecological improvements within a given area. These may differ from features impacted by development, as those feature-specific impacts should already have been addressed through the mitigation hierarchy and any associated compensation (**Recommendation 1**).

At a high level, a strategic framework would involve:

- Agreeing national targets (see those developed in Phase One) and plans through a National SMNG Working Group, informed by Regional SMNG Working Groups and their priorities;
- Ensuring alignment with national indicators (such as GES) and wider national commitments; and
- Developing corresponding regional priorities and plans through multi-disciplinary Regional SMNG Working Groups and local stakeholder engagement.

Ultimately any future framework should be adaptable to changing ecological, climate-related, and socio-economic conditions, and should be supported by clear implementation pathways that enable long-term, strategic ecological recovery. In the view of the T&F Group, this would be achieved by following the recommendations in the following sections and the guidance in **Section 4.**

The following recommendations (**Section 3.2** and **Section 3.3**) outline the framework for SMNG and describe how these principles could be delivered in practice. This phase has used a bottom-up approach, using the EMP areas to test national applicability. Although these areas fall under England's marine planning authority (MMO), the intention is that the framework

could be suitable UK-wide. The T&F Group recognises the existing work underway across devolved administrations and considers that where possible, alignment and synergies should be pursued to support wider UK-level MNG delivery. This would enable shared priorities, targets, and actions and help to achieve consistent, effective seascape-scale recovery.

Adopting a strategic framework would also remove the burden from the developer of being required to achieve specific MNG measures.

Finally, while a strategic approach is the preferred model, MNG policy should allow developers the flexibility to deliver their own MNG measures, however it should be highlighted that the achievement of MNG would then be at their own risk. Developers should, however, be encouraged to engage with National and Regional SMNG Working Groups and consider the targets and priorities set out in the SMNG Plans (**Section 3.3**).

3.2 Strategic Marine Net Gain – Governance and Consenting

The recommendations on governance and consenting for SMNG are presented in **Box 2** and are discussed in detail in the following sections.

Box 2 – Recommendations 10 to 13 on the governance and consenting of SMNG

Recommendation 10 - A SMNG framework should be governed nationally but delivered nationally and regionally.

Recommendation 11 A National SMNG Working Group, in collaboration with the Regional SMNG Working Groups, should develop a National SMNG Plan to deliver National SMNG measures and oversee fund allocation.

Recommendation 12 Planning authorities should establish a streamlined consenting process for SMNG measures that have been developed under an approved SMNG framework, and such measures should be exempt from MNG obligations.

Recommendation 13 - Regional SMNG Working Groups should develop Regional SMNG Plans and deliver Regional SMNG measures that align with national and regional biodiversity priorities and targets.

Recommendation 10 – A SMNG framework should be governed nationally but delivered nationally and regionally.

A strategic framework should be nationally governed through a single body to ensure alignment with national marine policy objectives, such as achieving GES, to ensure consistency of approach and to avoid fragmentation. At the same time, it should be decentralised in its delivery at a regional level, guided by clear targets that reflect seascape-scale recovery and align with regional priorities. These priorities should be based on ecosystem function within each region, key local pressures, and the ecosystem services provided, and should be informed by Regional SMNG Working Groups (**Recommendation 13**) made up of key stakeholders with specific regional knowledge and expertise.

Measures developed under this framework should span a broad range of MNG initiatives. National groups should coordinate research and development, lead measures for seascape scale recovery, wide-ranging mobile species, and oversee national habitat connectivity.

Regional groups should inform seascape-scale recovery and focus on habitat- and species-specific restoration (including for less mobile species), pressure reduction, and local community engagement.

All measures must align with both regional priorities and national targets, including those set out in the UKMS.

Recommendation 11 – A National SMNG Working Group, in collaboration with the Regional SMNG Working Groups, should develop a National SMNG Plan to deliver National SMNG measures and oversee fund allocation.

It is anticipated that the National SMNG governing body would be set up to establish:

- A National SMNG Working Group
- Regional SMNG Working Groups
- Terms of Reference (ToR) for both
- Responsibility for implementing measures and allocating funding for both national and regional delivery

Previous successful management structures can provide useful lessons, such as the steering group for the Marine Environment Protection Fund (MEPF) under the Aggregate Levy Sustainability Fund (ALSF), where Defra acted as Chair and Cefas managed administration (Defra, 2010).

The National SMNG Working Group, in collaboration with Regional SMNG Working Groups, would develop a National SMNG Plan to deliver national measures. The National SMNG Working Group would also oversee fund allocation to regional groups and audit achievements against objectives of the National and Regional SMNG Plans.

As outlined in **Section 3.1**, while developers have a duty to mitigate and compensate for their impacts, developer contributions are not a catch-all solution for historic or cross-sector pressures. UK seas face multiple, interacting pressures beyond marine development, including climate change, ocean acidification, land-based nutrient inputs, pollution, fisheries, marine litter, invasive species, and shipping impacts (emissions, noise, and biosecurity pathways). Finance mechanisms should therefore be designed to go beyond existing regulatory programmes and remain flexible enough to pool contributions from diverse funding streams.

Recent initiatives, such as the MRF, also seek to shift compensation towards strategic, seascape-scale approaches, which may draw funds away from specific local areas. Although these impacts are not always significant at a feature or habitat scale, they can influence local ecological dynamics, amplifying ecological depletion in a region.

Phase Three focussed on the EMP areas, as they have the greatest projected future MNG demand due to the scale of anticipated development in that area. Similarly, the National SMNG Working Group should consider forecasted development intensity when allocating funds regionally.

To address this, distribution of funds by a national governance body for regional delivery should allow the majority of funding, after deductions for the National SMNG Plan implementation and coordination, to remain within the region to be used for ecosystem improvements prioritised by regional groups and take account of the following:

- Development intensity.
- Greatest estimated future MNG demand.
- Regional priorities.
- Contribution to national seascape-scale recovery.

Recommendation 12– Planning authorities should establish a streamlined consenting process for SMNG measures that have been developed under an approved SMNG framework, and such measures should be exempt from MNG obligations

One of the most frequently cited barriers to marine restoration—and potentially to future MNG implementation—is the complexity, cost, and duration of the marine licensing process. Consenting SMNG measures at a seascape scale represents a significant shift in practice but it could offer substantial benefits by reducing delays, lowering costs, and increasing confidence in delivery. To achieve this, planning authorities, working with National and Regional SMNG Working Groups, should develop a streamlined consenting process for measures developed under an approved SMNG framework. This process should take account of LNRS, and LMRPs, dependent on their status and development nearer the time of implementation. Overall, consenting should be simpler where it relates to delivering agreed SMNG measures and outcomes, including through more efficient engagement with statutory consultees.

This could be achieved through strategic consenting of measures that are agreed as part of the SMNG Plans. The multi-stakeholder group that determines the measures would include the consenting bodies to support this process. The SMNG Plans would also have been assessed in line with the relevant regulatory frameworks to ensure that all the proposed measures have considered the local community and other users to ensure no significant effects on these receptors, amongst others. The benefits of the multi-stakeholder group developing the SMNG Plans should further reduce the likelihood of potential complications with consenting.

If the plans and in turn measures are pre-consented, they can be selected and implemented more quickly once the funding becomes available. There may be a need to regularly update the consents and conditions, as baseline conditions and proposed activities may change the sensitivity and vulnerability of receptors.

When defining the exemption process for MNG policy it should be made clear that measures designed to provide MNG should not have to go through the MNG process.

Recommendation 13 – Regional delivery of SMNG

Regional delivery should be coordinated through multi-stakeholder, expert-led Regional SMNG Working Groups initially established by the national governance body. These groups should ensure that all user interests are considered and foster partnerships among developers, regulators, fisheries, NGOs, SNCBs, and local communities to co-design and co-deliver SMNG measures.

The Regional SMNG Working Groups would lead stakeholder engagement at the regional level, building on the approach used during the first evidence and research gathering of this phase (see **Section 2.3.1** (Task and Finish Group, 2025a)). Their role would include informing and developing Regional SMNG Plans and, in turn, Regional SMNG measures.

Regional SMNG Plans could draw on existing recovery strategies, such as local authorities LNRS and their anticipated marine counterpart – LMRPs. Plans should be underpinned by a

regional baseline hosted on an appropriate digital spatial data platform. A regional baseline would provide a comprehensive understanding of threats, pressures, and ecosystem services within an area, enabling the design of measures that enhance ecological diversity while balancing socio-economic considerations, such as avoiding unintended constraints on fisheries.

The Crown Estate's Marine Delivery Routemap (The Crown Estate, 2024) offers a strong example of a digital, interactive platform for seabed and coastal planning that could support the development of bespoke SMNG Plans.

Phase Three used the EMP areas as a pilot study to undertake the steps necessary to initiate the development of a Regional SMNG Plan. Although regions for this framework have not been formally defined, in England, marine plan areas appear to be the most appropriate basis (MMO, 2014). They already reflect regional ecological characteristics and administrative needs while supporting integrated marine governance. Therefore, if this approach is taken forward, consideration should be given to the level of regional detail needed to effectively support the development of Regional SMNG Plans, particularly at an appropriate scale in each devolved nation.

There is an opportunity for Regional SMNG Plans to be incorporated into, or appended to, future marine plans if they are being amended or replaced. Doing so would ensure that relevant marine plan policies are considered alongside the development of Regional SMNG Plans.

Looking ahead, future marine plan replacements could also provide an opportunity to align the extensive stakeholder engagement undertaken by the MMO with the engagement required to inform Regional SMNG Plans. This would create efficiencies and strengthen collaboration between marine planning and SMNG delivery.

The T&F Group has given initial consideration (see **Section 2.3.1** and **Section 2.3.2**) to determining priorities, and potential measures for the EMP areas. However, wider and more extensive stakeholder engagement would be essential for developing the Regional SMNG Plans to ensure a comprehensive understanding of local pressures and opportunities for nature recovery. This would enable delivery of a broader suite of measures, as agreed through consultation undertaken throughout all three phases, including seascape recovery, habitat and species-specific restoration (including mobile species), pressure reduction, community engagement, and research and development.

During the development of SMNG Plans, consideration should be given to their intended scale, weight, and legal basis. This is important to ensure that neither National or Regional SMNG Plans are overly rigid or burdensome, and to determine whether an informational, non-statutory plan would be sufficient to guide delivery. To further support and simplify how the above detailed SMNG process could function at a regional level, key steps have been mapped out, in the Regional Navigational Chart presented in **Section 4.2**.

3.3 Strategic Marine Net Gain - Finance mechanisms

Although detailed consideration of financial mechanisms for MNG was outside the scope of this phase, the topic naturally emerged during wider stakeholder discussions, particularly regarding how contributions could be defined (**Section 3.3**) and how they could be collected, managed, and distributed to support effective MNG delivery.

It is suggested that involving the T&F Group in the development of any future funding mechanism would help ensure appropriate stakeholder input, draw on the knowledge gathered to date, and support effective implementation of the process outlined in this report.

The recommendations relating to finance mechanisms for SMNG are shown in **Box 3.** These are discussed in more detail in the sections below.

Box 3 – Recommendations 14 to 18 on the finance mechanisms of SMNG

Recommendation 14 - SMNG finance mechanisms should be simplified and transparent to support equitable and predictable contributions.

Recommendation 15 - Contributions should be pooled from multiple sources into a National SMNG fund, with independent oversight, and ring-fenced exclusively for both national and regional SMNG purposes.

Recommendation 16 - National funds should be used to deliver the National SMNG Plans which should include wider seascape recovery including highly mobile/migratory species, multi-habitat connectivity, and research and development and monitoring.

Recommendation 17 - National funds should be distributed equitably between the Regional Working Groups to deliver their Regional SMNG Plan and measures.

Recommendation 18 - A proportion of national and regional funds should be allocated to support a range of risk-based measures that encourage innovation and allow for uncertain outcomes.

Recommendation 14 – SMNG finance mechanisms should be simplified and transparent to support equitable and predictable contributions

Financial contribution processes should be clear, proportionate, and predictable. A simplified funding model should allow developers to plan contributions early in project development and support informed decision-making.

Determining exact contributions was not within the scope of this phase, but in working through the mechanisms and conducting consultations, this is clearly an important aspect which, whilst being considered through other workstreams (**Table 1**), has still been put forward as a 'future priority' topic following completion of this phase (**Section 5**).

There are several potential mechanisms for funds to be collated into a national fund including a blend of Government-administered funding operated as a levy-based mechanism similar to the Marine Aggregate Levy Sustainability Fund (Defra, 2010), or a private marketplace type funding framework similar to Landscape Enterprise Network (LENs) (LENs, 2026), which implements mechanisms such as escrow accounts to ensure payments are linked to verified ecological outcomes.

As highlighted in **Section 1.2.2**, the MRF also offers an existing framework that could provide such synergies. The MRF operates by collecting financial contributions from offshore wind developers whose projects cannot fully mitigate biodiversity impacts on-site. These contributions are pooled into a central fund administered by Defra, which delivers SCMs elsewhere in the marine environment. The MRF includes a library of pre-approved SCMs with fixed operational costs based on development scale (per km²), providing developers with cost visibility early in the planning process. While the MRF currently has limited types of measures and a single sector-specific scope, its principles could be adapted and expanded to include other marine sectors, as well as contributions beyond compensation and blended investments. This would significantly enhance the delivery of MNG.

Recommendation 15 – Contributions should be pooled from multiple sources into a National SMNG fund, with independent oversight, and ring-fenced exclusively for both national and regional SMNG purposes.

Under a SMNG framework the intention is that a National SMNG Fund should pool funds from multiple sources, the most obvious contributors are the project developers who would input MNG funds. In addition to this however, it should also be feasible for contributions to come from other sources, including Government, private, and philanthropic. Consolidating these sources as much as possible would reduce administrative burden and allow greater focus on delivering measures that provide the greatest environmental benefit. This approach moves away from isolated project funding and enables large-scale recovery efforts, fosters collaboration, and ensures multiple benefits across marine areas. It supports strategic delivery while maintaining transparency and accountability in how MNG is financed.

An example of how private funding is being used to support restoration efforts can be found in the EMP areas; a pet food company (which uses fish by-products in their pet foods) is currently investing significant sums in an initiative by Oyster Heaven that aims to restore oysters off the North Norfolk Coast (North Norfolk News, 2025).

To ensure that MNG efforts are sustained and upscaled over time, a similar approach to that being progressed in Wales could be adopted across all devolved nations, where Welsh Government is investing in the infrastructure and partnerships needed for long-term delivery. To support this, Welsh Government has funded a MARINE Fund Development Manager to help source blended and private finance for marine recovery projects (Welsh Government, 2025) which was inspired by the successful model of the Scottish Marine Environmental Enhancement Fund.

Wales Council for Voluntary Action (WCVA) has been working alongside the Wales Coasts and Seas Partnership (CaSP Cymru) to develop MARINE Fund Cymru (WCVA, 2025). This is a new dedicated fund supporting long-term investment in the recovery and resilience of marine and coastal ecosystems in Wales. Through voluntary contributions, the fund aims to help deliver a vision of Welsh seas that are clean, healthy, safe, productive, sustainably used, and biologically diverse. The Fund is managed by WCVA, with oversight provided by a Steering Group made up of representatives from Welsh Government, The Crown Estate, Natural Resources Wales (NRW), WCVA and CaSP Cymru members, including both industry and environmental NGOs.

Recommendations 16 and 17 – Allocation of funds

The SMNG funds should be allocated to support both the National SMNG Working Group and the Regional SMNG Working Groups and the development of their respective SMNG Plan(s). Allocation of funds should be taken in consideration of the discussion in **Section 3.2.**

It is suggested that National SMNG Plans would fund measures that support wider seascape recovery including highly mobile/migratory species (for example marine mammals and migratory birds and fish that roam over wide habitat ranges), multi-habitat connectivity and, research and development and monitoring. Such initiatives should link to existing programmes where possible and align with national commitments such as GES.

Regional SMNG funding would be used for initiatives that are developed as part of the Regional SMNG Plans (**Section 3.3**) that deliver recovery and restoration at a regional level.

Recommendation 18 – A proportion of national and regional funds should be allocated to support a range of risk-based measures that encourage innovation and allow for uncertain outcomes.

The distribution of funds could either take the form of a percentage allocated at an agreed level of acceptable risk across a certain number (or percentage) of projects. This approach would enable some initiatives with higher uncertainty but greater potential for biodiversity gains to be delivered.

Given that the UK is still at the early stages of understanding which activities are most effective for marine restoration, and that, even for the techniques that do currently exist, there is limited evidence on their long-term sustainability, there is a clear need to embed space for risk within MNG delivery. Doing so would support innovation, structured learning, and the research and evaluation required to develop, refine, and strengthen both existing and emerging restoration methods. It would also help broaden the suite of restoration activities available, avoiding a narrow focus on a small number of well-understood techniques and enabling a more diverse, resilient restoration pipeline. While such research-led activities are not always direct "delivery" measures, they are essential to building an evidence base that allows future MNG initiatives to be both effective and scalable.

4. Guidance to Implement Strategic Marine Net Gain

This section presents three Navigational Charts which are intended to visually guide the reader through the recommendations outlined in **Section 3**. Written step-by-step guidance is also set out in greater detail for national and regional application.

A central focus of this third phase undertaken by the T&F Group was to understand how strategic targets can be applied within the EMP areas, while also considering national application. For this reason, applying the regional guidance in other areas should take account of regional differences.

The first Navigational Chart provides a high-level overview of the SMNG framework and illustrates how MNG and SMNG connect with existing regulatory obligations, as outlined in **Recommendations 1 to 9**.

The second Navigational Chart, together with its step-by-step guidance, sets out the process that National SMNG Working Groups should follow to develop National SMNG Plans and National SMNG Measures, as detailed in **Recommendations 10, 11, 12, 14, 15, 16, 17, and 18**.

The third Navigational Chart provides a visual representation of how the framework is applied regionally and outlines the process Regional SMNG Working Groups should undertake to develop Regional SMNG Plans and Regional SMNG Measures, as detailed in **Recommendations 10, 12, 13, 14, 15, 16, 17, and 18.**

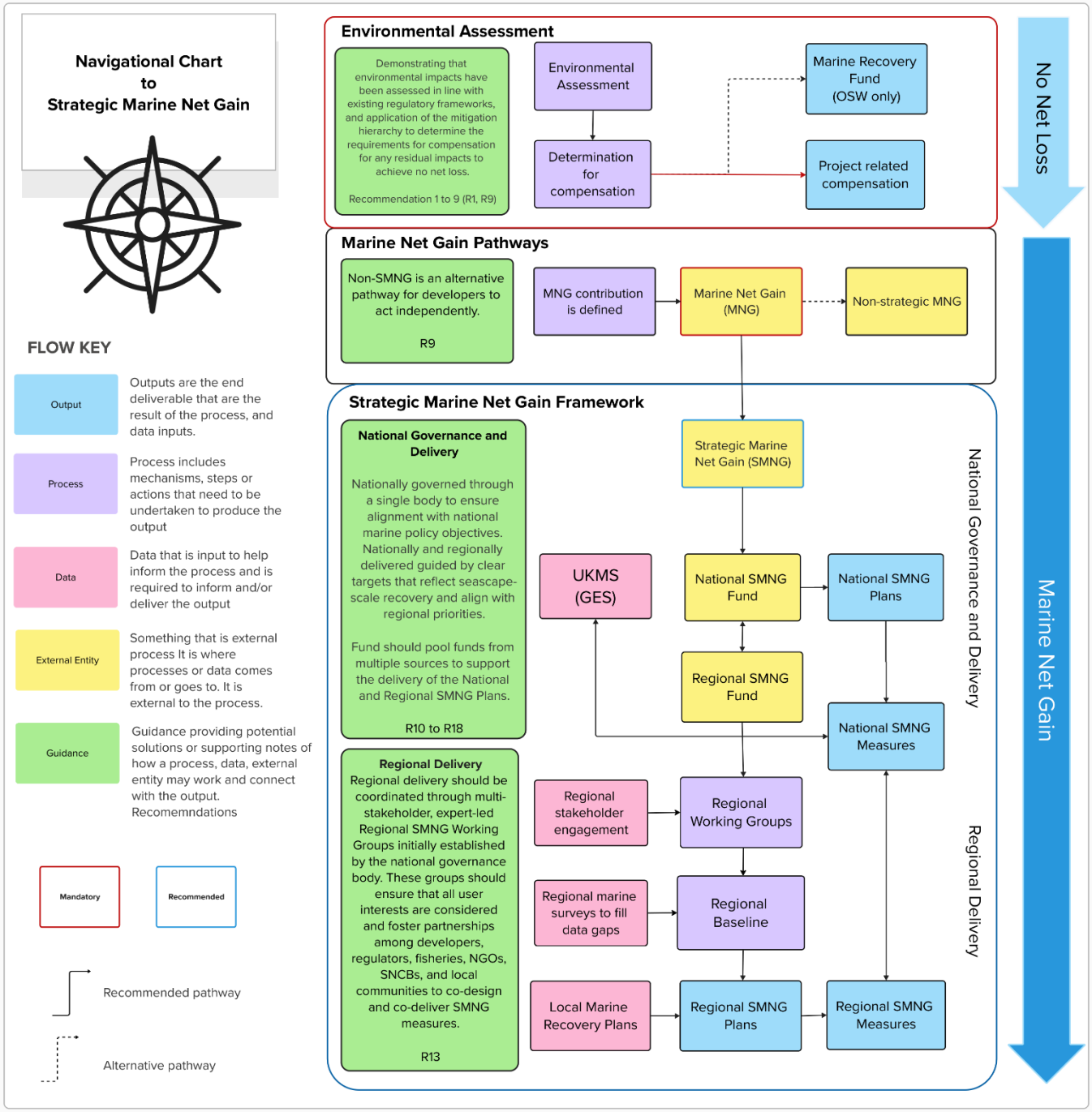

Figure 1 - Navigational Chart to SMNG- A high-level overview of the SMNG framework and how MNG and SMNG connect with existing regulatory obligations.

4.1 National SMNG

This Navigational Chart and step-by-step guidance set out the actions required to implement SMNG at a national level, including the establishment of the National SMNG Working Group and the delivery of its responsibilities. As this phase primarily focused on applying SMNG targets at a regional level, the regional guidance in **Section 4.2** provides a more detailed account of implementation steps, many of which could also be applied at the national level. To avoid unnecessary repetition, the detail is not duplicated here. However, there are important nuances between national and regional implementation that must be considered, and therefore additional detail on the national-level steps and the specific responsibilities of the National SMNG Working Group is provided below.

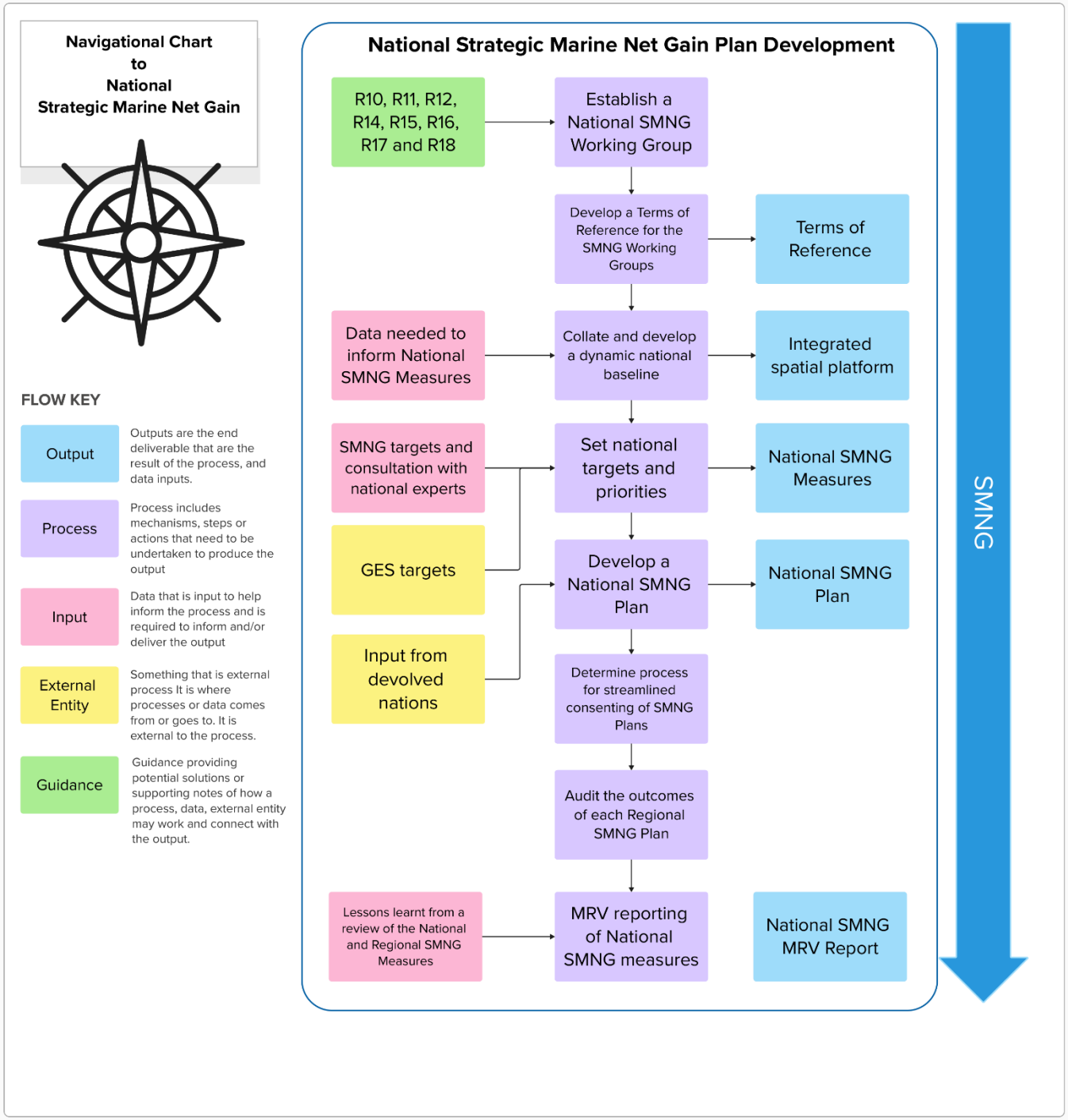

Figure 2 - Navigational Chart to National SMNG – A process flow of how the SMNG framework would work at a national level.

Step 1 – Establish a National SMNG Working Group

A National SMNG Working Group should be established to develop the National SMNG Plan, provide governance of the SMNG fund and ensure a consistent approach across the Regional SMNG Working Groups.

The National SMNG Working Group should be a multi-stakeholder body with national-level expertise. The group should consult relevant national bodies where transboundary considerations arise and engage with additional nations where necessary. It should also audit delivery, oversee monitoring, and ensure that findings from SMNG measures are publicly available, with lessons learned widely shared.

Step 2 - Develop a Terms of Reference for the SMNG Working Groups

During the initial establishment of the framework, a Terms of Reference (ToR) should be agreed with all new members (both national and regional) required to sign. This ToR should set out the group's objectives, communication pathways, governance structure, chairing arrangements, and lines of authority.

Step 3 - Collate and develop a dynamic national baseline

The national baseline would collate the data needed to inform National SMNG Measures focused on seascape-scale recovery, highly mobile species, multi-habitat connectivity, and research and development. Further detail on consideration can be found in **Step 2** of the Regional SMNG guidance (**Section 4.2**)

Step 4 - Set national targets and priorities

This step would involve a review of the SMNG targets (**Table 2**) and target areas developed by the T&F Group during Phase One and Two to determine up to date national SMNG targets. The finalised targets should also align with national marine policy commitments such as GES. The SMNG targets would be informed by the national baseline and consulted with relevant stakeholders to develop National SMNG Measures.

Step 5 - Develop a National SMNG Plan

The National SMNG Plan should be informed by the Regional SMNG Plans, and adjacent national bodies responsible for MNG in countries that support wide-ranging mobile species and the habitats they rely on. Ideally, this cooperation should also extend to countries outside of the UK, along key migratory pathways, where these species travel and utilise additional habitats throughout their life cycles. Therefore, similar to the Regional SMNG Plans (which would consult with other regions), where possible it would be important to review the National Marine Plans of other devolved nations and possibly, other countries (e.g. The Scottish Government, 2015; Welsh Government, 2019).

It is recognised that many species using UK coasts and seas migrate over extremely long distances, and full engagement with all relevant countries may not be feasible in the short term. However, this represents the most holistic and ecologically coherent approach and could serve as a long-term ambition.

The research and development measures should provide benefits across all, or most, regions and look into key issues relating to the effectiveness of SMNG measures and how to improve such measures. Collation of lessons learnt on previous SMNG measures should also be collated and distributed to the Regional Working Groups.

Step 6 - Determine a process for streamlined consenting of SMNG Plans

The National SMNG Working Group should determine the most appropriate route to streamline the consenting of SMNG Plans. One option, as outlined in **Recommendation 12**, is to pre-consent SMNG Plans that have been developed and approved as part of the SMNG framework.

Step 7 - Audit the outcomes of each Regional SMNG Plan and any measures undertaken outside of the SMNG Framework

The National SMNG Working Group should be responsible for auditing each MNG measure, whether it is delivered within or outside of the SMNG Framework, as all measures must demonstrate that they have achieved their intended objectives (with allowances for innovative and riskier measures). Key Performance Indicators (KPIs) for each measure should be developed by the Regional SMNG Working Group. Progress against these KPIs should be monitored initially by the Regional SMNG Working Groups and subsequently audited by the National SMNG Working Group.

Step 8 - MRV Reporting of National SMNG Measures

Similar to the Regional SMNG Measures, the findings from each National SMNG Measure should be disseminated to inform future development and contribute valuable scientific evidence to the wider biodiversity knowledge base. An annual report should be produced summarising all national measures, assessing whether they have achieved their KPIs, and highlighting key lessons learned. These insights would be essential for strengthening the evidence base, improving effectiveness, and supporting continuous learning.

4.2 Regional SMNG

This Navigational Chart and step-by-step guidance set out the actions required to implement SMNG at a regional level, including the establishment of the Regional SMNG Working Group and the delivery of its responsibilities. As this phase primarily focused on applying SMNG targets at a regional level, this guidance in this section provides a more detailed account of implementation steps, many of which could also be applied at the national level.

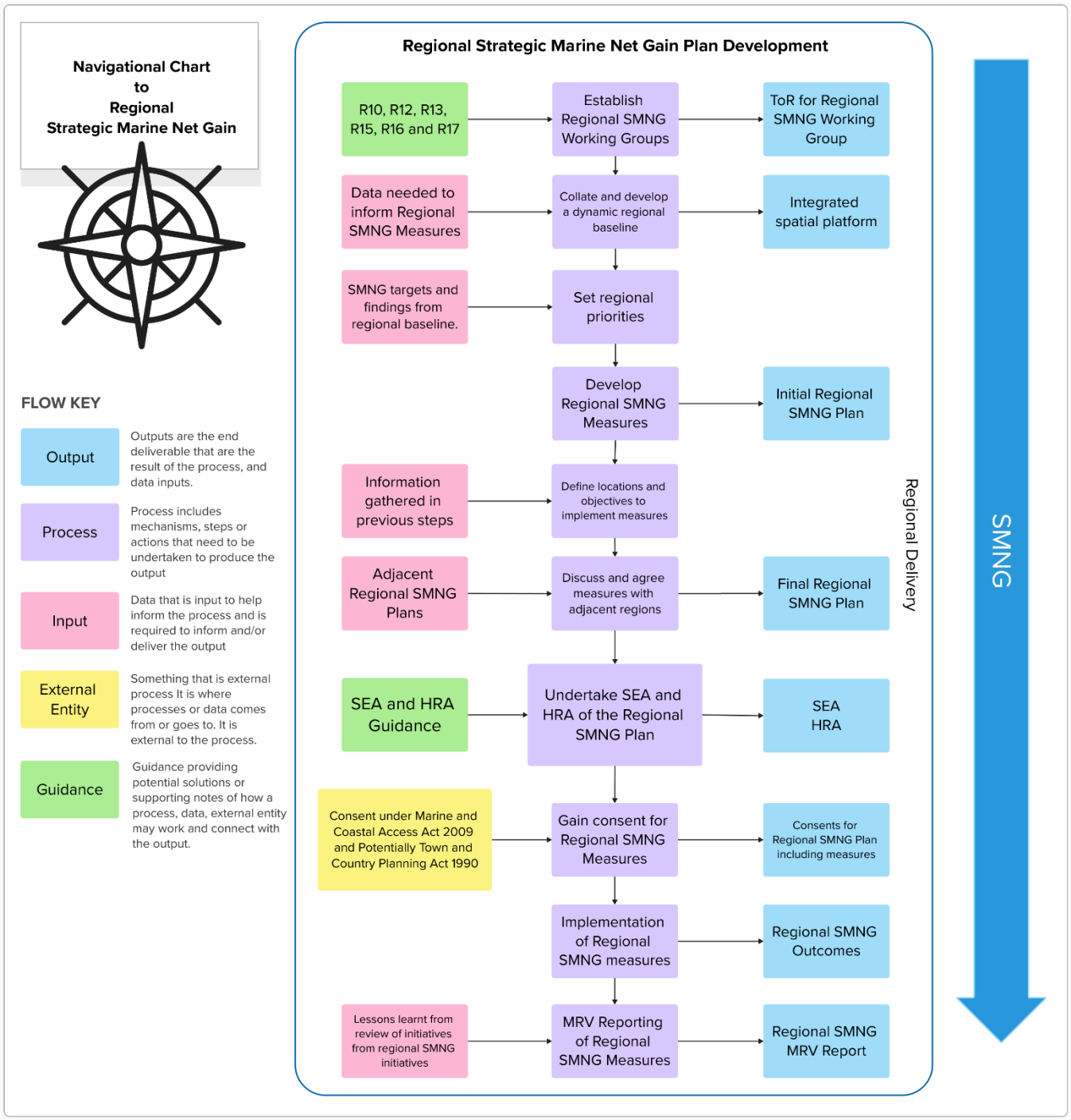

Figure 3 - Navigational Chart to Regional SMNG - A process flow of how the SMNG framework would work at a regional level.

Step 1 - Establish Regional SMNG Working Groups

The Regional SMNG Working Groups should comprise relevant stakeholders with a direct connection to the region. During the initial establishment of the framework, a Terms of Reference (ToR) should be agreed, and all new members—both national and regional—would be required to sign it. The ToR should set out the group's objectives, communication pathways, governance structure, chairing arrangements, and lines of authority.

Each Regional Working Group would contribute to the development of Regional SMNG Measures underpinned by the SMNG targets (**Table 2**), informed by regional priorities with key local stakeholders and aligned with national and international commitments such GES.

Membership of the Regional SMNG Working Groups could include, but is not limited to, representatives from the following organisations:

- Academic institutions
- Environment Agency
- IFCAs
- Industry representatives (e.g. fisheries, renewable energy, ports, cables, aggregates)
- Local Planning Authorities
- Marine and Coastal Partnerships
- MMO
- NE
- NGOs (e.g. Local Wildlife Trusts, RSPB, National Trust)

Step 2 – Collate and develop a dynamic regional baseline

A regional baseline should be collated, developed and hosted on an appropriate spatial platform, and provide a comprehensive understanding of the SMNG requirements for each region including, key ecological features, threats, pressures, and ecosystem services within an area, enabling the design of measures that enhance ecological diversity while balancing socio-economic considerations. Periodic reviews would be essential to account for ecological change over time, incorporating new evidence and lessons learned from both regional and national measures

A suggested series of steps underpin the development of a robust and dynamic baseline:

- Collate data on biodiversity within the region, including the distribution, condition, and status of habitats and species, and their ecological interactions.
- Collate data on ecosystem services provided by biodiversity to local communities.
- Collate data on threats and pressures affecting the ecosystem, including existing management measures and their effectiveness.
- Engage with key stakeholders, including local community groups, to discuss baseline conditions and opportunities for future measures.

Data input is crucial to forming a robust baseline. **Table 3** shows a number of key sources of data that could be used to inform the baseline (this is applicable to England but could be applied to other areas in principle).

Table 3 - Key sources of data that could be used to develop the dynamic regional baseline

Data Source	Information
Marine Plans for each region	Planning information relevant to the marine plan areas.
LNRS	Some counties have developed LNRS with marine and coastal counterparts. These should be used to inform measures that span the land to sea boundary and alleviate associated pressures.
LMRPs	The concept of these plans (yet to be published) is similar to the LNRS, providing a marine counterpart for the plans whose currently jurisdictional boundary applies down to Mean Low Water.
The Crown Estate – Marine Delivery Routemap	Digital platform to model and map potential use scenarios for the seabed and coastline.
Natural England Designated Sites Viewer	Condition assessments and features of interest information.
IFCA data sources	Shellfish and fish areas and fishing activities.
MaRePo and MaRePo+	Areas showing MaRePo and MaRePo+ data gathered throughout these projects such as identifying relevant mobile species, historic, threatened, and declining marine habitats.
Restoring Meadow, Marsh and Reef (ReMeMaRe)	Potential areas for Restoring Meadow, Marsh and Reef.

Step 3 - Set regional priorities

This follows what was undertaken in the second Evidence and Research Gathering exercise (T&F Group, 2025a) but in summary involves determination of what is feasible in the region in terms of habitat and species distribution and the constraints and opportunities for biodiversity improvements within each region

Regional priorities should be underpinned by the SMNG targets (Table 2) but refined to reflect what is most critical for delivering meaningful biodiversity gains within the region. These priorities must also align with national commitments, ensuring consistency while allowing flexibility to address region-specific ecological needs. They should be informed by the regional baseline, considering habitat and species distribution, current pressures, constraints, and the opportunities available to support recovery.

In setting these priorities, the Regional SMNG Working Group should also draw on local stakeholder insight to ensure practical considerations, and community perspectives are captured. Priorities should additionally take account of ecosystem services, both the benefits currently provided and how proposed measures may enhance or affect them.

Step 4 - Develop Regional SMNG Measures

Once the regional baseline has been developed and the regional priorities agreed, the next step is to generate a long-list of Regional SMNG Measures that could be feasible within the region. This long-list should be informed by a range of ecological, environmental, and practical considerations, including:

- present and historic distribution of habitats and species;
- the current condition of those habitats and species;
- whether a species functions as a habitat-forming or ecosystem-supporting feature (e.g. biogenic reefs, seagrass beds);
- physical conditions that influence the type and effectiveness of habitat restoration or creation;
- chemical and biological constraints (e.g. water quality, invasive species, prey availability);
- existing pressures and the effectiveness of current management measures;
- the potential implications and benefits of increased management; and
- anticipated climate-driven changes under different scenarios.

Each potential measure should be assigned a confidence score to reflect its success. This enables a balanced portfolio of measures, ensuring that regions include a mix of lower, higher-risk and innovative measures that can generate valuable learning.

This phase has illustrated how high levels of pressure can shape regional priorities, particularly the need for pressure reduction, where other regions may face fewer constraints. This variation reinforces the importance of developing Regional SMNG Plans that reflect local conditions, pressures, and opportunities, informed directly by local experience and stakeholder input. For England aligning regions with existing Marine Plan areas would support consistency and enable integration with established planning processes.

Step 5 - Define locations and objectives to implement measures

Using the information gathered in the previous steps, appropriate locations should be identified for implementing Regional SMNG Measures. This selection should consider feasibility, the likelihood of successful delivery, and the ecological functioning of the wider seascape. An ecosystem-based perspective is essential, locations should be chosen to support habitat connectivity and, over the longer term, help establish effective ecological corridors that benefit migratory species and wider species distributions. Achieving this seascape-scale recovery requires strong alignment between the development of National and Regional SMNG Plans.

The output of this stage should be an initial Regional SMNG Plan that outlines where and how measures could be deployed within the region. This plan should remain flexible to allow refinement as further steps are undertaken, new evidence becomes available, or priorities evolve.

Step 6 - Discuss and agree measures with adjacent regions

There are likely to be measures that have implications for adjacent regions, both positive and negative. For example, pressure-reduction measures may shift certain pressures into neighbouring areas even if they provide long-term ecological benefits overall. It is therefore important that proposed measures are discussed and agreed with adjacent regions to ensure transparency, avoid unintended consequences, and secure full support.

Such discussions may lead to refinement of the Regional SMNG Plan to better reflect cross-boundary considerations.

Step 7 - Undertake Strategic Environmental Assessment and Habitats Regulations Assessment of the Regional SMNG Plan

A strategic approach to MNG enables a Strategic Environmental Assessment (SEA) to be undertaken for the potential measures, allowing for a more comprehensive and holistic assessment of cumulative effects—both positive and negative. An SEA should be completed for all measures to identify their potential benefits and adverse effects. Completion of this step will flag measures with potential adverse significant effects so they can be refined, through avoidance, redesign, mitigation, or alternative siting, where possible. Measures should only be screened out where, after reasonable modification, adverse significant effects cannot be ruled out. Measures should also be assessed against the Conservation Objectives of any designated sites through a Habitats Regulations Assessment (HRA) to ensure that no significant adverse effect on site integrity would occur.

Step 8 - Gain consent for Regional SMNG Measures

Subject to the findings of the SEA and HRA, it should then be possible to secure the necessary consents for the measures to be taken forward. The involvement of SNCBs, regulators, and relevant stakeholders throughout the development of the Regional SMNG Plan should help reduce barriers to consenting, as many issues would already have been addressed through the plan-making process. This approach would also enable more rapid implementation once funding becomes available.

Where MNG projects are taken forward independently and outside of the SMNG Framework, their consent process should include discussions with the Regional SMNG Working Group to ensure alignment with the region’s priorities and the overall objectives of the Regional SMNG Plan.

Step 9 - Implementation of the Regional SMNG measures

The agreed and consented SMNG measures should be set out within the Regional SMNG Plan, ready for implementation once funding becomes available. Implementation should be overseen by the Regional SMNG Working Group, which would be responsible for assigning each initiative to the appropriate organisations for delivery.

Step 10 - MRV Reporting of Regional SMNG Measures

All MNG measures undertaken in the region—whether delivered under the Regional SMNG Framework or independently—must be monitored and reported against their agreed objectives. Key Performance Indicators (KPIs) for each measure should be developed by the Regional SMNG Working Group, with progress against these KPIs monitored initially by the Regional Working Group and subsequently audited by the National SMNG Working Group. Where measures are undertaken independently, project owners should ensure that the Regional Working Group is able to access the information required to monitor progress against the agreed MNG objectives.

Monitoring should demonstrate the extent to which each measure is achieving its objectives and document any adaptive management applied to support their delivery. The Regional SMNG Working Group should collate all monitoring information into a Regional SMNG Annual Report. This report should include a detailed account of each measure, covering:

- the objective of the initiative;
- methodology used, including maps and figures;
- monitoring results, including biodiversity changes, ecosystem service impacts (positive and negative), adaptive management, and photographs;
- community involvement;
- discussion of findings;
- lessons learned; and
- recommendations for future application.

The Annual Report should also provide a summary of all MNG initiatives undertaken in the region, including both measures delivered through the Regional SMNG Plan and those taken forward independently.

5. Conclusion

The UK's seas are undergoing profound ecological pressure and the need for sustainable growth across marine industries has never been more urgent. Yet they also hold extraordinary potential for recovery when policy, planning, and development align behind a shared purpose.

The SMNG T&F Group has worked collectively to shape how MNG can actively contribute to restoring the health, resilience, and biodiversity of our marine environment. This work, delivered across three phases under the OWEC Programme, sets out a practical, evidence-based and sector-supported framework for SMNG. It demonstrates how a national, coordinated yet locally informed approach can deliver meaningful ecological outcomes, complement regulatory processes, and ensure that growth in marine sectors aligns with nature recovery.

In consideration of the recommendations, supporting text and guidance above, the following future priority tasks and topics have been identified to further support successful implementation of the SMNG framework. These priorities focus on advancing understanding of how the framework could operate in practice, including five key areas:

- Developing a standardised approach for establishing dynamic national and regional baselines;
- Creating a consistent method for applying the strategic targets, setting regional priorities, and selecting SMNG measures;
- Designing a streamlined consenting pathway for SMNG Plans and measures;
- Defining national and regional governance roles, including Terms of Reference for Working Groups; and
- Establishing a robust Monitoring, Reporting and Verification (MRV) process to track delivery and outcomes.

It is also recognised that other essential tasks, such as defining MNG contributions and wider financial mechanisms is required. Some of these topics are already being progressed by organisations, as identified in **Table 1**. Therefore, ongoing consultation with those responsible organisations, is recommended to understand the outcomes of their ongoing work and to determine whether they have identified any additional future priority tasks or topics that should be considered to further support the development and implementation of SMNG.

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