
Examination of the Purbeck Local Plan (Local Plan)

Inspector's Matters, Issues and Questions

Date: 10 May 2019

Introduction

The Purbeck Local Plan (Local Plan) was submitted by Purbeck District Council in January 2019. From 1 April 2019 the Council structures in Dorset changed and Purbeck District Council, along with several other Councils, became part of the unitary authority known as Dorset Council.

The Local Government (Structural Changes) (Transitional Arrangements) (No.2) Regulations 2008¹ make provision for Local Plans, in the name of, and covering the same area as, local planning authorities that existed prior to the reorganisation date, in this case 1 April 2019, to continue to come forward until such time as a plan covering the whole unitary authority is adopted. The Regulations also indicate that the new unitary authority must adopt a plan covering the whole of its area within 5 years of the reorganisation date.

The introduction to the Purbeck Local Plan explains that the Plan sets out the approach and detailed policies for the whole of the area that was previously Purbeck District for the period up to 2034.

The Local Plan was submitted for examination on 28 January 2019. Accordingly, the policies of the National Planning Policy Framework (the Framework) published in July 2018 and subsequently revised in February 2019 apply for the purpose of the examination. The references to the Framework in the Matters Issues and Questions refer to the version of the Framework published in February 2019.

¹ Statutory Instrument 2008/2867

MATTER A	Legal Compliance and Procedural Requirements
Issue 1: Duty to Co-operate	
<p>Q1. Did the Council comply with the Duty to Co-operate as required by section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) having regard to the advice contained in the National Planning Policy Framework (the Framework) and the Planning Practice Guidance (PPG)?</p> <p>Q2. (a) What strategic matters have been identified through the preparation of the Local Plan and what co-operation took place to resolve them?</p> <p>(b) Has the co-operation between authorities been constructive and proactive?</p> <p>Q3. Does the Council's Duty to Co-operate Compliance Statement [SD09] and the Statement of Common Ground (SoCG) [SD10a] demonstrate that the duty to co-operate has been met?</p> <p>Q4. In relation to housing, the Purbeck Local Plan states that it is seeking to meet the housing need for the area it covers in full. The SoCG [SD10a] indicates that at present the extent to which other areas in Dorset can meet their own needs is not fully understood, as the work on assessing potential development options in each area is at different stages. It indicates that there is a strong possibility that Bournemouth and Christchurch will be unable to meet their needs (Table 4 page 11) and that should this prove to be the case the local planning authorities are committed to work together to assess the potential for some or all of this need to be met within other authorities' areas and that this work will need to be informed by an appraisal of all reasonable options for the distribution of growth across Dorset, taking account of issues such as land availability, infrastructure capacity and development constraints.</p> <p>The SoCG [SD10a] also indicates that in relation to local authority areas adjoining Dorset the principal issue of unmet housing need is likely to arise from New Forest District.</p> <p>What are the implications of the above when considering whether or not the Council has met the duty to co-operate?</p>	
Issue 2: Local Development Scheme	
<p>Q1. Has the Plan been prepared in accordance with the Local Development Scheme (LDS) (February 2018) [SD11], including in terms of timing and content?</p>	
Issue 3: Public Consultation	
<p>Q1. Has consultation on the Plan been carried out in accordance with the Council's Statement of Community Involvement [SD05] and the requirements of the 2004 Act and the 2012 Regulations?</p> <p>Q2. Were adequate opportunities made available for participants to access and make comments on the Local Plan and other relevant documents?</p> <p>Q3. Were representations adequately considered?</p>	
Issue 4: Sustainability Appraisal	
<p>Q1. Has the Plan been subject to an appropriate Sustainability Appraisal (SA) as required by section 19(5) of the 2004 Act having regard to the requirements of</p>	

the European Directive on strategic environmental assessment and relevant national policy and guidance?

Q2. Have the likely environmental, social and economic effects of the Plan been adequately assessed?

Q3. Has the submitted Plan been tested against all reasonable alternatives where these exist, such as different options for the spatial strategy including the removal of land from the Green Belt and the distribution of development, particularly housing development?

Issue 5: Habitats Regulations

Q1. Is the Plan legally compliant with respect to the Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitats Regulations)?

Q2. Is the Habitats Regulation Appropriate Assessment included within the Habitats Regulation Assessment (HRA) [SD03] sufficiently robust at a plan level?

Q3. The conclusions of the HRA [SD03] indicates that the implications for European sites of the Pre-submission Local Plan have been assessed at both screening for likely significant effects and appropriate assessment stages. It indicates that the screening for likely significant effects screened all housing and employment allocations as likely to have a significant effect on European sites due to their proximity to the sites and the need for effective mitigation in line with the established strategic approaches for the Heaths and Poole Harbour. It also indicates that the appropriate assessment sections conclude that the mitigation adequately provides protection of the European sites but that there remain some risks that should be resolved at the development project HRA level in relation to preventing impacts in close proximity to European sites, particularly in relation to employment sites.

The Council is asked to confirm whether or not Natural England has indicated that it is content with the approach set out above and the overall conclusions and recommendations of the HRA?

Issue 6: Other Legal and Procedural Requirements

Q1. The Purbeck Local Plan was submitted for examination on 28 January 2019. What are the implications, if any, for the Plan of the February 2019 revisions to the Framework and PPG resulting from the Government response to the Technical consultation on updates to national planning policy and guidance?

Q2. The Local Plan indicates that all its policies are strategic. Is this justified and consistent with national policy?

Q3. Does the Local Plan propose any policy that will supersede a policy in a made neighbourhood plan? If so, has this been clearly identified?

Q4. Is the Local Plan in compliance with Section 19(1A) of the Planning and Compulsory Purchase Act 2004 which requires development plan documents (taken as a whole) to include policies designed to secure the development and use of land in a local planning authority's area to contribute to the mitigation of, and adaptation to, climate change?

Q5. Several policies of the Local Plan refer to a Supplementary Planning Document or other standalone document thereby apparently seeking to give development plan status to documents which have not been subject to the same process of

preparation, consultation and Examination. Would this comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations)?

Q6. (a) Having regard to the provisions of the Local Government (Structural Changes) (Transitional Arrangements) (No.2) Regulations 2008, when is the wider plan for the new unitary authority, within which the area covered by the Purbeck Local Plan falls, intended to be brought forward?

(b) What, if any, are the implications of this for the examination of the Purbeck Local Plan and should the Purbeck Local Plan explain this?

MATTER B	Housing Need and Requirement
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Issue 1: Housing Need and Requirement (*Policy H1*)

Q1. The Inspector's Initial Questions [COR02-2019-04-05] sought comments from the Council on the implications, if any, of the revisions to the Framework and PPG made in February 2019 for the examination of the Purbeck Local Plan.

In its response [COR03-2019-04-12] the Council advised that, in so far as the revisions included confirmation in the PPG that 2014-based household projections should be used to provide the demographic baseline when applying the standard method of calculating housing need and given that the housing need of 168 homes per year indicated in the Local Plan was calculated using 2014-based household projections, as set out in the Strategic Housing Market Assessment (SHMA) Update for Purbeck [SD20], it considers that the calculation of housing need is in line with the revised PPG.

In the light of the above has the housing need figure of 168 homes per year indicated in the Local Plan been properly assessed having regard to the Framework and the standard methodology set out in the PPG, particularly in relation to:

- setting the baseline;
- the adjustment to take account of affordability; and
- capping the level of any increase?

Q2. The PPG indicates that there is an expectation that the standard methodology will be used to assess housing need and that the standard methodology is designed to address projected household growth and historic under-supply. In the light of this are there any exceptional circumstances to justify an alternative approach for calculating housing need to the standard methodology as set out in the PPG²?

Q3. The PPG indicates that the standard method for assessing housing need provides a minimum starting point in determining the number of homes needed in an area. It also indicates that that there may be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates³.

² PPG Reference ID: 2a-003-20190220

³ PPG Reference ID: 2a-010-20190220

(a) Are there any circumstances to indicate that it might be appropriate to plan for a higher housing need figure in the area covered by the Purbeck Local Plan than the standard method indicates?

(b) Should the housing requirement figure indicated in policy H1 provide for further flexibility over and above that derived from the application of the standard methodology to calculate housing need?

- Q4. Is there any evidence to indicate that the housing requirement figure should be set at a lower level than the standard methodology need figure due to constraints such as the Area of Outstanding Natural Beauty (AONB), Green Belt and/or protected habitats sites?
- Q5. Is there any evidence of a need to provide for unmet housing needs from neighbouring areas in the area covered by the Purbeck Local Plan having particular regard to the SoCG [SD10a] which indicates that there is a strong possibility that Bournemouth and Christchurch will be unable to meet their needs and that in relation to local authority areas adjoining Dorset unmet housing need is likely to arise from New Forest District?
- Q6. Is the second part of policy H1 which indicates that the Council will work with each of the existing six neighbourhood plan areas, and any emerging or future, neighbourhood plan groups to determine the housing requirement for the designated area consistent with national policy as set out in paragraph 65 of the Framework?

MATTER C	Green Belt
Issue 1: Green Belt	
<p>Q1. Is the in-principle need to review the Green Belt fully evidenced and justified, effective and consistent with national policy including paragraphs 136 and 137 of the Framework?</p> <p>Q2. Have exceptional circumstances been demonstrated to justify the alterations to the boundary of the Green Belt as proposed in the Plan to provide for housing development at Lytchett Matravers, Upton and Wareham and the Morden Park strategic alternative natural green space (SANG) and holiday park (<i>Policy 15</i>)?</p> <p>Q3. Is policy V2 (<i>Green Belt</i>) consistent with national policy in so far as it relates to the purposes of the Green Belt? If not, would the change to the policy (MM2) indicated in the schedule of possible modifications [SD14] ensure that it is consistent with national policy?</p> <p>Q4. Is the creation of suitable alternative natural greenspace (SANG) to offset the impact of removing land from the Green Belt at Lytchett Matravers and Wareham justified? If so, is the wording of policy V2 in relation to this matter sufficiently clear and robust as to be effective?</p>	

MATTER D	The Strategy for development
Issue 1: Spatial Strategy	
<p>Q1. Is the spatial strategy of the Plan justified, effective and consistent with national policy, in particular with respect to:</p> <ul style="list-style-type: none"> • the identification and assessment of reasonable alternatives; and • the overall scale and distribution of development? <p>Q2. Is the scale, type and distribution of development as set out in policy V1 (<i>Spatial strategy for sustainable communities</i>) justified, effective and consistent with the overarching vision and spatial strategy of the Plan?</p> <p>Q3. Should policy V1 refer to the role of small sites and windfall sites for housing in achieving the overarching vision regarding development in Purbeck?</p> <p>Q4. Policy V1 indicates that the Local Plan allocates sites for housing to deliver the Council’s vision for Purbeck. In doing so it refers to neighbourhood plan sites at Wareham and Bere Regis. Is such an approach consistent with national policy?</p> <p>Q5. How do the Neighbourhood Plan sites at Wareham (300 new homes including windfall) referred to in policy V1 relate to the Green Belt alteration proposed in this Plan at Wareham?</p> <p>Q6. Is the change to policy V1 (MM1) indicated in the schedule of possible modifications [SD14] necessary to ensure that the policy is effective?</p>	

MATTER E	Housing
Issue 1: Housing Allocations (<i>Policy H4, Policy H5, Policy H6 and Policy H7</i>)	
<p>Q1. (a) Having regard to the fact that the issue of whether exceptional circumstances have been demonstrated to justify the alterations to the boundary of the Green Belt as proposed in the Plan to provide for housing development at Lytchett Matravers (<i>Policy H6</i>) and Upton (<i>Policy H7</i>) has been addressed above, are these allocations otherwise soundly based and are the allocations at Moreton Station/Redbridge Pit (<i>Policy H4</i>) and Wool (<i>Policy H5</i>) soundly based?</p> <p>(b) Was the identification process of the allocations at Moreton Station/Redbridge Pit (<i>Policy H4</i>), Wool (<i>Policy H5</i>), Lytchett Matravers (<i>Policy H6</i>) and Upton (<i>Policy H7</i>) robust, what factors were taken into account in the assessment process to determine the sites for allocation and was the assessment robust?</p> <p>Q2. Is there robust evidence to support the inclusion of two 65 bed care homes in the Plan (Moreton Station/Redbridge Pit (<i>Policy H4</i>) and Wool (<i>Policy H5</i>))?</p> <p>Q3. Is the requirement to explore opportunities for a community hub at Wool (<i>Policy H5</i>) justified?</p> <p>Q4. Are the assumptions regarding capacity of each of the allocations justified and based on available evidence?</p>	

- Q5. Is there robust evidence that the development of the allocations is viable and deliverable?
- Q6. (a) What are the assumptions about the scale and timing of supply and the rates of delivery?
- (b) Are the assumptions realistic?
- (c) What evidence is there to support the assumptions?
- NB. The Council is requested to produce a detailed spreadsheet setting out how many dwellings each site is expected to deliver in each year of the plan along with evidence to justify the delivery information it contains.
- Q7. (a) Are the policy criteria set out in the relevant policies justified and effective?
- (b) Is the change to policy H4 (*Moreton Station/Redbridge Pit*) (MM6) indicated in the schedule of possible modifications [SD14] necessary for the Plan to be sound?
- Q8. (a) Is there sufficient certainty that the necessary and suitable SANGs for the site allocations at Moreton Station/Redbridge Pit (*Policy H4*), Wool (*Policy H5*), Lytchett Matravers (*Policy H6*) and Upton (*Policy H7*) would be delivered?
- (b) Would the use of the site referred to in the Habitats Regulation Assessment [SD03] as suitable as a SANG to serve the site allocations at Wool (*Policy H5*) be consistent with national policy in relation to Ancient Woodlands?
- Q9. Is there an inconsistency between the wording of policy H1 (*Local housing requirement*) which indicates that 'Over the plan period of 2018 to 2034, at least 2,688 homes will be required' and the wording of policies V1, H4, H5, H6 and H7 when referring to the number of homes to be provided on each site?
- Q10. Is the wording in relation to the requirements of policies H4, H5, H6 and H7 sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?

Issue 2: Housing Land Supply (*Policy H2*)

- Q1. Is the distribution of housing as set out in policy H2 (*The housing land supply*) consistent with the overall spatial strategy?
- Q2. Is the housing land supply as set out in policy H2 likely to achieve delivery of the types of housing identified as being necessary in the SHMA [SD20 and SD21] and to be provided for through policy H9?
- Q3. Are the Wareham and Bere Regis Neighbourhood Plans capable of making the allocations relied upon by policy V1 and H2 of the Local Plan?
- Q4. Is there compelling evidence to indicate that 933 dwellings (35% of the housing land supply) will come forward from small sites next to existing settlements and windfall sites within existing settlements (except Wareham)?
- Q5. The housing background paper [SD19] indicates that the approach taken in the Plan not to allocate small sites but rather to include a small sites policy (policy

H8) is intended to allow greater flexibility and deliverability of suitable housing. Is this justified and is such an approach consistent with national policy as set out in paragraph 68 of the Framework?

Q6. How has flexibility been provided in terms of the potential supply of housing land?

Q7. In order to identify all components that make up the housing land supply should the Plan identify completions since the start of the plan period and commitments (dwellings with planning permission, or with a resolution to grant permission subject to a planning obligation)?

Q8. (a) Does the housing trajectory demonstrate realistically that the housing development, for which the Plan provides, will come forward within the Plan period?

(b) The change (MM4) indicated in the schedule of possible modifications [SD14] indicates the intention to update the housing trajectory graph to reflect the latest available information on delivery and phasing for allocated sites. What would be the effect of this? Is this necessary to ensure the Plan is sound?

NB. The Council is requested to address specifically the implications of this latest information on delivery and phasing for allocated sites.

Issue 3: 5 Year Housing Land Supply

Q1. The Framework (paragraph 74) indicates that a five-year supply of deliverable housing sites, with the appropriate buffer can be demonstrated where it has been established in a recently adopted plan or in a subsequent annual position statement. Detailed advice on this process is set out in the PPG chapter *Housing and Economic Land Availability Assessment*⁴ where it is described as 'confirming' the 5-year housing land supply.

The PPG indicates that if a Local Planning Authority wishes to use this process to confirm its five-year housing land supply it must indicate the intention to do so when publishing the plan for representations at Regulation 19 stage.

The Housing Background Paper [SD19] was published in October 2018 alongside the pre-submission draft of the Plan at Regulation 19 stage. It states that the five-year housing land supply will be demonstrated and tested through the examination process and then refreshed through an annual position statement. In the light of this:

(a) Is it robustly demonstrated that at adoption the Plan will deliver a 5-year housing land supply at adoption and that this can be maintained throughout the Plan period, calculated in accordance with national policy and guidance, taking account of past delivery performance and applying the appropriate 10% or 20% buffer?

(b) What is the current position with regard to housing supply?

(c) Is there a 5-year supply?

(d) How has this been calculated?

⁴ PPG Reference ID: 3-049-20180913

Issue 4: Other housing policies (*Policy H3, Policy H8, Policy H9, Policy H10, Policy H11, Policy H12, Policy H13, Policy H14 and Policy H15*).

- Q1. (a) Are the specific requirements of policy H3 (*New housing development requirements*) justified, effective, likely to be viable and consistent with national policy?
- (b) Is the change to the policy (MM5) indicated in the schedule of possible modifications [SD14] necessary for the Plan to be sound?
- (c) Is the wording of the policy effective and sufficiently clear and precise for development management purposes having particular regard to paragraph 16 of the Framework?
- Q2. (a) What is the relationship between policy H8 (*Small sites next to existing settlements*) and the principle of policy H12 (Rural exception sites)?
- (b) Are the two policies (H8 and H12) mutually compatible?
- Q3. (a) Would policy H8 apply in settlements covered by an existing Neighbourhood Plan that includes housing allocations and if so, what are the implications of this?
- (b) Would this be consistent with national policy?
- Q4. (a) Are the specific requirements of policy H8 justified?
- (b) Does the policy sufficiently provide for the cumulative impact of homes on small sites to be considered?
- (c) Is policy H8 consistent with national policy in relation to limited infilling in villages in the Green Belt? If not, would the change (MM7) indicated in the schedule of possible modifications [SD14] ensure that it is consistent with national policy?
- (d) Is the wording of policy H8 sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?
- Q5. (a) Does policy H9 (*Housing mix*) provide enough clarity on how development proposals will be assessed in terms of the type and mix of housing?
- (b) Are the requirements of the policy particularly in relation to self-build plots and single storey homes justified by robust evidence, effective, likely to be viable and consistent with national policy?
- (c) Is the wording of policy H9 sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?
- Q6. (a) Is policy H10 (*Part M of the Building Regulations*) justified, effective and consistent with national policy?
- (b) In particular is the requirement of the policy for 10% of new homes on sites of 10 or more or a site area greater than 0.5 hectares to meet the optional technical standard of Category 2: accessible and adaptable homes justified and

consistent with national policy?

(c) Is the policy capable of being deliverable in all cases except where there are viability considerations?

Q7. Are the requirements of policy H11 (*Affordable Housing*) justified by robust evidence, effective, likely to be viable and consistent with national policy including in respect of the threshold for the provision of affordable housing?

Q8. Is policy H12 (*Rural exception sites*) justified, effective and consistent with national policy?

Q9. Is policy H13 (*Rural workers homes in the countryside*) justified, effective and consistent with national policy? Is the definition of a rural worker set out in the supporting text (paragraph 180) justified?

Q10. (a) Is policy H14 (*Second homes*) which seeks to restrict all new housing in the AONB, on small sites (as set out in policy H8) and on rural exception sites (as set out in policy H12) to homes that are occupied as a principal residence justified, effective and consistent with national policy?

(b) Is the definition of a principal residence in the supporting text (paragraph 185) justified?

(c) Is the amendment to the definition of a principal residence (MM8) indicated in the schedule of possible modifications [SD14] necessary for the plan to be sound?

Q11. The housing background paper [SD19] indicates that there is a need for two additional pitches for gypsy and travellers (who meet the current planning definition). It also indicates that there is a need for four plots for travelling showpeople.

The Local Plan does not make any allocations to meet the accommodation needs for gypsies and travellers or travelling showpeople but rather it proposes a criteria-based policy (Policy H15) (*Meeting the needs of gypsy, traveller and travelling show people*) for delivering pitches and plots on suitable sites which it indicates is intended to support delivery of a joint gypsy and traveller development plan document (DPD) that is being prepared with other Dorset Councils.

(a) Does the approach set out in policy H15 conform with the expectations of the Planning Policy for Traveller Sites (August 2015)?

(b) What is the status of the proposed DPD and how does it relate to the wider plan intended for the new unitary authority, within which the area covered by the Purbeck Local Plan falls?

Q12. What provision is made in the Plan for the housing needs of people who are no longer included in the planning definition of gypsies, travellers and travelling showpeople?

Q13. Is the Plan positively prepared, justified, effective and consistent with national policy in respect of meeting the accommodation needs of gypsies and travellers and travelling showpeople?

MATTER F	Environment
Issue 1: Environment Policies (<i>Policy E1, Policy E2, Policy E3, Policy E4, Policy E5, Policy E6, Policy E7, Policy E8, Policy E9, Policy E10, Policy E11 and Policy E12</i>)	
<p>Q1. Is policy E1 (<i>Landscape</i>) effective and consistent with national policy particularly in respect of areas designated as an AONB, heritage coast and World Heritage Site?</p> <p>Q2. (a) Has the Plan had regard to the statutory duties in relation to designated heritage assets set out in Sections 66(1) and 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990?</p> <p>(b) Is the wording of policy E2 (<i>Historic Environment</i>) clear and justified having regard to these statutory provisions?</p> <p>(c) In so far as policy E2 relates to designated and non-designated heritage assets does the wording of the policy appropriately address heritage assets in the round and is it consistent with national policy?</p> <p>Q3. (a) Is policy E3 (<i>Renewable energy</i>) justified, effective and consistent with national policy?</p> <p>(b) Does criterion d of the policy comply with the requirements of the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations)?</p> <p>Q4. Is policy E4 (<i>Assessing flood risk</i>) justified, effective and consistent with national policy?</p> <p>Q5. (a) Is policy E5 (<i>Sustainable drainage systems (SUDs)</i>) justified, effective and consistent with national policy?</p> <p>(b) Is the change (MM3) to the policy indicated in the schedule of possible modifications [SD14] necessary to ensure that the Plan is sound?</p> <p>Q6. (a) Is policy E6 (<i>Coastal change management areas (CCMAs)</i>) justified, effective and consistent with national policy?</p> <p>(b) The policy refers to the CCMAs being identified on the policies map. However, these do not appear to have been included on the version of the policies map submitted with the submission version of the Plan. Should they be?</p> <p>Q7. Are policies E7 (<i>Conservation of protected species</i>), E8 (<i>Dorset heathlands</i>), E9 (<i>Poole Harbour</i>) and E10 (<i>Biodiversity and geodiversity</i>) justified, effective, consistent with national policy and where relevant compliant with the requirements of the Habitats Regulations?</p> <p>Q8. Is policy E11 (<i>Development next to sewage treatment works and pumping stations</i>) justified and effective?</p> <p>Q9. (a) Does policy E12 (<i>Design</i>) incorporate appropriate measures to ensure good design in new developments?</p> <p>(b) Is the policy capable of effective implementation?</p>	

(c) Are the criteria of the policy sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?

MATTER G	Economy
Issue 1: Need and supply of employment land (<i>Policy EE1 and Policy EE2</i>)	
<p>Q1. Is the evidence of the type and amount of employment land needed within the plan period robust and up-to-date?</p> <p>Q2. Is the approach taken in the Plan not to allocate any new employment sites but to retain and safeguard land at two strategic employment sites and a number of other identified employment sites for employment uses (defined as B1, B2 and B8 uses) justified, consistent with the overall spatial strategy and with national policy?</p> <p>Q3. Is policy EE1 (<i>Employment land supply</i>) positively prepared?</p> <p>Q4. (a) Is the scale and distribution of the sites (strategic employment sites and other identified employment sites) to be safeguarded in policy EE1 of the Plan justified?</p> <p>(b) Are the changes (MM9, MM10 and MM11) indicated in the schedule of possible modifications [SD14] necessary to ensure that it is justified?</p> <p>Q5. (a) Are the provisions of policy EE2 (<i>Planning for Employment</i>) justified, effective and consistent with national policy?</p> <p>(b) Are the changes (MM12 and MM13) to policy EE2 indicated in the schedule of possible modifications [SD14] necessary to ensure that the Plan is sound?</p>	
Issue 2: Town and Local Centres (<i>Policy EE3</i>)	
<p>Q1. (a) Is policy EE3 (<i>Vibrant town and local centres</i>) which indicates that the Local Plan supports the provision of an additional 700sq. m (net) convenience retail floorspace justified? If so, is the delivery of that additional floorspace on the housing allocations at Moreton Station/Redbridge Pit (policy H4) and Wool (policy H5) justified?</p> <p>(b) For clarity and viability purposes should the policy indicate the extent of convenience floorspace to be provided on each of the allocations at Moreton Station/Redbridge Pit (policy H4) and Wool (policy H5)?</p> <p>Q2. Are the retail centres identified in policy EE3 justified and should the primary shopping areas of the town centres be identified?</p> <p>Q3. (a) Is that part of policy EE3 which relates to ground floor changes of use in town and local centres within Class A of the Use Classes Order justified, effective and consistent with national policy?</p> <p>(b) Is the wording of this part of the policy sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?</p>	

- Q4. Are the requirements of policy EE3 (criteria c, d and e) in relation to out of town retail proposals for main town centre uses justified, effective and consistent with national policy?
- Q5. Is that part of policy EE3 which relates to the loss of uses within Class A1, A2 and A3 or the loss of D1 and D2 uses justified, effective and consistent with national policy including paragraph 97 of the Framework?
- Q6. Is the change (MM14) to the supporting text of policy EE3 indicated in the schedule of possible modifications [SD14] necessary to ensure that the Plan is sound?

Issue 3: Tourism (*Policy EE4*)

- Q1. (a) Are the provisions of policy EE4 (*Supporting vibrant and attractive tourism*) justified, effective and consistent with national policy?
- (b) Is the wording of the policy sufficiently clear and effective for development management purposes having particular regard to paragraph 16 of the Framework?

MATTER H	Infrastructure
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Issue 1: Developer contributions (*Policy I1*)

- Q1. Is there robust evidence to demonstrate that the Plan's requirements, together with national standards, would not threaten the viability of development or put implementation of the Plan at risk?
- Q2. Is policy I1 (*Developer contributions to deliver Purbeck's infrastructure*) justified, effective and consistent with national policy in its provisions for ensuring that the infrastructure necessary to support development will be secured?
- Q3. In so far as developer contributions are intended to be sought through a mix of planning obligations secured through Section 106 agreements (S106) and the use of funds secured through the Community Infrastructure Levy (CIL), would the provisions of policy I1 ensure that there is no duplication between infrastructure or funds secured through Section 106 agreements and CIL receipts?
- Q4. For clarity should small sites as referred to in part b of the policy be defined?

Issue 2: Improving accessibility and transport (*Policy I2*)

- Q1. Are the provisions for improving accessibility and transport set out in policy I2 (*Improving accessibility and transport*) justified, effective and consistent with national policy?

Issue 3: Other infrastructure policies *Policy I3, Policy I4, Policy I5, Policy I6 and I7*)

- Q1. (a) Is policy I3 (*Green Infrastructure, trees and hedgerows*) robust and consistent with national policy?
- (b) Is the change (MM15) to the policy indicated in the schedule of possible modifications [SD14] necessary to ensure that the Plan is sound?

Q2. (a) Is policy I4 (*Recreation, sport and open space*) justified by robust evidence, effective and consistent with national policy including paragraphs 96 and 97 of the Framework?

(b) Is the change (MM16) to the supporting text of the policy indicated in the schedule of possible modifications [SD14] necessary to ensure the Plan is sound and would the change to the policy (MM17) comply with the Regulations having regard to Question 5 under Matter A (Legal Compliance and Procedural Requirements) Issue 6?

Q3. (a) Is policy I5 (*Morden Park strategic alternative natural green space (SANG) and holiday park*) justified, effective and consistent with national policy?

(b) Are the changes (MM18, MM19, MM20) to the policy and its supporting text indicated in the schedule of possible modifications [SD14] necessary to ensure that the policy is justified, effective and consistent with national policy?

Q4. Is policy I6 (*Wareham Integrated health and social care*) justified and effective?

Q5. Is policy I7 (*Community facilities and services*) justified and effective and is the modification (MM21) to policy I7 necessary to ensure the Plan is sound?

MATTER I	Implementation, delivery and monitoring
Issue1: Implementation and delivery	
Q1. Is policy IM1 (<i>Tools for delivery – the Purbeck Local Plan implementation strategy</i>) effective in its provisions to ensure the successful implementation of the Plan?	
Issue 2: Monitoring	
Q1. Does the Plan make appropriate provision for monitoring the effectiveness of its implementation? Q2. Is the change (MM22) to the monitoring framework indicated in the schedule of possible modifications [SD14] necessary to ensure the Plan makes appropriate provision for monitoring the effectiveness of its implementation?	