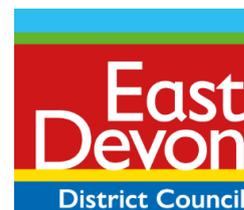


# East Devon Local Plan



## Local Plan Issues and Options report – Initial consultation feedback report – April 2021

Initial summary feedback report on consultation on the local plan issues and options report that was consulted on from 18 January 2021 to 15 March 2021



East Devon – an outstanding place

**Contact details**

Planning Policy team

East Devon District Council

## Contents

1	Introduction.....	4
2	The issues and options report that was consulted on.....	4
3	The communication strategy.....	5
4	Questionnaires and other written responses received.....	5
5	A note on statistical validity of the consultation .....	6
6	Where to view consultation responses.....	6
7	Background information on those making submissions.....	6
8	Responses received to questions asked.....	7
9	Issues raised that were not covered in the issues and options document or questionnaire .....	29
10	Issues raised by Government agencies and statutory bodies .....	29
11	Conclusions and next steps .....	30
	Appendix 1 – the communication strategy .....	31

## 1 Introduction

- 1.1 This report provides initial feedback on responses that have been received to the East Devon Local Plan Issues and Options report consultation. It is an initial report only and will be updated once representations have been reviewed and assessed in fuller detail.
- 1.2 In correspondence sent out it was advised that this issues and options report formally met Regulation 18 of the plan making regulations [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2012/2700/contents/part_18) and was available for public comment from 18 January 2021 to 15 March 2021.
- 1.3 It is highlighted at the outset that at this stage of reporting submissions received have not yet been fully scrutinised or reviewed, this report should therefore be seen as being a first stage of feedback. The intent is that in May 2021 this report will be redrafted to include greater detail of comments made.
- 1.4 Over the course of 2021 (and potentially beyond) more detailed assessment will be undertaken of responses received and this will feed into reports to Strategic Planning Committee of the council on specific subject based matters.
- 1.5 This report summarises the number and percentage of responses to each question asked in the consultation and in future drafts will provides commentary on key themes and issues raised in responses.

## 2 The issues and options report that was consulted on

- 2.1 To start the plan making process and seek initial feedback to inform policy development we consulted on a local plan issues and options document. The consultation document contained a series of topic based sections and included questions. We invited responses to the questions asked via an online questionnaire. We also, however, made a pdf version available for those without internet access or who were facing technical or other problems with completing it on-line.
- 2.2 For more information about the document consulted on and to read a copy of it, containing questions asked, see:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/>

---

### **3 The communication strategy**

- 3.1 To encourage participation in the consultation we worked closely with the communication team of the Council. This work involved extensive engagement with potentially interested parties and organisations and sending material out to various media sources.
- 3.2 Appended to this report is a communications plan and feedback report that highlights key communication activities undertaken.

### **4 Questionnaires and other written responses received**

- 4.1 In the issues and options report there were a number of questions asked and we specifically requested that people respond using an online questionnaire that was provided.
- 4.2 A large majority of responses to the consultation, addressing questions asked, came in via completed questionnaires, in total 598 questionnaires are logged on the consultation software. Whilst a majority of responses were submitted on-line a sizeable minority (nearly 60 – close to 10%) were emailed or posted. We made the pdf questionnaire available to people who had not been able to complete the on-line form and in a small number of cases some people did not have a computer or internet access. In other cases there were possible technical problems in respect of the operation of the software or the way individuals had their computers set up, this appears to have blocked address details being logged. There were also problems encountered by people not being able to save the questionnaire or being aware of the relevance of saving submissions that were part completed. Overall, however, cases of technical problems in the software or set-ups appeared limited.
- 4.3 There were, however, a number of respondents that we believe could have completed the questionnaire on-line but chose not to do so, despite our encouragement. This was specifically the case for agents submitting responses for clients (notably land owners and developers). It is disappointing that these responses did not come in on-line as they have had to be added to the software by officers which has taken time, used staff resources and delayed production of this report. Many of these responses also used quantities of characters/words that exceeded limits in the online consultation boxes which has caused problems in processing submissions.
- 4.4 It should be noted that where respondents submitted pdf questionnaire forms we have sought to add them to the consultation software, though where character/word limits were exceeded we have not sought to add any text received to the questionnaire, only the 'tic-box answers are recorded. The only limited exception to this approach was where it was possible to abbreviate words used in submissions in order to meet character/word limits. Some respondents submitted reports that may have commented on answers they support and some favoured elements of more than one answer, in these cases we have not sought to add their responses

to the questionnaire. It was not always clear exactly what was being favoured in submissions and it was not seen as appropriate for officers reviewing submissions to seek to interpret responses, especially not so when a respondent could have made their comments directly online. The questionnaire results noted in this report do not, therefore, record feedback from an estimated 25 respondents that commented on questions but did not fill in the questionnaire.

- 4.5 There were around 35 respondents that did not use the questionnaire or respond specifically or directly to the questions asked, or may be have only briefly alluded to them in their submission. These responses have not been added to the consultation software and do not impact on statistics reported on. Many of the 'non-questionnaire' submissions have been by public bodies, private companies or land owners (or agents acting for them) or by other organisations. It was always to be expected that some organisations and individuals would not fill in the questionnaire or respond to question it asks.

## **5 A note on statistical validity of the consultation**

- 5.1 The questionnaire was made freely available for anybody or organisation to complete and the Council encouraged participation. Choice of filling in the questionnaire was therefore a self-selecting exercise and the results in this report are the views expressed by those people that chose to make submissions. Responses should not therefore be read as being a verified statistically robust representation of the public as a whole, though the level of participation is such for the result to be considered as representing valuable informative.

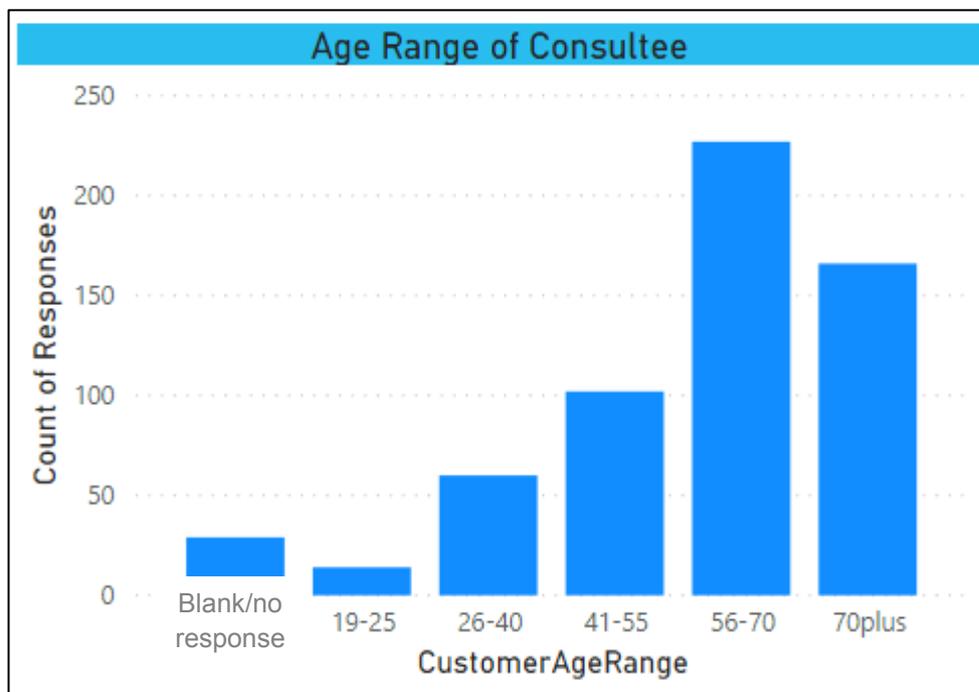
## **6 Where to view consultation responses**

- 6.1 At this stage we have not had time to publish individual responses received to the consultation. We will, however, seek to make individual responses available on the Council website in due course with contact details redacted, where appropriate and to accord with our privacy standards.

## **7 Background information on those making submissions**

- 7.1 In the questionnaire we asked people to provide background information on where they lived, their age and whether they were responding as a private individual or in some other capacity. These questions were asked to understand more about the characteristics of those responding.
- 7.2 Most responses received were from people with an East Devon postcode though there were also responses from other parts of the country as well, though most of these were from agents representing clients or from other bodies or organisations.

7.3 The overwhelming majority of people responding were in the 56 to 70 and 70 plus age groups. Younger people made up a far lower level of respondents. Data in the graph below sets out more information on this.



7.4 Most respondents, 76%, that completed the questionnaire were private individuals.

## 8 Responses received to questions asked

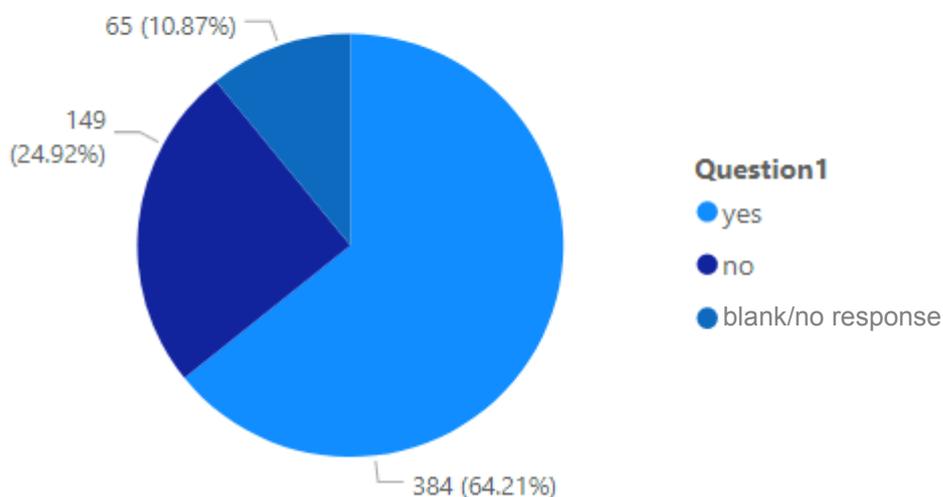
8.1 Set out below are details of the questions asked in the consultation and the number and/or percentage mix of response received. In a later iteration of this report we will make reference to some of the key and more common messages coming through in free text responses to questions asked. It is advised, however that we will not seek to identify and highlight all and every point raised in comments made. To do so would result in a very long document that could take many weeks to complete. To see all matters raised in all responses received they will need to be viewed in their entirety. The responses below should be viewed in the context of the full issues and options document and specifically the wording in the actual questions asked.

8.2 It should be noted that there was no requirement to complete all or any of the questions detailed below. Where people did not complete a question then the answer is given as a blank/no response.

### Question 1 - Local Plan Objectives

In paragraph 2.1 of the Issues and Options report we set out a series of suggested objectives for the future local plan that covered issues to include climate change, meeting housing needs and supporting the economy. We asked people if they were the right objectives.

Count of Responses by Question 1



Although most respondents (nearly two thirds) ticked the yes box a number of these did suggest other objectives as well. It was the case that many of the 25% that ticked the no box also suggested alternatives, as did some of the 11% of respondents that left the box blank.

## Question 2 – The scope of the local plan

In paragraph 2.2 of the Issues and Options report we propose producing a single plan, but it would be possible to produce a series of plans to cover the different issues. We asked which option people favoured.

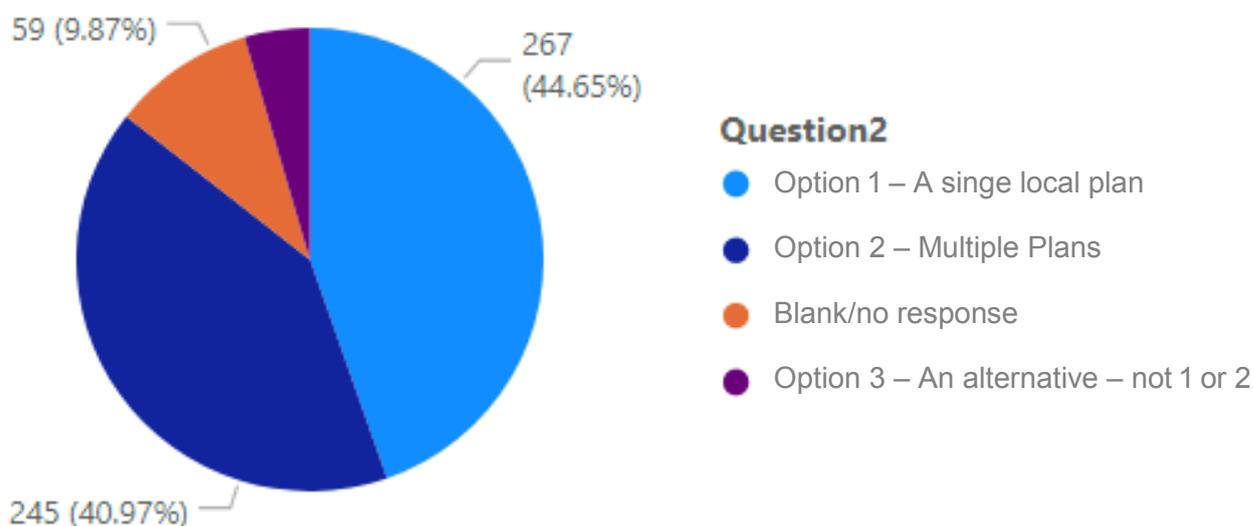
Question 2: The scope of the local plan: Do you think we should?

**Option 1 – Single Plan** - Produce a single local plan covering all policy matters?

**Option 2 – Multiple Plans** - Produce a plan that deals with strategic matters (the bigger stuff) first and then subsequent plans that deal with more local concerns and detailed matters later?

**Option 3 – Other**- Do an alternative or neither of the above?

### Count of Responses by Question2



## Question 3 - Neighbourhood Plans and the new Local Plan

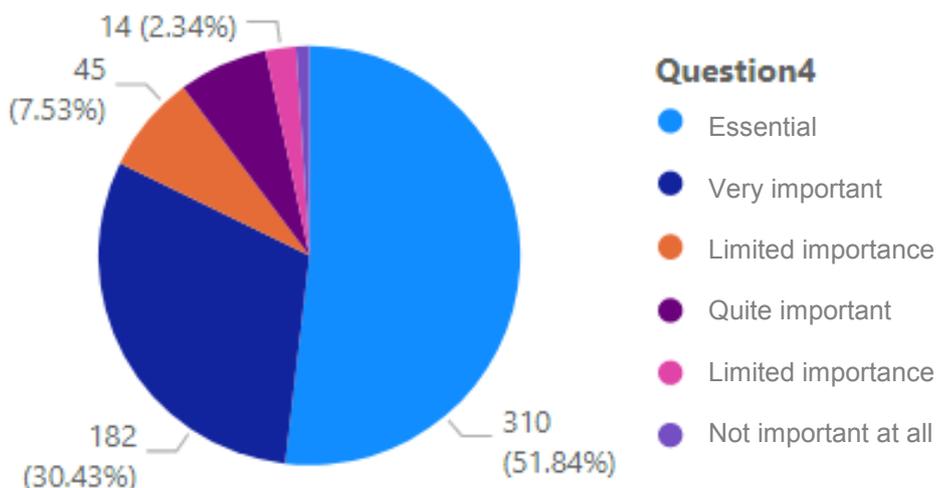
Neighbourhood plans have been agreed for many of our neighbourhoods and more are in preparation. In paragraph 2.11 of the Issues and Options report we explain the role of neighbourhood plans and their relationship with the local plan. There was a free text box for people to fill in, but no options to tick.

At this point in time analysis of free text responses has not been undertaken. Though from just a superficial review it is clear that many respondents highlighted the relevance and importance of neighbourhood planning work.

### Question 4 - Planning for health and wellbeing

In Chapter 3 of the Issues and Options report we set out the health and wellbeing benefits of active lifestyles and the ways in which planning can promote this. We asked about the importance of promoting health and wellbeing throughout the local plan.

#### Count of Responses by Question4

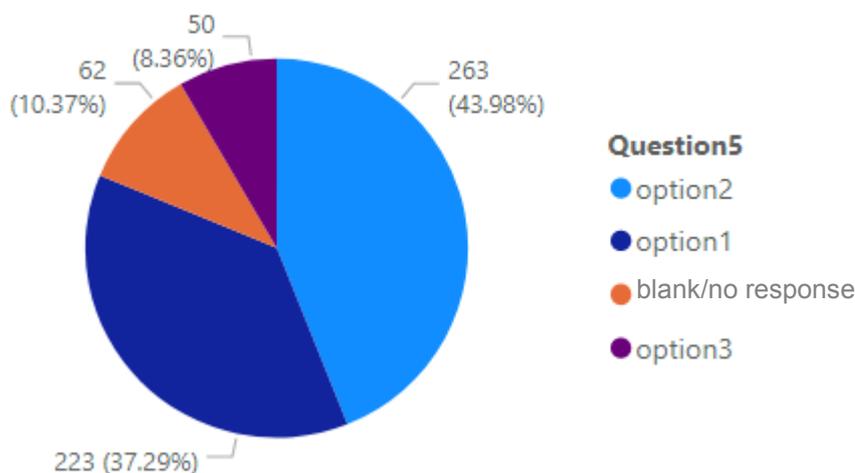


### Question 5 - Energy efficiency of new buildings

In paragraph 4.4 of the Issues and Options report we identify ways of reducing carbon emissions from new developments, including setting higher energy efficiency standards for new buildings. We asked about which approaches we should favour.

- Option 1** – Plan for net-zero carbon from plan adoption
- Option 2** - Plan for net-zero carbon from a future date?
- Option 3** – Do neither of the above and not have a policy?

Count of Responses by Question5

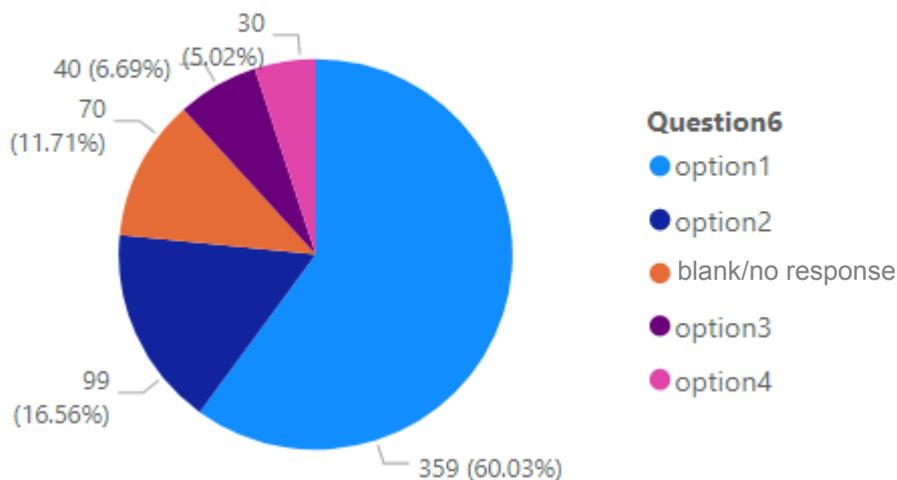


### Question 6 - Provision of solar arrays/farms and windfarms

Paragraphs 4.5 to 4.7 of the Issues and Options report deals with maximising energy from renewable sources. Question 6 sought views on the approach we should take in respect of solar arrays and windfarms.

- Option 1** – Identify suitable areas for renewable energy developments
- Option 2** – Not identify areas but offer general support
- Option 3** – Take a more restrictive approach to renewables
- Option 4** – None of the above

### Count of Responses by Question6

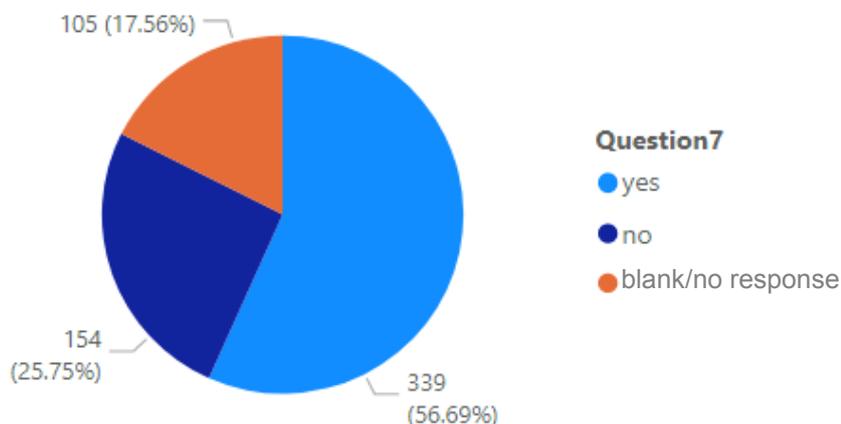


### Question 7 - Carbon saving measures

Paragraph 4.8 of the Issues and Options report sets out seven policy objectives for helping to achieve carbon neutrality including using ‘waste heat’, and promoting community led renewable energy schemes. We asked if people agreed with these and 59% of respondents answered yes.

Although most respondents ticked the yes box a number did suggest other objectives as well as did many that ticked the no box.

### Count of Responses by Question7



### Question 8 - How many new homes should we plan for each year?

In Chapter 5 of the Issues and Options report we set out the current Government requirement for us to build at least 928 new homes a year (although this figure can change). Paragraph 5.4 explains that we may need to almost double the number of affordable homes (to 461 every year for the next 20 years) to meet current and future needs. We asked about what level of housebuilding people would favour

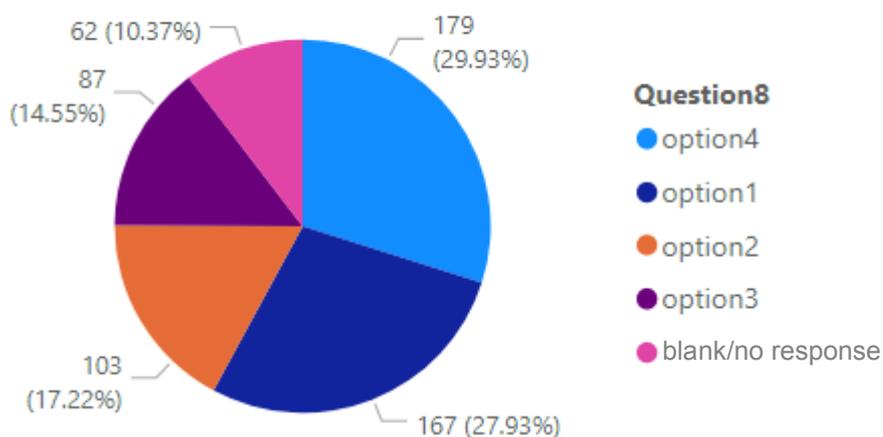
**Option 1** – Plan for an average of at least 928 new homes built each year

**Option 2** – Plan for a greater number of homes, for example 1,200

**Option 3** – Plan to build considerably more homes each year

**Option 4** – None of the above

#### Count of Responses by Question8



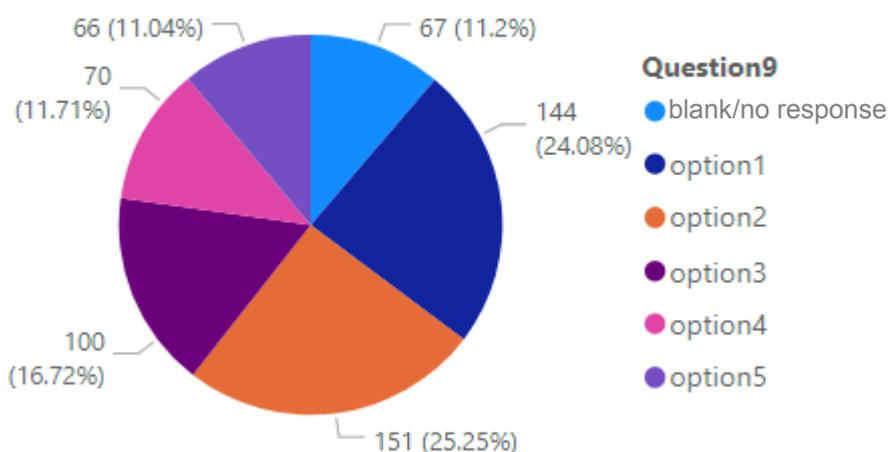
Of the respondents that favoured an alternative number quite a lot stated (or it could be inferred) that they favoured a level below 928. Had below 928 been an option it might be expected that some respondents would have ticked that box. We will seek to do further work looking into possible numbers.

### Question 9 - Sites for small scale housing developments

Paragraphs 5.5 to 5.7 of the Issues and Options report sets out Government policy that at least 10% of new homes should be built on smaller sites (below 1 hectare). This provides more opportunities for smaller, local businesses and is more likely to reflect local character than mass produced homes. We highlighted options, however, of providing more than 10%.

- Option 1** – Allocate or identify land for around 10% of homes to be on small sites
- Option 2** – Allocate or identify land for around 11% to 15% of homes to be on small sites
- Option 3** – Allocate or identify land for 26% to 50% of homes to be on small sites
- Option 4** – Allocate or identify land for 51% or more of homes to be on small sites
- Option 5** – None of the above

#### Count of Responses by Question9



### Question 10 - Planning for housing for people at all stages of their life

Paragraphs 5.8 and 5.9 of the Issues and Options report sets out the reasons for building a range of homes that can accommodate different life stage or health circumstances. We asked what approach we should take to encourage this, or is it not something the local plan should deal with.

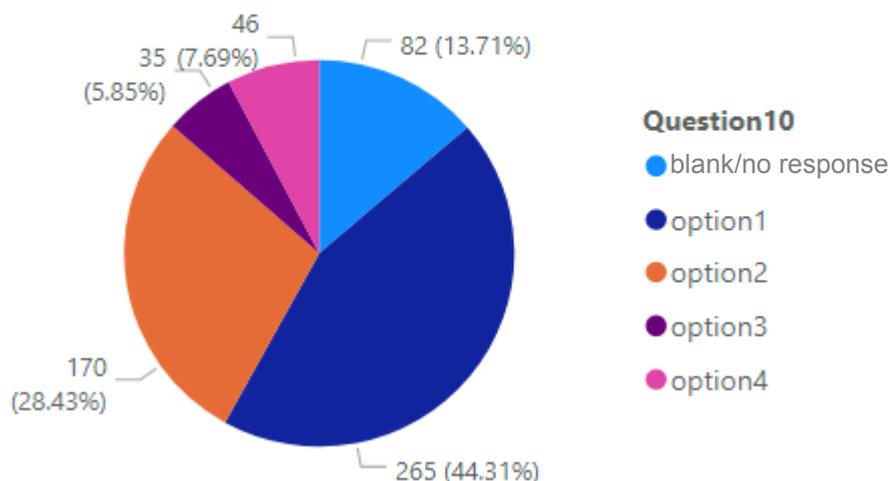
**Option 1** – We should explicitly require housing provision for people at all stages of life

**Option 2** – We should encourage but not require housing provision for people at all stages of life

**Option 3** – not set standards for differing types of housing provision

**Option 4** - None of the above or an alternative

### Count of Responses by Question 10



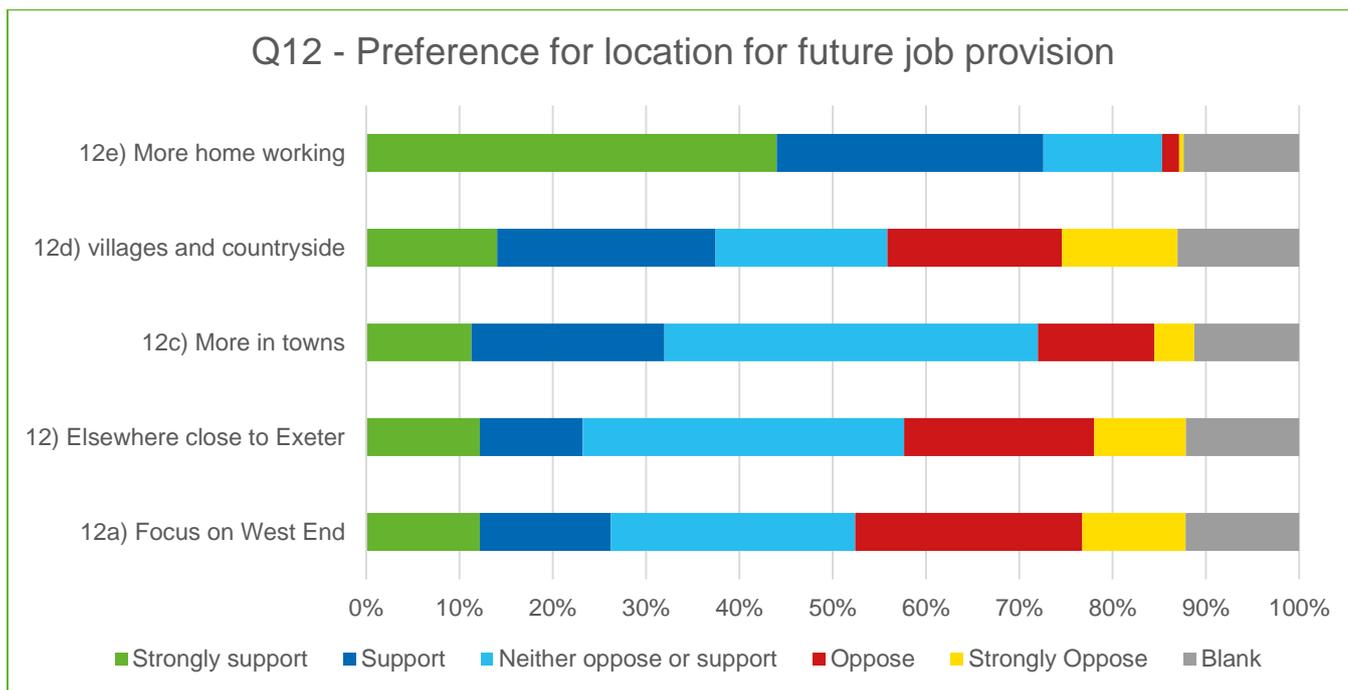
### Question 11 - Additional housing policy objectives

Paragraph 5.10 of the Issues and Options report identifies nine additional housing policy objectives, including encouraging more self-build homes, allocating sites for retirement housing and setting minimum space standards for new homes.

Although most respondents, 67%, ticked the yes box a number did suggest other objectives as well and we will report on these in a future report.

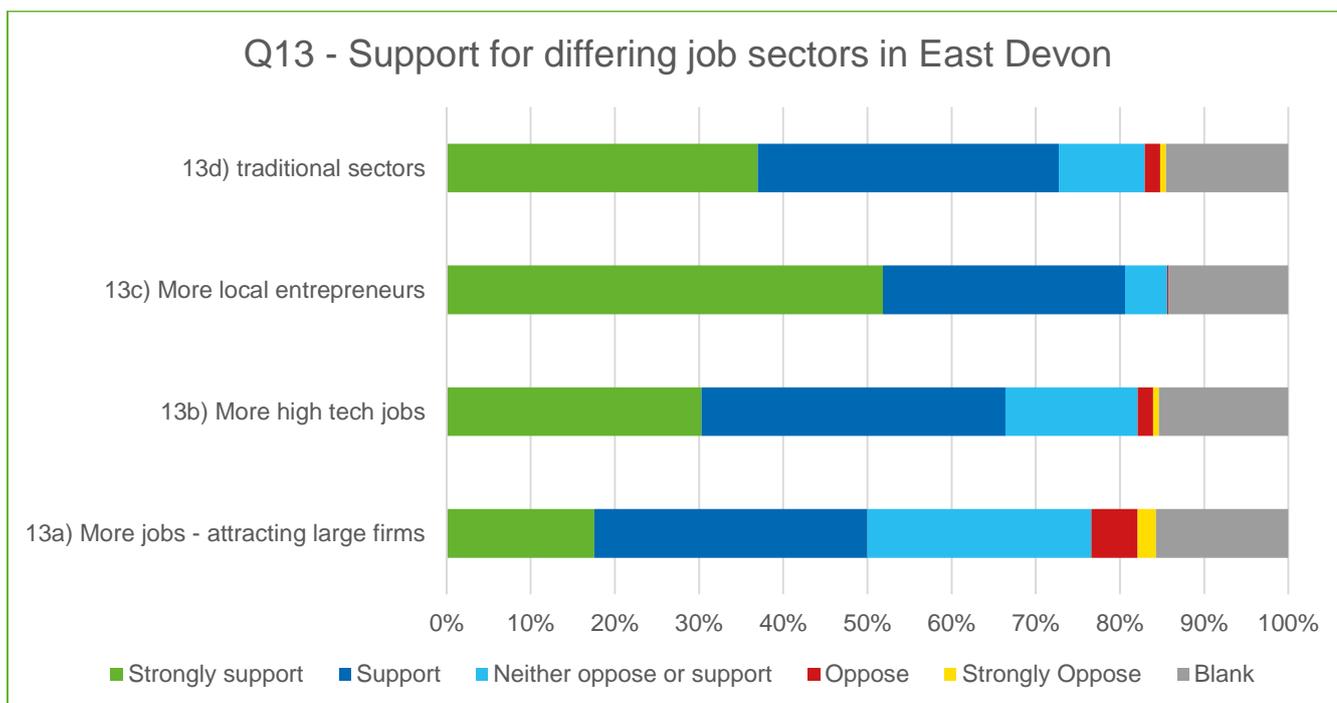
### Question 12 - Preference for location for future job provision

Paragraphs 6.4 to 6.7 of the Issues and Options report explains why much of the recent employment development has occurred near to Exeter and where future job growth could be located. We set out below a number of differing potential areas in East Devon that could accommodate future job growth and development and asked people to indicate their level of support.



### Question 13 - Differing jobs sectors in East Devon

Paragraphs 6.8 to 6.10 of the Issues and Options report discuss what sort of jobs the local plan should encourage, including the opportunities to attract new and emerging sectors with highly skilled jobs. We asked about the level of support for different options.



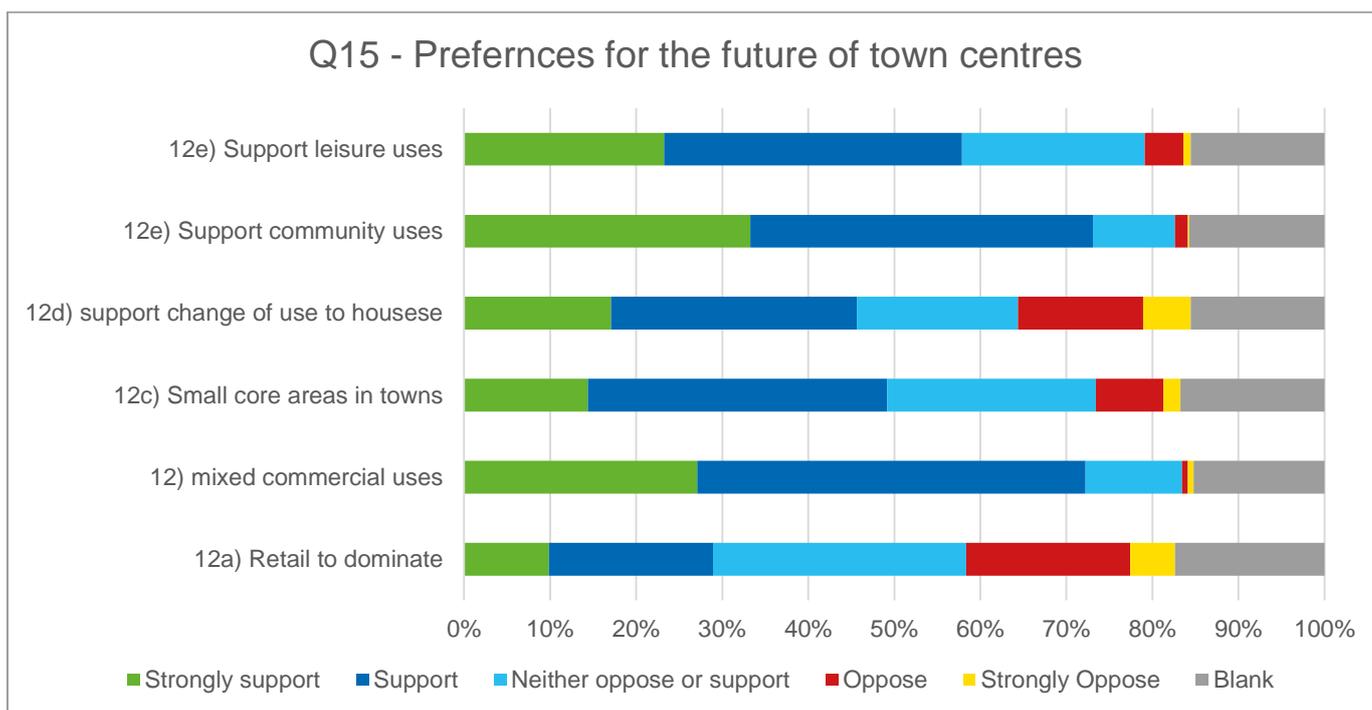
### Question 14 - Additional economic policy objectives

Paragraph 6.11 of the Issues and Options report identifies six areas where policies could be developed to help support the economy. These include promoting jobs close to where people live, encouraging people to patronise local businesses, supporting shared workspaces, allocating additional employment sites and links between economic development and developing a greener economy. Views were sought on whether these were appropriate.

Although most respondents (76%) ticked the yes box, a number did suggest other objectives as well as some people ticking the no box.

### Question 15 - Town centre uses

Chapter 7 of the Issues and Options report considers options for the roles of our town centres. Question 15 sought views on these options and we set out a number of differing potential uses and approaches to promoting town centre vitality and activity. Levels of support were sought.



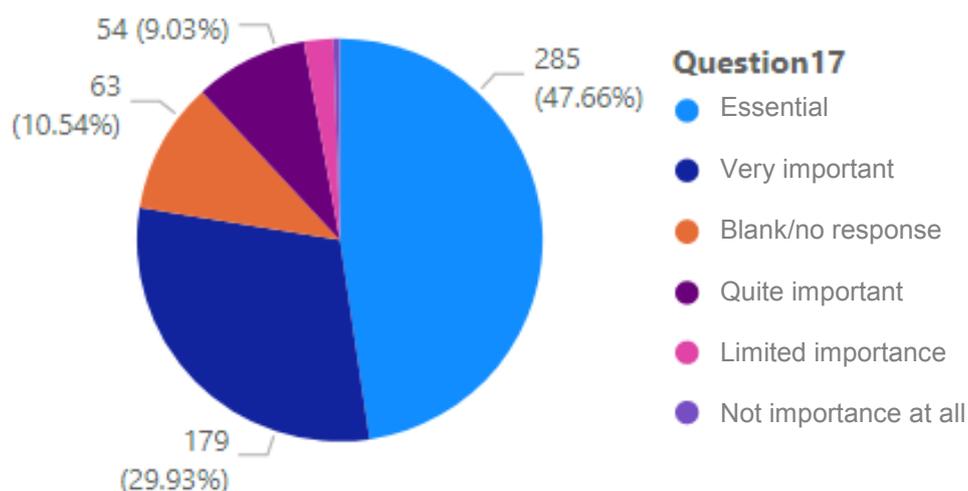
### Question 16 - Additional town centre policy objectives

Paragraph 7.6 of the Issues and Options report identified three additional areas where policies may be appropriate including the use of vacant stories over shops, resisting ‘out of town’ uses to support town centres and producing town centre masterplans to identify key areas for improvement. Views were sought on whether these were appropriate.

Although most respondents (67%) ticked the yes box, a number did suggest other objectives as well.

### Question 17 - Designing beautiful spaces and buildings

Chapter 8 of the Issues and Options report explained how attractive places can be planned and Question 17 sought to find out how important you think it is that this is done.



### Question 18 - Additional design policy objectives

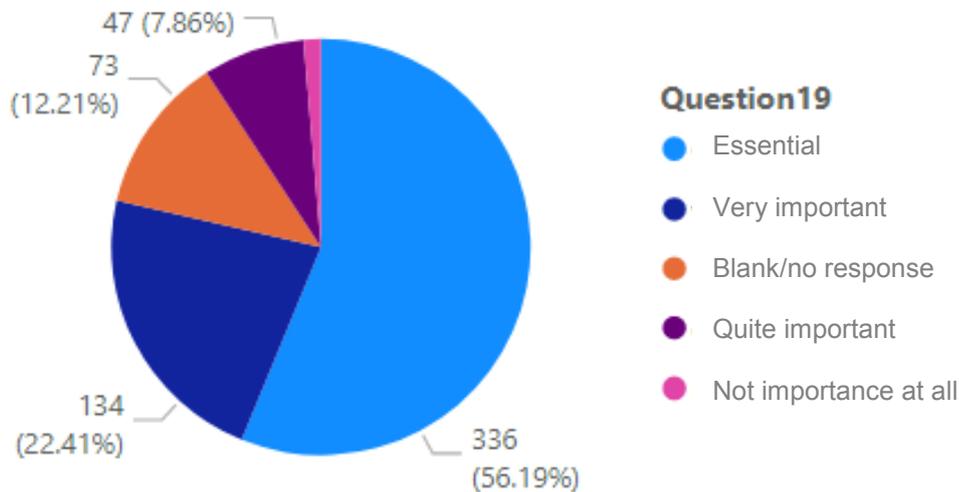
Paragraph 8.8 of the Issues and Options report identifies two areas with the potential for additional policy work. These are encouraging innovative designs and incorporating wildlife friendly elements into developments. We sought views on whether these were appropriate.

Although most respondents ticked the yes box, 71%, a number did suggest other objectives as well as did people ticking the no box.

### Question 19 - The importance of conserving and enhancing heritage assets

Chapter 9 of the Issues and Options reports describes our heritage assets and sets out the positive impacts they can have on our quality of life and local economies. We sought views on how important people thought heritage protection is.

### Count of Responses by Question19

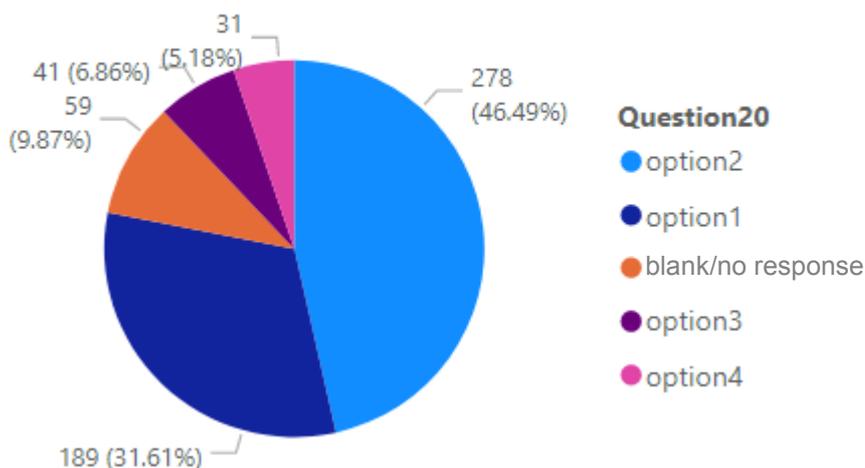


### Question 20 - Development in protected landscapes

Paragraphs 10.3 & 10.4 of the Issues and Options report sets out the importance of protecting our protected landscapes and the potential limitations this may place on how much and where development should be placed. Question 20 sought views on the levels of restriction that would be favoured.

- Option 1** - Place significant restrictions on development
- Option 2** - Allow for development to meet local needs
- Option 3** - Allow for greater levels of development
- Option 4** - None of the above or an alternative

### Count of Responses by Question20

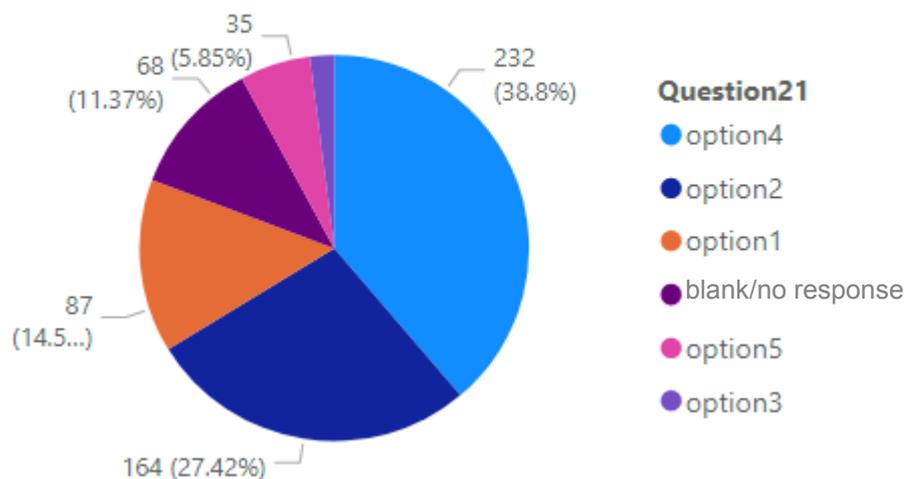


### Question 21 - Net gains in biodiversity

Paragraphs 10.5 to 10.7 of the Issues and Options report explains the new approach of quantifying the potential impact of development on biodiversity to inform planning decisions and ensure that there is a 'net gain'. Question 21 sought views on the approach you would favour to gain biodiversity improvements.

- Option 1** - On-Site provision
- Option 2** - Secure the habitats locally
- Option 3** - Pay a cash tariff towards a strategic delivery scheme
- Option 4** - A combination of the above
- Option 5** - None of the above or an alternative

### Count of Responses by Question21



### Question 22 - Additional natural environment policy objectives

Paragraph 10.8 of the Issues and Options report identifies 10 additional themes for the natural environment that may benefit from policies in the local plan. We sought views on whether these were appropriate.

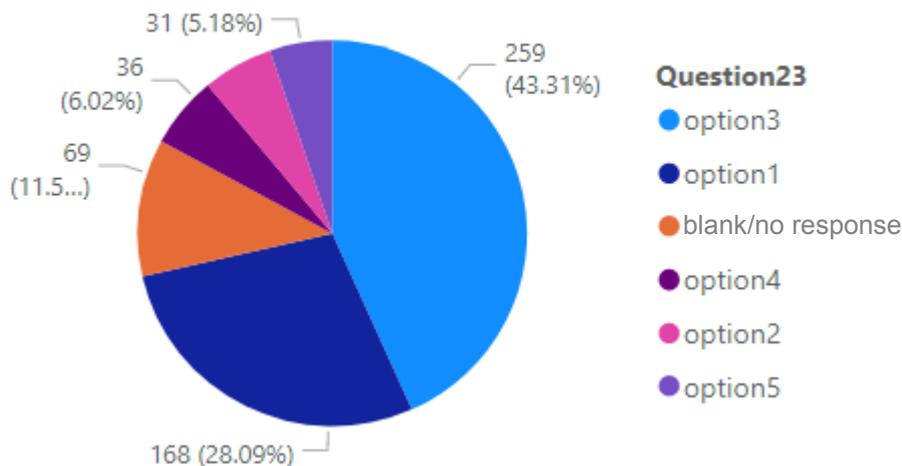
Although most respondents ticked the yes box, 69%, a number did suggest other objectives as well as did those ticking the no box.

### Question 23 - Promoting accessibility by walking and cycling

Chapter 11 of the Issues and Options report sets out the issues for promoting sustainable transport. Question 23 sought views on how important you think it is that new development is sited so that it is within walking distance of services and facilities.

- Option 1** - Focus new development as small clusters of growth in locations within easy walking or cycling distance of existing services and facilities
- Option 2** - new development on a small number of growth areas where the large scale development will support the delivery of new accessible services and facilities
- Option 3** - A combination of 1 and 2
- Option 4** - Do not require facilities and services to be within walking distance of new development but require them to be available within the settlement
- Option 5** - None of the above

**Count of Responses by Question23**

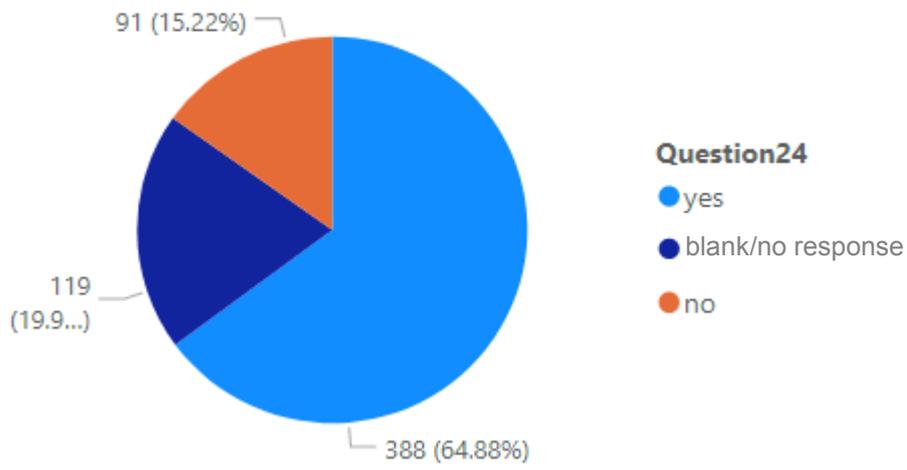


**Question 24 - Additional sustainable transport policy objectives**

Paragraph 11.7 of the Issues and Options report identifies 13 key issues that may need to be considered around the theme of sustainable transport. We sought views on whether these were appropriate.

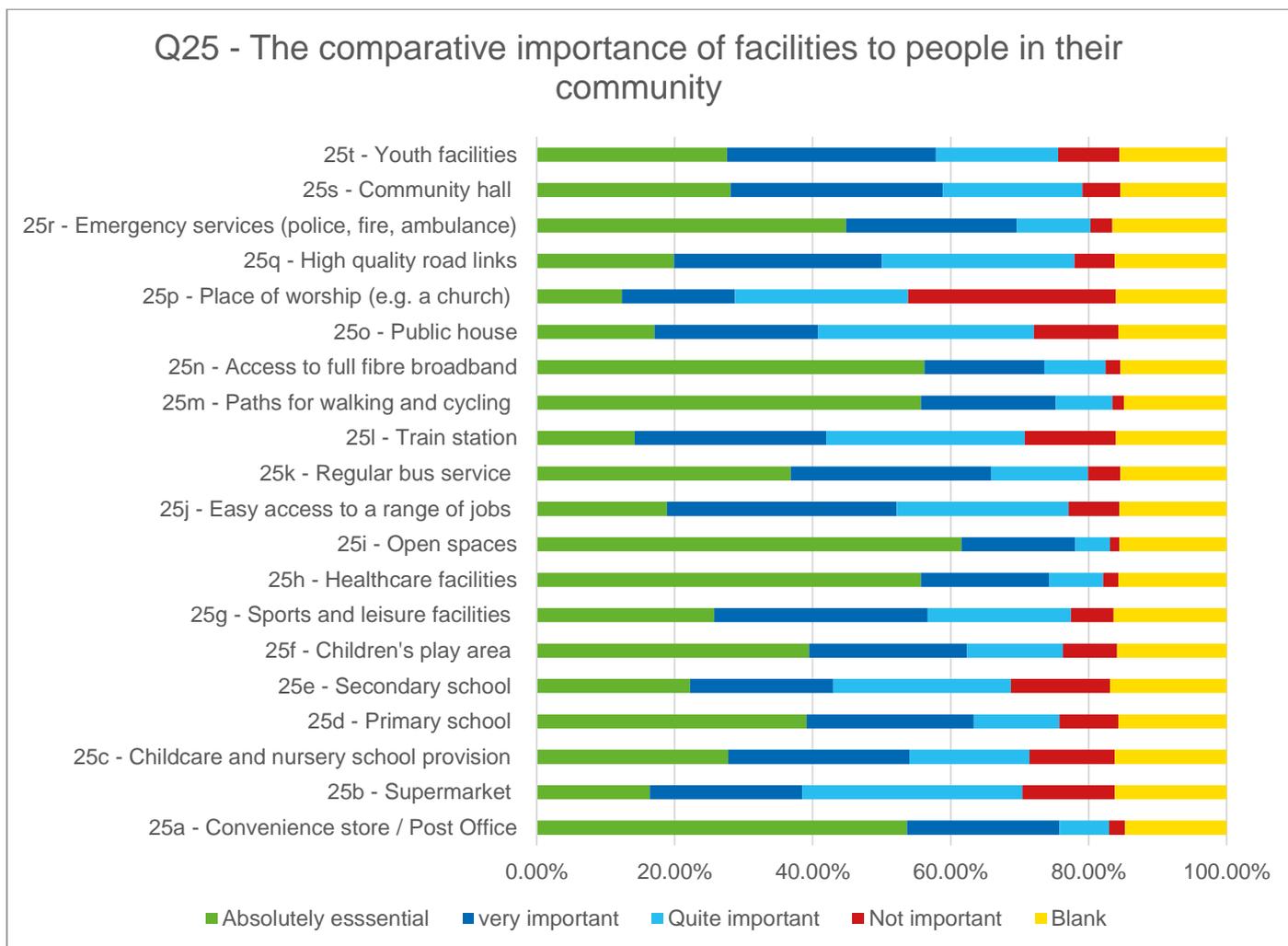
Although most respondents ticked the yes box, 81%, a number did suggest other objectives as did some people ticking the no box.

### Count of Responses by Question24



### Question 25 - Facilities and services that are important

Chapter 12 of the Issues and Options report deals with infrastructure requirements and asks what facilities are important to people, this information will help us prioritise what may be needed and where. We asked respondents to score listed services and facilities in accordance with their importance to where they live or would want to live



### Question 26 - Additional infrastructure and service provision policy objectives

Paragraph 12.9 of the Issues and Options report identifies five other infrastructure and service policy objectives. We sought views on whether these were appropriate.

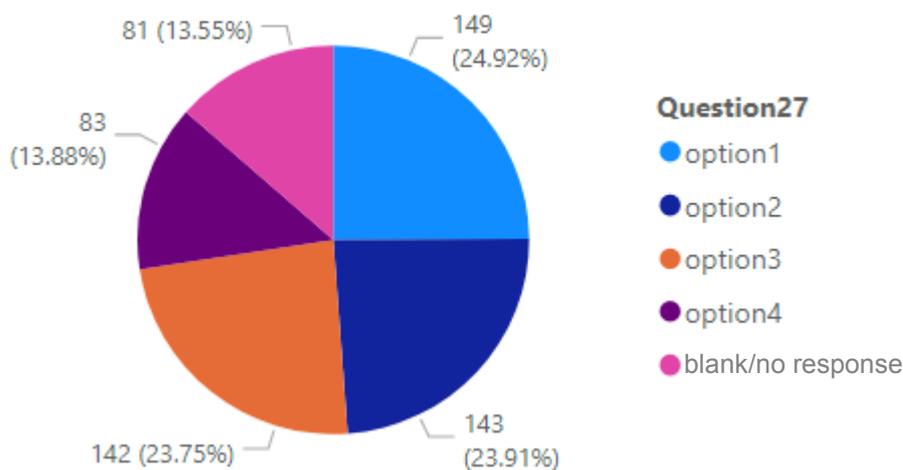
Although most respondents ticked the yes box, 66%, a number did suggest other objectives as well as did people ticking the no box.

### Question 27 - Retaining and refining the existing settlement hierarchy

Chapter 13 of the Issues and Options report considers strategic options for the distribution of new development expressed in terms of a settlement hierarchy. Question 27 sought views on respondents preferred pattern of development.

- Option 1** - Some hierarchy as current Local Plan: 7 Towns plus Cranbrook and the 15 villages
- Option 2** - A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development
- Option 3** - A hierarchy that retains the towns and Cranbrook but has a higher number of villages that may accommodate development
- Option 4** - Do something different in terms of a hierarchy or not one

Count of Responses by Question27

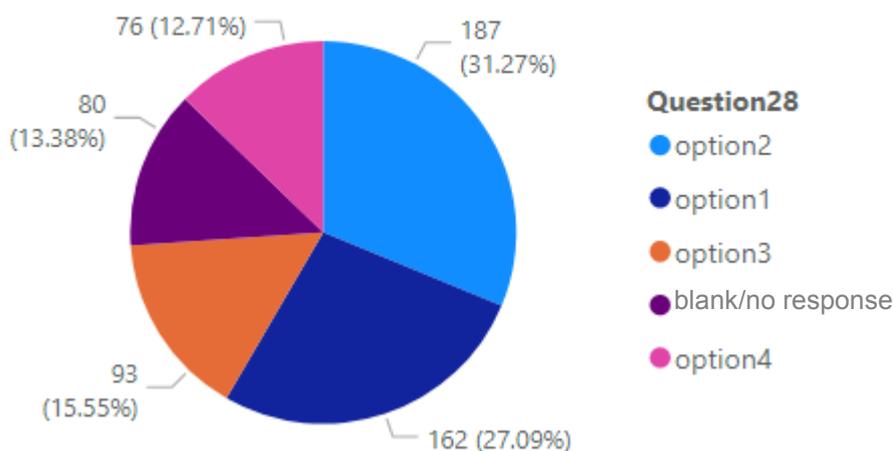


### Question 28 - Broad distribution of housing development

Paragraphs 13.12 to 13.14 of the Issues and Options report considers the strategic spatial options for accommodating housing growth. Question 28 asks which broad approach to the distribution of housing development respondents favoured.

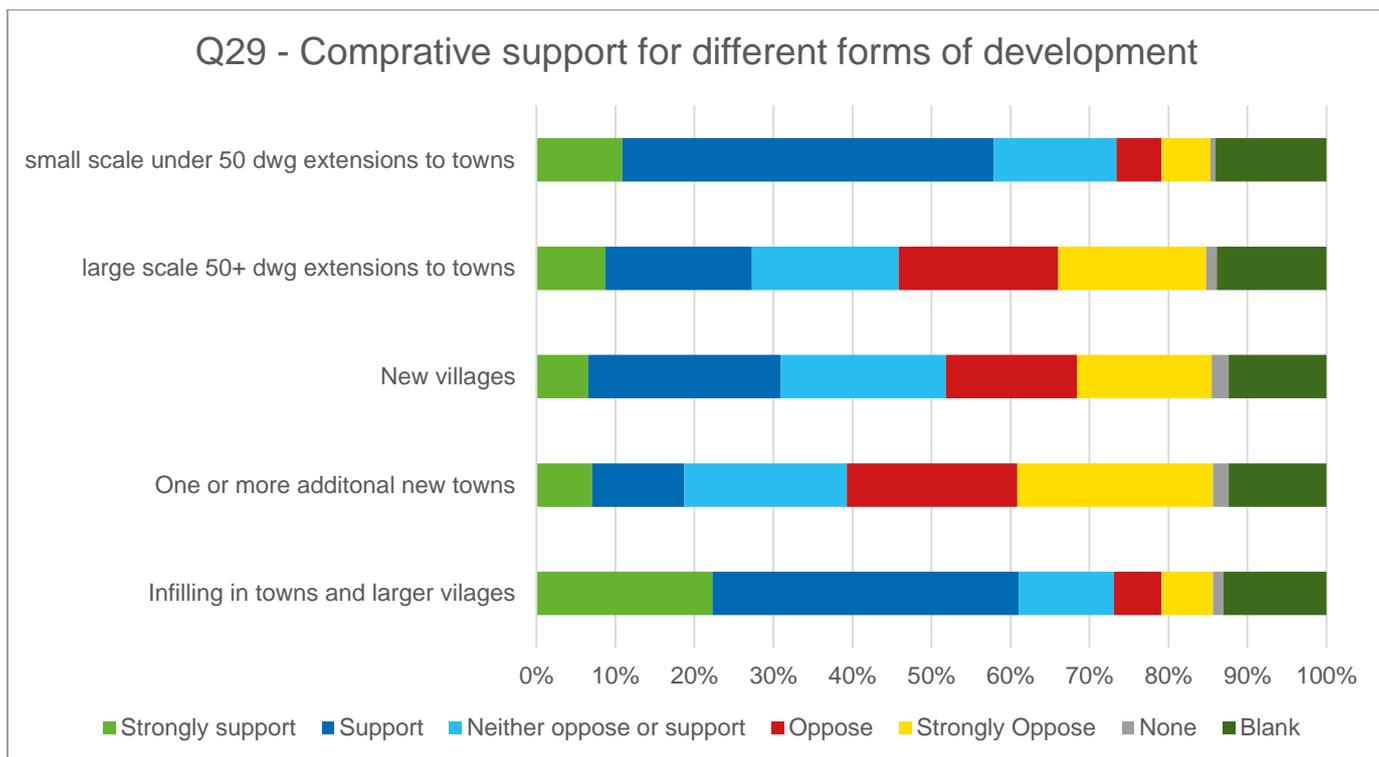
- Option 1** - As existing
- Option 2** - More West End focused
- Option 3** - A less West End focussed pattern
- Option 4** - an alternative to the above

Count of Responses by Question28



### Question 29 - Future options for the type and location of development

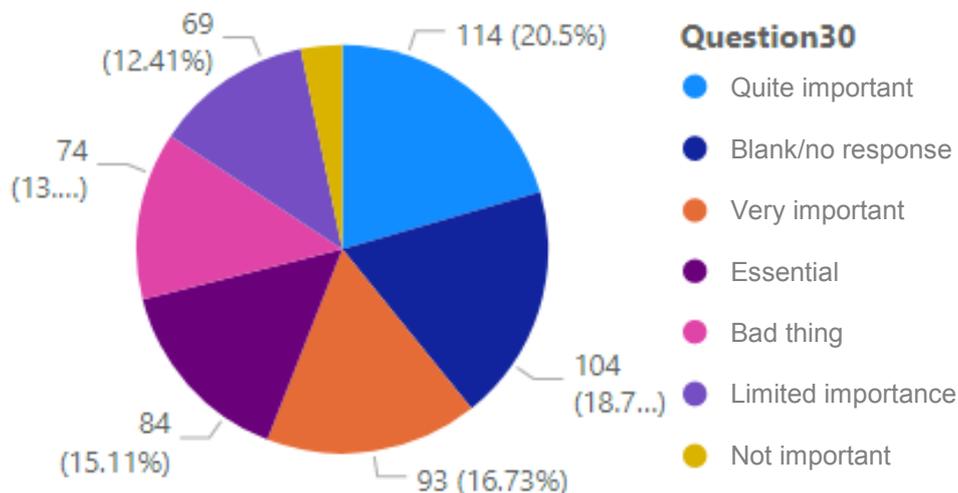
Paragraphs 13.15 & 13.16 of the Issues and Options report sets out a range of option for accommodating development. Respondents were asked to give there levels of support.



### Question 30 - Establishment of a Development Corporation

Paragraphs 13.17 to 13.19 of the Issues and Options report explained the role that a development corporation could play in delivering very large scale developments. Question 30 asked for views on how important a corporation could be.

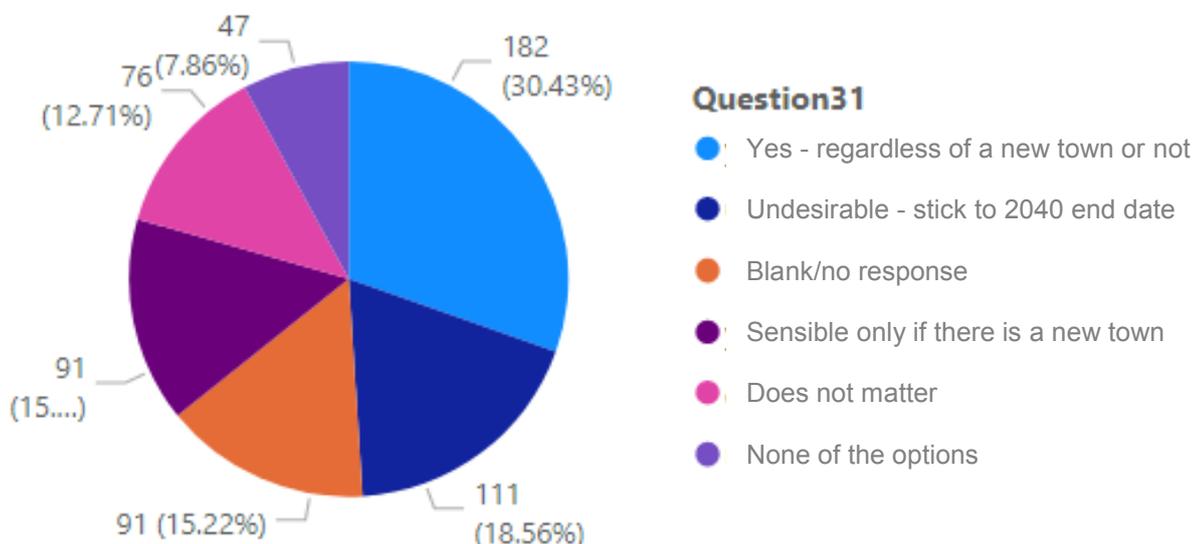
### Count of Responses by Question30



### Question 31 - Planning for development beyond 2040

Paragraph 13.20 of the Issues and Options report considers the timeframe that the local plan should consider. Views were sought on possible end dates with the question asked of whether we should plan for an end date that was well after 2040. The options also related this to whether or not a new town is proposed.

## Count of Responses by Question31



### Question 32 - And finally...?

As a final question we asked if people had any further comments. We will provide feedback on comments received in a final report.

## 9 Issues raised that were not covered in the issues and options document or questionnaire

9.1 A number of respondents raised issues that were not covered in the issues and options report. Whilst many of these were planning and local plan relevant issues some were less relevant and others not at all. We will report on these matters in the final report, noting that some agents, acting for landowners or developers, submitted representations promoting land for development.

## 10 Issues raised by Government agencies and statutory bodies

10.1 In the final feedback report we will include succinct summary text on comments made by statutory bodies to include the Environment Agency, Natural England, Historic England, Highways England as well as other key service providers and public bodies such as utility providers and neighbouring local authorities. Such consultees have particular importance in respect of duty to cooperate considerations.

## 11 Conclusions and next steps

- 11.1 This report provides a succinct summary of feedback only on the numbers and percentages recorded in response to each question asked in the questionnaire. At this stage no summary details or information is made available on free text responses to the questionnaire nor to responses received to the consultation where the questionnaire was not filled in.
- 11.2 A full detailed report will be produced that includes the contents of this report as well as summary information about written text comments received both within and outside of the Questionnaire.
- 11.3 The information received through the consultation, excluding contact details - except for organisations making comment and people that did not fill in the questionnaire, will be published on the Council web site. Responses received to the consultation will help inform development of the local plan over the coming months and specifically debate on future policy choices.

## **Appendix 1 – the communication strategy**

Insert communications strategy here