

**Kirdford Parish Council
Matter 2 – Strategic Policies**

ISSUE – Whether the strategic policies of the Plan would look ahead over a minimum of 15 years from adoption as per paragraph 22 of the National Planning Policy Framework (NPPF)?

Q.12 The strategic policies of the Plan would cover the period 2021 to 2039. Given the anticipated adoption date of the Plan as set out in the LDS, the strategic policies would not look ahead over a minimum of 15 years from adoption as per NPPF paragraph 22. What is the justification for this, and is the Plan positively prepared in this regard?

KPC Response:

1. We note the Inspectors' concerns regarding the wording of the NPPF Paragraph 22 and its requirement for strategic policies to "*look ahead over a minimum 15 year period from adoption*". However, Planning Practice Guidance (PPG) states that:

*"The National Planning Policy Framework is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period."*¹

2. Therefore, the PPG points towards the need for strategic policies to be prepared over a minimum 15 year period and that the LPA should plan for the full plan period yet there is no mention of the need for that 15 year period to be from the adoption date of the Local Plan.
3. Given this lack of clarity and the amount of work that would be required to update the Local Plan evidence for the sake of one or two years this does not seem reasonable.
4. However, if the Inspectors did conclude that 15 years is required post-adoption then the plan would need to be extended to either 2039/40 or 2040/41 respectively. The reason for this is that a "Spring 2025" (adoption date in the LDS) could fall in the 2024/25 Plan Year / Monitoring Year if adopted before 31st March 2025 resulting in a minimum plan end date of 2039/40. However, if it is adopted

¹Paragraph: 064 Reference ID: 61-064-20190315 Revision date: 15 03 2019

after the 31st March 2025 it would be adopted in the 2025/26 Plan Yer/ Monitoring Year resulting in a minimum plan end date of 2040/41.