

Context, Baseline and Scoping Report for Sustainability Appraisal (incorporating Strategic Environmental Assessment) of the Shropshire Hills Area of Outstanding Natural Beauty Management Plan 2019 - 2024

Contents

- 1. Introduction to the Shropshire Hills AONB
- 2. Summary of Management Plan strategic priorities and policies
- 3. Description of methodology and timetable
- 4. Statement of key issues
- 5. Summary of environmental baseline
- 6. Predicted environmental trends in the absence of Management Plan interventions
- 7. Review of relevant Plans and Policies
- 8. Identification of Strategic Environmental Assessment and Sustainability Appraisal objectives
- 9. Preliminary review of effects and possible consideration of alternatives

1. INTRODUCTION TO THE SHROPSHIRE HILLS AONB

The Shropshire Hills Area of Outstanding Natural Beauty was designated in 1958. It covers 802 km² in the two unitary Council areas of Shropshire and 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 AONBs in the UK, those in England and Wales regarded by government as having equal landscape quality and protection as our National Parks. The Shropshire Hills AONB Partnership, with 41 members from a broad range of sectors, is formally a Joint Advisory Committee to the two Councils and oversees the Management Plan process. A small staff team hosted by Shropshire Council work on behalf of the AONB Partnership.

Lying between the Welsh uplands and the English Midland Plain, the Shropshire Hills is a landscape of diversity, with a very varied geology 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 AONB remit also recognises factors including tranquillity and remoteness, local community and culture, and opportunities for quiet enjoyment.

2. SUMMARY OF MANAGEMENT PLAN STRATEGIC PRIORITIES AND POLICIES

The four strategic priorities for the previous 2014-19 AONB Management Plan are as follows:

Conserving and enhancing our outstanding landscape Wildlife, heritage, tranquillity, appropriate development

Helping our local communities thrive more sustainably Farming and land management, prosperity and wellbeing, low carbon

Promoting personal enjoyment, understanding and participation For local people and visitors, sense of place and belonging, doing and taking part

Maintaining and enriching the natural services on which we all depend Ecosystem services (air, water, food, climate, etc) and wider benefits to society

The relatively early current stage of review work for the 2019-24 Plan has not yet highlighted any need to change these.

Policies from the 2014-19 Management Plan are being reviewed and refined, on topics including:

Development and AONB protection Heritage Biodiversity Landscape character Housing Telecommunications Agricultural buildings Sustainable tourism Rural business Recreation Walking Tranquillity Transport Public car parking

Farming Land management funding Farm diversification Renewable energy Adaptation to climate change Habitat networks Ecosystem services Woodland and forestry Sustainability Access and enjoyment Health and wellbeing Education Volunteering

Area sections of the Plan will also be developed for the following parts of the AONB: Long Mynd – Stiperstones Clun Forest Clee Hills Stretton Valley, Wenlock Edge & Dales Wrekin Forest

The National Association for AONBs (NAAONB) is making the offer to Defra that the new round of AONB Management Plans are used as the basis of targeting of post Brexit agrienvironment/ land management support schemes. This may mean more detail than previously in sections of the Plan for sub-areas of the AONB.

3. DESCRIPTION OF METHODOLOGY AND TIMETABLE

The methodology used for this Sustainability Appraisal (SA) is based on Natural England's guidance for the Strategic Environmental Assessment (SEA) of AONB Management Plans, and that used for the last Management Plan. It has also been informed by the work of the Shropshire local authorities on sustainability appraisal for Local Development Frameworks, SEAs and SAs undertaken by other AONBs and government guidance on SEA. The SA is being developed in parallel with the revision of the AONB Management Plan. Natural England's guidance is that because AONB 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. A broad approach to sustainability in the work of the AONB Partnership is particularly valued by members. **We have therefore opted again to go beyond the legal minimum for Strategic Environmental Assessment and decided to 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.

Proposed stages in the process

1. Scoping

1.1 Identification of current issues and objectives (2017-18) Developed through:

- Distillation of issues arising from community projects and public engagement
- Consultation with the AONB Partnership and other groups
- Review of available data and changes from earlier 'State of the AONB' report
- Analysis of significant national, regional and local plans and strategies
- Monitoring linked to Sustainability Appraisal of previous Management Plan
- 1.2 Confirmation of SA objectives
- 1.3 Identification of evidence to support SA and Management Plan (2017-18)
- 1.4 Submission of Scoping Report to the statutory agencies (Feb 2018)
- 1.5 Analysis of responses from Scoping Report consultees (spring 2018)
- 2. Developing Sustainability Appraisal Report alongside draft Plan (spring- summer 2018)
- 3. Consultation on draft Sustainability Appraisal Report and draft Management Plan (12 weeks July Sept 2018)
- 4. Analysis of responses to consultations and consideration by AONB Partnership of necessary changes (July- Oct 2018)
- 6. AONB Management Plan submitted for formal observations by Natural England (Nov-Dec 2018).
- 7. AONB Management Plan submitted for adoption by local authorities (Early 2019).
- 8. AONB Management Plan published and launched (Spring 2019).
- 9. Sustainability Appraisal monitoring.

4. STATEMENT OF KEY ISSUES

The following key issues facing the Shropshire Hills were identified for the last 2014-19 Plan, and all are still relevant:

- The future of farming
- Maintaining wildlife habitats and heritage features
- Transport
- Development and economy
- Climate change
- Awareness and involvement
- Connecting and joining up

The AONB Partnership meeting of 14th November included ten presentations by partner organisations on their priorities for the AONB for the next five years. The write-up of this has been circulated to the Partnership.

The Transition Board on 7th December 2017 discussed some of the key areas which the Management Plan Review needs to focus, and which need to be stronger in the next Plan.

From this, the following list of key issues for the new 2019-24 Plan has been defined:

- The future of farming new UK policy and funding for land management and the Shropshire Hills response
- How to achieve more, bigger, better and joined up wildlife habitats and resilient ecosystems
- Pressure for economic development and growth, and risks of loss of sustainability
- The need to gain support for public benefits from the landscape
- The changing public sector and increasing need to harness volunteer effort and funds
- Need for stable delivery for the AONB team and more robust governance

The National Association for AONBs (NAAONB) has the aspiration to offer to Defra that the new Management Plans are used as the basis of targeting of post Brexit agri-environment/ land management support schemes. This may mean more detail in sections of the plan for sub-areas of the AONB.

There is a need to take forward themes from the February 2017 Shropshire Hills Uplands Forum, and look at implications for future of upland farming, especially post-Brexit, including supporting types of diversification or new farm enterprises which are more in keeping with the landscape. There is an opportunity to develop some more specific landscape and land management guidance, as some other AONBs have.

Planning protection of the AONB needs to be reaffirmed – where possible a tightening of words and trying to be more specific on planning and development, including issues such as poultry sheds, solar farms and housing.

The concepts of natural capital and ecosystem services need to be applied and used to underpin arguments for looking after the landscape and environment as an asset to the economy. Promoting environment and heritage led regeneration as an economic model for the area. Applying the 'Lawton principles' of bigger, better and joined up habitat networks at a landscape scale. Also applying catchment management principles.

The themes and priorities from the new Shropshire Hills Sustainable Tourism Strategy need to be integrated with the new Management Plan, including spreading visitors to reduce impacts and spread economic benefit, managing visitor pressure at 'hotspots' and further improving collaboration.

Upland livestock farming in particular is vital to maintaining the character of the Shropshire Hills, and needs help to adapt to new post-Brexit subsidy regimes. Broader understanding of the full range of public benefits arising from farming will be necessary.

Local people and visitors have a great love of the Shropshire Hills, and a willingness to understand more and contribute to the area's wellbeing. Opportunities through volunteering, community activity, business engagement and public events need to be continued, along with renewed efforts to connect young people with the countryside and outdoors.

5. SUMMARY OF ENVIRONMENTAL BASELINE

The following narrative is an update on the summary of environmental, economic and social factors relevant to the AONB from the last AONB Management Plan. More limited work on baseline information has been carried out so far than for the last Plan, partly due to diminishing resources in the AONB team and in many of the organisations which provide data. This summary is likely to be updated further as the Plan review process continues.

Policies and considerable conservation activity continue to maintain quality of the AONB's landscape and its features relatively well in a national context. Targeted gains in some areas are however offset by declines elsewhere, and the potential of the area to deliver significant public benefits through ecosystem services is far from being met.

Patterns in farming are continuing to polarise – with larger expanding units increasing in number and smallholdings also increasing, while middle sized family farms are becoming less numerous. Uncertainty over post-Brexit faming policy and funding is affecting farm business decisions and environmental activity. Uptake in the AONB of agri-environment schemes overall remains high, with over 75% of farmed land being in a scheme of some kind. The uptake by land area of woodland grants is only half as high (38% of all woodland). Both agri-environment and woodland grants are showing slight increases in uptake since 2013, after having been declining. Levels of new woodland planting are however at a long term low.

Condition of key conservation sites (including biological SSSIs and Scheduled Ancient Monuments) has improved, due to targeted work by the agencies (Natural England and Historic England). However, valuable sites of lesser status (e.g. county wildlife sites) appear to be declining in condition.

The health of the water environment is a real concern, with only 15% of river length classified as of 'Good Ecological Status', and no sections of river SSSI in either favourable or recovering condition. This is despite considerable activity and investment, without which the situation would be worse, but indicating the deep-rooted nature of the issues. The Clun Catchment is one of a number of sites nationally included in a high profile current Judicial Review case about condition of the Special Area of Conservation (SAC). Siltation and nutrient levels in streams and rivers are significant issues, usually from diffuse sources, and are associated with loss of valuable soils from both pasture and arable land. There are also concerns about aerial nutrient input to land and water e.g. from ammonia.

Biodiversity shows a mixed picture, with continuing declines in flowering plants and invertebrates, especially outside designated conservation sites. Concerted work on certain priority bird species (e.g. curlew, lapwing) has helped to stabilise declines, but numbers of some species are still critically low. Much conservation work is carried out by organisations and individuals, but other land holdings are being worked harder, with a gradual loss of features and environmental quality. Building more effective and resilient ecological networks across the landscape is proving to be very challenging and progress is slow.

Development pressure on the AONB has increased over the last 5-10 years. Due to changes in policy, there has been a significant increase in building of single houses and small groups. Worryingly, every single known case of proposed 'major development' in the AONB since 2012 (11 cases) has been recommended by planning officers for approval. Not all of these developments have eventually gone ahead, but large poultry units, solar farms and large

housing developments have all been contentious. There are also a large number of relatively minor development applications in the AONB, which have the potential cumulatively to affect its character. Current guidance is not really adequate on how these can be designed to best assimilate them into the landscape.

Recreational use of the countryside is increasing. This is good for public engagement, and for the most part has little negative impact, but greater pressure is being felt on some key sites of conservation sensitivity, and further targeted effort is needed to manage this. The reductions in public sector spending are showing in visitor facilities, from rights of way maintenance to public toilets and visitor information.

Headline indicators related to special qualities of the AONB

Headline indicators are key statistical measures which can help to summarise the condition of the AONB. Those shown below are based on national guidance for condition monitoring of AONBs, and influenced by local priorities. They are linked to the special qualities of the AONB, but are dependent on what data is available, and are not intended to be comprehensive.

Special qualities of the Shropshire Hills AONB		Headline Indicator and status for 2009- 14 Plan	Trend at 2009	Trend at 2013	Trend at 2018	<mark>Current status</mark> (at 2018, or most recent data available)
Overall	Diversity and contrast (landscape character)	Character is classed as being 'maintained' in the two National Character Areas in which the AONB falls ^a	→	•	→?	No new data likely. Other sources needed if this valuable indicator is to be continued e.g. fixed point photography?
Elements of the landscape	Hills Farmed landscape	70.5% of farmed land (46,625ha) is managed under some form of agri-environment scheme ^a	7	y	7	77.6% (2016 latest data) Assumed increase due to transition of ESA to ELS/HLS and greater scheme take up outside of ESA areas
	Woodlands	50% of overall woodland (6,800ha) is managed under a Forestry Commission Woodland Grant Scheme ^b	→	ч	7	<mark>38.5%</mark> in Jan 2018 ^b 31.8% in 2013 ^b NB does not include FC holdings
	Rivers and river valleys	0% of river SSSIs are in favourable or recovering condition ^a (one site – River Teme including River Clun SAC)	→	→	ы	Unit 6 (River Clun) Declining in 2014 Considerable activity but no sections yet in recovering condition ^a
Characteristics of the landscape (found in different ways across the whole area)	Geology	99.6% of geological SSSIs (by land area) are in favourable or recovering condition ^a	→	N ?	N	97.4% - small decline data checked Jan 2018 ^a
	Wildlife	58.2% of biological SSSIs (by land area) are in favourable or recovering condition ^a	7	я	Я	96.7% Major improvement due to prioritised work by Natural Engand ^a
		Key farmland and upland bird species are declining ^c	7	Ľ	y	Curlew and Lapwing long term <mark>declines showing</mark> levelling out, but at very low levels ^c
	Heritage	52% of Scheduled Ancient Monuments (86) are classified as 'At High or Medium Risk' ^d	Я*	Д*	7	23.42% of Scheduled Ancient Monuments (41) are classified as 'At Medium or High Risk' ^e
		2% of Listed Buildings (3) classified as 'At Risk' ^d	→	Л*	7	<mark>0.93%</mark> 'At Risk' 2018 ^e
	Environmental and scenic quality	60.3% of all SSSIs (by land area) are in favourable or recovering condition	7	Я	7	96.8% in 2018 ^a 97% in 2012 ^a
		^a 32% of river length is 'good' water quality ^f	7	7 ?	→?	15% of river length is of Good Ecological Status (Cycle 2 2016) ^f Data not directly comparable to earlier statistics
	Tranquillity	70% of the AONB is classified as 'tranquil' ^g	7	N ?	₩?	No new data.
	Culture and enjoyment	86.8% of rights of way are classified as 'easy to use'	N	۲?	N ?	New data not yet obtained

* Downward arrow indicates a negative trend for condition of the AONB, upwards a positive trend

- a Data supplied by Natural England
- b Data supplied by Forestry Commission
- c Based on data from Shropshire Ornithological Society, Upper Onny Wildlife Group, Upper Clun Community Wildlife Group and Kemp Valley Community Wildlife Group
- d Data supplied by English Heritage
- e Data supplied by English Heritage
- f Data supplied by Environment Agency
- g Data supplied by CPRE, 2005 ¹⁶. Definition of 'tranquil' based on green colour

6. PREDICTED ENVIRONMENTAL TRENDS IN THE ABSENCE OF MANAGEMENT PLAN INTERVENTIONS

- Loss of landscape character
- Continued loss of wildlife and heritage features
- Loss of scenic quality and tranquillity
- Unsustainable patterns of land use and development
- Missed opportunities for positive benefits from the landscape to prosperity and wellbeing

7. REVIEW OF RELEVANT PLANS AND POLICIES

The following plans and policies have been identified as relevant to the Management Plan review. These are the main directives, plans and strategies that influence the aspects of the AONB that the new Management Plan is seeking to address. Often the documents are further refined by interpretation at a 'lower level' (e.g. national strategies translated into local strategies). As the AONB Management Plan seeks to be a summary and reflection of local policies and actions, the scoping review has often been directed at the most pertinent local level documents. A table outlining the key thrust of each plan/strategy and its implications for the Management Plan review is published separately as an Appendix to this report.

INTERNATIONAL
Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)
Bonn Convention on Conservation of Migratory Species (1979)
The Convention on Biological Diversity (The Rio Convention) (Adopted June 1992, entered
into force December 1993)
Kyoto Protocol to the United Nations Framework Convention on Climate Change (Adopted
December 1997)
Ramsar Convention on Wetlands of International importance, especially waterfowl habitat
(1971)
Rio Declaration of Environment and Development 1992
The World Summit on Sustainable Development, Johannesburg (2002), Commitments arising
from the Johannesburg Summit
Transforming our World: the 2030 Agenda for Sustainable Development, UN
Copenhagen Accord United Nations Climate Change Conference 2009
Paris Agreement on Climate Change, December 2015
EUROPEAN
Aarhus Convention, UNECE Convention on Access to Information, Public Participation in
Decision-making and Access to Justice in Environmental Matters1998, ratified February 2005
The Birds Directive (Directive on Conservation of Wild Birds) (79/409/EEC) Adopted 1979
The Environmental Noise Directive (2002/49/EC) (2002)
Our life insurance, our natural capital: an EU biodiversity strategy to 2020, European

Commission 2011

The Habitats Directive (Directive on the Conservation of Natural Habitats and Wild Fauna and Flora) (Directive 92/43/EC)

The Landscape Convention (entered into force 1st March 2004, ratified by UK in November 2006)

European Convention on the Protection of Archaeological Heritage, (Valletta, 1992)

The Waste Framework Directive (75/442/EEC) (October 2000) and The Landfill Directive (99/31/EC).

The Water Framework Directive (2000/60/EC)

The Floods Directive, 2007

2020 Energy Strategy

NATIONAL

'A Green Future: Our 25 Year Plan to Improve the Environment' (Defra, 2018)

'The Natural Choice', the Natural Environment White Paper (Defra, 2012)

The Carbon Plan (DECC, 2011)

UK Bioenergy Strategy (DECC, 2012)

Climate Change Act 2008

Code for Sustainable Homes (CLG, 2009)

Countryside and Rights of Way (CRoW) Act 2000

Sustainable Energy Act (2003) Department for Trade and Industry

Creating a sporting habit for life, A new youth sport strategy (DCMS, 2012)

Water for Life, the Water White Paper (Defra, 2011) Water for people and the environment Natural Environment & Rural Communities Act (2006)

Securing the Future – UK Government Sustainable Development Strategy (DEFRA, 2011)

Mainstreaming sustainable development – The Government's vision and what this means in practice (Defra, 2011)

Secure and Sustainable Buildings Act (2004)

Public Health England Strategic plan for the next four years: better outcomes by 2020

Safeguarding our Soils – A Strategy for England (Defra 2011)

Biodiversity 2020: A strategy for England's wildlife and ecosystem services (Defra 2011)

Government Review of Waste Policy in England 2011 (Defra 2011)

The Wildlife and Countryside Act 1981 (as amended)

Rights of Way Circular (1/09) Guidance for Local Authorities (Defra 2009)

National Planning Policy Framework (CLG 2012)

Planning (Listed Buildings and Conservation Areas) Act 1990

Ancient Monuments and Archaeological Areas Act 1979

Britain Tourism Strategy 2012-20

Government's Tourism Action Plan - One Year On. Oct 2017

Flood and Water Management Act 2010

Government Woodland and Forestry Statement 2013

Industrial Strategy: building a Britain fit for the future, 27 November 2017, Department for Business, Energy & Industrial Strategy

Clean Growth Strategy An ambitious blueprint for Britain's low carbon future. 12 October 2017 Department for Business, Energy & Industrial Strategy

WALES

People, Places, Futures - The Wales Spatial Plan 2008 Update

TAN 8 Renewable Energy

Powys Unitary Development Plan 2001-2016 (Adopted 1st March 2010)

A Living Wales - Natural Environment Framework (NEF)

Energy Wales: A Low Carbon Transition (Welsh Government March 2012)

Sustainable Tourism - A Framework for Wales 2007

Well-Being of Future Generations (Wales) Act 2015

Environment (Wales) Act 2016

SHROPSHIRE & REGIONAL

The Marches LEP Strategic Economic Plan 2014

Shropshire's Community Strategy 2010-2020 A Flourishing Shropshire (Shropshire

Partnership 2010)

Shropshire Local Development Framework : Adopted Core Strategy 2006-2026 (Shropshire Council 2011)

Schedule of remaining and replaced local and structure plan policies (Shropshire Council)

Supplementary Planning Document: Sustainable Design Part 1 (Shropshire Council 2011)

Site Allocations and Management of Development (SAMDev) Preferred Options 2012

Shropshire Place Plans - Bishop's Castle, Bridgnorth, Church Stretton, Cleobury Mortimer, Craven Arms, Ludlow, Minsterley and Pontesbury, Much Wenlock

Shropshire Biodiversity Action Plan Delivery Plan 2009

New Economic Growth Strategy for Shropshire 2012-2026

Shropshire Geodiversity Action Plan (August 2007)

Shropshire Local Transport Plan (LTP) 2011-2026

Shropshire Hills and Ludlow Sustainable Tourism Strategy and Action Plan 2018-2022

TELFORD & WREKIN

Shaping Our Future - Telford & Wrekin's Journey to 2020 (Community Strategy)

Telford & Wrekin Local Plan 2011 - 2031

Telford & Wrekin Destination Management Plan 2014-17

8. IDENTIFICATION OF STRATEGIC ENVIRONMENTAL ASSESSMENT AND SUSTAINABILITY APPRAISAL OBJECTIVES

The following objectives have been selected against which to appraise key aspects of the AONB Management Plan. The environmental objectives, which form the essential legal SEA requirement of this process, are those set down in Natural England's guidance. The additional discretionary sustainability objectives are those used in the previous Plan cycle, and are based partly on Natural England's guidance and partly on local priorities.

Environmental objectives (essential)

- 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 and climate
- E8 To maintain cultural heritage (including architectural and archaeological heritage)
- E9 To protect and enhance landscape
- E10 To protect material assets including natural resources
- E11 To avoid significant adverse effects between the above interrelationships

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
- S12 To enhance resilience of communities and infrastructure to climate change

9. PRELIMINARY REVIEW OF EFFECTS AND POSSIBLE CONSIDERATION OF ALTERNATIVES

Some of the principal issues emerging from the sustainability appraisal are: (this analysis is similar to that for the 2014-19 Plan but has been slightly refined and updated)

- The approaches of the Management Plan are generally strong for sustainability, and there are many more positive interactions between issues than negative ones. The Plan provides an important means to navigate some of the key issues for the area.
- The high quality of the AONB's **environment is a huge economic asset** which, if sensitively used and not damaged by inappropriate development, can deliver great long term economic benefits. In the need however to take a long term view and protect this asset, there is a risk of the designation being perceived as hampering economic progress. *Demonstrating the positive economic effects of the environment and of looking after it remains crucial.*
- As a largely very rural area, **people are very dependent on transport by private car**. Policies to limit the impact of transport and traffic on the area need to avoid negative social and economic consequences.

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 in the area.

• Onshore wind development has slowed, but large scale development of **solar farms** seeking to lower carbon emissions would have a level of impact on the landscape unacceptable to many people.

Further work is necessary to determine an acceptable scale and level of development of solar energy in the AONB, and alternative means of reducing carbon emissions need to be actively promoted, including energy conservation, carbon management in soils, biomass and small scale renewables.

- **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.*
- In the longer term, climate change will intensify conflicts between basic human needs (food, energy, etc) and maintaining nature and landscape.
 Demonstration is necessary to show that maintaining landscape and nature is important to long term human needs and compatible with food and energy production.
- The AONB's high quality environment and protection of it contribute to problems of **affordability of housing**, through high demand and limits on supply. Affordable housing may be allowed in the AONB where other forms of development would not be. *A robust system is required to ensure that affordable housing can be provided to meet social needs, but in keeping with the landscape.*
- The **higher standards**, e.g. of design, sought in the AONB may add to costs. This 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.