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2024-25 Annual report to  
the Ministry of Housing,  
Communities and Local  
Government

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Natural England's timeliness on  
responses to planning  
consultations in England

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July 2025

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## Executive Summary

The main findings of the report are as follows:

In 2024-25 Natural England received 21,575 planning application consultations. 21,515 consultations required a response within the year, of which 89.43% were responded to within 21 days or otherwise agreed deadlines.

Although overall casework levels remain consistently high, the volume of lower-risk work fell by 16% in 2024/25, suggesting that reforms such as expanding access to self-service tools like [Impact Risk Zones](#) and standing advice are delivering positive results. At the same time, we have seen a 20% rise in the volume of highest-risk and opportunity casework.

873 deadline extensions were granted for planning application consultations (4.1%). Natural England sent 21,102 responses to customers and the average time taken to provide a substantive response was 9.8 days.

In addition, Natural England received 1,010 pre-application consultations, either directly from developers or via local planning authorities, responding to 77.9% of those due in the year within 21 days or otherwise agreed deadlines. This is an improvement on 2023-2024 levels when 69.9% pre-applications consultations were responded to within agreed timescales.

Natural England deals with a high proportion of complex cases, mostly relating to impacts on habitats sites<sup>1</sup> or protected landscapes (National Parks and National Landscapes). In 2024-25, this included receiving 541 Planning consultations for Nationally Significant Infrastructure Projects (NSIPs), 946 Local Plan consultations, and 477 Environmental Impact Assessment (EIA) requests relating to screening and/or scoping.

Over the past year, Natural England has continued to implement efficiency measures to focus resources on high-risk and high-opportunity casework, including strategic, plan-level engagement to support nature recovery from the earliest stages of the planning system. We also [contacted Local Planning Authorities](#) to set out our approach to casework prioritisation and to provide further detail on our services. We are also working closely with Government on planning reforms, including changes to the role of statutory consultees, exploring options for cost recovery under the Town & Country Planning Act, and advising on proposals set out in the Planning & Infrastructure Bill.

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<sup>1</sup> Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites, and including those sites listed in Para 187 of the NPPF

## Overview

### Introduction and purpose of report

This report details Natural England's performance as a consultee in the planning system against the statutory duty to respond to planning application consultations from local authorities and pre-application enquiries from developers within 21 days or otherwise agreed deadlines. Natural England is required<sup>2</sup> to report annually to the Secretary of State for Housing, Communities and Local Government on its performance against the statutory duty. This report fulfils that requirement.

Natural England's purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has responsibility for ensuring that England's unique natural environment including its flora and fauna, land and seascapes, geology and soils are protected and improved.

### Natural England's role in the planning system

Natural England is a statutory consultee in the planning system for development plans, Environmental Impact Assessments, Strategic Environmental Assessment, Habitats Regulations Assessments, Local Development Orders and for certain planning applications relating to Sites of Special Scientific Interest (SSSI) and best and most versatile agricultural land. We may also be consulted on a range of other development proposals. Natural England is also a competent authority, issuing consents where there will be impacts on protected species and sites.

Natural England has a statutory duty to respond to certain consultations specified in Article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) (as amended). This requires a substantive response<sup>3</sup> to consultations from local planning authorities on planning applications and to pre-application consultations from developers within 21 days of receipt or such longer period as may be specified in other legislation (e.g. consultations under the Wildlife and Countryside Act as amended) or within any other period agreed in writing between both parties. The 21-day period does not begin until Natural England has sufficient information to enable a substantive response.

Natural England takes a proportionate approach to its planning advice, based on risk and opportunity, and with a focus on finding solutions. Natural England seeks to enable sustainable development by advising on the avoidance, mitigation or, as a last resort, compensation for impacts on the natural environment through the use of planning conditions or obligations, and on appropriate enhancement measures. Natural England is increasingly focussing its engagement on strategic plans and projects to maximise opportunities to deliver gains for the natural environment.

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<sup>2</sup> Under Article 23 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), consultees must submit a report on compliance against the statutory duty to respond to consultations no later than 1 July each year.

<sup>3</sup> Article 22 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 defines a substantive response as one which (a) states that the consultee has no comment to make; (b) states that, on the basis of the information available, the consultee is content with the development proposal; (c) refers the consultor to current standing advice by the consultee on the subject of the consultation; or (d) provides advice to the consultor.

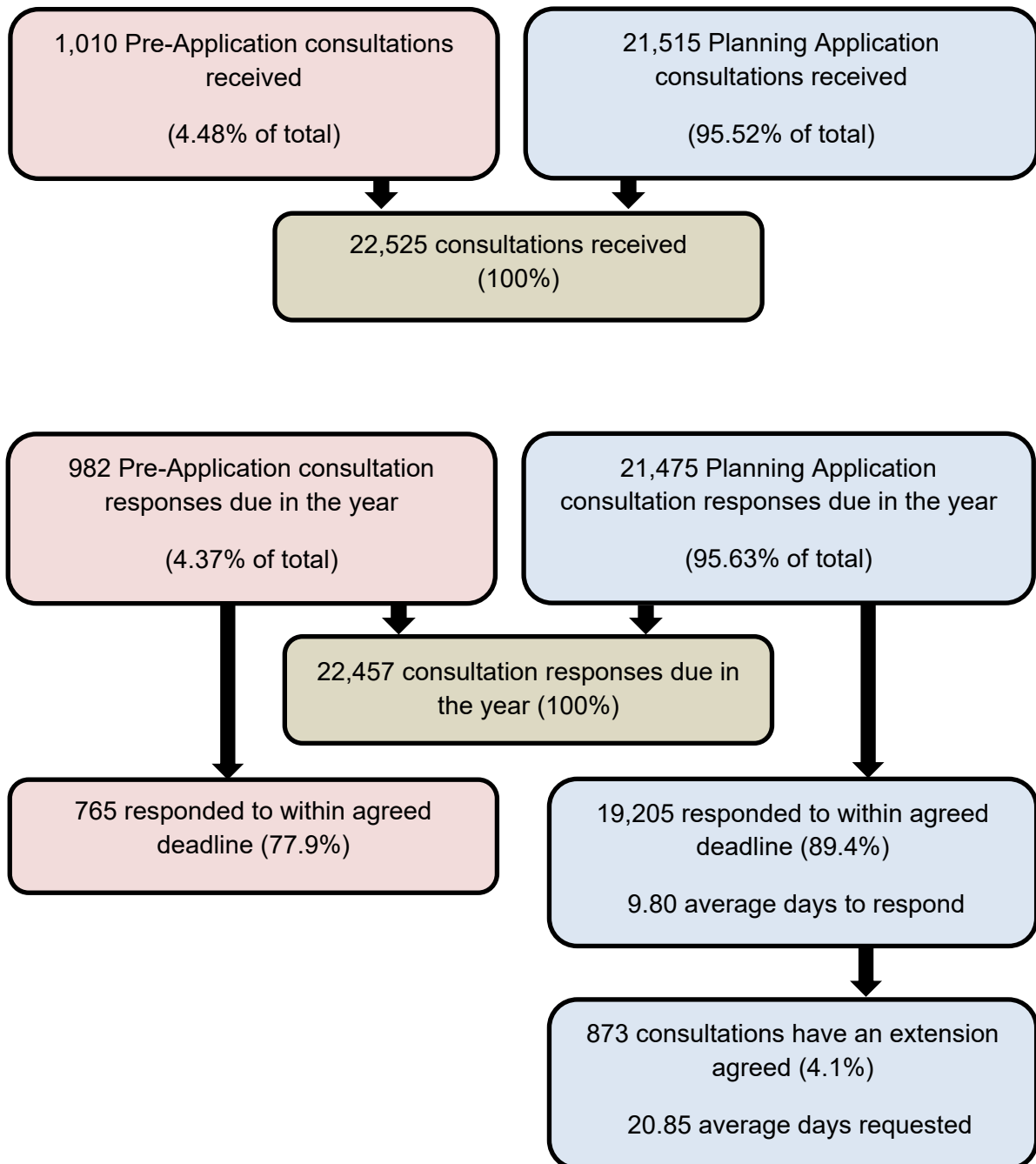
### Measures to improve planning performance

Natural England gives high priority to its planning work, which sits within the wider Sustainable Development programme. Various reforms to both planning and wildlife licensing work are ongoing to improve effectiveness and focus effort on strategic level engagement to deliver greater environmental gains. This includes increased resource and more targeted engagement in strategic plans and projects to deliver environmental opportunities such as biodiversity net gain and nature recovery; developing strategic solutions to address complex environmental challenges such as nitrates issues impacting on designated wildlife sites; a digital improvement project, including piloting the use of Impact Risk Zones around Sites of Special Scientific Interest to provide automated advice to planning authorities, and working with the Planning Advisory Service to help local planning authorities get ready to deliver Environment Act requirements, in particular on biodiversity net gain and Local Nature Recovery Strategies.

Local planning authority and developer customer feedback is obtained via the joint Natural England and Environment Agency Development Industry Group and is used to continuously improve the planning advice service. This includes working with our customers so that they consult Natural England early and provide all the information needed to inform our responses, avoiding the need for further consultations.

## Analysis of Natural England's performance

### Summary Schematic: Planning application and pre-application responses



## Performance Tables

The Performance Tables below provide a more detailed breakdown of Natural England's responses to planning application and pre-application consultations.

### Planning Applications

MHCLG Qualifying Consultations Received 2024-25		
Received	Received	%
Received from LPA's - <i>Excl Pre Apps</i>	21,515	95.52%
Received from Other sources - <i>Excl Pre Apps</i>	N/A	
Pre Apps - <i>From All Sources</i>	1,010	4.48%
<b>Total Received</b>	<b>22,525</b>	
LPA Consultations Excluding Pre Apps		
Customer Responses Due in the Period (regardless of receipt date)	Due	%
Deadlines Due	21,475	
Deadlines Met	19,205	89.4%
Deadlines Missed	2,270	10.6%
Reasons for Missed Deadlines		%
Further information needs to be provided (from LPA/developer)	62	2.7%
Complex proposal (e.g. need for site visits/meetings, ongoing negotiations, specialist input)	375	16.5%
Agency resourcing (e.g. workload issues, staff absences, availability of specialist expertise)	1,316	58.0%
(Internal) Process error (e.g. incorrectly assigned deadlines, IT issues)	90	4.0%
<i>Not Specified</i>	427	18.8%
<b>Deadline Extensions Granted</b>	<b>873</b>	<b>4.1%</b>
Reasons for Extended Deadlines		%
Further information needs to be provided (from LPA/developer)	109	12.5%
Complex proposal (e.g. need for site visits/meetings, ongoing negotiations, specialist input)	190	21.8%
Agency resourcing (e.g. workload issues, staff absences, availability of specialist expertise)	555	63.6%
(Internal) Process error (e.g. incorrectly assigned deadlines, IT issues)	19	2.2%
Responses Sent in the Period	Responses	%
Substantive Responses	21,102	
Average Days to provide Substantive Response	9.8	

## Pre-Application Consultations

Pre Apps (All - Not LPA Specific)		
Received	Received	%
Pre App Consultations Received	1,010	
Customer Responses Due in the Period (regardless of receipt date)	Due	%
Deadlines Due	982	
Deadlines Met	765	77.9%
Deadlines Missed	217	22.1%
Reasons for Missed Deadlines		%
Further information needs to be provided (from LPA/developer)	25	11.5%
Complex proposal (e.g. need for site visits/meetings, ongoing negotiations, specialist input)	30	13.8%
Agency resourcing (e.g. workload issues, staff absences, availability of specialist expertise)	39	18.0%
(Internal) Process error (e.g. incorrectly assigned deadlines, IT issues)	4	1.8%
<i>Not Specified</i>	119	54.8%
Responses Sent in the Period (regardless of receipt date)	Responses	%
Holding/DAS Responses	330	38.3%
No Response Type Specified	0	0.0%
Substantive Responses	532	61.7%
<b>Total Responses Sent</b>	<b>862</b>	
Average Days to provide Substantive Response	6.5	

NB. Pre-application consultations include both consultations received directly from developers and consultants as well as pre-application requests received from local planning authorities.

### Commentary

#### Planning Application Consultations

During 2024-25, Natural England received 21,515 planning consultations. 89.43% of consultations were sent within 21 days or other agreed deadlines, which is an improvement from last year (85.96%).

Deadlines were missed with respect to 2,270 (10.6%) consultations and extensions to deadlines were granted on 873 (4.1%) consultations, an improvement from last year (5.4%). Resourcing and workload pressures accounted for the majority of missed or extended deadlines.

Response times improved, with the average number of days for a planning applications response (9.8 days) decreasing compared to the previous year (10.2 days).

Although we have been impacted by staff turnover and the need to upskill new staff, we have seen an improvement in performance compared to 2023-24. We have introduced a range of efficiencies as outlined in this report, primarily based on an increased focus on high risk and high opportunity casework and managing down lower risk work, which we consider is having an impact on our overall performance. Our Impact Risk Zones are a key tool in supporting validation and consultation requirements, and are helping to reduce the number of unnecessary referrals.

#### Pre-application consultations

During 2024-25, Natural England received 1,010 pre-application consultations.

77.9% of pre-application consultations were handled within agreed deadlines, although pre-application does not carry statutory response times in the same way as planning applications. This is an improvement on 2023 – 2024 response times when 68.9% of pre-applications consultations were responded to within agreed timescales.

#### Natural England's wider planning role

In addition to our Development Management role, Natural England also received 541 consultations relating to Nationally Significant Infrastructure Projects, 477 consultations relating to EIA screening and/or scoping and 946 Local Plan consultations. We also received 3,168 consultations from other agencies and organisations, including in relation to our marine planning function.