

Report to: **Strategic Planning Committee**



Date of Meeting: 7 March 2023

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Initial feedback report on consultation on the draft East Devon Local Plan – consultation undertaken from 7 November 2022 to 15 January 2023

Report summary:

This report provides a succinct overview of consultation on the draft East Devon Local Plan with some initial observations on themes coming through in feedback received and some data drawn from the on-line consultation software. It is highlighted that later in 2023 a detailed feedback report will be presented to Strategic Planning Committee and this future fuller report will provide relevant information to help Members determine actions going forward.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

Strategic Planning Committee note the contents of this initial feedback report.

Reason for recommendation:

To provide some initial feedback on the consultation that has been undertaken.

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Portfolio(s) (check which apply):

- Climate Action and Emergency Response
- Coast, Country and Environment
- Council and Corporate Co-ordination
- Democracy, Transparency and Communications
- Economy and Assets
- Finance
- Strategic Planning
- Sustainable Homes and Communities
- Tourism, Sports, Leisure and Culture

Equalities impact Low Impact

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Climate change Low Impact

Risk: Low Risk;

Links to background information

The draft local plan, the Policies Map and other documents can be seen at: [Draft Local Plan Consultation - East Devon](#)

Link to Council Plan

Priorities (check which apply)

- Better homes and communities for all
 - A greener East Devon
 - A resilient economy
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1. Introduction

- 1.1 From 7 November 2022 to 15 January 2023 the Council consulted on a draft local plan. This plan was written (as the name implies) to be a draft version of what we consider the final local plan (the plan we submit for Examination) could contain and look like. It is stressed that it was not a fully complete plan in respects of all aspects of policy coverage and further work will be required.
- 1.2 Of most importance the consultation has provided an opportunity for any interested individual, body or organisation to pass comment on the plan and any proposals or policies within. This specifically included areas of land (sites) that were proposed as allocations for development. In making comment on the plan anyone was also able to comment on matters or things that the plan does not contain but they think it should.
- 1.3 This is an initial very early feedback report on the consultation. By clear design and intent it does not refer to specific comments that respondents to the consultation made and it does not contain any suggested responses to how the Council may wish to respond to matters raised (specifically not in respect to how the plan might be amended in respect of feedback). Later in 2023 committee will receive a far more detailed feedback report and this more detailed work will be available to help inform future work on plan making. Part of any future work will involve reviewing timetables for future plan production. Current timetables are set out in the most up to date East Devon Local Development Scheme [lds-april-2022.pdf \(eastdevon.gov.uk\)](#).

2. Promotion of the consultation and the levels of responses received

- 2.1 Committee will be aware that the consultation on the local plan was very actively promoted with a clear intent and design to encourage people to be involved and pass comment. There was an online platform, Commonplace, that allowed for submissions to be made and also the plan was available in electronic - PDF format, and at libraries - in paper format. People could make comments online, via emails and through sending in letters. At exhibitions we invited 'quick comments' to be submitted in written

paper format and we are aware that there were conversations on social media around the plan and contents within.

- 2.2 It is too early to provide precise details of the total number of separate individuals or organisations that responded, we are still collating information but we can provide some headline figures at this early stage:
- Through the Commonplace software there were around 2,500 different individuals or organisations that made comment on the plan.
 - In email or letter format we received submissions from what we would estimate to be around about 1,000 different individuals or organisations.
- 2.3 As a measure of those responding the above figures should, however, be treated with a degree of caution. Of the 2,500 responders through the Commonplace software there may be some double-counting potentially where people went into the software more than once and did not register each entry against a single account. Likewise the estimated 1,000 emails and letters may contain cases where people sent in more than one letter or email. Of more significant note, however, is that fact that we know that some respondents submitted comments through Commonplace as well as sending them to us, or additional ones, in email or paper format. This may account for a substantial amount of 'double-counting'.
- 2.4 There will be some considerable work to be undertaken to produce a definitive (or at least approximately accurate) figure for the number of separate individuals or organisation that responded to the consultation but based on what we know to date it would not be surprising if the total figure was somewhat in excess of 3,000. It should also be noted that the figures we quote do not count the separate individuals that signed petitions that were submitted to us, nor have we factored in numbers (nor will we seek or be able to) of those that were involved in conversations that were external to the Council on social media about the local plan. Also we received many hand written 'quick comments' at exhibitions and it will not be possible to determine how many of those submitting these written comments will or will not have commented through other means as well.
- 2.5 Some of those that submitted comments will have raised a single item or issue of objection or concern (or support) though others will have covered many different aspects or elements, including separate policies, and development site allocation options in the plan.

3. The Commonplace consultation portal

- 3.1 Committee will be aware that the Council has purchased the use of Commonplace software, as a corporate system, to support consultation exercises. This software was

used for the local plan consultation and it was the route through which most people submitting comments chose to do so. It is acknowledged that there were some issues with the software and the consultation more widely which were discussed at Scrutiny Committee on the 2nd February. A report reflecting on the consultation and the role of the commonplace software will be brought separately to a future meeting.

- 3.2 All of the policies in the plan could be commented on through the software as could sites that featured in the plan as proposed allocations as well as those at and around settlements identified in plan policy as offering potential suitability for growth but which at this stage were deemed not suitable and as such were classified as rejected.
- 3.3 All comments received through the Commonplace consultation portal can be seen on the system at [Have Your Say Today - East Devon Local Plan - Commonplace](#). Respondents could also upload PDF documents onto the software and these are not yet published and available to view – we plan to publish these alongside submissions received via emails and letters.
- 3.4 We will also look at the potential to download all comments received through Commonplace and to publish these in PDF format as this might be a more accessible means to view comments for some people that want to look at submissions on the plan.
- 3.5 As well as showing comments against each policy the software had a tick box answer section that allowed respondents to show their level of satisfaction with each policy and each possible development site option that featured in the consultation.

4. The make-up of respondents using Commonplace

- 4.1 The Commonplace software allowed people to include various details about themselves, though this was not compulsory.
- 4.2 Of those that stated their age the following spread of respondents, by age groupings, was recorded.

Age group	Number of respondents	Percentage split
13-15	8	0.46%
16-24	36	2.07%
25-34	115	6.62%
35-44	227	13.08%
45-54	306	17.63%
55-64	438	25.23%
65-74	435	25.06%
75-84	157	9.04%
85 or over	14	0.81%
Total	1,736	100%

- 4.3 There were 643 respondents who left the question blank or responded that they would prefer not to state
- 4.4 A total of 1,777 respondents gave address details out of 2,379 uniquely generated respondent IDs (meaning 602 did not give details); 1,671 (94.03%) out of those 1,777 lived in East Devon and 106 (5.97%) lived elsewhere.
- 4.5 A total of 1,844 respondents gave details regarding their connection to the district.

Connection	Number of respondents	Percentage split
I live here	1,741	94.41%
I work here	55	2.98%
I commute through here	28	1.52%
I own a business here	7	0.38%
I study here	2	0.11%
I volunteer here	1	0.05%
I am a consultee	1	0.05%
I am a developer	1	0.05%
I am a house owner	1	0.05%
I am a landowner	1	0.05%
Other	6	0.33%
Total	1,844	100%

5. Satisfaction scores on site specific allocations from Commonplace

- 5.1 All of the sites, bar three, that featured in the Local Plan consultation document as preferred or second choice options received responses, the three exceptions were:
- LP_Sowt_11a - Land at Bishops Court Lane, Clyst St Mary;
 - LP_Dunk_05 – Broomfields, Dunkeswell; and
 - LP_Wood_01 - Field 4583, Exmouth Road, Exton.
- It is not yet known if these sites received comments in email submissions.
- 5.2 The number of satisfaction responses to differing sites varied greatly. Some sites received just 1 or 2 responses, whereas, in contrast some were very much higher, 403 in the case of Site Brcy_12 in Broadclyst.
- 5.3 For all sites respondents could choose a single satisfaction score of:
- 0 - Unhappy;
25 - Dissatisfied;
50 – Neutral;
75 – Satisfied; or
100 – Happy.
- 5.4 All scores for each question were added up to provide an average score so that a score of 0, or a little above indicates a strong degree (on average) of unhappiness, whilst in complete contrast a score of 100, or a little below, would indicate a strong

degree (on average) of happiness. A figure in the middle would indicate (on average) a mid-point between the extremes.

- 5.5 In the consultation questions asked about people's views on the appropriateness of sites for development. Respondents had the opportunity to give a sentiment response using the scale set out at para. 5.3 and they could also provide a more detailed written comment. In most cases the comments help to explain the sentiment rating however in some cases they are contradictory and these will need to be treated with caution to ensure that the views expressed are accurately reflected in feedback.
- 5.6 For all sites whether shown as preferred allocations, second choices or rejected there was a general pattern of unhappiness in respect of responses around suitability for development. A great many sites achieved scores in the 0 to 20% range (indicating a picture of un-happiness) with comparatively few pushing upwards, closer to or beyond the 50% position.
- 5.7 We did ask the question in the consultation - How do you feel about our approach to undertaking site assessment work? The response score was 25.18%, though it's not clear if this (unhappiness response) was a response that reflected people's views on the methodology followed or the outcomes it generated.
- 5.8 Included in the sites we sought views on were the three options in the consultation document for a new settlement. There were over 300 responses to this question and the responses received were:
- Option 1 - 23.3%;
 - Option 2 – 11.11%; and
 - Option 3 – 8.7%.

These scores suggest a low level of satisfaction with all of the new community options with a slightly higher level of satisfaction with option 1.

- 5.9 Also, in the western part of East Devon, the substantial development proposal next to the M5 and north of Topsham scored 35%, though there were only 5 respondents.

6. Sentiment scores on plan policies from Commonplace

- 6.1 As with the site choices we also have sentiment questions, on Commonplace, for policies and the same scoring system used for sites applied. There was a more varied range of percentage responses, and quite a lot were higher, than in respect of the feedback received on sites.
- 6.2 Feedback on policies that related to the plan strategy were in the high 20% to 50% range and for employment allocations policies typically a little higher. Reflecting the scores of site choices for a second new town the ranking of Strategic Policy 8:

Development of a second new town east of Exeter – scored a figure of 22.01%. However, it is not clear if this reflects respondents in principle views on planning for a second new town or whether it is a response to the satisfaction of the quality of policy wording, construct and expectations of the policy.

- 6.3 Policies in the plan that were about towns in East Devon saw scores in the 30 and 40 percent levels though for subject based matters, as opposed to those that related to specific sites - to include climate change, housing and employment scores were higher, most over and above 50%. Policies around environment, built heritage and recreation matters saw amongst the highest scores, many in the 70% or 80% ranges.

7. Emails and letters received

- 7.1 We have not yet had chance to review the comments that have been received in letter or email format though it is clear from the number of submissions that have come in that this was and remains a popular format for people to submit comments.
- 7.2 We are aware that some people struggled, to some degree, with the consultation software and chose therefore to email or write in. There were, as well, some people that do or did not have access to a computer and as such were not able to use the software.
- 7.3 Many agents acting for clients also did not use the software for making submissions and chose instead to make their submissions in email format, often with reports attached as PDF documents. Though in some cases PDFs were uploaded onto and through the consultation software.
- 7.4 Our intention is that all of the representations received through written comment - emails, PDFs and letters, will be saved and be available to be individually viewed on our website, though with sensitive elements such as contact details redacted. Given numbers involved, however, this may take some time to complete.

8. The exhibitions and quick survey responses

- 8.1 We held nine in person exhibitions at various venues around the district to support the consultation. These were well attended with most seeing visitor numbers estimated in the range of 200 to 300 people. This was a level of attendance that was typically greater than for exhibitions held in respect of production of previous local plans in East Devon.
- 8.2 Whilst questions raised at the exhibitions were wide ranging most were in respect of, or related to, the settlements where the exhibitions were held or in some cases to settlements close by. Most people were interested in and raised questions relating to sites that were proposed in the plan as allocations for development at and around these settlements. At the exhibitions most people that expressed a view about sites

did not favour the allocation for development of the sites they were raising questions about.

- 8.3 At the exhibitions we provided slips of paper that people could submit quick response comments on. In a future feedback report we will provide a summary of the key themes and messages that came through, for each event, from the quick comment forms.
- 8.4 In respect of Feniton and Whimble we asked a specific question (also included on the Commonplace software) that sought views on the scale of housing that people regarded as appropriate for the village. Of those that expressed a view the responses received are tabled below (where it was clear what people were voting for). The question asked was – *“Please tick the relevant box for the level of additional housing development that you feel is appropriate for Feniton (for the Whimble exhibition the text read Whimble) for the period from 2022 to 2040.”* We also show the corresponding feedback received for the same question asked through the Commonplace software.

Level of development favoured	Votes at Feniton	Votes at Whimble	Votes at Feniton from Commonplace	Votes at Whimble from Commonplace
Zero homes	5	14	9	11
1 - 50 homes	4	21	17	15
51 - 100 homes	0	5	3	1
101 - 250 homes	0	2	3	3
251 to 500 homes	0	0	2	2
501 or more homes	0	0	2	2

9. More general matters raised in responses to consultation

- 9.1 We have not had a chance to read, catalogue or review the great range of comments received through the consultation (rather there has been a very partial overview made of some). So at this stage we cannot provide any form of detailed, thorough or comprehensive feedback of matters raised and the numbers of people commenting on differing issues. However, and anecdotally at least, matters raised in discussions at exhibitions (other than where site specific) that came up on a regular basis included:
- a) Concerns that we were planning for too much development, especially too much house building. Some people noted the Written Ministerial Statement before Christmas by the Secretary of State Michael Gove, noting mandatory housing targets maybe removed.

- b) Opposition, in-principle, to planning for a new community. This was most clearly articulated at the Clyst St Mary exhibition, though some elsewhere favoured the development.
- c) Concerns over the ability of infrastructure to cope with and accommodate development was raised by many, including in respect of such matters as highways, schools, medical services, policing and sewage systems. These types of concerns frequently come up through plan consultation, though anecdotally at least, we had the impression that they were raised to a greater extent with this plan than happened in the past.
- d) Concerns that the percentage of affordable housing on 'qualifying sites' is too low, and that insufficient affordable housing would be delivered, in particular housing that was considered (by some respondents at least) to be "truly affordable" for meeting "local" needs.
- e) Concern for the environment in general and impacts that may arise from development. Amongst themes and matters raised was the potential for adverse impacts (and loss to development) of land designated as part of one of the AONBs.

9.2 We would reiterate that the above is emphatically not (and is not intended) to be a comprehensive lists of matters raised but it does seek to give a flavour of some of the matters that came up on a regular basis. Whilst we have listed some of the broad and often over-arching concerns it is important to recognise that there will also be lots of detailed comments around policies in the plan and some of these, we can assume, will be of quite technical in nature that go into matters of specific policy detail.

9.3 It is also relevant to note that the character and nature of responses from land owners and developers, and agents acting for them, will frequently differ in tone, form and aspired outcomes from those received from many interested members of the public that have provided feedback.

10. What happens next

10.1 Over the coming weeks officers will undertake a detailed and thorough exercise in reviewing and cataloguing all comments received. Where appropriate, for example addresses and telephones numbers, information will be redacted and we will make representations available to view on the Council web site.

10.2 Later this year (hopefully in the early Summer) we will publish and present to Strategic Planning Committee a full consultation feedback report and allied to this we will be seeking committee instruction on:

- How to most usefully use the feedback;
- How and where to amend the plan in response to comments received;
- What extra and additional work may be needed; and
- How we should progress with plan making.

Financial implications:

There are no financial implications on which to comment.

Legal implications:

There are no legal implications requiring comment.