

# Impact Assessment



Assessment of: Devon County Council's endorsement of the review of Blackdown Hills National Landscape Management Plan

Service: Climate Change, Environment and Transport

Head of Service: Meg Booth

Version / date of sign off by Head of Service:

Assessment carried out by (job title): Kate Hind, Environment Partnership Officer, with Lisa Turner, Blackdown Hills National Landscape Planning Officer

## 1. Description of project / service / activity / policy under review

Devon is home to five National Landscapes, formerly known as Areas of Outstanding Natural Beauty (AONBs). Each landscape has a partnership responsible for overseeing its management. The 'Blackdown Hills Management Plan' is a statutory document created and reviewed every five years by the partnership, which straddles the Devon and Somerset border.

A Management Plan provides a shared long term vision for the National Landscape and contains ambitions, targets and actions that seek to further the statutory purpose, i.e. to conserve and enhance the designated Area of Outstanding Natural Beauty (AONB).

Under the Countryside and Rights of Way Act (CROW), it is a statutory requirement for local authorities to produce Management Plans for their National Landscapes and to review these at five yearly intervals. The Review aims to reflect significant changes to legislation, policy and the

environmental context to ensure that the Plan remain valid and up to date.

## 2. Reason for change / review

The Plan must address the significant issues of the *climate emergency* and *nature recovery*, taking account of, and contributing to, *Local Nature Recovery Strategies* and the hierarchy of *climate strategies* and action plans.

Work and priorities for managing the National Landscape set out in the Management Plan are required to contribute to Defra's *Environmental Improvement Plan* (EIP23). This sets the goals for enhancing England's natural environment, including the targets to;

- protect 30% of our land and sea for nature through the Nature Recovery Network by 2030 ('30 by 30')
- restore or create more than 500,000 hectares of wildlife-rich habitats outside protected sites by 2042; and, halt the decline in species abundance by the end of 2030, increasing it above 2022 levels by 2042.

Specifically, a *Protected Landscapes Targets and Outcomes Framework* (TOF) sets the ambition for how Protected Landscapes are expected to achieve 3 outcomes from EIP23 through a number of targets:

- Goal 1: Thriving plants and wildlife
- Goal 7: Mitigating and adapting to climate change
- Goal 10: Enhancing beauty, heritage and engagement with the natural environment

The *Levelling Up and Regeneration Act* (LURA) (2023) amended and strengthened the CRow Act in respect of Protected Landscapes, to;

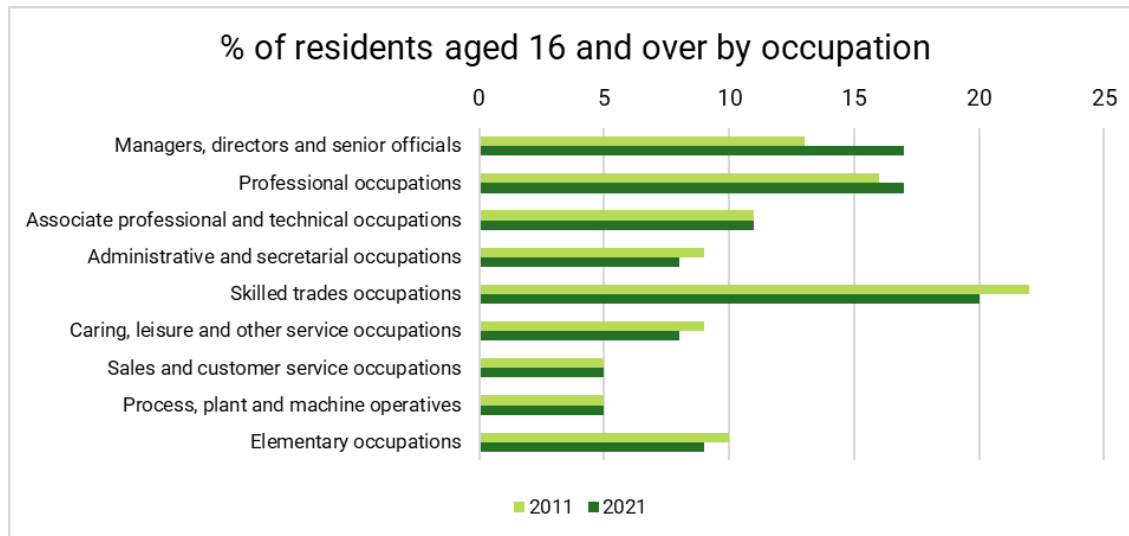
- Require relevant authorities in England to 'seek to further the purpose of conserving and enhancing the natural beauty' of the National Landscape. This replaces a 'duty of regard' to the purpose in previous legislation.
- Allow the Secretary of State to make provision to require relevant authorities in England 'to contribute to the preparation, implementation or review' of a National Landscape's Management Plan and for the Plan to contribute to meeting specific targets set under the Environment Act 2021.

## 3. Aims / objectives, limitations and options going forwards (summary)

See Section 1.

## 4. People affected and their diversity profile

- Population: 14,130 residents within the National Landscape, with around 150,000 living in the nearby towns around the periphery.
- Age: Based on the 2021 Census, 19% of resident population is age 19 and under, 21% are age 20-44, 31% are between 45 and 64 and 29% are 65 years of age and older. The largest cohort is those aged between 50 and 64. The population profile has remained stable since the 2011 Census but with a small increase in the proportion of residents over the age of 75, from 10% to 13%.
- Ethnic group: The numbers of people within the National Landscape whose ethnicity is other than White British is low:  
Proportion of the population within each ethnic group in Blackdown Hills National Landscape:
  - Asian, Asian British or Asian Welsh: <1%
  - Black, Black British, Black Welsh, Caribbean, or African: <1%
  - Mixed / Multiple ethnic groups: 1%
  - White: 98%
  - Other ethnic groups: <1%
- Deprivation spread: Official figures show there is limited deprivation within the Blackdown Hills, with 33% of the population living in the 5th Decile and 44% in Decile 6. The remainder are in the 7<sup>th</sup> and 8<sup>th</sup> Decile.
- Disability: in 2021, 75% of the resident population reported that they suffered no long-term health conditions, 17% considered themselves as disabled under the Equality Act and 8% had a long term physical or mental health condition.
- Employment: The chart below shows occupational profile of resident population, compared to 2011. Skilled trades are the largest sector, but has fallen, whereas managers, directors, senior roles and professionals have increased.  
56% of the adult population is employed, whereas 42% are not seeking work.



## 5. Stakeholders, their interest and potential impacts

Numerous stakeholders have been involved in the iterative process informing the review of the Plan either through directing the review or taking part in stakeholder feedback, notably local authority partners who are responsible for the plan, other agencies such as Natural England, Historic England, Wildlife Trusts, as well as individuals from the local community and parish councils. The Management Plan is intended to be a shared strategy for the place that will have relevance to stakeholders in the following ways:

- Local authorities: The relevant authority organisations that are required to jointly prepare, adopt and review the *Management Plan*, and who carry out key functions, such as planning, that affect the National Landscape. The *Management Plan*, in its entirety, establishes the management policy of these responsible authorities.
- Blackdown Hills National Landscape Partnership organisations: These varied organisations will have a key role in delivering and championing the *Management Plan*.
- Relevant authorities: All public bodies and statutory undertakers (including local authorities, government and governmental organisations, parish councils, utility providers) have a duty to seek to further the purpose of the National Landscape; this *Management Plan* will guide them in fulfilling their statutory duties.

- Landowners, land managers and developers: Those who own and manage land in the National Landscape have a vital role to play; the plan aims to guide, support and attract resources for sensitive management of the National Landscape.
- Local communities, businesses and visitors: Everyone who lives, works or visits the Blackdown Hills can play an active role in caring for the National Landscape; the plan identifies some of the priorities for action and ways to become involved.
- Others such as funding bodies, third sector, and voluntary groups and organisations may refer to the plan or use it to gain a greater understanding of the issues affecting the area.

## 6. Research used to inform this assessment

Different methods of research were used to inform the review of the management plan, and this has been used to inform this assessment:

- a. Literature review/other plans and strategies – to help set the scope of the review, national guidance on management plan review was referenced alongside learning best practice from other protected landscapes (National Parks and National Landscapes management plans recently or concurrently undergoing review). Various other plans and strategies were reviewed, such as Devon Carbon Plan, and reference was had to the development of the Devon Local Nature Recovery Strategy for example.
- b. Data collection and statistical analysis -
  - We commissioned a State of the National Landscape report in 2023, to collate a range of data and information for the Blackdown Hills National Landscape, from Natural England, Defra, 2021 Census and other sources, relating to the topics of the previous management plan
  - Working collaboratively with other national landscapes, engagement in research projects provided us with data from Cranfield University on soil carbon
  - DEFRA/Natural England provided a set of national statistics to support the targets and outcomes framework/and monitoring
- c. Stakeholder engagement and consultation

At different stages of the review we sought direct input and feedback from partners and community. This included an online public survey, a stakeholder workshop with partner organisations, parish councils and other local representatives, and a workshop with local community environmental groups.

## 7. Description of consultation process and outcomes

Key consultation phases in the review process:

- Blackdown Hills Management Group workshops to scope scale of review
- Public online survey, widely promoted through parish councils, parish magazines, social media and event, to gauge views on natural beauty, and future priorities
- Stakeholder workshop for organisations, to help development vision, principles and priorities.
- Reporting to local authority partners in advance of public consultation and ongoing engagement with officers and councillors
- Six-week consultation period for partners and public on a draft plan (online via website, promoted to stakeholders and public)

Comments, advice and suggestions from agencies and individuals informed the development of the plan and appropriate amendments made at each stage.

## 8. Equality analysis

### Giving Due Regard to Equality and Human Rights

The local authority must consider how people will be affected by the service, policy or practice. In so doing we must give due regard to the need to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations.

Where relevant, we must take into account the protected characteristics of age, disability, gender, gender reassignment, pregnancy and maternity, marriage and civil partnership, sexual orientation, race, and religion and belief. This means considering how people with different needs get the different services they require and are not disadvantaged, and facilities are available to them on an equal basis in order to meet their needs;

advancing equality of opportunity by recognising the disadvantages to which protected groups are subject and considering how they can be overcome.

We also need to ensure that human rights are protected. In particular, that people have:

- A reasonable level of choice in where and how they live their life and interact with others (this is an aspect of the human right to 'private and family life').
- An appropriate level of care which results in dignity and respect (the protection to a private and family life, protection from torture and the freedom of thought, belief and religion within the Human Rights Act and elimination of discrimination and the promotion of good relations under the Equality Act 2010).
- A right to life (ensuring that nothing we do results in unlawful or unnecessary/avoidable death).
- The Equality Act 2010 and other relevant legislation does not prevent the Council from taking difficult decisions which result in service reductions or closures for example, it does however require the Council to ensure that such decisions are:
  - Informed and properly considered with a rigorous, conscious approach and open mind, taking due regard of the effects on the protected characteristics and the general duty to eliminate discrimination, advance equality and foster good relations.
  - Proportionate (negative impacts are proportionate to the aims of the policy decision)
  - Fair
  - Necessary
  - Reasonable, and
  - Those affected have been adequately consulted.

<p>Characteristics</p>	<p>Potential or actual issues for this group.</p> <p>[Please refer to the <a href="#">Diversity Guide</a> and <a href="#">See RED</a>]</p>	<p>In what way will you:</p> <ul style="list-style-type: none"> <li>• eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary.</li> <li>• advance equality (to meet needs/ensure access, encourage participation, make adjustments for disabled people, 'close gaps'), if possible.</li> <li>• foster good relations between groups (tackled prejudice and promoted understanding), if relevant?</li> </ul> <p>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</p> <p>Are you complying with the <a href="#">DCC Equality Policy</a>?</p>
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All residents (include generic equality provisions)	<p>One of the four sections of the plan is called 'People'. It has objectives, guiding principles, targets, actions and policies.</p> <p>The guidance from Natural England on all National Landscape management plans is to improve the partnership and governance equality and diversity.</p>	<p>The Blackdown Hills National Landscape Management Plan places people at its core, recognising the essential role of residents, visitors, businesses, and landowners in its delivery. The plan is structured around four key themes: Place, People, Nature, and Climate, each with defined objectives, guiding principles, targets, actions, and policies.</p> <p>To help eliminate or reduce potential disadvantage and improve accessibility, the plan aligns with the government's PLTOF target to "Improve and promote accessibility to and engagement with Protected Landscapes for all using metrics based on those in the Defra Access for All programme." It goes further by committing to:</p> <ul style="list-style-type: none"> <li>• Securing opportunities for physical improvements to accessibility, such as enhanced trails, parking, and facilities.</li> <li>• Ensuring projects incorporate volunteering opportunities and engagement with schools.</li> <li>• Taking positive action to increase diversity within the management group and decision-making processes.</li> </ul> <p>By focusing on improving physical accessibility and fostering engagement across different groups, the plan seeks to advance equality of access and participation. While some actions may require prioritisation of resources or changes in land use, these are considered necessary and proportionate to achieving the overall aim of an inclusive and accessible landscape.</p>
Age	See above	See above
Disability (incl. sensory, mobility, mental health, learning disability, neurodiversity, long term ill health) and carers of disabled people	See above	See above

Characteristics	Potential or actual issues for this group.  [Please refer to the <a href="#">Diversity Guide</a> and <a href="#">See RED</a> ]	<p>In what way will you:</p> <ul style="list-style-type: none"> <li>eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary.</li> <li>advance equality (to meet needs/ensure access, encourage participation, make adjustments for disabled people, 'close gaps'), if possible.</li> <li>foster good relations between groups (tackled prejudice and promoted understanding), if relevant?</li> </ul> <p>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</p> <p>Are you complying with the <a href="#">DCC Equality Policy</a>?</p>
Culture and ethnicity: nationality/national origin, ethnic origin/race, skin colour, religion and belief	See above	See above
Sex, gender and gender identity (including men, women, non-binary and transgender people), and pregnancy and maternity (including women's right to breastfeed)	See above	See above
Sexual orientation and marriage/civil partnership	See above	See above

Characteristics	<p>Potential or actual issues for this group.</p> <p>[Please refer to the <a href="#">Diversity Guide</a> and <a href="#">See RED</a>]</p>	<p>In what way will you:</p> <ul style="list-style-type: none"> <li>• eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary.</li> <li>• advance equality (to meet needs/ensure access, encourage participation, make adjustments for disabled people, 'close gaps'), if possible.</li> <li>• foster good relations between groups (tackled prejudice and promoted understanding), if relevant?</li> </ul> <p>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</p> <p>Are you complying with the <a href="#">DCC Equality Policy</a>?</p>
Other relevant socio-economic factors such as family size/single people/lone parents, income/deprivation, housing, education and skills, literacy, sub-cultures, 'digital exclusion', access to transport options, rural/urban	See above	See above

## 9. Human rights considerations:

There are no human rights considerations arising from the review of the Blackdown Hills management plan in relation to the Human Rights Act (1998).

In what way can you support and create opportunities for people and communities (of place and interest) to be independent, empowered and resourceful?

The plan provides a focus for partnership working and collaboration among agencies, with a clear geographical emphasis. Part of the plan's Vision statement is to see 'thriving, diverse communities, with a strong sense of place and wellbeing, are sustained by a connection to the land, natural environment and a rich local cultural heritage. Living and working sustainably in and around the area, they underpin the prospering local economy and can access the services they need.' This is backed by objectives and policies that help to provide the framework for supporting and creating such opportunities, for example;

Objective: To nurture flourishing communities, where the population is both cohesive and diverse, where there is easy access to a range of services and facilities, and where the commitment of local people helps to conserve and enhance the environment, heritage and landscape of the Blackdown Hills.

Policy PE4: Local communities will be supported to identify, plan, and provide for their own needs, in undertaking activities to encourage sustainable lifestyles, reinforce and celebrate local cultural traditions, and engagement in cultural and natural heritage initiatives. Support initiatives that help to provide, retain or enhance community facilities and services where they are compatible with conserving and enhancing natural beauty.

In what way can you help people to be safe, protected from harm, and with good health and wellbeing?

The plan includes a policy that promotes good health and wellbeing insofar as engaging and connecting with nature and the countryside;

Policy PE3: Opportunities to use the natural environment resource of the Blackdown Hills to benefit the health and well-being of residents and visitors which are compatible with conserving and enhancing natural beauty will be sought and promoted, particularly where this will enhance landscape, biodiversity, heritage and access.

In what way can you help people to be connected, and involved in community activities?

In addition to the vision statement, objective and policies described in the sections above, the following policy also contributes to this:

PE1 Seek to inspire and foster connection with the Blackdown Hills through provision of a range of sensitive and sustainable opportunities for volunteering and active engagement with the countryside, wildlife and heritage of the Blackdown Hills that are available and accessible to all, working to ensure that everyone feels welcome to explore and enjoy the area.

## 10. Environmental analysis

An impact assessment should give due regard to the following activities in order to ensure we meet a range of environmental legal duties. The policy or practice does not require the identification of environmental impacts using this Impact Assessment process because it is subject to (please mark X in the relevant box below and proceed to the 4c, otherwise complete the environmental analysis table):

Devon County Council's Environmental Review Process	
Planning Permission	
Environmental Impact Assessment	
Strategic Environmental Assessment	X

	Describe any actual or potential negative consequences. (Consider how to mitigate against these).	Describe any actual or potential neutral or positive outcomes. (Consider how to improve as far as possible).
Reduce, reuse, recycle and compost:		
Conserve and enhance wildlife:		
Safeguard the distinctive characteristics, features and special qualities of Devon's landscape:		
Conserve and enhance Devon's cultural and historic heritage:		
Minimise greenhouse gas emissions:		
Minimise pollution (including air, land, water, light and noise):		
Contribute to reducing water consumption:		
Ensure resilience to the future effects of climate change (warmer, wetter winters; drier, hotter summers; more intense storms; and rising sea level):		
Other (please state below):		

## 11. Economic analysis

	Describe any actual or potential negative consequences. (Consider how to mitigate against these).	Describe any actual or potential neutral or positive outcomes. (Consider how to improve as far as possible).
Impact on knowledge and skills:		<p>In the management plan there are policies for each section. Please see below the policies relating to knowledge and skills.</p> <ul style="list-style-type: none"> <li>• The Blackdown Hills National Landscape supports local communities in meeting their needs, promoting sustainable lifestyles, and preserving cultural and natural heritage.</li> <li>• Economic development is encouraged through local markets and sustainable products, provided they do not compromise the area's natural beauty.</li> <li>• Employment, skills, and business growth are supported through training, enterprise initiatives, and networking, particularly when they align with conserving the landscape's special qualities.</li> <li>• Tourism and recreation are welcomed when they benefit the local economy without harming the landscape, biodiversity, or tranquillity.</li> <li>• Additionally, efforts to improve broadband and mobile coverage are supported, ensuring they do not negatively impact the area's character.</li> </ul>
Impact on employment levels:		See above
Impact on local business:		See above

## 12. Describe the linkages or conflicts between social, environmental and economic impacts (Combined Impacts):

The management plan is structured around four key areas—people, place, climate, and nature—recognising their interconnectedness and the ways they can support and challenge each other. It seeks a balanced approach, such as enhancing public access to nature while mitigating potential negative environmental impacts from recreation, including dog fouling, wildlife disturbance, and litter.

Examples of policies in the plan include:

- Support farmers to take up environment land management schemes
- Continue to promote, deliver and advocate for 'mainstreaming' natural-based solutions as a mechanism to provide resilience to property and infrastructure, both within the Blackdown Hills National Landscape but also, importantly, downstream where major critical infrastructure is at risk from flooding and where building resilience is only possible through upstream interventions
- Community-led planning tools, such as neighbourhood plans, and initiatives such as Community Land Trusts will be supported as the principal means of identifying need and securing local community assets such as affordable housing. Any development should conserve and enhance natural beauty
- Transition to renewables; energy used within the area needs to rise to near 100% renewable by 2050. The transition to low carbon and renewable energy should be undertaken in a way that seeks to further the conservation and enhancement of the natural beauty of the Blackdown Hills National Landscape, and is compatible with its special qualities, landscape character and heritage value
- Reduce the need to travel and support the development of sustainable low carbon transport and active travel options, while working to avoid leaving any community isolated

## 13. How will the economic, social and environmental well-being of the relevant area be improved through what is being proposed? And how, in conducting the process of procurement, might that improvement be secured?



The National Landscape Management Plan enhances the well-being of the area by balancing economic growth, community needs, and environmental conservation.

- Economic: The plan supports sustainable local businesses, tourism, and employment, ensuring economic activity aligns with the conservation of the landscape. It also promotes improved broadband and mobile connectivity to support local enterprise.
- Social: By improving access to nature, supporting community initiatives, and preserving cultural heritage, the plan enhances quality of life, health, and well-being.
- Environmental: Conservation is central to the plan, ensuring biodiversity, natural beauty, and climate resilience are protected. Measures are in place to manage visitor impact, promote sustainable land use, and safeguard the landscape for future generations.

All procurement follows Devon County Council procedures.

## 14. How will impacts and actions be monitored?

A role of the Blackdown Hills National Landscape Partnership is to monitor and evaluate the actions that happen as a result of the implementation of this plan to demonstrate where management actions are making a difference on the ground - but without the monitoring process being overly burdensome. There are two main strands to this monitoring:

### 1. National Protected Landscapes Targets and Outcomes Framework

This defines the contribution that Protected Landscapes (as areas) should make to national targets and certain Environmental Improvement Plan outcomes. The Framework contains 10 targets. Each target is accompanied by an indicator which will measure progress towards it and its related outcome. Natural England will evaluate progress towards the targets and outcomes in the Framework.

### 2. Management reporting

Qualitative monitoring of action is relatively straightforward; partners regularly report to the Blackdown Hills National Landscape Partnership Management Group. This is the opportunity to highlight the work they are doing throughout the year. In addition, the Partnership's Annual Review is the mechanism for reporting on implementing the Management Plan and the Blackdown Hills National Landscape website highlights a range of project work.

The Blackdown Hills National Landscape Partnership team will additionally look to develop a programme to identify appropriate, effective and proportionate mechanisms to measure or judge progress towards local priorities that may not be covered elsewhere or require local knowledge and research (could be related to diversity and inclusion and engagement, or specific wildlife species, or hedgerows, for example), and will seek to work with wider partners to secure a long-term programme of monitoring along with appropriate resources.