

# Sustainability Appraisal Report (incorporating Strategic Environmental Assessment) of the Shropshire Hills National Landscape Draft Management Plan 2025 - 2030

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#### **CONTENTS**

#### 1 CONTEXT

Introduction, description of the assessment process, main priorities of the Plan, relationship to other plans and strategies

#### 2 **BASELINE**

Reference to description of the state of environment and current trends, character of the National Landscape and relevant environmental problems

#### 3 ENVIRONMENTAL ASSESSMENT (essential)

Compatibility of management plan objectives and environmental objectives, specifically by assessment of individual policies, scope for mitigation, review of alternative policies

## 4 "SUSTAINABILITY OBJECTIVES" APPRAISAL (optional)

Review of policies against other sustainability objectives.

## 5 **MONITORING**

Use of indicators and targets, relationship to Management Plan monitoring.

## 6 **TECHNICAL REVIEW**

Gaps in information, technical deficiencies, scope for new research

#### 7 APPENDIX 1

Matrix appraisal of draft National Landscape Management Plan policies against Environmental and Sustainability objectives

A two page non-technical summary is published separately.

#### 1.1 INTRODUCTION TO THE SHROPSHIRE HILLS NATIONAL LANDSCAPE

The Shropshire Hills was designated as an Area of Outstanding Natural Beauty in 1958. It covers 802km² in Shropshire and the Borough of Telford and Wrekin, extending from the Wrekin to the Clun Forest and from the Stiperstones to the Clee Hills. The area is one of 46 National Landscapes in the UK. The Shropshire Hills National Landscape Partnership is made up of 36 members, and hosted by Shropshire Council.

Lying between the Welsh uplands and the English Midland Plain, the Shropshire Hills is a landscape of diversity, with no single feature or hill dominating. A very varied geology is reflected in the different landforms, habitats and wildlife. The hills themselves, rolling pastoral farmland and woods, rivers and river valleys are the main elements of the landscape. Heritage and antiquity is ingrained in the landscape – in settlement and field pattern, hillforts, traditional buildings, and industrial heritage from charcoal burning to lead mining and stone quarrying. The National Landscape designation is unusual in its breadth, and also recognises such intangibles as tranquillity and remoteness, along with human values such as local community and culture, and opportunities for quiet enjoyment.

#### 1.2 DESCRIPTION OF THE APPRAISAL PROCESS

The methodology used for this Sustainability Appraisal (SA) is based on Natural England's guidance for the Strategic Environmental Assessment (SEA) of National Landscape Management Plans. It has also been informed by the sustainability appraisal for the previous two National Landscape Management Plans, SEAs undertaken by other National Landscapes, and government guidance on SEA. The SA has been developed in parallel with the revision of the National Landscape Management Plan, and this report is published alongside the draft Management Plan for consultation. Natural England's guidance is that because National Landscape Management Plans aim to benefit the environment, the SEA/SA process should be strategic and focus on the policies within the Management Plan.

The natural beauty of the Shropshire Hills is particularly affected by economic and social influences in the area. We have therefore opted once again to go beyond the legal minimum for Strategic Environmental Assessment, and decided do a fuller Sustainability Appraisal. In line with Natural England's guidance however, this process does not need to be as rigorous as that undertaken by planning authorities for Local Development Framework documents.

A Sustainability Appraisal Scoping Report was produced in December 2024, and comments on this were received from Natural Resources Wales. As a result of this some additional plans, policies and programmes have been considered and the comments have influenced the draft Management Plan.

The heart of the Sustainability Appraisal process is the matrix assessment of each draft Management Plan Policy against the SEA and SA objectives. Since there is not much change in the draft policies from the last Management Plan, the key issues arising are seen to be very similar to those described in the previous Sustainability Appraisal. The matrix assessment from the last Sustainability Appraisal has been refreshed for the policies contained in the public consultation draft of the Management Plan. This was carried out by the National Landscape Manager, who has acted as editor of the Management Plan. An update of the key findings forms the basis of the non-technical summary.

In the matrix assessment (Appendix 1), the interaction between the Management Plan policies and SEA/SA objectives is scored using the following scale:

Policy strongly supports SEA/SA objective ++
Policy supports SEA/SA objective +
Policy is neutral in relation to objective N
Policy potentially works against SEA/SA objective Policy strongly works against SEA/SA objective --

#### 1.3 SUMMARY OF MANAGEMENT PLAN STRATEGIC PRIORITIES

The chosen six strategic themes for the new 2025-30 Shropshire Hills National Landscape Management Plan are as follows:

- Nature is restored and natural processes regenerated
- Climate is stabilised through decarbonising, and we are resilient to change
- Water is clean, and its flows and cycles support our lives, and all life
- Land is nurtured so it can sustain us
- People are healthy and connected to nature in vibrant communities and as welcome visitors
- The Shropshire Hills are valued and cared for as a special Place

# 1.4 RELATIONSHIP TO OTHER PLANS AND STRATEGIES, INCLUDING INTERNATIONAL PROTECTION OBJECTIVES

The full list of other plans and strategies identified as relevant, and their implications for the National Landscape Management Plan is published at in an Appendix to the Sustainability Appraisal Scoping Report (updated following consultation).

#### 2. SUMMARY OF ENVIRONMENTAL BASELINE

A State of the Shropshire Hills report was published in May 2025 and is available at https://www.shropshirehills-

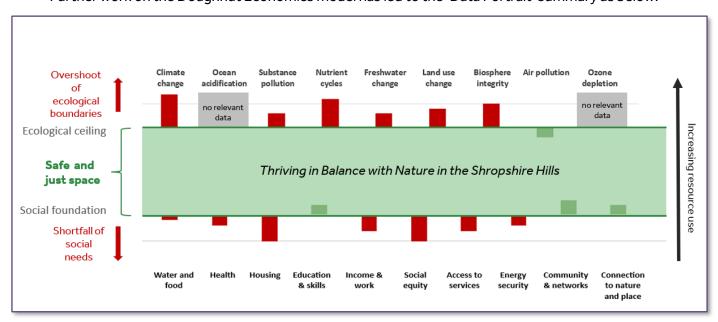
nl.org.uk/Documents/State%20of%20Shropshire%20Hills%20Report%202025.pdf.

This summary combines insights from our Shropshire Hills Doughnut data portrait, available data from the Protected Landscapes Targets & Outcomes Framework and the detailed 'State of the Shropshire Hills' report, a supporting document to the Plan.

The quality of the Shropshire Hills landscape continues to be high in a national context but is under a range of pressures. Despite a lot of activity and positive efforts, condition of some of the special qualities of the National Landscape is declining, and progress in addressing the most urgent issues is inadequate. Gains in some aspects are offset by declines in others, and the potential of the area to deliver even greater public benefits is hampered by these trends.

- Nature Good quality habitats are fragmented, and not all valuable sites are in good condition, with limited progress to improve these. Ecosystem functions (e.g. hydrology, soils, pollinators) are reduced.
- Climate Greenhouse gas emissions are higher than the national average, and only reducing at half the speed necessary to reach net zero by 2050. Carbon storage within land and soils in the area is very significant, but some of this is being lost as emissions.
- Water The quality of water has declined in some sub-catchments. Levels of some nutrients in water are higher than needed to maintain important ecological features.
- Land The proportion of land in agri-environment schemes has fallen. There is some increase in agro-ecological farming and in woodland.
- People The area is fairly prosperous on average but there are pockets of deprivation and some people face real challenges, often across intersecting issues, e.g. income, health, access to services and nature.
- Place Development pressures and increasing road transport are gradually eroding quality of place and tranquillity. The condition of heritage assets has improved. Community activity remains strong.

Further work on the Doughnut Economics model has led to the 'Data Portrait' summary as below:



#### 3. ENVIRONMENTAL ASSESSMENT (required)

Compatibility of Management Plan objectives and SEA environmental objectives, specifically by assessment of individual policies, scope for mitigation, review of alternative policies / actions

The following objectives have been selected against which to appraise key aspects of the National Landscape Management Plan. The environmental objectives, which form the essential legal SEA requirement of this process, are those set down in Natural England's guidance, with amendments to E8 and E9 following advice on best practice from English Heritage in 2013.

Note that these are not objectives of the Management Plan, but generalised environmental objectives against which the impacts of the Management Plan can be assessed.

#### **Environmental objectives (required)**

- E1 To protect and where practical enhance biodiversity (habitats)
- E2 To protect and enhance fauna and flora (individual species)
- E3 To ensure no adverse effect arises on population (i.e. demographic balance)
- E4 To safeguard human health
- E5 To protect and enhance soil quality
- E6 To protect water
- E7 To protect air, lower greenhouse gas emissions and adapt to climate change
- E8 To conserve and enhance the historic environment, heritage assets and their settings
- E9 To protect, enhance and manage the character and appearance of landscapes/townscapes, maintaining and strengthening local distinctiveness and sense of place.
- E10 To protect material assets including natural resources
- E11 To avoid significant adverse effects between the above interrelationships

(E7 has been reworded to reflect the increased urgency of climate change and to incorporate adaptation.)

The matrix appraisal of draft National Landscape Management Plan policies against these objectives is given in Appendix 1. Areas of potential conflict requiring consideration are highlighted in yellow in the matrix. Key issues arising are discussed below.

Some of the issues are similar to previous plans, but the context continues to change. These are necessarily brief considerations of large and complex topics which are also addressed in the Management Plan itself. The italic text at the end of each paragraph is intended to point towards ways in which the potential conflicts identified can be overcome or minimised. The topics fall into two broad categories around:

- 1. Potential side-effects of protecting the landscape and natural beauty (which protection results directly from the designation), and
- 2. Broader issues around environmental transitions, which are applicable everywhere, but play out differently in a protected landscape.
- The policies of the Management Plan are generally **strong for overall sustainability** as well as conserving and enhancing natural beauty, and there are many more positive interactions between issues than negative ones.
  - The National Landscape and processes supporting it, including the Management Plan, are an important means to navigate some of the key issues for the area towards a sustainable future.
- The high quality of the environment of the Shropshire Hills is a huge economic asset which, if sensitively used and not damaged by inappropriate development, can deliver great long term economic benefits. The environmental assets of the Shropshire Hills support many kinds of sustainable economic activities and possibilities, and the quality and direction of economic progress need to be considered.

It remains important to demonstrate the positive economic effects of the environment and of looking after it.

The high quality environment of the Shropshire Hills and protection of it as a National
Landscape contribute to problems of affordability of housing, through both high demand and
limits on supply. Policies enable affordable housing to be allowed where other forms of
development would not be, but provision is still not adequate. The higher standards, e.g. of
design, sought in the National Landscape may add to costs.

A robust system is required to ensure that affordable housing can be provided to meet social needs, but in keeping with the high quality landscape. Potential higher costs may be somewhat overcome by good guidance and economies of scale. Some of the higher costs are more likely to return to the local economy (e.g. through using local materials), with knock-on benefits.

- **Nature recovery and landscape character**. Measures to strengthen the nature recovery network may change the current character and appearance of the landscape but will almost always do so in ways which are positive for landscape quality and natural beauty.

  We need to be willing to embrace landscape change which is positive ecologically.
- There is rightly an increased urgency to tackling climate change and reducing greenhouse gas emissions to net zero (notably this is now included in Protected Landscape targets). This affects every economic sector and part of society including land management, transport, tourism, planning and built development. Avoiding the most serious effects of climate change requires changes and compromises now, some of which may be sacrificing short-term benefits but often these changes will bring other benefits. e.g. to people's health from changing diets and more active travel. Measures to reach the net zero target are sometimes perceived as limiting the economy, but there is great potential for sustainable economic progress through these changes, and on the other hand, the costs of not mitigating climate change would be extraordinarily high.

There is a need to plan for 'just transition' where sections of society could be disproportionately affected by changes.

• There is increased pressure on land and a risk that a narrow focus on food security creates a falsely polarised apparent choice between food production or nature. Food production is of course important and medium and long-term food security depends on a high quality environment. Maintaining functioning natural systems is important to human needs. To make better land use choices we need to look at the whole food system including eating patterns, food waste, etc as well as land management.

We need to highlight areas of common ground between food production and the environment e.g. soil health. We also need to pursue integrated models and new ideas for land use which improve human health and local food system resilience as well as maintaining nature and functional ecosystems. The simplistic narratives of 'either food or nature' should be challenged with a more positive model.

Renewable energy such as solar and wind generation will continue to pose a challenge in terms
of what level of impact on the protected landscape is considered acceptable. Impacts on
biodiversity, heritage, landscape and resources also need to be considered. Communitybased renewable schemes have stronger overall sustainability credentials taking into account
social benefits too.

The relative lack of detailed guidance means that decisions will probably continue to turn on case by case merits. All means of reducing carbon emissions need to be actively promoted, including energy conservation, carbon management in soils, biomass and small scale renewables.

 There may be a perceived conflict between climate change adaptation measures and measures for climate change mitigation, such as in application of limited resources.
 In reality, both are needed. Despite overwhelming scientific evidence there is still work to do to convince some people that the current unprecedented changes to climate are human-induced and that action on emissions by the UK is worthwhile since every country must act if there is to be a global solution.

- There could be a **tension between nature-based solutions for climate mitigation and nature recovery**. For example a narrow view of land management decisions based on carbon alone could lead to actions which are harmful to nature, e.g. tree planting on high ecological value grasslands, tree plantations focussing on fast-growing non-native species.

  The climate and ecological crises need to be addressed together by integrated measures.
- As a rural area, many people are very dependent on transport by private car and some people
  are very constrained in travel opportunities and choices by cost. Policies affecting transport
  and traffic in the area come mostly from national and county policy rather than the National
  Landscape Management Plan.

Influencing patterns of behaviour will be a long-term process and will require significant investment and commitment to alternatives. There is evidence of the economic and social value of reducing transport, and the level of homeworking is increasing.

The main significant negative effects identified between policies in the draft National Landscape Management Plan and SEA environmental objectives relate to the **relationship between landscape protection and renewable energy**. The key area of potential conflict is Management Plan policies against large scale wind and solar energy development in the National Landscape, which could be seen to limit potential ability to reduce CO2 emissions in the area (objective E7 'To protect air, lower greenhouse gas and adapt to climate change'). The important influence of climate change on the future of the National Landscape requires that this issue be considered carefully. It should be noted that this is not just an issue for the Shropshire Hills National Landscape Management Plan, and the consideration of alternatives below therefore recognises the broader context of spatial planning and policy initiatives at a larger scale.

Alternatives to reduce conflict between National Landscape Management Plan landscape protection policies and development of renewable energy, especially solar and wind energy:

#### 1. Allow large scale solar and wind energy development in National Landscape.

This approach enables greater gains with CO2 emission reductions, but at the expense of the nationally protected landscape. Until very recently, government policy has been against onshore wind energy. Solar farms also reduced in recent years due to changes in subsidy regimes. With the urgency of climate action, renewables have come back to the fore and it is right that National Landscapes should play a part, in balance with their other value and the potential and opportunities elsewhere.

#### 2. Concentrate solar and wind energy development outside protected landscapes.

This option relates more to national and county policies, above the level of an National Landscape Management Plan but is nevertheless relevant. It represents the general position of current national policy (i.e. NPPF presumption against major development in National Landscapes), although some decisions seem to go more with option 1 above. A difficult issue arises in relation to Management Plan policies on wind energy development outside but near to the National Landscape boundary. In line with many other National Landscapes, the new draft Management Plan introduces a new policy (P1viii) on the setting of the National Landscape. If however the approach to wind development near National Landscapes is too restrictive, it could perversely undermine the potential of this option to reduce pressure within National Landscapes themselves (i.e. every windfarm outside an National Landscape is one less within one). Given that landscape and visual impact reduces relatively quickly with distance, the policy approach proposed in the Management Plan of only opposing large scale wind development within 5km of the boundary

probably represents the right balance. Using the Welsh definition of large (25MW+), this is roughly developments of 8+ large turbines.

# 3. Vigorously pursue energy conservation measures to reduce demand and the levels of renewable (including solar and wind) energy required.

The National Landscape Management Plan strongly supports this approach, through its support for to Low Carbon activity and policy in support of energy conservation and low carbon community initiatives. Energy conservation is the most effective way of lowering carbon emissions with least impact on the landscape, and therefore legitimately becomes a concern of the National Landscape Management Plan. It is not an alternative to renewable energy, but good practice in renewable energy always puts energy conservation first as it reduces the scale of generation necessary, often making renewable options more economic or manageable.

# 4. Promote and encourage renewable energy measures which are compatible with the National Landscape and its landscape.

The Management Plan also supports this approach through small scale renewables and including woodfuel energy. The actual potential of these approaches in relation to the scale of net zero targets needs however to be borne in mind. It is only in combination with options 3 and 2 above that this approach becomes at all viable.

## 5. Optimise carbon management and sequestration opportunities.

The opportunities for carbon sequestration in the area have not been quantified, but are known to be relatively small in relation to CO2 emissions from energy. Measures to manage methane emissions from farming, carbon storage in soils, and increasing tree and woodland cover will however have some positive effect.

An effective combination of options 2, 3, 4 and 5 does however provide a realistic and justifiable basis for opposition by the Management Plan to unconstrained development of large scale solar and wind energy development as in option 1. Policies have been added in the new draft Plan to be more explicit regarding solar energy, but there is no significant change from the general policy position in the previous Management Plan.

Other issues arising from the Appraisal in relation to environmental issues are as follows:

- All renewable energy technologies need to be carefully applied to avoid damage to biodiversity, heritage, landscape and resources.
   Good information and guidance will be key to achieving this.
- Climate change will continue to intensify pressures on land and create perceived tensions between meeting human needs (e.g. food, energy) and maintaining nature and landscape. Demonstration is necessary to show that sustainable food and energy production is compatible in the area with maintaining landscape and nature. Indeed, maintaining functioning natural systems is crucial to human needs in the future.

#### 4. "SUSTAINABILITY OBJECTIVES" APPRAISAL (optional)

The additional discretionary sustainability objectives have been defined as part of the scoping process, and are based partly on Natural England's guidance and partly on local priorities.

#### Additional sustainability objectives (mostly focused on economic and social goals)

- S1 To sustain a thriving economy
- S2 To reduce poverty and deprivation
- S3 To optimise employment opportunities for all
- S4 To maintain and improve quality of life, health and wellbeing for all
- S5 To sustain vibrant, cohesive, safe and sustainable communities
- S6 To promote social inclusion and improve accessibility of services and facilities
- S7 To raise standards of education and training and promote employment skills
- S8 To encourage the use of locally sourced goods and materials
- S9 To encourage the continuation and appropriate diversification of farming
- S10 To protect the environment, people and properties from flood risk
- S11 To reduce the demand for travel and promote modes of travel other than private motor vehicles

[Note that these are not objectives of the Management Plan, but generalised economic and social objectives against which the impacts of the Management Plan can be assessed].

The consideration of the Management Plan's policies against social and economic objectives is very worthwhile, as these factors have profound influence on the landscape of the Shropshire Hills. The review of National Landscape Management Plan policies against these sustainability objectives is also contained in the matrix in Appendix 1. This process shows that the approaches of the Management Plan are generally strong for sustainability, and there are many more positive interactions between issues than negative ones. Indeed the Plan, as it should, provides an important means to navigate some of the key sustainability issues for the area.

In these columns, a good many of the potentially negative interactions have been scored as +/-, indicating that there may be a positive or negative impact. This is explained in the consideration below of key issues arising, which fall into four main groups:

- a) The effect on the economy of protecting the environment
- b) Possible social consequences of seeking to minimise travel
- c) Effects on affordability of housing
- d) The cost implications of higher standards sought

#### a) THE EFFECT ON THE ECONOMY OF PROTECTING THE ENVIRONMENT

National Landscape designation does prevent some forms of development, which could be seen as potentially limiting economic progress. However the high quality of the National Landscape's environment is also an economic asset which can be sensitively used for long term sustainable economic benefit, and may be damaged by inappropriate development. Since the last Management Plan there has been an increase in large scale intensive livestock rearing developments, especially poultry, and additional policies have been added on this. There is a particular need to ensure that new farm enterprises and agricultural development are in keeping with the National Landscape.

Alternatives to reduce any potential conflict might be as follows:

#### 1. Relax Management Plan policies to allow more development.

This may achieve greater economic benefit (in the short term at least), but is at the expense of the environment and landscape qualities of the National Landscape. In reality it is planning policies more than those in the Management Plan which protect the National Landscape, and this option would put the Management Plan out of alignment with national and local policies.

# 2. Be positive about forms of economic development which $\underline{are}$ compatible with the National Landscape.

This option is in keeping with the secondary purpose of National Landscapes 'to promote sustainable forms of economic and social development, which in themselves conserve and enhance the environment'. It is strongly supported by the Management Plan, e.g. in policies on topics including farming, tourism and appropriate renewable energy. This approach recognises that the National Landscape Management Plan and the activity of partners needs not just to be about what shouldn't happen, but be positive and proactive about what should happen. There are many examples of this in the National Landscape Partnership's work, though relating any economic benefits back to the primary National Landscape purpose will remain important.

#### 3. Demonstrate and publicise the positive economic effects of the environment.

This option links to option 2 above, and aims to gain support for the approach by providing evidence.

4. Provide guidance and support to help reduce negative impacts of development.

This option is also compatible with options 2 and 3 above.

### b) POSSIBLE SOCIAL CONSEQUENCES OF SEEKING TO MINIMISE TRAVEL

The National Landscape Management Plan proposes approaches which seek to limit the impact on the National Landscape of increased road traffic. In a largely very rural area, people are very dependent on transport by private car, and there is the risk that such policies may have negative social consequences. In reality, the influence of the Management Plan on this issue is relatively small, and is likely to be through the promotion of alternatives such as improved public transport and linking recreation opportunities to public transport. These are likely to have benefits to those most in need. The promotion of local products and sustainable tourism is also likely to support jobs while minimising transport. There is evidence that strengthening community in rural areas can help to reduce dependence on mobility to meet people's needs of homes, jobs and services.

#### c) EFFECTS ON AFFORDABILITY OF HOUSING

High standards of protection of the National Landscape may exacerbate problems of **affordability of housing**, especially by making the area more attractive to wealthier incomers. The measures to reduce this conflict lie largely beyond the scope of the Management Plan, and lie in the Council's policies for affordable housing and contributions. The Management Plan makes clear that affordable housing should be allowed in the National Landscape where other forms of development would not be, but that high standards of design need to be maintained.

#### d) THE COST IMPLICATIONS OF HIGHER STANDARDS SOUGHT

The **higher standards**, **e.g. of design**, sought in the National Landscape may add to costs. An emphasis on quality in tourism provision risks excluding those on lower incomes.

This may be somewhat overcome by good guidance and early consideration. Some design aspects do not affect cost, and where higher costs are incurred, there are likely to be some benefits to the local economy (e.g. through using local materials). Provision for low cost

accommodation which meets good environmental standards e.g. campsites, hostels, should be supported.

#### 5. MONITORING

The draft National Landscape Management Plan sets out a series of 'headline indicators' for monitoring the condition of the National Landscape's special qualities. Based on the analysis above, the following indicators should also ideally be monitored to assess the impact of the Management Plan on other environmental factors and on economic and social objectives:

- Carbon emissions (CO2 per capita)
- Indices of economic prosperity, including GVA, employment levels, etc.
- Indices of deprivation (the Index of Multiple Deprivation is available at super-output area level).

These are now provided as part of the Targets and Outcomes Framework.

#### 6. TECHNICAL REVIEW

No particular gaps in information or technical deficiencies have been identified in carrying out this appraisal.