



URBAN NATURE PLANS +

POLICY BRIEF 01

Urban Nature Restoration: **National-level imperatives under the Nature Restoration Regulation**





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ABOUT THIS POLICY BRIEF

This policy brief is informed by discussions with city staff and policy makers, supported by desk research and policy analysis, and grounded in the practical experiences of cities participating in the EU-funded Urban Nature Plans plus (**UNP+**) project. This document highlights the key challenges in implementing **Article 8 - Restoration of Urban Ecosystems of the Nature Restoration Regulation** (NRR), and outlines action areas for National Governments to support local and regional governments (LRGs) more effectively. It is intended to provide practical considerations and recommendations to national authorities as they engage with LRGs in developing and implementing their National Restoration Plans (NRPs), with particular attention to Article 8.

KEY RECOMMENDATIONS FOR NATIONAL GOVERNMENTS:

The following recommendations are intended to support national governments in enabling LRGs implement Article 8 effectively.

1. Clarify LRG roles in the NRPs and support them with technical and financial guidance.
2. Promote regional cooperation by establishing task forces to address cross-boundary issues such as water management and ecological connectivity, while fostering collaboration between urban and rural areas.
3. Develop national financing frameworks that enable cities to access EU and national funding sources, as well as adopt innovative financing tools to support urban nature restoration and long-term management.
4. Standardise key terminology and monitoring indicators across UNPs to support measurable progress, enhance comparability, while improving public communication on the benefits of nature restoration.
5. Support participatory governance by embedding meaningful community engagement opportunities in urban nature planning, implementation and management processes.
6. Ensure equitable processes and outcomes through reforms in housing, land use, and taxation policies.
7. Facilitate data sharing and capacity building to improve local monitoring, reporting, and adaptive management of urban nature.
8. Develop national guidelines that articulate how UNPs contribute to achieving restoration targets, while allowing flexibility for cities to address specific local conditions.
9. Take full advantage of the available EU resources to address the challenges faced by LRGs:
 - a. EU expert and working groups, such as the European Biodiversity Platform (EUBP) NRR sub-expert group, and the EUBP Working Group on Green Infrastructure, offer avenues for dialogue among representatives of public authorities at EU, national and local levels, civil society organisations, and NGOs to clarify conceptual and implementation challenges and exchange knowledge and best practices.
 - b. The Technical Support Instrument (TSI) helps national authorities design and implement reforms that support the achievement of top EU priorities. As such, it can be mobilised to address capacity gaps at LRG level.¹

¹ At the moment of writing, the TSI priorities for 2026 are not yet available. These are selected on the basis of needs identified across Member States and linked to top EU priorities the Member States are in the process of implementing. Please visit <https://reform-support.ec.europa.eu> for more information.

INTRODUCTION AND CONTEXT

Approximately **75% of Europeans currently reside in urban areas (EEA)**, placing cities on the frontline of critical environmental challenges, such as air pollution, extreme heat, habitat fragmentation, and biodiversity loss. These challenges pose severe risks to both human health and the well-being of other species, with impacts including increased mortality from Urban Heat Islands (UHI), loss of ecosystem services, and declining biodiversity. Insufficient adaptation and governance measures further exacerbate these risks, highlighting the need for immediate, coordinated action (Haase et al., 2014; Kabisch et al., 2016; Lassalle et al., 2023; Pörtner et al., 2023; Pötz et al., 2023; Seddon et al., 2020; Ziter et al., 2022).

Rapid urbanisation across Europe has had a complex and far-reaching impact on urban nature. It has led to the loss, fragmentation or degradation of natural areas. At the same time, it has prompted the integration of green and blue infrastructure, such as parks, gardens, and tree-lined streets, urban wetlands, and water bodies, into the urban fabric. Urban nature plays a significant role in mitigating the UHI effect, improving air quality, managing flood risks, and improving both the quality and health of ecological systems, as well as human wellbeing. Consequently, the erosion of urban nature threatens urban resilience, public health, biodiversity preservation, and economic stability.

Urban nature is critical for mitigating urban environmental challenges. However, despite its clear benefits, urban nature is frequently undervalued or lost due to competing urban priorities.

The EU acknowledges the **pivotal role cities play in addressing the current polycrisis** through various policy instruments such as the **EU Biodiversity Strategy for 2030** and most recently the **Nature Restoration Regulation (NRR)**, which entered into force in August 2024. While the

implementation of the NRR is in its early stages, the fulfilment of existing policies has been weak, in part due to the limited recognition and integration of urban priorities and challenges at national decision-making levels. As a result, **many cities lack the clear strategies and adequate resources needed to achieve these goals effectively.**

Article 8 of the NRR is a crucial step forward, requiring EU Member States to halt the decline in urban green spaces and tree canopy cover by 2030. It also mandates an increase in the total national area of urban green space through its integration into urban grey infrastructure and an increase in tree canopy cover in each urban ecosystem area from 2031 (**European Commission 2024**). This regulatory measure is **in line with the EU's broader sustainability and competitiveness agendas**, underlining climate resilience as crucial for long-term economic growth and stability (**European Commission 2021**).

Achieving these targets demands proactive urban planning and significant financial and technical support to comprehensively integrate and implement urban nature initiatives.

To address these challenges, the **EU Biodiversity Strategy for 2030** has proposed **Urban Nature Plans (UNPs)**² as a comprehensive framework for systematically embedding nature into urban development policies and practices. UNPs are designed to reconcile urban growth with climate resilience enhancement and improving humans and other-than-humans wellbeing. **Without immediate and robust action, European cities face increased environmental degradation, reduced quality of life, and missed economic opportunities for sustainable growth. Thus, the NRR's urban restoration targets represent a key opportunity to ensure European cities remain sustainable, resilient, competitive and liveable for future generations (European Commission 2024).**

² Formerly, Urban Greening Plans

AT THE HEART OF THE CHALLENGE

Article 8 of the NRR sets ambitious targets for urban ecosystem restoration across the EU. While the regulation mandates the EU Member States to develop **National Restoration Plans (NRPs)**³, **implementation** falls largely on **local and regional governments** (LRGs), and on city administrations in particular.

However, there is a concern that the **governance frameworks** and planning instruments provided by the NRR, including the **Uniform Format**⁴, will fall short of clearly defining **LRG roles and responsibilities in the development and implementation of the NRPs**. This ambiguity would have the effect of undermining their effective operationalisation, leading to fragmented, inconsistent, or inefficient planning and implementation of restoration measures.

This brief identifies the following key challenge areas:

- How can Member States effectively engage LRGs in NRP development?
- In what ways can the roles and responsibilities of LRGs be clearly defined and reflected throughout planning and implementation processes?
- What mechanisms can support coherence, aggregation and inclusion of local actions into national-level strategies?
- What types of national support, including capacity-building efforts, are necessary to enable LRGs to meet their restoration responsibilities effectively?

1. Urban Ecosystem Delineation and Conflicting Ownership Interests (public vs. private)

Challenges in **delineating Urban Ecosystem Areas (UEAs)**⁵ — within which Art. 8 and its targets apply — have been raised by different actors, including public authorities at different levels, civil society organisations, and NGOs. **While the Nature Restoration Regulation allows flexibility for different cities within the same Member State to adopt different, context-appropriate approaches, maintaining overall coherence is essential.** Furthermore, **potential trade-offs and spill-over effects** on the areas falling outside of the designated area need careful considerations in the delineation of its boundaries (cf. **infra**).

Land ownership patterns further complicate implementation. For instance, in **Mannheim**, approximately 90% of sealed land is privately owned, and while stone gardens have been outlawed since 2021, enforcement of this provision has proven to be challenging. At the same time, **conflicts** emerge from **competing urban priorities**. As observed in **Paris** with the opening to the public of the former Petite Ceinture railway which has been serving as an important biodiversity corridor, park management should balance the needs of people (e.g., access to green spaces and usability) with other-than-human needs. This highlights tensions in managing green and blue infrastructure effectively.

Action areas at national level:

- Provide for **context-sensitive delineation** of UEAs while ensuring consistency. Develop guidelines that help define UEAs based on local ecological, social, and spatial specificities (e.g., density, land use, connectivity). At the same time, set national standards to ensure coherence — such as data requirements, inclusion of key biodiversity corridors, or consultation processes with local stakeholders. This guidance should take into account the reduced availability of means of smaller towns, and provide support accordingly.
- Provide guidance to manage **land-use tensions**, particularly between **private and public land ownership**. This could include:
 - Legal frameworks or incentives to encourage private landowners to contribute to restoration goals (e.g. subsidies, tax reductions, or maintenance support).

³ EU Member States are required to submit National Restoration Plans to the Commission within two years of the Regulation coming into force, describing how they will deliver on its targets (cf. Chapter III of the Regulation).

⁴ The uniform format is a comprehensive planning support tool, set up to closely follow the requirements of the Regulation, while supporting Member States in the implementation phase and allowing for comparability across Member States. See [Implementing Regulation \(EU\) 2025/912](#).

⁵ According to NRR Art. 14(4), Member States must define and map urban ecosystem areas in all their cities and towns and suburbs. These areas should either cover the whole city/town or parts of the city/town including at least its urban centres and clusters, and peri-urban areas where deemed appropriate. Countries can also choose to combine nearby cities or towns into a single urban ecosystem area.

- Participatory planning approaches which consult and engage local stakeholders and communities to integrate ecological targets with public and private land use.
- National guidelines to help municipalities manage conflicting priorities in multifunctional urban nature spaces (e.g. biodiversity vs. recreation).
- Develop national funding guidelines for urban nature that allow municipalities to provide **financial support to private landowners** to install urban green and plant trees.

2. Regional Collaboration and Coherence

Nature restoration cannot be confined within administrative borders. Effective implementation requires **regional coordination** and **coherent planning frameworks that bridge urban and peri-urban areas**, especially for water management and ecological connectivity. The NRR recognises this need by allowing Member States to aggregate adjacent UEAs — across cities, or towns and suburbs — into single urban ecosystem areas. This opens opportunities for more integrated, cross-jurisdictional planning, particularly in metropolitan regions.

Cities like **Paris** exemplify both progress and persistent challenges. The city aligns its urban nature efforts with various planning instruments (e.g., climate plan, urban master plan, bioclimatic plan) at multiple scales (city-wide, metropolitan, and local). However, high spatial pressure forces trade-offs that often shift environmental burdens onto surrounding areas. This undermines the principle of ‘**no net loss**’ and raises the broader question of cities’ obligations to their peri-urban areas, highlighting the need to consider regional dynamics in planning and compensation mechanisms.

Fragmented planning structures further complicate efforts. Paris and Serbian cities struggle with limited regional governance, while German cities focus predominantly on urban cores, simplifying implementation but also avoiding broader ecological responsibilities. In contrast, examples such as Mannheim’s biotope network planning with neighbouring areas, and Scotland’s 19-member green authorities’ network on human and ecological connectivity demonstrate the potential of integrated, cross-boundary collaboration — though still often experimental.

To ensure ecological restoration is truly effective and equitable, it is essential to recognise the interdependence of urban centres and their surrounding areas. A shift toward integrated, regionally coherent strategies is needed —

one that balances densification, ecological integrity, and cross-jurisdictional accountability⁶.

Action areas at national level:

- Mandate the integration of restoration into **regional strategies** and cohesion policies.
- Encourage **regional task forces** to address cross-jurisdictional issues and promote **inter-municipal alliances** for data sharing, peer-to-peer learning, and joint funding applications.
- Reduce **fragmentation of planning frameworks across administrative levels** to increase coherence and provide clear guidelines on implementing **no net loss at regional level**. Consider the opportunity of aggregating adjacent UEAs where that makes sense.
- Develop mechanisms for integrating and collaborating on **ecosystem corridors** that cross political boundaries, including Member State, city, or regional borders. These can take the form of formal agreements, joint planning instruments, funding incentives.
- **Standardise terminology and methodologies** (e.g., “green space”, “compensation”) for effective monitoring, compliance, and comparability.

3. Financing Urban Nature Restoration: Incentives and Instruments

Article 21(7) of the NRR requires the European Commission (EC) to provide an overview of available resources for implementing the regulation (this includes EU funding, national budgets, and private sector contributions), along with assessing financial needs and gaps, and proposing mechanisms to fill these gaps. In this context, Member States have a key role in mobilising both **public investment** and **private sector resources to fulfil restoration objectives**⁷.

Cities such as Barcelona and Paris report **limited financial support** from their national governments, pushing them to experiment with alternative solutions. **Barcelona** employs

⁶ See also [ICLEI \(2022\) Cities for an Integrated Landscape Approach - Curbing Land Degradation and Restoring Europe’s Soil Ecosystems](#).

⁷ This could include Citizens’ financial participation. National governments would need to adjust regulatory frameworks or implement financial incentives.

regional funding mechanisms, like CO₂ taxes, to finance restoration projects. When direct financial incentives are not feasible, cities focus on providing guidance and support, for example, **Paris** has developed a digital tool, **BiodivScore** to support public and private construction project managers in their greening efforts. Further, Paris is pioneering innovative financing by applying their national carbon credit scheme and creating a high-integrity carbon label for local carbon removal projects to spur local impact and initiate blended finance to scale such efforts. A public-private company⁸ was formed that enables local corporate investments in nature-based solutions.

The EC is exploring innovative **financing tools** such as carbon removal certificates, nature credits, and payments for ecosystem services. However, the challenges⁹ surrounding the design of these instruments and the timeliness of their delivery might limit their role in financing the NRR.

Action areas at national level:

- Mainstream **biodiversity goals** into national budgets, including reallocating existing budget lines to support local NRR initiatives, and advocate for their integration into the upcoming **EU Multiannual Financial Framework** (2028-2034).
- Map and disseminate **successful examples of innovative financing tools** employed across Member States that can be replicated at local level.
- Provide **blended finance mechanisms** to de-risk private investments. This means using public funds (e.g., grants, guarantees, or concessional loans) to reduce financial risks for private investors, thereby encouraging their participation in restoration projects that may otherwise seem too risky or unprofitable.
- Ensure accessibility to funding instruments for **under-resourced municipalities**, through simplified processes, targeted technical assistance, dedicated funding streams, clear communication, and capacity-building programmes.
- Explore the integration of urban nature restoration with national carbon certification schemes and other market mechanisms that include robust safeguards against greenwashing while enabling market accessibility for small stakeholders. This could include aligning biodiversity funding with relevant frameworks, such as **climate funding** and the **Carbon Removal Certification Framework** (CRCF) or biodiversity credits¹⁰.

- Develop a national mapping of the regional spatial distribution of ecosystem services surpluses and deficits to identify compensation and equitable distribution mechanisms.

4. Behavioural Change and Social Engagement: Leveraging Monitoring and Communication

Restoration efforts require significant **behavioural change** in how residents interact with and value urban nature. Vandalism and neglect of urban nature reflect **low community ownership** and **weak stewardship**. **Public awareness** around restoration measures and their benefits is often reactive. For instance, flooding becomes a motivator only after a personal experience while **air quality** is a more tangible entry point for public engagement. Quantifying and effectively communicating restoration benefits¹¹ are widely recognised as critical for securing public and private support and building meaningful inclusive governance processes. Yet, measuring benefits remains extremely challenging due to their public nature and longer delivery timeframes. **Barcelona** has estimated €45 million annual savings from its tree canopy (2024) through the I-Tree Eco application. It evaluates pollutant retention, carbon sequestration, carbon storage, and avoided runoff. This represents a financial saving in resources and expenses related to the costs that would be involved in using other carbon or pollutant retention mechanisms. Cities like **Paris** and **London** are advancing in quantifying ecosystem service benefits of urban nature. **Belgrade prioritises investment in land acquisition** to tackle illegal construction threatening urban forests.

Action areas at national level:

- Fund **community-based education** programmes and participatory planning processes.

⁸ [Coopérative Carbone Paris & Métropole du Grand Paris | Développer & financer des projets de réduction/séquestration carbone et écologiques en Ile-de-France et en circuit-court.](#)

⁹ Currently still solely voluntary and in its infancy, demand for such market vehicles remains limited, albeit growing. Market-building still requires public financial engagement particularly through blended finance instruments. Ensuring quality across different dimensions — nature outcomes, justice, and sound governance — is critical.

¹⁰ See ICLEI's forthcoming position paper on nature markets.

¹¹ Recognising this challenge, the EC has included a dedicated research topic in the Horizon Europe Work Programme 2025: Understanding the perceptions of and improving communication on the biodiversity crisis and nature restoration benefits to sustain citizen engagement and democratic governance.

- Support municipalities in developing tailored **communication strategies** grounded in lived experience and local values.
- Standardise **metrics and evaluation frameworks** to track progress and demonstrate value. At the same time, frameworks should be flexible enough to reflect local specificities.
- **Provide municipalities with technical and financial support** for monitoring, reporting, and communicating ecological, economic, and social returns on restoration investments.

5. Justice and Equity in Urban Restoration

Implementation of the NRR must embed a **justice lens** to avoid reinforcing inequalities, making sure that improving the cities liveability does not make them unaffordable. Rising **housing costs** threaten equitable access to urban nature while tax systems and **speculative investment trends** (e.g., in [Paris](#) almost one out of five housing units, 19%, is unoccupied—this is 262,000 units) challenge inclusive urban liveability. **Risks of gentrification** and insufficient social housing can be exacerbated by greening initiatives, if not managed proactively. At the same time, **co-creation methodologies** remain crucial for aligning

restoration efforts with local communities' needs and expectations, and ensure their meaningful participation at every stage of the process.

Action areas at national level:

- Establish safeguards against gentrification and implement **progressive taxation** and **anti-speculation** rules to protect equitable housing (i.e., ensuring that all people, regardless of income, background, gender or race, have access to safe, affordable and adequate housing).
- Ensure that long term affordable housing is integrated into areas with access to green and blue infrastructure, and that urban nature investments do not contribute to gentrification. Align **rent control measures** and **social housing strategies** with nature restoration goals to promote inclusive access to healthy, climate-resilient environments for all residents.
- Support restoration projects that **prioritise underserved and marginalised communities** and integrate social housing considerations.
- Consider embedding **reparative justice** in regulatory frameworks holding the private sector accountable by requiring them to compensate for and repair environmental damage.

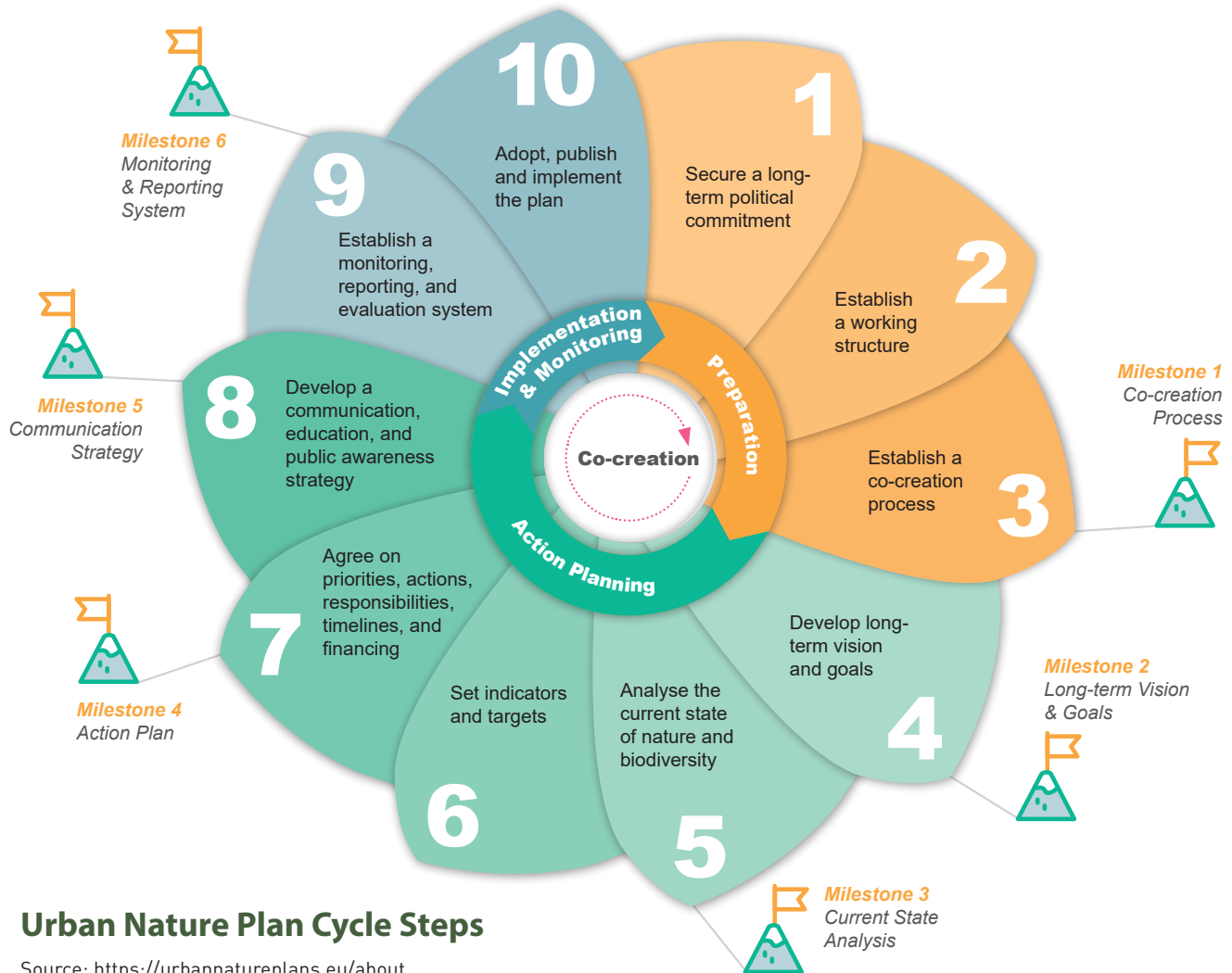
THE ROLE OF URBAN NATURE PLANS

The idea of Urban Nature Plans was introduced in the EU Biodiversity Strategy for 2030 to facilitate the return of nature into cities and reward community action¹². They are an integrated planning framework that emphasises the important role that nature plays in improving the liveability and resilience of the urban milieu. They can help address the challenges posed by the lack of coordination and coherence across sectors like housing, mobility, and urban greening. As such, and as recognised by the **Nature Restoration Regulation Reference Portal**¹³, UNPs are an important tool in the restoration of urban ecosystems. In particular, they should serve as a foundational instrument to **align local and regional restoration efforts with national strategies and broader EU objectives** under the NRR, particularly Art. 8 on urban ecosystems and Art. 14(9) on synergies with climate change mitigation and adaptation,

land degradation neutrality and disaster prevention, and help prioritise restoration measures accordingly.

¹² To bring nature back to cities and reward community action, the Commission calls on European cities of at least 20,000 inhabitants to develop ambitious Urban Greening Plans by the end of 2021. These should include measures to create biodiverse and accessible urban forests, parks and gardens; urban farms; green roofs and walls; tree-lined streets; urban meadows; and urban hedges. They should also help improve connections between green spaces, eliminate the use of pesticides, limit excessive mowing of urban green spaces and other biodiversity harmful practices. Such plans could mobilise policy, regulatory and financial tools. ([EU Biodiversity Strategy, 2020.](#))

¹³ The [Nature Restoration Regulation](#) (NRR) Reference Portal includes a comprehensive set of guidelines, explanatory notes, reference data and other materials to assist with the development and implementation of the National Restoration Plans.



- UNPs can help foster **coherence across planning levels** — from local to regional to national — by supporting consistent integration into national planning, monitoring, and reporting processes.
- **Equity and social outcomes** should be embedded as core principles within UNPs, ensuring that nature restoration strategies do not reiterate and exacerbate existing socio-economic and environmental inequalities but rather incorporate principles of justice into their design, implementation and evaluation.
- UNPs should promote the use of **standardised terminology** (e.g. “green space”, “social justice”), design criteria and urban planning standards (e.g., square metres per household, minimum standard for connectivity, etc.), and monitoring methodologies and indicators for better alignment with national-level indicators and cohesive evaluation¹⁴.
- The existing UNP guidance provides a robust framework for **multi-stakeholder engagement** that integrates local restoration priorities across multiple levels of government.
- Member States should build on this guidance by including practical examples of effective **multi-level governance collaboration**, highlighting good practices for engaging regional and local authorities — particularly those targeting smaller municipalities and underrepresented communities.

¹⁴ While the NRR Art. 8 only considers urban green spaces and tree canopy cover as indicators, additional indicators are relevant and useful.

CONCLUSION

Implementing Article 8 of the NRR requires **coordinated national-local strategies**, targeted support, and the development of tools to **facilitate coherence, co-creation, and funding**. The **UNPs** and the expanded **UNPplus** framework, offer a concrete mechanism for Member States to **bridge governance gaps**, empower cities, and meet urban nature restoration goals.

About UNPplus

This policy brief is the result of discussions with city staff and policy makers, desk research, policy analysis and grounded in the experiences of cities participating in the EU-funded project UNPplus. It highlights key challenges in the implementation of Art. 8 of the NRR and action areas for National Governments to better support LRGs. UNPplus has a clear role in bridging these gaps by fostering shared understanding and collective advocacy.

UNPplus can act as a facilitator by aligning frameworks, offering tools, and enabling city networks to advocate collectively. UNP+ supports regional collaborations by providing tools and fostering a shared understanding of the benefits of urban nature.



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