

**Telford & Wrekin Local Plan**

**Green and Natural  
Environment – Topic  
Paper**

**September 2025**

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## 1 Executive Summary

**1.1** This topic paper sets out the evidence, regulatory framework and rationale relating to the Green and Natural Environment policies NE1: Biodiversity and geodiversity, NE2: Trees, hedgerows and woodlands, NE3: Biodiversity Net Gain and NE4: Development greening factors in the Telford & Wrekin Local Plan 2020-2040 publication version (February 2025).

**1.2** These policies are compliant with the National Planning Policy Framework, December 2024 (NPPF) and are positively prepared, justified, effective and consistent with national policy.

## 2 Introduction

**2.1** This topic paper is part of the background technical work to inform the Local Plan and explains, in greater detail than is possible in the plan itself, the process by which the Council has arrived at the policy approach on the green and natural environment which is set out in the Telford & Wrekin Local Plan 2020-2040 publication version.

**2.2** This topic paper should be viewed in light of Policies NE1: Biodiversity and geodiversity, NE2: Trees, hedgerows and woodlands, NE3: Biodiversity Net Gain and NE4: Development greening factors in the Telford & Wrekin Local Plan, and in conjunction with the designated sites which are shown on the Policies Map.

**2.3** This topic paper should be read alongside the Topic Paper: The Green Network, which provides background on the other policies in the Green and Natural Environment section of the Local Plan. Further evidence on Strategic Landscapes and green gaps is provided in an evidence document Telford and Wrekin Borough Landscape Designations Review (September 2023).

**2.4** The following review draws principally on evidence that supports the Local Plan. Other background documents that form part of the evidence base for the Local Plan referred to in this study have been quoted where relevant. The paper does not intend to repeat what is contained in other documents but, rather, seeks to quote relevant parts where it will support this review.

## 3 Biodiversity

**3.1** The formal definition of biodiversity taken from the Convention on Biological Diversity is 'the Variability among living organisms from all sources including terrestrial, marine and other aquatic ecosystems, and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems.'

**3.2** Biodiversity is all around us, not just in designated sites and special landscapes, but also in our urban and agricultural landscapes, our gardens and local parks. Biodiversity is essential for our health and wellbeing; it provides opportunities for education and recreation, and we are reliant upon it for a range of 'ecosystem services', from carbon storage, urban cooling and flood water alleviation to pollination and food production.

### Biodiversity in Telford & Wrekin

**3.3** Telford was originally built as a New Town, with urban areas designed to sit among extensive green spaces and biodiversity-rich spoil mounds and woodlands which are remnants of the area's rich industrial heritage. The original intention to create a 'Forest City' has resulted in a town with plentiful trees, woodlands and hedgerows and this legacy is protected through

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the local Green Network designation<sup>(1)</sup>. Newport is a Market Town in the north east of the borough. The historic route of the Newport Canal, now a site of Special Scientific Interest (SSSI), runs through the town and Aqualate Mere Ramsar Site lies just to the east in Staffordshire. The Ironbridge Gorge World Heritage Site, in the south of the borough, is a heavily wooded gorge with species-rich grassland meadows and the River Severn running through the birthplace of industry. The borough supports an active agricultural industry and the rural area is made up of scattered villages and small settlements in an agricultural landscape with fields, hedgerows, rivers and scattered woodlands. In the south of the borough, the Wrekin Hill SSSI is valuable both for biodiversity and geodiversity, is an attraction to visitors and is a recognisable and visible feature in the landscape.

**3.4** There are eight Sites of Special Scientific Interest (SSSI), 20 Local Nature Reserves (LNR), 47 Local Wildlife Sites (LWS) and 52 Ancient Woodland Sites in the borough. Throughout the plan period, several additional LNRs are planned for designation, which will be identified on the Local Plan Policies Map. A small part of the Shropshire Hills National Landscape falls within the borough boundary, with the majority being in the adjacent county of Shropshire.

## 4 Geodiversity

**4.1** The IUCN defines geodiversity as *“the variety of the geological and physical elements of nature, such as minerals, rocks, soils, fossils and landforms, and active geological and geomorphological processes”*.

**4.2** The Shropshire Geodiversity Action Plan sets out the process by which geodiversity assets are recorded, monitored and designated as Local Geological Sites across Shropshire and Telford & Wrekin.

**4.3** Geodiversity and biodiversity are inextricably linked. The varied natural landform and substrate of the borough has created the variety of soil types, acidity levels and water tables which support the range of habitats present and which, in turn, support a diverse assemblage of species. The rich mineral resources historically present in the area supported productive mineral and coal-based industries, resulting in the remnant spoil heaps and restored mineral working sites which have become valuable stepping stones and refuges for biodiversity within the urban area today.

### Geodiversity in Telford & Wrekin

**4.4** Shropshire and Telford & Wrekin are exceptionally rich in geodiversity, with designated sites representing the majority of the recognised divisions of geological periods. Geological sites require specific management to maintain the stability and visibility of rock exposures and are a resource for education, historic interest and research. The Shropshire Geological Society is active in providing advice to landowners.

**4.5** There are 25 Local Geological Sites in the borough (formerly known as Regionally Important Geological and Geomorphological Sites (RIGS)). A number of the Sites of Special Scientific Interest in the borough include geological assets within the designated features.

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1 The Green Network designation is further discussed in a specific technical paper accompanying the submission of the Local Plan. Technical Paper: The Green Network (March 2025)

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## 5 Trees, Hedgerows & Woodlands

**5.1** Trees, hedgerows and woodlands are an integral part of the natural environment and provide a range of 'ecosystem services' including; urban cooling, shelter, biodiversity value, visual amenity, carbon storage, noise and air filtering, and flood alleviation. Woodlands provide significant visual amenity, have recreational value where public access is afforded and are valuable refuges for wildlife. They hold back flood water and can provide timber products and wood fuel. Hedgerows, both in rural and urban environments, provide corridors along which wildlife can move and, associated with the right tree planting, can dramatically change the 'sense of place' of a new development or existing community. Veteran and ancient trees are particularly valuable and are considered irreplaceable, since no new planting can replicate the historic or biodiversity value of these specimens in a meaningful way.

### **Trees, hedgerows & woodlands in Telford & Wrekin**

**5.2** The largest part of the borough's tree and woodland resource is located within the built up environments of Telford and, to a lesser extent, Newport. These trees, hedgerows and woodland, together with the open spaces with which they are associated, collectively constitute the design concept of a 'Forest City' on which the New Town of Telford was originally based.

**5.3** Telford & Wrekin contains some extensive areas of woodland including areas of Ancient and Semi-natural Woodland. The wooded areas of the borough are strongly associated with the Ironbridge Gorge and The Wrekin SSSI but are also found within the range of former pitmound sites and areas of public open space spread throughout the urban area. Residents of the town have strong relationships with the woodlands and value both their visual amenity and the recreational opportunities they provide.

**5.4** There is a significant resource of ancient and veteran trees within the borough. These valued trees have historical and ecological value and are found both within and outside of ancient woodland sites.

**5.5** Hedgerows and shelter belts were an integral part of the design of Telford and continue to make a significant contribution to the feel of the town while providing screening, opportunities for recreation, sustainable travel routes and allowing biodiversity to move through, and thrive within, the urban area. The majority of this resource is now 40 or so years of and is well established and enshrined in the 'sense of place' of many communities.

## 6 Planning Policy/Regulatory Framework

**6.1** The inclusion of biodiversity, trees and green infrastructure issues in national planning policy demonstrates the Government's commitment to ensuring that sustainable development includes protection and enhancement of the natural environment, and recognises that nature positively contributes to quality of life and health and wellbeing.

### **National Planning Policy Framework (NPPF) 2024**

**6.2** The NPPF sets out, in Section 15, the role of the planning system in conserving and enhancing the natural environment. This includes not only minimising impacts, but also providing net gains for biodiversity, alongside climate change mitigation and adaptation. The NPPF seeks to establish coherent ecological networks to make more, bigger, higher quality and better

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connected designated sites, which support the recovery of threatened species. This will also increase the resilience of the natural environment to current and future pressures, while recognising the wider benefits of the ecosystem services it provides.

**6.3** Paragraph 187 sets out core planning principles included that planning policies and decisions should 'contribute to and enhance the natural and local environment' by: protecting valued landscapes, recognising ecosystem services, minimising impacts on biodiversity and providing net gains, Establishing coherent ecological networks, preventing unacceptable levels of soil, air, water or noise pollution or land instability, and remediating degraded land.

**6.4** Paragraph 188 states that: 'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'

**6.5** Paragraph 189 speaks of giving great weight to conserving and enhancing landscape and scenic beauty in nationally designated sites including National Landscapes, alongside wildlife and cultural heritage. Paragraph 190 sets out how applications for major development within such designated sites should be considered, and that permission should be refused other than in exceptional circumstances and where public interest can be demonstrated.

**6.6** Paragraph 192 relates to protecting and enhancing biodiversity and geodiversity through plans, which should:

- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

**6.7** Paragraph 193 sets out how local planning authorities should address biodiversity in planning decisions: 'When determining planning applications, local planning authorities should apply the following principles:

- a. if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b. development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

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- c. development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons<sup>70</sup> and a suitable compensation strategy exists; and
- d. development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

**6.8** Paragraphs 194 and 195 cover habitats sites (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 ) and states:

- ‘The following should be given the same protection as habitats sites:
  - a. potential Special Protection Areas and possible Special Areas of Conservation;
  - b. listed or proposed Ramsar sites; and c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.
- The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.’

**6.9** Paragraphs 196- 201 set out how planning policies and decisions should address ground conditions and pollution and their effects on health, living conditions and the natural environment, including: ensuring sites are an acceptable use of and suitable for the proposed uses; securing appropriate remediation and site investigation information; limiting noise and light pollution; supporting compliance with national air quality objectives; and ensuring integration with existing businesses and community facilities.

## Review of Current Local Planning Policy

**6.10** Telford & Wrekin Council’s current planning policies on biodiversity, geodiversity and trees are contained within the Telford and Wrekin Local Plan 2011- 2031. This will be superseded following adoption of the new Local Plan.

## 7 Legislation & Guidance

**7.1** This act came into force in November 2021, and introduced statutory requirements for a range of natural environment issues.

- Strengthened biodiversity duty for public authorities to conserve and enhance biodiversity through their functions.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network
- Duty upon Local Authorities to consult on street tree felling
- Strengthen woodland protection enforcement measures
- Conservation Covenants



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- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature
- Legally binding target on species abundance for 2030

## State of Nature 2023

**7.2** The most comprehensive report on the UK's current biodiversity. State of Nature uses the latest and best data from biological monitoring and recording schemes, collated by the incredible work of thousands of skilled people, most of whom are volunteers, to provide a benchmark for the status of our wildlife.

- [State of Nature 2023 - report on the UK's current biodiversity](#)

## Blueprint for Halting and Reversing Biodiversity Loss: the UK's National Biodiversity Strategy and Action Plan (NBSAP) for 2030

**7.3** The UK national biodiversity strategy and action plan (NBSAP) for 2030 draws on the commitments made by the UK to summarise and emphasise our collective ambition and determination to work together to address biodiversity loss. The NBSAP commits the UK to achieving all 23 of the Kunming-Montreal Global Biodiversity Framework (GBF) targets at home. The UK submitted a set of 23 National Targets to the Convention on Biological Diversity on 1st August 2024. These sit alongside the NBSAP and include a subset of country-level commitments to illustrate the actions by which the GBF will be delivered in the UK.

## Environmental Improvement Plan (2023) for England

**7.4** The first revision of the 25 Year Environment Plan, originally published in 2019. This updated plan sets out how government will work with landowners, communities and businesses to deliver each goal for improving the environment

- [Environmental Improvement Plan 2023 - GOV.UK](#)

## Green Infrastructure Framework

**7.5** Natural England resource comprising principles, standards, mapping datasets, planning and design guide, process guide and supporting tools for practitioners to deliver good green infrastructure.

- [Green Infrastructure Home](#)

## Shropshire and Telford & Wrekin Local Nature Recovery Strategy

**7.6** As part of legally-binding commitments, the Secretary of State for Environment, Food and Rural Affairs appointed 48 responsible authorities to lead on preparing a local nature recovery strategy for their area. Together these strategy areas cover the whole of England with no gaps or overlaps. The strategy for Shropshire and Telford & Wrekin was published for consultation in August 2025. Shropshire Council is the responsible body, with Telford and Wrekin Council and Natural England contributing as supporting authorities. The wider steering group is comprised of representatives of key stakeholders and additional specialists and interested parties are actively feeding in to the process. The strategy will map important areas and for habitat



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restoration, and include actions for key species. The strategy will feed into biodiversity net gain assessments and steer habitat compensation, as well as informing planning decisions, and forming a focus for nature conservation action and co-operation across Shropshire.

- [Shropshire and Telford & Wrekin Local Nature Recovery Strategy | Shropshire Council](#)

## Biodiversity Net Gain – Guidance

**7.7** Details on the delivery of BNG via plan making and development management.

- [Biodiversity net gain - GOV.UK](#)

## Mandatory Biodiversity Net Gain in England - A Guide, IEMA (2024)

**7.8** A simple ‘how to’ guide on England’s first phase of mandatory Biodiversity Net Gain (BNG), taking practitioners through a project lifecycle from pre-purchase of a site, through design, planning permission, construction, operation and monitoring.

## Natural Environment White Paper (2011)

**7.9** The Government White Paper on the natural environment The Natural Choice: securing the value of nature (2011) sets out the government strategy with relation to the natural environment for the next 50 years. The paper supports the use of green infrastructure as an effective planning tool and recognises the multi-functional value of green spaces and the ecosystem services which open space provides. Urban green spaces are recognised for their value in allowing species to move through urban areas as part of a functioning ecological network.

## Making Space for Nature: A Review of England's Wildlife sites and Ecological Network (2010)

**7.10** Making Space for Nature (2010), also known as the Lawton Report, details the importance of ecological networks and assesses the quantity, quality and functionality of designated sites. The Lawton Report concluded that designated sites are effective in conserving biodiversity up to a point, but that they are too fragmented, isolated and small to be capable of responding to the challenges of climate change and increased recreational and land use pressures. The report sets out proposals to make designated sites ‘more, bigger, better and more joined up’ through a network of core areas, corridors, stepping stones and restoration areas. The recommendations of the Lawton Report were carried through into the NPPF.

## ODPM Circular 06/2005: Biodiversity and Geological Conservation - Statutory obligations and their impact within the planning system

**7.11** This government circular remains in place alongside the NPPF and national Planning Practice Guidance (PPG): it is proposed to be reviewed and replaced but no timescale has yet been set. The circular sets out that a local planning authority has a duty to protect biodiversity both in terms of species and habitats when making planning decisions. Crucially it also states in Paragraph 99 that protected species surveys should not be left to planning conditions.

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## **British Standard 42020 (2013) Biodiversity - Code of practice for planning and development**

**7.12** BS 42020 is a national standard developed by BSI in association with biodiversity experts and a range of stakeholders. The standard provides clear guidance on appropriate level and method of survey and professional standards for consultant ecologists providing information to the planning system. The British Standard sits alongside a range of species specific survey and mitigation guidelines and standard methodologies.

## **The Natural Environment & Rural Communities Act (2006)**

**7.13** The Natural Environment & Rural Communities (NERC) Act (2006) identifies a list of habitats and species of principal importance for nature conservation (also known as Section 41 habitats and species) which are a material consideration in planning decision making.

## **BS5837 (2012) Trees in relation to design, demolition and construction: recommendations**

**7.14** This British Standard provides guidance, in respect of development sites, for a balanced approach to the retention of trees, how the assessment of impacts of trees on design considerations should be conducted and on the means of protecting trees during development works.

## **Trees in the Townscape: A guide for decision makers**

**7.15** Trees in the Townscape was written by the Trees and Design Action Group (TDAG) and is an innovative, collaborative, cross specialism best practice guide. The guide sets out twelve principles for local authorities to follow for managing trees in an urban context. The principles include knowing your tree resource, ensuring the right trees for the right place, procuring healthy trees, appropriate management and awareness of associated risks.

## **BS3998 (2010) Tree work recommendations**

**7.16** This standard gives recommended best practice principles for works to trees and hedgerows in order to maintain the physiological function, health, safety and structural integrity of tree and hedgerow assets.

## **A Tree & Woodland Framework for Telford & Wrekin: Connecting communities with trees and woodlands (2016 - 2021) by Telford & Wrekin Council**

**7.17** This framework sets out the mechanism by which the Council will ensure appropriate management of the tree and woodland resource in the borough and its relationship with communities. The framework sets out to manage the tree resource for the benefits it can deliver: recreation, visual amenity, biodiversity value and shade while being aware of the conflicts which can develop between trees and residents. The framework sets the principles by which the Council will manage its own tree resource and will make decisions on nuisance complaints and tree work applications and seeks to enshrine the 'right place – right tree' concept in tree management and planting in the borough in the long term.

## **Other tree guidance**

**7.18** Other relevant tree safety and management guidance:

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- NJUG Vol 4 – Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees (2007)
- Large species trees in urban landscapes – a design guide and management guide (draft 3) by CIRIA (November 2010)

## 8 Key Issues and Opportunities

**8.1** The creation of Telford as a New Town centred around a 'Green Network' of interconnected green spaces, woodlands, shelter belts, historic pitmounds, water courses and water bodies which gave the town a strongly green identity which continues to be valued by its residents today. The new Local Plan provides an opportunity to maintain that rich legacy, to carry it forward into new evidence based planning policy and to set out a vision for the future of the borough. The Local Plan seeks to balance desirable growth with maintaining and enhancing the green spaces which make the borough an attractive place to live and work.

**8.2** Further detail of the Green Network can be found in the Topic Paper: The Green Network which accompanies the Telford & Wrekin Local Plan Submission Version.

**8.3** The borough already supports nationally and locally designated sites for biodiversity, including SSSIs and Local Wildlife Sites. There is strong local and political support for the declaration of further Local Nature Reserves where land is protected from development and managed for biodiversity, public access and recreation. Additionally, a number of Local Green Spaces have been designated through neighbourhood plans, and Telford and Wrekin Council have committed to protecting over 300 areas of publicly owned land by designating them as Green Guarantee sites.

**8.4** The borough has a number of significant woodland areas, both within and outside of designated sites, with many ancient woodland sites and veteran trees. There are opportunities to protect, restore and expand woodland and to ensure that new development includes significant tree provision located to maximise contributions to climate change adaptation, to wildlife corridors, and to strengthening functioning green infrastructure.

**8.5** Current policies within the Local Plan give particular weight to trees covered by Tree Preservation Orders (TPOs) and within Conservation Areas. The new Local Plan is an opportunity to give recognition to the value of trees outside of Conservation Areas and which are not covered by TPOs but which are valued by local people and contribute strongly to visual amenity and local character. The new Local Plan is also an opportunity to reflect the stronger protection set out in NPPF for veteran trees, ancient woodlands and other irreplaceable habitats such as peat bogs, which should be protected from damage or loss in the strongest terms.

**8.6** Large scale, phased development schemes are fairly common in the borough due to the way in which Telford in particular has developed. It is important for developers to understand biodiversity and tree constraints at an early stage of site investigation so that master planning can accurately reflect all of the constraints on the site. It is important that biodiversity assets are assessed as part of outline planning application submissions so that impacts can be properly avoided and mitigated in line with both NPPF and biodiversity net gain hierarchy requirements, and ensure sustainable management can be achieved in the long term. This 'front loading' of ecological and tree assessments in the planning process provides certainty for the developer when approaching the development of the site, allows detailed assessments of viability to include all the potential costs and constraints, and allows the Local Planning Authority to include appropriate conditions on any outline consent granted.

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## 9 Strategic Policies

**9.1** The Local Plan vision is based on investing in the sustainable development of the borough, by enhancing the quality of life and the natural environment for those who live, work and visit the area. The description of the type of place we aspire to by 2040 includes several green and natural environment goals: Telford and Wrekin will be a Forest Community with an enhanced and protected natural environment that local residents can enjoy close to their doorstep; it will be a borough that is adapted to climate change; new development contributes to the health and wellbeing of residents, and The Council, residents and stakeholders are custodians of the boroughs historic assets and environment and these will be given the highest levels of protection for future generations to come. Policies S1 and S2 set out the Council's strategic commitment to protecting and enhancing the natural environment and how development can help support this through the 'forest community' approach.

### S1 Protecting and Enhancing the Borough's Green Spaces

**9.2** S1 enjoyed support from both developers and statutory consultees for the way in which the policy seeks to protect and enhance green spaces in the borough. Respondents did however requested further clarity within the policy around woodlands and 'forest communities'. Some consultees also felt that while the policy was positive, enhancing the boroughs green space required more detail than a single policy could give and may be better addressed in another section elsewhere in the plan. In response to this feedback the council has made suitable alterations to improve the clarity and accessibility of the policy.

**9.3** This policy is in line with NPPF Paragraph 187 as it contributes to 'protecting and enhancing valued landscapes, sites of biodiversity or geological value', 'recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of .....trees and woodland;' and also 'providing net gains for biodiversity'. It aligns with NPPF paragraph 192 by promoting restoration and recovery of nature, and paragraph 162 which advocates a 'proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes,'.

### S2 Nature conservation

**9.4** Most consultees for this policy supported the premise and general goal, agreeing that developments can and should protect, maintain and enhance biodiversity and geodiversity. There was however some confusion about the policy and its relation to Biodiversity Net Gain (BNG) policies elsewhere in the plan. A few consultees also considered that section 7 (Green and Natural Environment) did enough to cover the enhancement of the boroughs green spaces others suggesting that combining policies S1 and S2 may be helpful in order to streamline the chapter for developers.

**9.5** This policy is in line with NPPF Paragraph 193, which states: 'opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.' This NPPF paragraph also sets out a hierarchy of protection: 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

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**9.6** Following the public consultation on the draft Local Plan (Regulation 18) the Green and Natural Environment section of the plan was re-worked to simplify the policies and the requirements upon developers, to provide certainty for developers and to reflect the representations of members of the public, local interest groups and statutory consultees. Following the formal publication period (Regulation 19) of the Local Plan, some additional minor modifications are proposed to the policies to reflect the responses received.

**9.7** The policies within the Green and Natural Environment section of the publication version of the Local Plan are as detailed and justified below.

## **NE1: Biodiversity & geodiversity**

**9.8** The majority of representations made relating to this policy were strongly supportive including supporting representations from Natural England and Shropshire Wildlife Trust. A local business group based in Newport objected to the policy as an ‘unnecessary burden on developers’ especially with reference to the seeking of biodiversity enhancements. Proposed modifications include links to the Lawton Principles.

**9.9** This policy is in line with NPPF paragraph 193 in setting criteria-based policies against which development proposals will be assessed. The policy also recognises, in line with paragraph 192, the hierarchy of international, national and locally designated sites and species. NE1 clearly sets out the level of ecological information required within a planning application to allow a determination against the policy, and relevant national legislation, to be made. The seeking of ‘opportunities for securing measurable net gains for biodiversity’ is directly specified in Paragraph 192 of the NPPF and the inclusion of this requirement within policy NE1 is in line with National Guidance and is reasonable and sound.

## **NE2: Trees, hedgerows & woodlands**

**9.10** Five representations, including Shropshire Wildlife Trust and Natural England, directly supported the policy. The Woodland Trust felt that the policy did not go far enough in the recognition of ancient woodland and veteran trees as irreplaceable habitats and the strict protection of those habitats required under NPPF and a minor modification is proposed to clarify the wording of the policy on those aspects. One developer and a local business group objected to the policy considering it to be too onerous on developers in the requirement to retain, protect and appropriately manage trees on proposed development sites. Proposed modifications to this policy help to clarify the requirements on developers are loss and mitigation, as well as evidence requirements.

**9.11** This policy, including the proposed minor modification, is in line with NPPF Paragraph 193 which states that: ‘development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists’. It also aligns with paragraph 192 which states that plans should ‘promote the conservation, restoration and enhancement of priority habitats’. The policy requires developers to retain, protect and appropriately manage trees as a matter of normal practice, but does include some criteria under which the removal of some trees (not including aged or veteran trees or trees covered by Tree Preservation Orders) may be acceptable, and makes provision for securing delivery of offsite planting. The proposed policy is in line with NPPF and is reasonable and sound.



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## NE3: Biodiversity Net gain

**9.12** Amongst the seven policies within this chapter of the local plan NE3 received the most responses. Consultees felt that the policy was ambitious however concerns were raised in regards to the Biodiversity Net Gain standards within the plan and many requested these standards be lowered to reflect national policy. Consultees felt that higher standards could negatively impact viability and requested that the council provide further evidence to justify raising targets above the national level. Proposed modifications clarify the requirements and evidence developers should provide to support applications.

**9.13** This policy is included in the Local Plan to due to the statutory requirements laid out in the Environment Act 2021. As well as meeting legal requirements, the provision of Biodiversity Net Gain (BNG) will support objectives in the Local Plan for enhancing the natural environment, achieving good urban design and supporting climate change adaptation.

**9.14** The policy expects all new development to deliver biodiversity net gains, which is in line with NPPF paragraphs 187, 192 and 193, which all promote securing net gains for biodiversity within developments. The policy expects proposals that are exempt from statutory BNG to provide gains proportionate to the development, and that major developments should deliver in excess of 10% with an aspiration for 20%, subject to viability. Research by a range of bodies has indicated that the impact to viability of delivering more than the statutory 10% uplift is limited, as the main cost to a development is to reach the statutory 10%. BNG costs are low when compared to other policy costs, and, if considered and designed early into a project, have a negligible impact on viability especially if delivered onsite.

- Viability Assessment of Biodiversity Net Gain in Kent, Kent County Council (June 2022)
- Biodiversity Net Gain: Financial & Economic Appraisal for Major Infrastructure Projects, Defra (March 2020)
- Biodiversity net gain and local nature recovery strategies-Impact Assessment, Defra (October 2019)

**9.15** This policy acknowledges that achieving the required percentage BNG may be difficult on some sites, and that off-site compensation may be of greater benefit in some cases. As long as the mitigation hierarchy for both impacts and compensation has been demonstrated, and proposals comply with other policies in the Local Plan, the council aims to take a flexible and pragmatic approach to delivery of BNG, to support local nature recovery priorities and benefit the district as a whole. Further information on BNG in Telford and Wrekin is provided on our website: [Telford & Wrekin Council | Biodiversity net gain](#)

## NE4: Development Greening factor

**9.16** The responses highlight the necessity of preserving rural character and biodiversity while considering development within green networks. Some responses question the council's evidence for requiring the Greening Factor while others request that the Greening Factor be encouraged rather than required or stated as a target rather than a minimum. Proposed modifications provide additional clarity on the application of the Greening Factor fits or overlaps with other natural environment policy designations.

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**9.17** This policy seeks to link biodiversity net gain with Forest Community principles, to ensure that suitable green infrastructure is provided 'on the doorstep' across the built environment, not just in nature reserves or parks. Good quality, multifunctional green features within our streets make them more liveable and attractive, increase climate resilience, and help ensure sustainable long-term management of our shared spaces.

**9.18** The Development Greening Factor is a key element of the National Green Infrastructure

**9.19** Framework (GIF), a new guidance tool created by Natural England help increase the amount of green cover to 40% in urban residential areas. This aims to deliver a commitment within the Defra's Environmental Improvement Plan 2023 : that the public should be able to access green space or water within a 15-minute walk from their home. It provides a structure to analyse where this is needed most in urban environments, to support equitable access to greenspace.

**9.20** The Development Greening Factor uses a simple process to quantify the amount of green infrastructure in a development, giving a score between 0 and 1. Different developments will be expected to meet minimum scores, and there are a variety of ways that this can be delivered. Evidence relating to policy NE4: Development Greening Factor is presented in the Telford & Wrekin Green Space Factor Study by The Green Infrastructure Consultancy (June 2023). Local green infrastructure needs will be decided via use of national tools such as Tree Equity Score and Environmental Benefits from Nature Tool until local evidence is developed.

**9.21** This policy is in line with the following paragraphs in the NPPF:

- Paragraph 20, which states: 'Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for: d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.'
- Paragraph 96, which states: 'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: c) enable and support healthy lives, through both promoting good health and preventing ill-health, .....— for example through the provision of safe and accessible green infrastructure....'
- Paragraph 162, which states: 'New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. .... through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems;'
- Paragraph 188, which states: 'Plans should: .....take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; '
- Paragraph 199, which states: 'Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, ..... such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.'

## Other Green and Natural Environment Policies

**9.22** Evidence relating to policy NE5: Green Network is presented in a separate Technical Paper: The Green Network (2025)



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**9.23** Evidence relating to policy NE6: Shropshire Hills and Strategic Landscapes is presented wholly in the evidence document Telford and Wrekin Borough Landscape Designations Review by The Environment Partnership (September 2023).

**9.24** Evidence relating to policy NE7: Strategic Green Gaps is presented in the Telford and Wrekin Borough Landscape Designations Review (September 2023).

## 10 Conclusion

**10.1** The Council proposes policies within the Telford & Wrekin Local Plan which will ensure the protection, maintenance and enhancement of the natural environment, which are in line with NPPF and national planning legislation in that they are positively prepared, justified, effective and consistent with national policy.