

Neighbourhood Planning and the new Local Plan Communications Plan

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Background/Purpose

Neighbourhood planning is particularly advanced and active in East Devon. There is a strong level of interest and take up from our communities, encouraged and supported by East Devon District Council since the opportunity to make neighbourhood plans (NPs) was introduced through the Localism Act 2011.

Neighbourhood Plans are designed to give communities (typically at town/parish council level) greater influence and control over the nature and shape of development in their areas. Neighbourhood Plans once 'made' (adopted) become part of the statutory development plan and therefore are used, alongside the Local Plan, to help determine planning applications.

Neighbourhood Plans need to broadly conform to strategy and strategic policies of the overarching Local Plan, but can add to it with specific local context and requirements. This includes the allocation of land for development, the protection of land through local designations (including for green spaces and heritage assets), and the setting of non-strategic planning policies.

At time of writing, there are now a total of 23 'made' plans in East Devon, and approximately a further 10-12 actively advancing through the process. There has also been increased interest recently from a number of other communities who have yet to commence NPs, or have stalled in the process, linked in part to the knowledge that a new Local Plan is being developed.

Given that all NPs have been developed under the existing adopted Local Plan for East Devon (2016-2031), and have been tested at examination for conformity with it, there are potentially significant implications arising from the decision to commence work on a new Local Plan.

NPs are community-led and involve a significant amount of volunteer time, usually over many years. They also involve a considerable amount of community consultation and are ratified by local referendums giving them a democratic status, and a high profile in the community. Once adopted, the new Local Plan will take precedence over made NPs, in so far as there is a conflict between the two.

The initial Issues and Options Consultation on the Local Plan provided a significant level of feedback that NPs should be fully taken into account in the development of the new Local Plan, and that NP groups and communities should be engaged throughout the process. Although concerns were raised from some (particularly from within the development industry) about the weight that should be given to NPs, particularly if they have not provided for any development, overall it is clear that the new Local Plan, as the higher tier strategic plan, will need to set an evidence-based development strategy unencumbered by individual NPs. However, any potential conflicts should be identified early and solutions found as far as possible.

In June 2021, Strategic Planning Committee agreed that a Communications Plan was needed to manage this process of engagement with NP groups (NPGs). This document has been informed by the plan timetable for the Local Plan, which is compressed (with Plan adoption scheduled for early 2024), as well as feedback from NPGs on how best to engage with them.

It should also be noted in terms of context, that the Local Plan and NPs must be in general conformity with the National Planning Policy Framework, which itself has just been revised in July 2021, simultaneously with the launch of a new National Model Design Code. This has emphasised the role of NPs/NPGs in both the development of design codes - working with the Local Authority -, and in identifying sites for housing development. The national situation is expected to shift further during the timescale of producing the new Local Plan, with the Planning Bill due to be announced in the autumn of 2021.

Aims and Objectives

Aim

To ensure Neighbourhood Planning Groups are well informed about, and are able to engage meaningfully in, the development of the new Local Plan for East Devon, leading to a Local Plan (LP) which furthers and empowers neighbourhood planning in the district, minimises unnecessary conflict between the Local Plan and neighbourhood plans and the need for additional work for NPGs.

Objectives

1. Providing timely information, at the earliest opportunity, to NP Groups/Leads on the work to develop the new LP for East Devon, with clarity about the steps involved, the current state of play, timescales, and the opportunities to engage.
2. To facilitate an open two-way dialogue between the LPA and NPG's/Leads regarding the content of the new LP and the relationship with NPs, which maintains and builds trust, understanding and mutual respect;
3. To assist the LPA in understanding and taking account of the wishes of NP communities and the evidence-base provided by NPs in the formulation of LP strategy and policy, and progression of related topic-based work.
4. To identify and act in a timely fashion upon opportunities where consultation and engagement with NPGs on matters related to the new LP would add value and better inform the work.
5. To support the early identification of potential conflicts between the emerging LP and our made/advanced NPs, and facilitate a constructive and collaborative way forward.
6. To support and guide communities in progressing neighbourhood planning working in the context of an adopted and emerging LP, through the transition to the new adopted Local Plan, and beyond (including sharing of evidence base and support with plan reviews)
7. To facilitate networking and sharing of good practice and experience between NP groups in East Devon.
8. To maintain and strengthen the role and function of NP's across East Devon to positively influence development in their areas.
9. To conform to and further the Consultation Strategy and Statement of Community Involvement, and the evidence/audit trail for the LP examination.
10. Fulfil our statutory duty to support and guide communities through the NP process including to navigate the relationship with an emerging LP.

Scope

This Communications Plan is specific to guiding and managing the relationship between NPs and the emerging LP. Topics covered and actions taken will often also be relevant to communities who are not currently engaged in neighbourhood planning. Therefore, whilst the focus is on neighbourhood planning groups it would be expected that invites for webinars and events etc. would be extended to town or parish councils of areas not covered by a neighbourhood planning group, as appropriate. Furthermore, although there is overlap, this is not a Communications Plan for the wider on-going work to promote and support NP in the District.

Key Messages

- Acknowledging and valuing the hard work that goes into NPs
- Be realistic and constructive – demonstrating a willingness to work transparently and constructively with NPGs, including being realistic about where LP strategy & policy may need to depart from what a NP says, based on the latest available evidence and managing expectations regarding the extent to which we can engage without any extension to the plan making timetable
- Being clear throughout that any comment/opinion provided by officers of EDDC, including from the Planning Policy team, at any stage is the informal view/opinion of that officer at that particular time given in good faith, and is in no way binding on subsequent consideration by that or any other officer, or on formal decisions taken by, the Council.

Key Audiences

There are many stakeholders and interested parties in NP in East Devon. However, for the scope of this Communications Plan, the primary audience is Neighbourhood Planning Groups and Leads which include Parish Councils (PCs) as 'Qualifying Bodies' (via Clerks and engaged Councillors).

Within this, there are effectively three main audiences:

1. Communities with 'made' plans

2. Communities with emerging plans

Often communities with 'made' plans discontinue their NP Steering Group (NPG) and so Parish Council's (PCs) are the only/main point of contact in those cases. This may mean some duplication in communication regarding the Local Plan as Parish Council's across the district will be contacted about the work at various times too. Furthermore, as referred to under 'Scope', we will also engage with Parish Councils through this work who do not have and/or do not intend to produce neighbourhood plans as appropriate, including those who have not moved further than designation of a NP area. It is therefore important for the NP Officer to be aware of, link up with and promote those wider communications in implementing this plan.

Individual officers of the Planning Policy team, including but not limited to the Neighbourhood Planning Officer, will be engaged in liaising with NPGs / PCs, and leading the implementation of this plan, with assistance as required from officers from other teams/departments, including Development Management, Conservation, Landscape, Housing, Economic Development etc.

EDDC Local Members may also be engaged in liaising with them where they represent communities active in neighbourhood planning and/or are on Strategic Planning Committee.

The wider audience of the residents, businesses and other stakeholders represented in NP communities and statutory consultees who have an interest in neighbourhood planning may also be contacted/engaged as appropriate but are not the primary audience for this plan.

3. Communities considering preparing a neighbourhood plan

Some areas of the district have made little or no progress towards a neighbourhood plan but they should not be excluded from this work as they may be looking to produce a neighbourhood plan in the future and by engaging them via their town or parish council in this work we could help them to understand the role of a neighbourhood plan and the relationship with the emerging local plan and encourage them to get more involved in neighbourhood planning.

Risks and Mitigation Considerations:

1. There are reputational risks for the Council arising from potential damage to the trust/relationship that has been built between the District Council and our neighbourhood planning communities over many years through our support for neighbourhood planning, if the Council does not, and/or is not seen to, be giving neighbourhood plans due regard in the development of the new Local Plan.
2. There are also risks relating to the ability of communities to make plans which influence and guide development in their areas and to the value of those in future decision making if the relationship between the new Local Plan and neighbourhood plans is not clear.

These risks above are mitigated by the existence and active implementation of this plan.

3. There is also a risk that communities who do not have and/or to do intend to develop a neighbourhood plan could be seen as disadvantaged by this plan. This will be mitigated by close working between officers leading on the Local Plan and the Neighbourhood Planning Officer, and extending invite to the wider audience as appropriate.
4. Risk of impact on the Local Plan timetable which is focussed on delivering a new Local Plan as soon as is practicable, and by end 2023/early 2024. Greater degrees of engagement with NP communities could require more time and members views on this should be sought.

Key Milestones/Triggers for Neighbourhood Plan Communications & Engagement Activity:

With reference to the LP timetable:

Stage	Timing	Communications Undertaken/Proposed	Response
1. Issues and Options (I&O) Consultation	Jan to March 21	<ul style="list-style-type: none"> • Notification of consultation sent to all statutory consultees including all PC's • Notification forwarded to all active NP contacts (PC's and NPGs) • Included an open question in the I&O consultation regarding relationship with NPs. • Organised an initial webinar with NP contacts to discuss in May 2021. • Used all of the above to inform a paper to SPC (20th June 2021 meeting) which affirmed importance of NPs and working with NPGs, and agreed to produce this Communications Plan and undertake & report on research into NP content. • Feedback undertaken via Snap on the webinar included preferred methods of engagement going forwards. 	<p>Very few responses to the notification email but good level of comment on the I&O consultation (c.650 responses) including from NPGs, PCs and individuals with an interest in NPs.</p> <p>Good attendance at webinar - over 20 communities</p> <p>13 responses to Snap Survey, generally wanted more of this type of engagement.</p>
2. Call for Sites	Jan to March 21	<ul style="list-style-type: none"> • Included within above notifications. • Link to HELAA /Call for Sites information on our website shared with NP contacts with webinar notes (June 2021) • Options to engage in site allocation process ahead TBC 	<p>At least one NPG submitted sites under this call</p>

Stage	Timing	Communications Undertaken/Proposed	Response
<p>3. Topic based work to inform draft plan preparation, with series of topic papers going to SPC</p>	<p>On-going (to Dec 21+)</p> <p>Monthly officer team meetings</p> <p>Monthly SPC meetings</p>	<ul style="list-style-type: none"> • Suggested all SPC papers going forward to include a standard heading for ‘Implications for Neighbourhood Planning’. • Key paper 20th July SPC on Role and Function of Settlements. • Email from Planning Policy officers to all Parish Councils 23 July 2021 asking for verification of data held on community facilities • Ensure regular (monthly) updates from Neighbourhood Planning Officer as a minimum. <ul style="list-style-type: none"> ○ July 2021 - 3-sides A4 update document sent by email to all NP contacts 28/07/21 to: advise of where LP had got to; links to Role & Function of Settlements paper & related SPC discussion; notification/reminder about the community facilities/services data verification request; note of possible forthcoming SPC papers & heads up on the new National Planning Policy Framework & National Model Design Code ○ August 21 update – expected to include September SPC agenda • Engagement going forward to be scoped out with Member feedback from September SPC meeting and in dialogue with LP topic leads. Webinar proposed on topic of settlement boundaries autumn 21. 	<p>X No. responses received by deadline of 13/08/21</p> <p>For information only – but only 2 responses by way of reply so difficult to assess value. Keep future updates shorter (max 2 sides)</p>

Stage	Timing	Communications Undertaken/Proposed	Response
		<ul style="list-style-type: none"> Use of NP database to identify any potential conflicts with NPs to discuss – contact individual groups / all affected as necessary 	
4. Draft Plan document (initial high level draft)	By Dec 21	It will be important to ensure that NPGs have an opportunity to review the initial draft in the run up to the Dec SPC meeting and can give initial feedback either at the meeting as part of public speaking arrangements or via ward members.	
5. Draft agreed by SPC	By April 22	The period between a likely high-level and flexible document being produced by Dec 2021 and a draft for consultation by April 2022 is seen as a key if short opportunity to test out the strategy and policy direction with NPGs (as well as other communities). This could include a series of webinars as well as specific meetings with individual communities most affected. Other possibilities suggest ‘Planning for Real’ type exercises in respect of development site allocations/choices could be considered but the impact on the plan making timetable could be significant.	
6. Draft LP consultation	May - June 22	<p>Notification to all statutory consultees by email – will include all PCs</p> <p>NP Officer to share/promote this to all NP contacts (NPGs & PCs)</p> <p>As above, potential to run a webinar to present the draft plan and to have 1:1 meetings with communities most affected.</p>	

Stage	Timing	Communications Undertaken/Proposed	Response
7. 'Wash-up' from above & progression of Publication Plan	July – Sept 22	<p>Share / publicise summary feedback to this consultation with NPGs</p> <p>Report back to SPC on key messages coming from neighbourhood planning groups through the consultation.</p> <p>Continue to support individual NPs as required to consider potential implications for their emerging /made NP.</p>	
8. Publication consultation	Nov/Dec 22	<p>Notification to all statutory consultees by email – will include all PCs</p> <p>NP Officer to share/promote this to all NP contacts (NPGs & PCs)</p> <p>At or before this stage important to inform groups of remaining likely implications.</p>	
9. Submission/Examination through to Inspector's report, including public consultation on modifications (Oct/Nov 23)	March 23 to Jan 24	<p>Consultees representations, including NPG's and others engaged in/with an interest in NP to be submitted for consideration by the Inspector. May be called to speak to hearing and will be notified of consultation as per earlier rounds.</p>	
10. Adoption	Feb 24	<p>Notification to all statutory consultees by email – will include all PCs</p> <p>NP Officer to share/promote this to all NP contacts (NPGs & PCs)</p>	

Stage	Timing	Communications Undertaken/Proposed	Response
11. Post-adoption	Feb 24 onwards	Neighbourhood Planning Officer to work to support NPG's who wish to update/modify their NPs as a result of the new Local Plan (n.b. this work may start earlier)	

Methods of Communication

Informed by methods used to reach NPGs and the wider audience on the Local Plan, particularly the Issues and Options consultation, wider on-going communications by Planning Policy team and feedback from the webinar, the following is an assessment of potential methods to reach and engage the intended audience, highlighting those considered most effective/appropriate:

No.	Method	Suitability to reach target audience (H/M/L)
1	Website:	Only suitable in combination with other methods and needs some proactive notifications (only supported by 25% respondents to webinar feedback survey)
1a	Content on the dedicated ' emerging Local Plan ' webpage	L (but promote link in all communications)
1b	SPC agendas, papers, minutes and meetings available on-line via EDDC website	M-H (but needs proactive engagement to inform on existence of these papers)
1c	Dedicated NP webpages on the EDDC website. (Nothing has been posted on here as yet re. the new LP work)	M (add a page related to relationship to new LP with link to 1 & 2 above, webinar notes etc.)
2	Direct Emails:	(supported by 56% respondents to survey)
2a	Global emails to notify and consult re. matters related to the Local Plan sent to all statutory consultees (from PP database). Includes NP communities by including all Parish Council's	M (relies solely on Clerks – not all of whom may have been closely engaged in NPs / to pass on to local NP contacts; also limited opportunity to raise specific NP matters)

No.	Method	Suitability to reach target audience (H/M/L)
2b	Sharing of the above with contacts engaged in NP by our NP Officer and explaining the relevance and any general implications, call to action etc.	H (requires maintenance of up to date contact details/email distribution list(s)) (in accordance with data protection rules) – see also newsletters below.
3	Newsletters (n.b. can be shared via most e-methods in this table):	(supported by 56% respondents to survey)
3a	Planning Policy newsletter (via Granicus / GovDelivery) including article on NPs – last issued Jan & Feb 21 at time of I&O consultation. NP Officer to email out too or ensure all NP contacts will receive (subject to compliance with data protection)	M – H (good way of communicating with all communities – including NP ones)
3b	EDDC E-newsletter to ALL residents (via Granicus / GovDelivery) sent out regularly by EDDC Communications team	L-M (should utilise and include matters relevant to NPs as will reach wider community audience, but not ideal for engaging NPG groups specifically)
3c	NP newsletter – issued c. 1 per year 2015-2019 . Last sent as 3-side NP news update July 2021 – could in future use NP newsletter template, issue as PDF and upload to website, or include NP article in wider Planning Policy newsletter (see no.3a above)	H (low response rate so ask a few if useful and how to improve. Suggest keep short (2 sides A4) with links for more info)
4	Events:	
4a	Webinars Initial webinar held May 2021 to discuss the relationship in general terms between NPs and the emerging new LP, including formal	H (Over 80% (and up to 93%) of respondents to the feedback survey from the webinar held in May with NPG's were either very or fairly satisfied with all aspects of the event and 92% would be either very (67%) or fairly (25% likely to attend future webinars. The preferred length to be 1.5 to 2 hours and a

No.	Method	Suitability to reach target audience (H/M/L)
	presentations by Planning Policy team and a Q&A. Write up of this widely shared on email with NP contacts, beyond those who attended.	<p>preference for these to continue to be held virtually, and in the evening (i.e. the format we used was broadly welcomed)</p> <p>Building on broad success of initial webinar (May 2021) aim to hold these quarterly going forward – Oct/Nov 21, Jan/Feb 22, April/May 22 and so on.</p> <p>Need to agree asap what topics and when as needs lead-in time.</p> <p>Suggestions from webinar feedback survey in order of popularity:-</p> <ol style="list-style-type: none"> 1. Emerging LP strategy (88%) 2. NP review/modification process (75%) 3. Approach to housing (75%) (perhaps incl affordable housing/CLTs, 2nd/holiday homes) 4. Evidence base (56%) 5. Maximising impact of NPs (other) 6. Climate change/carbon neutrality/sustainability matters (other) <p>As above, suggest could have one to discuss draft plan (before or at start of consultation) and on Settlement boundaries – Nov 21.</p>
4b	Seminar/workshop in person	<p>Only supported by 50% survey respondents (94% supported on-line). Consider if coronavirus restrictions allow but suggest that webinar generally preferable in terms of resources (time & travel) and accessibility</p>
5	<p><u>Focus Groups</u> (Could be face to face or on line)</p>	<p>M (Both options only supported by 44% respondents)</p> <p>Would allow for more in-depth discussion but could be seen as exclusive – keep as an option</p> <p>One comment that if having focus groups, face to face would be preferable.</p>
6	<p><u>Press Releases</u> General Press Releases relating to the LP – issued via EDDC Communications team</p>	<p>L – but useful to update /notify the wider public in NP communities</p>

No.	Method	Suitability to reach target audience (H/M/L)
7	Social Media	
	Social Media (FB, Twitter) via EDDC Communications team	L – but could increase by promoting the links/feeds in all communications
8	Video	
8a	YouTube video e.g. as used to promote the Issues and Options consultation	L – wider comms tool to link to as appropriate
8b	SPC can be watched live or recorded via EDDC YouTube Channel	M-H (but needs proactive engagement to inform these papers)
9	Via Others	
9a	Through Members – SPC committee members / local members representing NP communities / possible re-instatement of a ‘Member Champion’ for NP	M -member training may be needed. Need to be clear what we are asking and what form this would take.
9b	Through Parish Clerks – largely covered by email and newsletters above (n.b. if want to reach wider communities in NP areas PCs can help – notice boards, websites, newsletters etc.)	M-H – covered above
9c	Via networks/partner organisations who engage with NP communities and PCs e.g. Devon Communities Together newsletter	L – reach uncertain but could increase exposure
10	Direct Contact with individual NPGs via NP Officer / Planning Policy Team generally	H (Supported by 69% respondents) Propose to use for NPGs most affected on specific matters and via daily duties of dedicated NPG but beyond this resourcing would be an issue.

Frequency / Targets

Determine with reference to the LP timetable and SPC Committee schedule.

Only realistically do maximum 1 webinar (or other event) per quarter.

Web updates to be on-going and emails at least monthly and as required.

Resources

There is a dedicated 0.8fte Neighbourhood Planning Officer and an annual NP budget.

It is fully expected that this communications plan could be delivered through existing resources.

Monitoring & Evaluation

It will be important to keep effectiveness of implementation of this plan under review, including by seeking feedback from NPGs and keeping a record of everything we do /send etc. (see earlier table above to be added to).

EDDC Communication team could also advice on web hits, YouTube views, social media likes and shares etc. as appropriate.

Abbreviations

CLT – Community Land Trust

HELAA - Housing and Economic Land Availability Assessment

I&O – Issues and Options Consultation

LP – Local Plan

NP – neighbourhood planning

NPG – neighbourhood planning groups

PCs – parish councils

SPC – Strategic Planning Committee