



Telford & Wrekin
Co-operative Council

Protect, care and invest
to create a better borough

Biodiversity Duty

Consideration Report & Action Plan



Part 1. Consideration & Action Setting

June 2025

Foreword

At Telford & Wrekin Council we have long prided ourselves in creating communities who can connect with rural landscapes and wild places. We have protected green spaces such that 89% of households are within a 4 minute walk of an accessible green space. We know our residents and businesses appreciate this green and pleasant environment and choose to make it part of their everyday lives.



Biodiversity, wildlife, is all around us, as anyone who has fed the birds in a garden will know. These acts from the small to large can bring rewards, not just to wildlife, but for us too, as we go about our daily lives.

The natural environment has the ability to lift our mood and provide places to relax and explore as we experience the constant changing of the seasons. Nationally and locally, the events of the last few years have reinforced just how important this can be for our wellbeing.

Our natural green spaces can also help us through less obvious ways. They can provide safe walking and cycling routes away from busy roads. They absorb rainwater amongst the hard surfaces of the urban environment, reducing flooding. Trees can provide shade and have a cooling effect during the height of summer, making the increasing heatwaves more manageable for us all, especially our most vulnerable neighbours.

Most importantly our natural environment is home to a wide range of plants and animals, and this variety of living things is often referred to as biodiversity. Increasingly, the global effects of human action, pressures on land use and climate change are leading to a decline in that biodiversity. Many species are really struggling despite the many years of conservation efforts by organisations around the world.

Telford & Wrekin Council recognises our responsibility to the natural world and we welcome the increased consideration and transparency brought about by the Environment Act's changes to the Biodiversity Duty on Public Bodies.

We will continue to conserve and enhance the biodiversity of the borough benefiting wildlife and benefiting us all as we strengthen our connection with nature.

Cllr Carolyn Healy
Cabinet Member for Neighbourhoods, Planning & Sustainability

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The Biodiversity Duty

What is biodiversity and why is it important?

Put simply, biodiversity is the biological diversity, or variety of life on earth. It includes all species of plants, animals and fungi at all levels, encompassing everything from genetic diversity to ecosystems.

There are a wide range of overlapping reasons why biodiversity is important, from the survival of our species to moral obligations. It underpins our economy, food production, sense of place and physical and mental health. It also helps buffer us against disease and climate change. It inspires pride, creativity and contentment.



However, fundamentally, each of us depending on our individual values and circumstances will have different motivations, from purely practical to ethical.

Why do we have a Biodiversity Duty?

The planet is undergoing a global extinction event, which is primarily caused by human activities. This is not just a problem for tropical rainforests in far off lands. The state of the UK's biodiversity is in the worst 10% of the world and 13% of the remaining species here are threatened with extinction.

In response to this, and international commitments, the UK Government published its [Environmental Improvement Plan \(EIP23\)](#), in January 2023. Within it, they set out commitments to significantly improve the state of the nation's natural environment.

By 2030, the government has committed to:

- halt the decline in species abundance
- protect 30% of UK land

By 2042, the government has committed to:

- increase species abundance by at least 10% from 2030, surpassing 2022 levels
- restore or create at least 500,000ha of a range of wildlife rich habitats
- reduce the risk of species extinction

- restore 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term

They have amended legislation to aid the delivery of these national commitments.

What is the Biodiversity Duty and what do we need to do?

The [Environment Act 2021](#) has amended the pre-existing Biodiversity Duty, within Section 40 of the Natural Environment and Rural Communities Act 2006, to include conserving and enhancing biodiversity.

Section 40 Duty to conserve and enhance biodiversity

“For the purposes of this section “the general biodiversity objective” is the conservation and enhancement of biodiversity in England through the exercise of functions in relation to England.

A public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective.

After that consideration the authority must (unless it concludes there is no new action it can properly take)-

- (a) determine such policies and specific objectives as it considers appropriate for taking action to further the general biodiversity objective, and*
- (b) take such action as it considers appropriate, in the light of those policies and objectives, to further that objective.....”*




Along with considering, planning and delivering actions to conserve and enhance biodiversity, there are also now duties for reviewing and reporting as well as a new overseeing body, with powers of prosecution, to hold government and other public authorities to account (Office of Environmental Protection).



Telford and Wrekin

What biodiversity is in Telford and Wrekin?

Telford is proud to have been recognised by the UN as a [Tree City of the World](#). The ethos of Telford, since its inception, was to be a forest town, with woodland and trees being planted throughout the heart of urban communities.



The trees planted at the birth of the town are now reaching maturity. This brings huge benefits to residents and the environment as well as challenges to TWC, especially with new tree diseases, causing significant management implications.

Telford also has a large rural area of mixed arable and pasture farmland. Part of the [Shropshire Hills National](#)

[Landscape](#) (formerly Area of Outstanding Natural Beauty) enters the borough's western boundary, covering the iconic Wrekin and Ercall Site of Special Scientific Interest (SSSI).

The borough has eight nationally important nature conservation sites designated as Sites of Special Scientific Interest (SSSIs), six of these for biodiversity. It is also in the impact zone of Aqualate Mere SSSI which receives additional protection as an internationally designated wildlife site (under the Ramsar Convention).

These sites are all regularly assessed by Natural England for their health. Only two of the nine are in Favourable Condition. The rest are facing fundamental challenges to being able to retain their reasons for designation. This includes the three SSSIs owned by TWC. Actions captured within this plan aim to identify solutions to address this situation.

TWC has committed to designate significant areas of the semi-natural land in its ownership as [Local Nature Reserve \(LNR\)](#). The 18 areas already designated now extends to 590ha. This equates to 3.2ha per 1,000 residents, over three times the national benchmark.

TWC has plans to deliver five more LNRs. Again these are tightly entwined within the urban fabric for daily use by our communities.

What are TWC already doing?

Many of the functions TWC carry out affect biodiversity directly, including how we manage protected wildlife sites. Other actions have indirect effects, like the type, volume and disposal of materials we buy and use. Both direct and indirect effects may be significant, either on their own, or in combination with other actions carried out by TWC or others.

Biodiversity itself is also complex, with different species and habitats being more or less resilient to different human activities. An example is a roadside verge which can be left to grow as a wildflower meadow. This allows the grasses and flowers to grow and set seed before being cut and removed.

This ancient practice makes the area increase in wild plant species and provides a long period of nectar for pollinators.

However, the cutting and removing can also remove butterfly eggs and seed for birds over winter. So having an approach that balances the need for close mown areas for road visibility, longer meadow areas for flowers and pollinators and the occasional area left uncut for a couple of years at the edge of a hedgerow can be helpful.



Therefore, to consider our impacts it is important to look broadly across our corporate policies, declarations, pledges, strategies and plans to find existing commitments.

Our Policies, Declarations, Pledges, Strategies and Plans

Currently, TWC has the following policies, strategies and plans, which have been identified with the potential to help or harm biodiversity. To inform an understanding of their impacts the Strategic Environmental Assessments (SEAs), Habitat Regulations Assessment reports (HRAs) and other related documents have been used where available.

Shropshire and Telford & Wrekin Local Nature Recovery Strategy (draft)

This strategy is being actively compiled for formal public consultation, with expected adoption at the end of 2025. It is a requirement of the Environment Act and TWC is an active partner in its creation.

It will comprise of an ecological description and identify priorities for action with accompanying measures. It will also contain a map which shows the prescribed “core” wildlife areas, and also those which are the highest priority to receive conservation activities to enable nature recovery. These will aid all landowners and managers in identifying the most appropriate actions for nature recovery.

Telford and Wrekin Playing Pitch Strategy and Local Play Strategy

Both strategies are under review and as part of that work the reviewed strategies will integrate the formal sports and play facilities within the wider green network.

Both the previous and developing Play Strategy recognise the value of the natural world for play. The previous strategy states play “*within the environment is recognised as probably the most important natural form of children’s activity and one crucial to increasing their awareness of the real world. The Council will encourage the awareness of natural play using natural elements*”.



It is planned within the Strategy to set up a working group to explore issues related to environmental and natural elements play.

The reviewed Playing Pitch and Outdoor Recreation Strategy Stage B was completed in April 2024, which relates to winter sports and the remaining stages of review are in process.

The new Playing Pitch and Outdoor Recreation Strategy is programmed to go out to consultation in summer 2025. Adoption is sought in late 2025 and this will look to include wider recreational activity in green and blue spaces.

Council Plan (2024)

One of the Council's four priorities is that "our natural environment is protected, and the Council is taking a leading role in tackling the climate emergency". One of the four key outcomes to deliver this is working towards protecting and enhancing wildlife.



Health and Wellbeing Strategy (2023)

This strategy has identified a "Green and Sustainable Borough" as one of its eight priorities for the borough. It recognises that *"access to green space and the natural environment has significant benefits to health, in terms of opportunities for physical activity and the impact on emotional health."*

It also quotes the 2022 residents' survey that found that almost *"half of respondents indicated that improved open green spaces is the most important priority to them for improving cultural, leisure and sports facilities and service."*

Tree and Woodland Management Policy (2021)

The summary of policies of this document recognises that the *"Council needs to ensure the quality of the tree and woodland assets to enjoy the benefits now, but also help to pass on these benefits to future generations; recognising the importance of maintaining safe green spaces and woodlands alongside enhancing biodiversity and combating climate change."*

Telford and Wrekin Council Becoming carbon neutral Action Plan (2021)

This plan contains a number of actions to use the ability of habitats to capture CO₂ from the air and lock the carbon into the soil.

Climate Emergency Declaration (2019)

TWC declared a Climate Emergency on 25th July 2019. It has pledged to become carbon neutral by 2030.

Telford and Wrekin Local Plan (2018)

The HRA Screening of the Local Plan changes found no likely significant effects which could harm internationally protected sites. The Plan contains several policies to directly safeguard, mitigate and enhance biodiversity through the development management process.

The Sustainability Appraisal (2017) assessed the objective: “*To enhance the Ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.*” There was uncertainty on the overall impact given scale of development, however it concluded that it is probable that minor negative impacts will occur, but mitigation and negotiation to these is possible.

The Local Plan is currently under review and has progressed to Publication (Regulation 19) Stage. It includes policies to safeguard biodiversity and where possible enhance it beyond statutory minimum levels. This includes an aspiration for major developments to provide at least 20% biodiversity net gain, which is above the minimum statutory level of 10%. The inclusion of a development greening factor will aid climate adaptation and the protection and enhancement of the urban green networks is also set out.

Air Quality Updating and Screening Assessment 2015

This assessment states that the air quality of the borough is very good and the levels of pollutants are relatively stable. The borough’s Air Quality Management Annual Status Report 2022 monitors pollutants over time, especially for key locations in the urban area. It shows that levels of NO₂, a key pollutant harming biodiversity, is slowly declining over time and as being under the national Air Quality Objective levels.



Local Transport Plan (2011-26)

This document's SEA contained the following two objectives and conclusions:

Objective: To protect and where possible enhance biodiversity and geodiversity and explore opportunities for green infrastructure.

Conclusion: That the baseline condition was Moderate and future trends would be stable with or without the plan, however stated there should have an overall positive impact *“due to the integrated approach with the Green Infrastructure Strategy, the inclusion of mitigation measures and the promotion of a modal shift, thus minimising negative effects from road traffic”*.

Objective: To identify, manage and protect habitats and species which are important on an international scale.

Conclusion: *“The condition of the sites should remain stable without LTP3 due to the high level of protection to which they are afforded through international legislation. However, in the longer term some change might be unavoidable, as a result of the changing climate.”*

Therefore, it is likely that it will have neutral to slight positive impacts upon biodiversity.

Environmental Policy (2010)

This corporate policy states that TWC will conserve and enhance the natural environment and biodiversity of the Borough by:

- *“Protect and enhance biodiversity within the planning system*
- *Incorporate biodiversity into relevant council strategies, plans and programmes*
- *Protect and enhance biodiversity within the Local Authority estate*
- *Participate in the Shropshire Biodiversity Partnership and assist in the delivery of the Shropshire Biodiversity Action Plan*
- *Promote the social benefits of biodiversity in the delivery of public services and support access to nature for the local community”*

Responsibilities for it's delivery are given as:

“Leadership and support for the policy will be provided within the Council through elected representatives and senior managers. Its delivery is the overall responsibility of the Chief Executive. Key local strategies will help to deliver the various aims contained in the policy.”



West Midlands' Biodiversity Pledge

TWC signed this, based on the earlier Biodiversity Duty, in 2009, in which it committed to:

- Ensure the conservation of biodiversity is incorporated into all relevant corporate strategies, plans and programmes.
- Champion the benefits of biodiversity within local partnerships including Community Strategies and Local Area Agreements.
- Consider the impacts on biodiversity and review policies and actions to assist wildlife adapt.
- Participate actively in Local Biodiversity Partnerships and assist with the delivery of Local Biodiversity Action Plans.
- Protect and enhance biodiversity within the planning system and deliver the key principles for biodiversity set out in national planning guidance.
- Seek to ensure that up-to-date biodiversity data is available and used appropriately and support the maintenance and development of Local Records Centres.
- Work in partnership with others to identify, protect and enhance Local Sites of Importance for Biodiversity, taking them into account within the planning and land management systems.
- Protect and enhance biodiversity within the local authority estate.
- Promote the social benefits of biodiversity in the delivery of public services and support access to nature and understanding of the natural world within formal and informal education and community engagement.
- Raise awareness of all staff, elected members, contractors and the general public with regard to biodiversity issues.

Sustainable Procurement Policy (2009)

This document's Statement of Intent includes the acknowledgement that TWC has a responsibility to progress sustainable development through the purchasing of buildings, goods and services. It has been augmented by the Council's Environmental Procurement Guidance document which was adopted in 2020. This includes doing so in line with the Council's Environmental Policy and Climate Change Strategy.



Actions

Moving forward

The Council recognises the far reaching requirements of the Biodiversity Duty across all Council services.

The [current government guidance from Defra](#) has been relied on to steer this consideration and our formation of actions. The guidance identifies key functions,

concerns, recommendations and locations to lead consideration and action planning. These “topics” have been directly incorporated within Part 2 of this document, the action plan. Some, where not applicable to the geography of the borough (e.g. coastal), have been removed and a small number of additions made which are implicit within the guidance and relevant to our context.



The action plan is presented as a standalone table. Although some are cross cutting and difficult to categorise, to aid navigation, actions have been split into the following broad groupings:

- Green Space and Site-based topics
- Built Environment topics
- People and Communities topics
- Development Planning topics
- Broader Corporate Policy topics

Topics have been allocated one or more action for completion.

A range of information has been recorded against each action:

- key intended purpose
- predicted impact on biodiversity (geographic spread, duration and level)
- predicted impact on people (geographic spread, duration and level)
- impact on TWC resources

With regard to resources, it is acknowledged that no additional funding is provided to a public body to meet their Biodiversity Duty. Therefore, all actions are subject to them being resourced either from continuing current activities, changes in activities, efficiencies and/or securing additional external income.

Data, Monitoring and Reporting

A comprehensive baseline of TWC's impacts is not available due to the very wide scope. However, proxy data is available, such as protected sites, habitat and species distribution, via broader scale datasets.

Going forward, the Environment Act requires Local Authorities (excluding parish councils) to publish reports on how they have complied with their duty. It also sets out the timetable for reporting periods and publication dates:

- the first reporting period should finish no later than 1st January 2026.
- the following reporting periods must be within five years of the previous one.
- reports must be published within 12 weeks of the end of the reporting period date.

By law, our report must include:

- a summary of the action TWC has taken to deliver the duty.
- how we plan to deliver our duty in the next reporting period.
- actions Planning have taken to meet biodiversity net gain obligations.
- details of gains resulting, or expected to result, from approved biodiversity gain plans.
- how Planning will meet their biodiversity net gain obligations in the next reporting period.
- any other information considered appropriate.



The Government's current [Biodiversity Duty reporting guidance](#), including specific requirements, is published online and should be checked prior to compilation of each report.



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