

# Enabling Faster, Smarter Nature Recovery

Earned Autonomy Briefing Note

21<sup>st</sup> October 2025

*Audience: external*

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## BACKGROUND

The HM Treasury's paper, "A new approach to ensure regulators and regulation support growth", together with Recommendation 15 from the Corry Review advocating greater autonomy for trusted environmental partners, marks a pivotal shift in how regulatory bodies can better enable both nature recovery and economic development.

These proposals respond to concerns raised by organisations leading nature recovery initiatives, who report that environmental regulation has increasingly become a systematic barrier to effective delivery. Key issues cited include:

- Inconsistencies in permitting and licensing.
- A disconnect between advisory guidance and final decisions.
- Fragmented and protracted application processes
- Short-term funding cycles misaligned with project timelines.
- Duplication across multiple permits and consents
- Overly cautious and disproportionate regulatory approaches

Considering this feedback, the Corry Review recommends that environmental regulators empower experienced and capable delivery organisations with greater regulatory autonomy, helping to remove barriers and accelerate environmental and economic progress.

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## EARNED AUTONOMY MODEL

Since summer 2025, the Environment Agency (EA) has been working closely with delivery partners to build a comprehensive understanding of the customer journey across the EA's permitting and licensing regimes. This collaboration has informed the development of a suite of targeted interventions to address key bottlenecks identified by stakeholders and helped shape an Earned Autonomy Model aligned with the recommendations of the Corry Review.

The model has been co-designed around a risk-based framework that aims to grant significantly greater autonomy to competent delivery organisations undertaking low-risk nature recovery activities, while maintaining proportionate regulatory oversight for higher-risk schemes. It introduces tailored permitting pathways for both accredited and non-accredited organisations, ensuring that all those involved in nature recovery can benefit from this new regulatory approach. The model also includes the creation of a Nature Permitting & Coordination Team which will provide dedicated advice and support to nature recovery projects, and will be responsible for implementing the Earned Autonomy framework.

As outlined in Table 1 below, the first permitting pathway streamlines approval for low-risk nature recovery activities using new and updated standard rules permits, exemptions, and regulatory position statements (RPS). These alternative mechanisms offer faster, more efficient processes that are well-received by customers. This pathway is open to all delivery organisations with no accreditation required.

The second pathway is designed for organisations accredited under the Earned Autonomy framework. These organisations can carry out low to medium-risk activities under a nature recovery RPS by notifying the EA of their intent. The EA will screen each proposal to ensure it meets the necessary criteria and, if approved, the activity can proceed without the need for a formal permit application.

For high-risk activities, accredited organisations will still be required to apply for a permit. However, these applications will be managed through Adaptive Permitting- a risk-based approach that concentrates regulatory scrutiny on the highest-risk elements of a scheme. This method is intended to significantly reduce determination times and ensure regulatory efforts are focused where they will have the greatest benefit.

**Table 1: Earned Autonomy Model**

Permitting Pathway	Nature Recovery Activity Type	Accreditation Required?	Regulatory Controls
<b>Streamlined Permitting</b>	Low Risk	No	Standard Rules, Exemptions and RPS
<b>Earned Autonomy</b>	Low/Med Risk	Yes	Nature Recovery Regulatory Position Statement (RPS)
<b>Adaptive Permitting</b>	High Risk	Yes	Risk-based regulation

## EARNED AUTONOMY ACCREDITATION

Accreditation will be required for organisations wishing to operate under Earned Autonomy and Adaptive Permitting. The accreditation criteria is currently under development, but early discussions have indicated that the criteria will most likely be framed around capabilities and compliance history. Accredited organisations will need to demonstrate that they have the capabilities and competencies to operate with reduced regulatory oversight from the EA and will need to show a strong track-record of compliance with environmental legislation.

The final accreditation criteria will be developed with input from core delivery organisations to ensure it is fit for purpose and meets the needs of both parties. The EA is also working with Defra and Natural England to promote alignment between our respective Earned Autonomy Models.

## SUPPORTING INTERVENTIONS

The Earned Autonomy Model will be supported by a suite of interventions designed to promote consistent and proportionate regulation of nature recovery activities, whilst encouraging the development of compliant nature recovery projects. These interventions have been identified through the customer journey work mentioned above and seek to address many of the bottlenecks identified through this process.

**Table 2: Supporting interventions.**

Supporting Interventions	Actions
<b>External Guidance</b>	Develop comprehensive guidance on the development and delivery of nature recovery projects for external partners
<b>External Training Course</b>	Design and deliver a 1-day training course for external partners on the development and delivery of nature recovery projects
<b>Internal Regulatory Guidance</b>	Create internal guidance for EA staff to promote consistent and proportionate regulation
<b>Internal Training for EA Staff</b>	Develop a 1-day course for EA staff on supporting and regulating nature recovery projects
<b>River / Coastal Restoration Design Guides</b>	Develop new design guides with up-to-date information regarding restoration principles and methodologies
<b>Communication</b>	Review and formalise communication routes between delivery organisations and EA staff.
<b>Water/Marine Restoration Plan approach</b>	Agreeing a protocol and legal framework to permit activities across a specific area within a set time scale

## EARNED AUTONOMY PHASED ROLLOUT

The proposed Earned Autonomy Model was approved by the EA and Defra in October 2025 and has received strong endorsement from the eNGO community. Between October and March, the EA will continue to advance this work in preparation for Phase 1 of a rollout programme beginning in April 2026. The first phase will run to the end of summer 2026 and, if successful, will transition into a second phase national rollout.

To build the necessary protocols and frameworks, inform the development of the Nature Permitting & Coordination Team, and to evaluate the effectiveness of the new permitting pathways, we would like to test the

model through live projects. The EA is therefore launching an **Expressions of Interest (EOI) in November** to participate in Phase 1, inviting delivery organisations to help co-develop and trial the Earned Autonomy Model.

## NEXT STEPS

We are now moving into the development phase of this work with the view of launching our Phase 1 Rollout in April 2026. Between now and April, we will be working on developing the proposed permitting pathways, supporting interventions and building the new Nature Permitting & Coordination Team. Now that our Earned Autonomy Model has been agreed, we will also be undertaking some engagement with EA staff and our core delivery partners to promote this work. The proposed timeline and outline programme of work has been provided below

## TIMELINE

Activity	Oct 2025	Nov 2025	Dec 2025	Jan 2026	Feb 2026	Mar 2026	Apr 2026	May 2026	Jun 2026	Jul 2026	Aug 2026	Sept 2026
<b>Earned Autonomy Phase 1 Rollout Scoping</b>												
<b>Comms &amp; Engagement with stakeholders</b>												
<b>Call for projects &amp; application screening</b>												
<b>Earned Autonomy Model Development phase</b>												
<b>Phase 1 launch event</b>												
<b>Phase 1 Rollout</b>												

## CONTACTS

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