

THE NORTH DORSET LOCAL PLAN PART 1 2011-2026 (LP1)

ISSUE 1:

DUTY TO CO-OPERATE, LEGAL REQUIREMENTS AND THE COUNCIL'S BROAD STRATEGY (POLICIES 1 AND 2)

ON BEHALF OF MESSRS DRAKE

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1. ISSUE 1 – DUTY TO CO-OPERATE, LEGAL REQUIREMENTS AND THE COUNCIL’S BROAD STRATEGY (POLICIES 1 AND 2)

1.1 Has co-operation between North Dorset District Council and other nearby local planning authorities been a continuous process of engagement from initial thinking? What evidence is there of effective co-operation (NPPF paragraph 181) and of joint working on areas of common interest being diligently undertaken for the mutual benefit of neighbouring authorities (NPPF paragraph 178)? Is there a long term commitment to co-operation?

1.1.1 The Duty to Co-operate (SUD019) includes a series of memorandum of understanding between the neighbouring authorities which sets out how the duty to co-operate has been addressed to date and how it will be taken forward.

1.1.2 It is evident that the main focus for joint working has been with other local authorities in the Dorset sub region (i.e. rural Dorset and Bournemouth). However, there is clearly a relationship with authorities to the north of the district which was referred to in the Background Paper on Meeting Housing Needs of November 2013 (MHN001) states (in paragraph 4.10) that

‘the northern part of the District, including the towns of Gillingham, Shaftesbury, Sturminster Newton and Stalbridge, look towards Yeovil and Salisbury functional housing markets. In contrast the south of the District including the main town of Blandford tends to look towards the Bournemouth & Poole functional housing market.’

1.1.3 Paragraph 2.12 of the Local Plan Part 1 also comments that ‘The recent SHMA Update recognises that the northern part of the District has only a limited functional relationship with the South East Dorset Conurbation’.

1.1.4 It will therefore be important to know what the Council has to say about relationships between settlements in the north of the District and neighbouring areas of Somerset and Wiltshire; especially as the Strategic Housing Market Assessment (SHMA) has focused on relationships within the Bournemouth and Poole Housing Market Area, covering the six local authorities of Bournemouth, Christchurch, East Dorset, North Dorset, Poole and Purbeck.

- 1.1.5 Evidence submitted in support of the Partial Review of the Purbeck Local Plan, Part I, includes interim findings for Purbeck from the on-going work by GL Hearn to prepare a new Strategic Housing Market Assessment (SHMA) for what is now called the Eastern Dorset Housing Market Area (the same six local authorities). In the Council's response (INS008) to the Inspector's Question 3 to the Council, this update of the SHMA is referred to in paragraph 2.13 which is awaiting the publication of the 2012-based DCLG household projections which are due to be published on 26th February 2015. Relationships with adjoining housing market areas in Somerset and Wiltshire may also be important for settlements in the north of the District. It would be helpful to know how these relationships are considered in the updated SHMA.
- 1.1.6 There appears to be a long term commitment to co-operation in respect of the emerging SHMA and this is evident in the INS008 para 2.18 and 2.19 although this is prepared from a North Dorset perspective and is not a joint paper.
- 1.1.7 Pegasus is concerned that the new SHMA will have implications for the preparation of Part 2 of the Local Plan, which is not due to be published as a Draft until May 2016. A further issue which could affect the preparation of Part 2 of the Local Plan is the Tri-Council Partnership between North Dorset, West Dorset and Weymouth and Portland Councils, which are within separate Housing Market Areas. West Dorset Weymouth and Portland Local Plan is a joint Local Plan and currently subject to Examination. Para 2.65 of SUD019 states that once the two local plans (i.e. West Dorset Weymouth and Portland Local Plan and North Dorset) have been adopted, "the tri-council partnership will provide the opportunity to consider whether different arrangements should be put in place to establish planning policies for the area covered by the three councils, which extends to more than half the shire county of Dorset".
- 1.1.8 The new SHMA together with the merger of the Councils may lead to a need to review Part 1 of the Plan sooner. The Planning Practice Guidance states (ID 2a-007-20140306) that:

"Where Local Plans are at different stages of production, local planning authorities can build upon the existing evidence base of partner local authorities in their housing market area but should co-ordinate future housing reviews so they take place at the same time."

- 1.1.9 If North Dorset continues with the preparation of Part 2 of their Local Plan, the opportunity to co-ordinate future housing reviews as set out in the Planning Practice Guidance may well be lost if there is indeed a strong relationship between the local authorities outside the SHMA. However, if Part 2 of the plan is not prepared it is considered that the Local Plan Part 1 as proposed will provide insufficient guidance in respect of development opportunities outside the four main towns as there is a heavy reliance on the preparation of Neighbourhood Plans.
- 1.1.10 The emphasis in the NPPF is upon the preparation of a single plan prepared in the context of the duty to co-operate.

1.2 Have any cross boundary strategic priorities or issues been identified? If so, are they clearly reflected in LP1 (NPPF paragraph 179)?

1.2.1 Pegasus has no further comments on this question other than those made in response to question 1.1.

1.3 Has LP1 been prepared in accordance with the Council's Statement of Community Involvement?

1.3.1 Pegasus has no comments on this question.

- 1.4 Is LP1 based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances? Has the strategic site selection process been objective and based on appropriate criteria? Is there clear evidence demonstrating how and why the preferred strategy was selected?**
- 1.4.1 Pegasus considers that there is inadequate justification for the preferred strategy in terms of the lack of a policy framework for the larger villages – see response to question 1.5 below.

1.5 Is the Council's core spatial strategy (policy 2) justified and compatible with the principles referred to in paragraphs 17 and 55 of the NPPF? Will the policies and proposals in LP1 contribute to the sustainable growth of the District?

1.5.1 Pegasus on behalf of Messrs Drake consider that the approach set out in Core Policy 2 in respect of the larger villages, such as Child Okeford is not justified. It is too restrictive and fails to reflect paragraphs 17 and 55 of the NPPF. Paragraph: 001 Reference ID: 50-001-20140306 states:

"It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. This is clearly set out in the National Planning Policy Framework, in the core planning principles, the section on supporting a prosperous rural economy and the section on housing. A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities."

1.5.2 Plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. It is considered that the Local Plan Part 1 does not provide that framework for the larger villages. Instead it sets out a restrictive approach which is in conflict with the remaining sections of the NPPF and the objectives of the Local Plan.

1.5.3 Such a restrictive approach to the larger villages does not take account of the rural nature of the district and the different roles and character of the area.

1.5.4 Paragraph 55 of the NPPF states that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities even where there are groups of smaller settlements, development in one village may support services in a nearby village. However, the Local Plan does not even enable this approach; instead it seeks to apply a "blanket approach" of strictly controlling development outside the main towns, which is not consistent with the NPPF or the planning practice guidance.

- 1.5.5 It is considered that the Draft Core Policy should be reinstated. The Draft Policy identified Stalbridge and 18 of the Districts larger villages as 'local centres' and the main focus for sustainable growth outside the four main towns (referred to as Main Service Centres); and form a network of sustainable rural communities providing local services to meet day-to-day needs (SDS002 Spatial Strategy Topic Paper updated 2012).
- 1.5.6 Child Okeford was identified as one of the larger villages. Draft Core Policy 3 then applied the policy of restraint to the smaller villages. It is not clear why this approach has not been continued in the Pre-Submission Plan.
- 1.5.7 SDS002 paragraph 3.24 referred to Draft Core Policy 19 – Stalbridge and the Larger Villages which
- .."set out a strategic approach to development in these settlements, but did not include any 'inset diagrams'. The supporting text here stated that "in some villages, there is significant potential for infilling and redevelopment within settlement boundaries. Where it is considered that additional housing is needed, though, sites will be identified in the Site Allocations DPD, drawing on the information in the Council's SHLAA".**
- 1.5.8 Draft Core Policy 19 envisaged the retention of the current Local Plan settlement boundaries for Stalbridge and the larger villages until new, more detailed policies were put in place. The supporting text stated
- "in order to accommodate the level of growth set out in the emerging RSS, the current settlement boundaries will be reviewed during the production of the Site Allocations DPD. In the meantime, the settlement boundaries around Stalbridge and the larger villages, as set out in the Local Plan, will continue to be used for development management purposes".**
- 1.5.9 There does not appear to be any justification for the restrictive approach now proposed in Part 1 of the Local Plan. Whilst the Spatial Topic Paper refers to a more local approach to policy formulation "giving more power to local communities to take an active role in shaping the place in which they live, work or have an interest." This has to be set against the framework provided by the NPPF and also more recently the Planning Practice Guidance.
- 1.5.10 Irrespective of the abolition of the Regional Strategy, a settlement strategy reflecting the hierarchy of settlements and their role and function in the district is appropriate in order to provide a framework for the provision of sustainable development. The NPPF states at para 150 that Local Plans:-

“ are the key to delivering sustainable development that reflects the vision and aspirations of local communities. Planning decisions must be taken in accordance with the Local Plan unless material considerations indicate otherwise.”

1.5.11 Our clients consider that the “wash over” all settlements outside the four main towns with a policy that would not permit infilling until Neighbourhood Plans are produced is unnecessarily restrictive and inconsistent with the NPPF para 55 and the Planning Practice Guidance paragraph 001 Reference ID: 50-001-20140306.

1.5.12 The Plan envisages local needs being met and delivered through neighbourhood planning. However, a neighbourhood plan should support the strategic development needs set out in the Local Plan and plan positively to support local development (as outlined in paragraph 16 of the National Planning Policy Framework. (Paragraph: 004 Reference ID: 41-004-20140306)

“Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”

- 1.6 Paragraph 1.8 of the Sustainability Appraisal (SUD003a) refers to “five market towns which act as hubs serving their rural hinterland.” Is Stalbridge the “fifth market town?” The town is referred to as an individual settlement throughout LP1 (rather than included generically as a village). Is this an indication that it displays different characteristics to other small settlements in the District and as such are the policies being applied to it justified?**
- 1.6.1 Pegasus has no comments on this question.

- 1.7 Restrictive countryside policies will apply to settlements where settlement boundaries are proposed to be removed. Bearing in mind that only 230 dwellings (as a minimum) are proposed outside the 4 main towns, will housing need (including for affordable housing) and LP1 objectives 4 and 5 (page 23) in these locations be met? What is the justification for only proposing about 230 dwellings (6% of total provision) in smaller settlements? Why has the Council placed little weight on the 2010 SHLAA (MHN007) which identified 19 smaller settlements (page 47) suitable for some market and affordable housing? Are there any significant opportunities for sustainable residential or economic development in these settlements? (see also question 6.1)**
- 1.7.1 Pegasus considers that the allocation of 230 dwellings outside the 4 main towns for the plan period is unduly restrictive; it will fail to meet housing needs or support and maintain rural services particularly as North Dorset has one of the highest affordable housing needs, the lack of housing will not fulfil the Government objectives of significantly increasing the housing land supply.
- 1.7.2 The Council's latest Annual Monitoring Report (AMR) 2014 (IMP006) states that 45% of the population of the District live outside of the five major settlements (four main towns plus Stalbridge) where only circa 6% (230 dwellings as a minimum) of future residential development is proposed under Policy 6 – Housing Distribution. As North Dorset is described as a rural District there is a concern that this proposed distribution will not be sufficient to meet housing needs outside the four main towns and meet the objectives of the Plan.
- 1.7.3 Appendix 2 of AMR 2014 identifies 274 existing planning consents in the rural area outside of the four main towns of which all are included in the Council's five year housing land supply and therefore are expected to be delivered by 2019. As a consequence after 2019 there may be no further development in the rural areas. Such a severe restriction is not compatible with the principles of Paragraphs 17 and 55 of the NPPF and is likely to inhibit sustainable growth across the District.
- 1.7.4 It is noted that the SHLAA was produced in 2010 which is nearly 5 years old, in which case it cannot be considered to be consistent with the emphasis in the NPPF (paragraphs 158 and 159). The Strategic Housing Land Availability Assessment should be prepared to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period; it should also be up-to-date in line with paragraph 158.

- 1.7.5 There is too much reliance on Neighbourhood Plans meeting the shortfall in policy guidance, if neighbourhood plans are not prepared then the policy of restricting development in the larger villages will apply which will reduce the housing supply and undermine the objectives of the Plan, particularly Objective 4 and Objective 5.
- 1.7.6 Our response to question 1.5 covers this issue.
- 1.7.7 Pegasus considers that there are significant opportunities for sustainable residential development in Child Okeford, which has been categorised by the Council as one of the larger villages and recognised in the SHLAA as one of 19 settlements suitable for Market and Affordable Housing.
- 1.7.8 Further guidance should be included in the Plan which facilitates development in the larger villages, particularly those that have a range of facilities and services such as Child Okeford. In the Councils latest paper INS010a Table 2 demonstrates that the village is well served and access to all the amenities and facilities and services require. It should be noted that Parish Council have produced a Directory (2014) which contains information about all the organisations, groups, clubs, facilities and businesses in Child Okeford.

APPENDIX 1: CHILD OKEFORD VILLAGE DIRECTORY 2014

1.8 Planning Practice Guide (PPG) on Rural Housing (paragraph 001) advises that rural housing is essential to ensure viable use of local facilities and that blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence. What is the robust evidence for the Council's approach? Is there a risk that the Council's approach, which includes the removal of all settlement boundaries (except for the four main towns), will leave to uncertainty and act as an impediment to sustainable development in these locations?

1.8.1 Pegasus considers that there is no justification for the removal of the settlement boundaries for the larger villages; this approach is unsound and inconsistent with the NPPF paragraph 55.

1.8.2 There is a risk that if the Council relies on Neighbourhood Plans to deliver the growth that this will not happen and instead the approach will result in planning by appeal. This was an issue raised by the Inspector considering the Wiltshire Core Strategy; the Council had not reviewed the extent of the boundaries to inform the Core Strategy; instead relying upon the pre-existing development plan documents. As these were adopted some years previously they were out of date for the purposes of the Core Strategy plan period.

"To review boundaries, the CS identifies community led planning as the vehicle to deliver the necessary updates. However, there remains a considerable risk that, for example, Neighbourhood Plans will not be delivered across the county in a comprehensive or timely fashion. Such an outcome would, in the context of the CS Settlement and Delivery Strategy, potentially preclude development initiatives on the basis of an unjustified evidence base and therefore not represent a positive form of planning." Ref para 36 of the Inspector's Report.

1.8.3 In North Dorset a "blanket approach" restricting development is proposed, which is inconsistent with the NPPF and the Planning Practice Guidance, it is considered that a policy vacuum exists. The strategy for the larger villages is therefore uncertain and will not support the promotion of sustainable development in the rural areas in accordance with the NPPF.

1.8.4 Pegasus considers that a policy framework should be included for the larger villages, thereby facilitating sustainable development in the rural areas which would enhance or maintain the vitality of rural communities and support the provision of affordable housing and the objectives of the Plan.

- 1.9 Local Planning Authorities should boost significantly the supply of housing, including through the promotion of sustainable development in rural areas (NPPF paragraph 55). Does the Council’s option of “opting in” to the Local Plan Part 2, or the reliance on the adoption of Neighbourhood Plans (pages 36 and 37) provide the appropriate framework for ensuring that local needs for housing and employment in rural areas will be met?**
- 1.9.1 The supply of housing in all but the four main towns will rely on Neighbourhood Plans or local communities ‘opting-in’ to define a settlement boundary in Part 2 of the Local Plan. This approach means that the provision of housing to meet local needs is not resolved in Part 1 of the Local Plan and remains highly uncertain.
- 1.9.2 At the time the local plan is prepared it provides an opportunity to review development boundaries, so that they can be amended to reflect the existing settlement boundary and reflect development opportunities consistent with the size and role of the settlement, as well as accommodating continuing infill within the town and any other opportunities identified by neighbourhood planning.

1.10 What is the justification for the removal of the settlement boundaries now (with the exception of the four main towns)? What options were considered by the Council? Policy 9 refers to affordable housing schemes “adjoining the built up area” of Stalbridge and the villages. How would a decision maker know how to react to such a scheme when the built up area is not defined? If the Council’s approach is not sound (i.e. justified), what is the appropriate way forward?

1.10.1 The justification for the removal of the settlement boundaries appears to be the abolition of the RSS. (SDS002 Spatial Strategy Topic Paper updated 2012) which is set out in the conclusions.

“In the light of changes to national policy: the impending abolition of regional planning; and the introduction of neighbourhood planning, it is appropriate to seek to revise the draft Core Strategy to reflect the new, less rigid ‘higher level’ policy framework and the localism agenda;...

The provision of this level of growth at the four main towns would enable a more flexible approach to be taken in Stalbridge and the villages;...

The Core Strategy will establish the overall level of development that will need to be provided in the four main towns, but the quantum and location of future development in Stalbridge and individual villages will be determined primarily through neighbourhood planning having regard to local needs and priorities.”

1.10.2 The Options that the Council considered are set out in (SDS002) paragraphs 4.31 – 4.33 which refer to three possible options for establishing a new strategic policy approach to development in Stalbridge and the villages. These options were based on the draft NPPF in 2011.

1.10.3 In terms of the representations from Parish and Town Councils and their criticisms of the approach set out in Draft Policy 3 (see paragraph 4.41) there does not appear to be any evidence of looking into these concerns or explaining the alternatives.

1.10.4 It is interesting to note that in neighbouring West Dorset Weymouth and Portland development boundaries are retained. Submitted Policy SUS 2 (iii)

“...Development in rural areas will be directed to the settlements with defined development boundaries, and will take place at an appropriate scale to the size of the settlement. Settlements with no defined development boundary may also have some growth to meet their local needs

- 1.10.5 Pegasus considers that the approach is not sound, it cannot be justified and is inconsistent with the NPPF and Planning Practice Guidance. Core Policy 2 should be amended to facilitate development in the larger villages where it will support the provision of facilities and services and enhance or maintain the vitality of rural communities.

1.11 Is the relationship between LP1 and any future Neighbourhood Plans (as outlined in Chapter 1) sufficiently clear? Do the strategic policies of LP1 provide sufficient and appropriate “hooks” on which to “hang” neighbourhood plans?

1.11.1 Whilst Local Plans should recognise the contribution that Neighbourhood Plans can make in planning to meet development and infrastructure needs they need to be prepared in the context of the NPPF.

1.11.2 Part 1 of the North Dorset Local Plan does not provide sufficient strategic guidance for neighbourhood planning. NPPF (paragraph 184) states:

‘The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them.’

1.11.3 Pegasus considers that there is insufficient guidance in the Local Plan Part 1 for Neighbourhood Plans to come forward. The Planning Practice Guidance states that: A neighbourhood plan should support the strategic development needs set out in the Local Plan and plan positively to support local development (as outlined in paragraph 16 of the National Planning Policy Framework.)

1.11.4 Neighbourhood development plans have the potential to deliver a step-change in the level of growth in the plan area. They can make significant changes to the policies in this plan, so long as they do not undermine its strategic objectives and approach. They need to be consistent with the Local Plan as set out in paragraph 184 above.

1.11.5 Consideration should be given to the inclusion of a policy for neighbourhood development plans so they provide guidance on the role and function of the plan and its relationship to the Local Plan.

1.12 What is the justification for progressing with a plan that once adopted would only have a lifespan of about 11 years? Paragraphs 2.45 and 2.46 refer to the vision for 15 years time, so why is the plan period not 15 years from submission or likely adoption (as referred to in paragraph 157 of the NPPF)?

1.12.1 Pegasus on behalf of Messrs Drake consider that there is no justification for this approach. The plan period is not consistent with legislative and regulatory requirements.

1.12.2 In order to be consistent with government guidance the Local Plan should “be drawn up over an appropriate timescale, preferably a 15 year time horizon, take account of longer term requirements and be kept up to date.”

1.12.3 Recent examples of Examinations where the Inspector has considered that the plan period should be 15 years are the local plan of East Devon where the Inspector (March 2014) concluded that if the Plan was adopted in 2014, the plan would only have a life of 12 years. This approach offers less certainty and a longer plan period would give developers, landowners and the Council greater confidence in the long term delivery. East Devon revised its Objectively Assessed Housing Need Assessment and has acknowledged that the housing provision will need to increase and also the plan period in response to the Inspector’s concerns.

1.12.4 The Inspector at South Worcestershire JCS Examination in his Interim conclusions (Oct 2013) stated at para 56 that

“The Plan looks forward at least 15 years from its likely adoption date and so is consistent with the advice in NPPF paragraph 157.”

1.12.5 At Lichfield (Sept 2013) the Inspector concluded that:

“This would involve a main modification to the Plan and the work it would entail would mean that the Plan would not be adopted before 2014 at the earliest. That being so the Plan, which runs to 2028, would only have a 14 year life - rather than the 15 year time horizon which the NPPF indicates would be preferable. The Council should, therefore, consider extending the end date of the Plan to 2029 and making the necessary adjustment to housing numbers.”

1.12.6 Another example is the letter from the Inspector concerning the Ashfield Local Plan Examination,

“The earliest the Ashfield Local Plan could be adopted would be late in 2014. This would reduce the lifespan of the Plan to a little over 9 years. This would be significantly below the 15 years preferred by the

Framework and could mean that the Plan would fail to provide for developable housing sites or broad locations for growth in the latter part of years 6 to 10. If the examination revealed that any further work was necessary or that main modifications were required, there could be additional delay so reducing the plan period still further. In this respect the Plan is not consistent with the Framework. This is a matter which relates to the soundness of the Plan.”

- 1.12.7 More recently in 2014 following the suspension of the Examination of the West Northamptonshire Joint Core Strategy, the Joint Planning Unit was requested by the Inspector to extend its plan period beyond 2026. The Main Modifications consultation proposed to extend the plan period from 2026 to 2029 to reflect the outcome of the objectively assessed housing needs work. This was subsequently included in the adopted Plan (December 2014).
- 1.12.8 The time periods covering the supporting evidence base for the North Dorset Local Plan are of differing lengths. It should be noted that the SHMA (MHN004) provides a housing figure to 2031, yet the plan period is to 2026.
- 1.12.9 The Council provide no reasoned justification for its shortened plan period. Therefore it is considered that the plan period should be extended to at least 2030, if not 2031 to coincide with the evidence base and the housing requirement should be increased on a pro-rata basis.

1.13 The Planning Practice Guidance (paragraph 012 under Local Plans) confirms that while additional local plans can be produced, for example, a separate site allocations document, there should be a clear justification for doing so. What is the clear justification in this case?

1.13.1 Whilst the Council have added in another paragraph 1A in SUD017a to justify their approach Pegasus on behalf of Messrs Drake consider that there is insufficient justification for the 2 Part Plan approach. By producing the Local Plan in two parts, each in turn is subject to Examination; there is uncertainty in terms of the amount of guidance provided and the evidence based to support the Plan. The evidence base already has different time periods which is confusing and makes comparison of figures difficult.

1.13.2 It is clear that the evidence base to support Part 1 is already being superseded by the revised SHMA which is in preparation for the Eastern Dorset HMA and will be finalised once the 2012 household projections are published (these are now due to be released on 26th February 2015). The Council acknowledge in INS008 para 2.18 and 2.19 that they will consider the implications of the SHMA with the neighbouring Local Planning Authorities in a review; in which case this will affect the preparation of Part 2. It is not clear whether Part 2 will be continue to be prepared or whether a review of Part 1 will need to take place in order for the Plan to be based on the adequate, up-to-date and relevant evidence in accordance with the NPPF and in order to be sound.

1.13.3 This approach combined with the proposal to remove settlement boundaries does not provide effective guidance for development in the plan period and consequently affects the soundness of the Plan.

- 1.14** Although not necessarily a matter of soundness, LP1 is over 400 pages long. Planning Practice Guidance (paragraph 010 under Local Plans) advises that “local plans should be as focused, concise and accessible as possible.” Are there any opportunities which the Council could take to streamline the document?
- 1.14.1 Pegasus shares the Inspector’s concern that the Plan as produced is overly long, particularly as it does not include site allocations; this is not a matter of soundness and is a matter best addressed by the Council.