

Date: 22 December 2025

Our ref: ST&W/LNRS

Your ref:



BY EMAIL ONLY:

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Dear Lynn,

Shropshire, and Telford & Wrekin Local Nature Recovery Strategy – Pre-publication Panel Response.

Thank you for providing Natural England with the draft Shropshire, and Telford & Wrekin Local Nature Recovery Strategy on 11th December 2025, for consideration under pre-publication requirements set out in Regulation 13 of The Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023.

Thank you also for your presentation to the LNRS pre-publication panel on 17th December 2025. The panel would like to congratulate you and your team on preparing such a high-quality strategy. Panel members also remain impressed by the collaborative approach taken towards developing this strategy, and especially your drive to engage as widely as possible resulting in such a large response during public consultation.

Summary response of the pre-publication panel to Shropshire, and Telford & Wrekin LNRS.

Based on the draft strategy provided for the pre-publication panel, the panel recommendation is that the document is **APPROVED** for publication, with minor amendments as listed.

The panel welcomed changes to the strategy made in response to comments from the pre-consultation panel meeting on 6th June 2025. Whilst acknowledging work is still needed to incorporate all remaining consultation comments, the panel did not feel a further meeting prior to publication would be needed. However, this does assume the outcome on completion of outstanding work is as you anticipate, and that the following comments arising from the pre-publication panel meeting are addressed.

Mapping

1) The panel returned to a point from the pre-consultation meeting, included in the written response as follows:

We like the fact that any user can simply click on a field and the applicable actions will appear. However, some users are potentially interested in one particular action (e.g. natural flood management) throughout the county. Currently, it is not easy to click on a single action and see where it is proposed at a county scale, it is suggested that the map can be searched by action.

Although this is a mutually desirable function it hasn't yet been possible to add, so this original suggestion above remains. Your further preference to insert a link to connect people directly to the relevant section of the document (for further information) would also be a helpful addition, acknowledging there are constraints on time and the technology.

2) When viewing the APIB layer separately (with Opportunity layers turned off), the APIB layer disappears when zoomed in to the 1km square level. The details of the APIB also cannot be viewed. The panel suggests exploring a means to allow this larger scale view, whilst recognising the information is not itself missing.

3) Given the veteran tree layer is not Open Government Licence data, the panel suggests ensuring this cannot be downloaded, in contravention with its licence.

4) It is recommended that names for mapping are brought more into alignment with other LNRs. If retaining the NRN title is preferable, it needs to be clear what is an APIB and what is a mapped measure.

Strategy Document

1) At page 18, regarding the ancient woodland measure A8.1: "Restore and expand nature rich ancient semi-natural woodland".

To note, it isn't possible to expand ancient woodland, so please consider changing this word to "buffer and connect". Also, nature-rich ASNW is probably unnecessary – generally it is all nature rich and if it isn't we still want to restore it. Leaving the wording nature-rich in relation to other woodlands is fine.

Also, consider including PAWS within this measure and have just a single one, unless these are split out for purposes of mapping differently.

Recommended wording: **"Restore, buffer and connect ancient semi-natural woodland" or "Restore, buffer and connect ancient woodland"**.

2) At page 58 there is a discrepancy in targets.

First paragraph "*woodland creation targets have been set out by Natural England and the Forestry Commission at... 16.5% by 2050*"

The target is correct. But the target is actually set by the UK government in the EIP and the footnote links to a blog by FC and NE policy heads. The footnote should ideally link to the regulations that mandate the target:

Recommended wording: **"Trees are an important part of the UK Government's Environmental Improvement Plan (EIP) and woodland and tree targets have been set out in the EIP and associated regulations. To achieve these targets, England needs to increase tree cover to 16.5% by 2050"**.

Recommended link: [The Environmental Targets \(Woodland and Trees Outside Woodland\) \(England\) Regulations 2023](#).

Second paragraph: "*positioning it well to exceed the UK Government's aspiration of 19% tree cover by 2050*."

This differing figure is confusing. It is the figure proposed by the Committee for Climate Change in order to meet future carbon budgets, but is not the target settled on by the UK government for the EIP in England.

Recommended wording: **"positioning it well to exceed the UK Government's aspiration of 16.5% tree cover by 2050"**.

Recommended footnote: [The Environmental Targets \(Woodland and Trees Outside Woodland\) \(England\) Regulations 2023](#).

Two other points to note on page 58:

Ash dieback: Recommend a different form of words, since although ash dieback is a threat in woodland settings, in general the woodland cover will not reduce but the species composition will shift dramatically away from the ash component as other species are planted or naturally regenerate under the thinning ash canopy, impacting dependent species; in the wider countryside, there is more likelihood of impacting canopy cover since replacement is less likely.

Recommend: **“Ash dieback is likely to impact canopy cover targets, especially in the wider countryside where lone trees may not be replaced, and to influence nature recovery by shifting the species composition of ash-dominated woodlands such as those on Wenlock Edge and Ironbridge Gorge.”**

Also note that the link is broken to the Shropshire Council’s Trees Outside Woodlands programme.

3) At page 70 where the strategy reads “Endorsement from government agencies reassures stakeholders that the LNRS is robust, fair, and aligned with national priorities” the panel prefers that “endorsement” is replaced with “support” to avoid confusion with organisational responsibility for permitted actions.

Further Suggestions

1) On page 20, there is reference to afforestation as one of the three main land use pressures on nature, now or historically. Has afforestation been such a significant pressure in Shropshire? It could be seen that way in various other counties, but it doesn’t seem quite such a significant feature here.

2) On page 25, *“Woodland creation is a priority action for achieving carbon net-zero targets – but the ‘right tree, right place’ principle should be applied”*

Recommended wording: change “but” to **“and”** as being much more positive.

3) On page 35, *“Conifer plantations in the landscape area, which are generally considered to be of low biodiversity value, could transition into more diverse habitats, such as mixed woodlands”*

Recommended wording: **“Conifer plantations in the landscape area, which are generally considered to be of low biodiversity value, compared to native deciduous woodland, could transition into more diverse habitats”**.

The panel look forward to receiving the final draft strategy and a response to these comments (with your intention to publish within a pre-publication period early next year) but also agree that the Shropshire, and Telford & Wrekin LNRS is already a sound, comprehensive and well-written document.

I commend you and your team for the work undertaken to reach this point and I’m encouraged to learn that discussion amongst yourselves and your steering group has already begun to shift towards delivery. Defra’s Arm’s Length Bodies look forward to continuing their work with you and wider partners to further nature recovery through this strategy.

Yours sincerely,



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