Sutton Poyntz Neighbourhood Plan - Submission Plan Representation Summary

Weymouth Town Council submitted the final version of the Sutton Poyntz Neighbourhood Plan (2019) to Dorset Council for independent examination in May 2019. People were given six weeks from 31 May 2019 until the end of Friday 12 July 2019 to comment on the content of the plan or how it was produced. At the close of the public consultation nineteen representations were received. A further representation from Natural England has been received late after the close of the consultation.

Rep ID	Responde nt	Summary
1	Cllr David Gray	Future neighbourhood planning in Weymouth As at Councillor my concern is that when Weymouth develops its Neighbourhood Plan that this plan is superseded into the
		overall plan for Weymouth. Can you give me re-assurance that this is the case?
2	Cllr David	Future neighbourhood planning in Weymouth
	Harris	I recognise the extensive work done by the Sutton Poyntz Neighbourhood Plan Steering Group, but am concerned that this plan should be viewed within the context of the Neighbourhood Plan for Weymouth and the West Dorset Local Plan. I feel it would be wrong that a small group should be able to declare independence from Weymouth Town, and would like re-assurance that as the Weymouth Neighbourhood Plan is developed, and supported by the newly elected Weymouth Town Council, that it is acknowledged that this may lead to a need to modify the Sutton Poyntz Neighbourhood Plan.
		General comments
		I believe that this plan does not recognise the positioning of Sutton Poyntz in Weymouth as a whole and is therefore not reflective of the area as a whole.
		The plan focuses solely on preventing change rather than steering future developments. The Neighbourhood Plan is in danger of setting up a zone in which no change is allowed which might discourage further families and particularly younger families. Section 4.6.3.2 p 41.
		Consultation process
		The actual consultation process was limited
		<u>Plan boundary</u>
		The boundary of the area covered by this plan does not reflect the true Geography of the area. Changes in Council boundaries and their consequences do not seem to have been recognised.

		P27 Section 4.5.1 Strategic Objective bullet 1 'to retain the rural character of the village as a discrete settlement surrounded by open fields and separated from Preston.' is in conflict with the Plan Area Application which shows the area is not discrete but includes part of Preston viz Sunnyfields, Reynards Way, Millers Close and Rimbrow Close off Puddledock Lane but not the 17 century Malt Cottages our the modern Old Granary Close. Objectives Objectives on P11 are simple statements which are conservative rather than looking at development. Objective 1 looks at housing needs only of residents and does not allow any consideration of SP contributing to the housing shortage. Objective 7 does not recognise the opportunity for running businesses from domestic residences exploiting the roll-out of full high speed fibre across Dorset.
3	Cllr David Northam	Future neighbourhood planning in Weymouth I recognise the extensive work done by the Sutton Poyntz Neighbourhood Plan Steering Group, but am concerned that this plan should be viewed within the context of the Neighbourhood Plan for Weymouth and the West Dorset Local Plan. I feel it would be wrong that a small group should be able to declare independence from Weymouth Town, and would like re-assurance that as the Weymouth Neighbourhood Plan is developed, and supported by the newly elected Weymouth Town Council, that it is acknowledged that this may lead to a need to modify the Sutton Poyntz Neighbourhood Plan.
		General comments I recognise that Neighbourhood Plans should reflect Local Places (viz Sutton Poyntz Place Appraisal) but fear that where there are motivated and energetic groups, such Neighbourhood Plans will effectively set up exclusive zones limiting development [nimbyism] whereas those areas with communities which are less vocal or organised no such development bounds will be set leading to exploitation
		The origins of this plan are with an initiative from the Sutton Poyntz Society which has previously acted as a lobby group to preserve Sutton Poyntz and the creation of the Sutton Poyntz Conservation Area. I am therefore concerned that the Neighbourhood Plan is not embracing the opportunities of development to improve communities but is rather seeking to prevent change.
		The Neighbourhood Plan is in danger of setting up a zone in which no change is allowed which might discourage further families and particularly younger families. Section 4.6.3.2 p 41.
		No reference is made to concurrence or conflict with the West Dorset, Weymouth Portland and Dorchester Local Plan of 2015 references are instead made to the National Policy Planning Framework.

Plan boundary

The boundary of the Neighbourhood Plan has been self-selected to align with those in favour of a neighbourhood plan; as revealed by Section 1.3 p6 which states the Neighbourhood Plan area was extended to include particular properties which had previously been excluded from the area. The boundary is set to an isolated (two entry roads and a third restricted access lane) exclusive area of high RV properties. Just outside the area are equally old properties but with lower RVs (Southern end of Sutton Poyntz Road, Malt Cottages on Western side of Puddledock Lane) and new developments from the 1930s and 1950s (Verlands and Winslow Road) and 1990s Old Granary Close.

P27 Section 4.5.1 Strategic Objective bullet 1 'to retain the rural character of the village as a discrete settlement surrounded by open fields and separated from Preston.' is in conflict with the Plan Area Application which shows the area is not discrete but includes part of Preston viz Sunnyfields, Reynards Way, Millers Close and Rimbrow Close off Puddledock Lane but not the 17 century Malt Cottages our the modern Old Granary Close.

Consultation process

The wider consultation on the Neighbourhood Forum and Neighbourhood Plan Area Application was not well publicised [Note p7 says extensive publicity in 2016 between 10th June and 5th August] and only elicited 8 representations. A response perhaps based on a view that this was only about Sutton Poyntz and a lack of appreciation as to what a Neighbourhood Plan entails.

Management & Monitoring

Para 1.7 p8 Management & Monitoring refers to the confusion arising from the abolition of the W&PBC and the creation of the Weymouth Town Council (with Parish responsibilities including Sutton Poyntz) and the Dorset Unitary authority with responsibilities including Weymouth Town Council. The plan does not discuss the relationship that will be needed between DC and WTC on planning matters. It is suggested that the Sutton Poyntz Society is invited to be represented on a sub-group of the WTC Planning & Licensing Committee and this sub-group is given the monitoring role and the Management responsibility lies with DC (ref p9).

Employment Business and Tourism

The Aspirations set out in Section 5 focus on preservation and not on development or improvement. It is suggested that these Aspirations are not formally included as policy statements within the Neighbourhood Plan. The plan under Section 4.2 states no specific policies have been developed with respect to Employment Business and Tourism. There is no desire to improve incomes (which are noted as being low), there is no discussion of home working using improved digital technologies. This again reflects the conservative nature of this community and potentially will lead to stagnation. As such I do not believe the Neighbourhood Plan should be accepted.

Objectives

Objectives on P11 are simple statements which are conservative rather than looking at development.

		Objective 1 looks at housing needs only of residents and does not allow any consideration of SP contributing to the housing shortage. Objective 7 does not recognise the opportunity for running businesses from domestic residences exploiting the roll-out of full
		high speed fibre across Dorset.
4	Cllr	Future neighbourhood planning in Weymouth
	Howard Legg	I believe that exactly what the scope of such a proposal is by those resident in the area and particularly by residents outside the area is not well known. I think it will be helpful if the final report, if it favours the plan being adopted, explains how other areas may or will not be affected and particularly explains that strategic plans and local plans produced by Dorset Council or Weymouth Town Council will not be compromised by this neighbourhood plan.
5	Dorset	Future Planning in Weymouth
	Council – Spatial Planning	The formation of Weymouth Town Council part way through the preparation of the Sutton Poyntz Neighbourhood Plan has caused some concern amongst local residents and newly elected Councillors that the emerging Sutton Poyntz Neighbourhood Plan will constrain the ability of Weymouth Town Council to prepare a future Weymouth Neighbourhood Plan.
		In order to allay this concern it is proposed that a paragraph is added to the introduction chapter to clearly explain that the Sutton Poyntz Neighbourhood Plan does not constrain Weymouth Town Council from preparing a new Weymouth Neighbourhood Plan. Suggested text is supplied.
		<u>Plan Area</u>
		There is a second concern amongst local residents and new Town Councillors that the Sutton Poyntz Neighbourhood Plan will have an impact beyond the current designated neighbourhood area.
		In order to address this concern it is proposed that a paragraph is added to the introduction chapter to clearly explain that the policies of the Sutton Poyntz Neighbourhood Plan will only cover the current designated plan area and that any future Weymouth Neighbourhood Plan has the option to modify existing policy text. Suggested text is supplied.
		<u>Plan Period</u>
		Front cover / Paragraph 1.4 – We agree with the proposed Plan period until 2036. Our preference is for the Plan period to begin in April and end in March to reflect the monitoring year.
		Policy BNE1 Protection and enhancement of wildlife habitat in relation to new development
		It is noted that criteria BNE 1.4 seeks Biodiversity Appraisals and Biodiversity Mitigation Plans (BMP) on all development proposals within the area defined as the Green Corridor, with the exception of existing residential or business premises but

including any size rural barn.

In contrast, the Councils existing 'Planning Application Requirements' (April 2019) seeks these assessment only relating to the following

- all development sites 0.1ha or greater in size
- sites where there are known protected species or important habitats / habitat features
- all greenfield or brownfield development sites above 0.1ha in size not currently used as existing residential or business premises.
- A BMP is also sought for any sized rural barn.

Although the supporting text to the Neighbourhood Plan policy provides a justification for these additional measures the Council is concerned that this policy requirement overly complicates an already established process. The harm judged by applications below 0.1ha is considered to be minimal and not significant enough to seek, as standard a Biodiversity Appraisal or BMP.

It is suggested this policy requirement should be amended to only apply to development sites above 0.1ha or greater in size.

Policy BNE2 Local Green Space

The supporting Independent Assessment of Candidate Site for Local Green Space Designation: Sutton Poyntz Neighbourhood Plan (April 2018) is welcomed and justify the eleven listed designations. The designations are all close to the community served, demonstrably special and not vast tracks of land. The three listed exceptions for future development within the second criterion of the policy text are considered suitable for the status of this designation.

The proposed policy is supported.

Policy BNE3 Tree Preservation

This policy has been prepared in general accordance with Policy ENV10 ii) of the adopted local plan that states "Development will provide for the future retention and protection of trees and other features that contribute to an area's distinctive character. Such features may not always be designated or otherwise formally recognised."

The Policy is supported by the Sutton Poyntz Place Appraisal which helpfully outlines the distinctive character of village. For example, each village character area has a section on tress & hedges.

The proposed policy is supported.

Policy GA1 Transport needs and new development

The proposed policy is supported.

Policy GA2 Off Street Traffic Congestion

It is understood that the majority of residents support a new car park but that it has not been possible to secure a viable location. Instead a general policy (GA2.3) has been drafted that limits the size of a new car park and ensures the proposal does not detract from the village character or impede traffic flow on adjoining roads.

We cannot see where such a large car park can be justified or could be located without it impacting on the character or setting of the village. This must be carefully considered given that the village is attractive and lies within the AONB and Conservation Area and there are a number of listed buildings. A large area of hardstanding in the centre of the village is unlikely to preserve or enhance the character of the village, the conservation area or the wider landscape of the AONB.

We recommend the removal of reference to the provision of a new car park.

Policy GA3 Impact of traffic density on current infrastructure

Criteria GA3.1 states that a proportion of the Community Infrastructure Levy (CIL) raised from new development shall be directed towards traffic calming and control measures. The formation of Weymouth Town Council however changes the way this policy could be applied making this policy unsuitable. New CIL receipts raised in the Sutton Poyntz Neighbourhood Plan area will be paid to Weymouth Town Council who will have discretion to spend the funds locally across the Weymouth parish area. Funds raised in Sutton Poyntz will not necessarily be spent in Sutton Poyntz or on transport calming or control measures.

It is recommended that criterion GA3.1 is deleted.

Policy GA4 Pollution Reduction

Policy GA4 requires adequate charging facilities for ultra-low emission vehicles. Currently this requirement is not explicitly supported by national planning policy. The Revised NPPF 2019, paragraph 110 and The Road to Zero Strategy (July 2018) are quoted.

In advance of any change in National Planning Policy, the Council would be supportive of a policy that provided general support for charge points in new development.

Policy HE1 Protecting Archaeology

The proposed policy is considered inline with the objective of policy ENV4 and is supported.

Policy H&P1 Building style & design

The second criterion H&P1.2 seeks new development to take account of nearby building styles and materials within five character areas defined within the Sutton Poyntz Place Appraisal. The policy helpfully lists the areas with an accompanying map (M-PAC1) and cross-refers to further guidance within the Place Appraisal.

The proposed policy is supported.

Policy H&P2 Housing Numbers and size

The proposed policy is supported.

Policy H&P3 Key views

The policy lists 7 key views that have been identified through independent assessment of candidate locations for key views designation: Sutton Poyntz Neighbourhood Plan (April 2018). This report is usefully cross referenced in the supporting text. Although the study originally identified 15 key views these have been reduced to seven reflecting only the most iconic.

The key views are helpfully mapped (M-HP3), photographed and described. The extent of each view should be to be clearly shown on a map and should not be extensive.

We particularly have an issue with key views 4, 5, 6 and 7 which are considered extensive. We recommend that these views are deleted.

Policy H&P4 Flood Prevention

Policy H&P4 requires development proposals to make use of sustainable drainage design features and demonstrate that the rate of surface water run-off into adjacent land and traffic routes is equal or lower to that prior to development. This policy approach reflects the broad objective of Local Plan policy ENV5 to avoid the risk of flooding.

The proposed policy is supported.

Policy SR1 Protection of community assets

The proposed policy is supported.

Policy SR2 Enhancement of community recreation facilities

The proposed policy is supported.

Section 5: Community Aspirations

Section five outlines the community aspirations identified throughout the Neighbourhood Plan consultation process. Neighbourhood Plans must only contain policies related to 'Land use' matters within the remit of Neighbourhood Plans however the Plan correctly identifies these matters as 'community aspirations' which are separated from the main Plan within their own chapter.

This separation is considered sufficiently distinct so as not to cause confusion and the approach is supported as a useful mechanism in which to record other matters raised during the consultation process.

Strategic Environmental Assessment

The SEA screening exercise for the Sutton Poyntz Neighbourhood Plan concluded that the Sutton Poyntz Neighbourhood Plan is unlikely to result in significant environmental impacts therefore a full SEA is not required in this instance. This is largely due to

		the plan not allocating land for additional housing and maintaining the current rate of housing delivery (20 homes over the next 20 years), directing new development towards the existing urban area.
		Historic England and the Environment Agency responded to the consultation and agreed with the conclusion that the Sutton Poyntz Neighbourhood is unlikely to have significant environment effects.
		Appropriate Assessment
		There is no requirement to conduct an Appropriate Assessment due to the lack of any sources or pathways proposed by the plan and the distance of 1.2km between the NP area and the closest Natura 2000 site (the Isle of Portland to Studland Cliffs SAC).
		Referendum area
		We have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. We consider that the Sutton Poyntz Neighbourhood Plan, as submitted, has no policy which we consider significant enough to have an impact beyond the designated neighbourhood area boundary, requiring the referendum to extend to areas beyond the boundary of the Plan. The referendum should therefore be held over the neighbourhood area only.
6	Highways England	Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance comprises the A35 which passes some 5 miles to the north of the plan area.
		We are satisfied that the plan's proposed policies are unlikely to lead to development which will adversely affect the operation of the trunk road and therefore we have no specific comments to make, although in general terms we are supportive of policies that will improve walking, cycling and public transport provision and encourage more sustainable travel modes.
7	Historic England	There are no issues associated with the Plan upon which we wish to comment.
8	Jane Gear	Plan making process
		There are many things about the village plan and the way it has been handled which give me cause for concern. The land owners and house owners were not made aware that they were going to be put in the plan until it was made public. I have attended nearly all the meetings, and many objections are not recorded in the minutes.
		The plan is certainly not acceptable. How can some villagers decide which properties can create a building plot in their garden thus increasing the value of these properties. There is a housing shortage everywhere, and Sutton Poyntz is becoming a retirement zone. There were many young families when my children were growing up – over twenty as I remember – and now there are only a handful who can afford to buy in this area. We have been surrounded by development over the years and yes, you do survive happily.

		The key thought that a group of self appointed villagers is able to decide what is going to happen to other peoples`land and property, and police the village, is totally unacceptable. If there is to be a committee, it should be by election of the whole village, and not by the Sutton Poyntz Society.
9	Katrina Blee	I would like my general support to be recorded for the plan. Policy H&P3 – Key views
		I would like to lodge a very strong objection to the exclusion of the view off Plaisters Lane next to the property Fellside in Policy Policy H&P3 – Key views.
		This view is probably the second most important view in the village, the assessment excluded it because the current landowner had erected a tall gate so it is difficult to see through this currently but in previous village appraisals was much coveted and in the neighbourhood plan survey it was listed as an important view by residents.
		If it were included in the list of key views, this would enable the planning authority to require that a view to the hill is preserved should the field ever be developed in the future. This does not necessarily have to be at the exact same location as the gate.
10	Lyn grant- Jones	Policy BNE 2 – Local Green Spaces, G9 Puddledock Allotments (Herbies Garden)
		"Herbies garden" is our private garden, and should not be included in the Neighbourhood Plan as green space. Just as every other resident of Sutton Poyntz with private gardens, are not included in the green space designation.
		When my Husband and I purchased the land there were 5 other people gardening the plots, and although the land was not sold to us as "allotments" or with any specifications with regard to the other gardeners, we were happy to let the gardeners continue to use a plot, with written licenses agreed and renewed on an annual basis charging a small rent of £15 per plot, per year.
		In my opinion, having it labelled as "a community facility" could potentially impact on how our land could be used in the future if the proposals in the plan were passed. We have never even considered the land for anything other than as our Private garden for growing flowers, fruit and vegetables and keeping chickens and bees. We know that there is already a mass of "protection" on our land in the form of being in an Outstanding Area of Natural Beauty, Conservation Area and Local Plan Open Gap. It has always been our understanding that the land is also a "flood plain" and as such would never gain planning permission for development.
		For all these reasons I strongly suggest that it is unnecessary to insist on making our land "Green Space", there would be no benefit over and above our own management and guardianship which we foresee will continue for at least the life of the Neighbourhood Plan of 18 years, and beyond.
		<u>Consultation Process</u>

In the introduction of the Sutton Poyntz Place Appraisal, one of the key themes includes "Better communication and cooperate with landowners" under the heading Land Use and Conservation. I would like point out that the group did not consult, communicate or cooperate adequately with us as landowners especially at the beginning of this process to produce the Neighbourhood Plan.

This lack of communication and inadequate information to property owners continued throughout the year despite explicitly expressing this complaint to the Steering group back at the beginning of the year.

AP 5.4.3 – Local List of Heritage Assets

There was no hint that our cottages would be on such a listing until the evening before the expert assessed the houses of Sutton Poyntz, and then there was a distinct lack of time (4 days) for everyone involved to arrange to attend the meeting with the consultant, especially for homeowners who lived at a distance or did not have access to the report. There was inadequate time for us to discuss and send a letter signed by all of the home owners at Puddledock Cottages regarding our houses being included on the Local Heritage list, so once again there are unresolved issues.

Although the consultant explained that non-designated Heritage listing has little impact on the homeowner, it is very suspicious that so many people simply do not wish their property to be on the list. It is my belief that there has not been enough reassurance of the implications, from the Steering Group.

Section 1.7: Management and Monitoring

I would not support the 'alternative approach' to task the Sutton Poyntz Society with undertaking the role of monitoring and managing the Plan. The society has a reputation for being extremely challenging, causing huge distress to house and landowners over many past years. I feel that a minority of un-elected village members "policing" / "monitoring" the majority would be a continuation of what has gone before.

I strongly believe that the management and monitoring of the neighbourhood plan should be left to the new unitary authority.

Housing growth

The Plan foreword suggests the policies and aspirations recognise the need for Sutton Poyntz to play its part in meeting housing needs, but there is no real plan for specific housing, only a hope that some of the homeowners with larger gardens will want to build on their property. This will increase the density of the housing within the development boundary which doesn't seem like a great idea, and may not be favoured by the homeowners in question.

It is hard to imagine that within this increased density of housing there will still be more room than there is at present for 'improved off road parking' to resolve parking issues. Surely more dense housing can only mean more traffic, as do businesses, even low-key businesses, which all seems rather contradictory.

Policy H&P2 Housing Numbers and Size

		The place appraisal particularly discusses the need to "focus on smaller houses both for younger families and for downsizing" but the H&P2 emphasizes the downsizing for residents retiring rather than the encouragement of 'affordable' housing for younger people and families.
		<u>Traffic</u>
		Traffic is identified as a problem for the safety of pedestrians and road users, and the destruction of road surfaces such as Puddledock lane. Improvements by managing the levy seems like a good idea, but it's hard to imagine how that can be achieved without obtrusive road markings, traffic calming bumps or speed restriction signs. It would be helpful if the plan stated clearly what is proposed.
		Improving quality of life and community spirit
		The forward suggest the biggest concern of the Neighbourhood Plan is the desire to create a stronger community that is a better place to live, allowing more people to work locally and resolve traffic and parking issues. I see nothing in the plan to make such a difference. The biggest effect of the plan so far has been to divide the community rather than making it stronger.
		<u>Hearing</u>
		I would welcome the opportunity to discuss these objections with the council or the examiner.
11	Nick	<u>Vested Interests</u>
	Maton	Right at the beginning, and as a result of the Preliminary Consultation undertaken in February 2016, one respondent raised a concern that the process 'could be taken over by vested interests'. Some members of the Sutton Poyntz Society could be accused of having a vested interest in the recommendations contained in the Sutton Poyntz Neighbourhood plan where related to housing, as local landowners. An example is given.
		It is inevitable that those with a vested interest in the outcome of any Neighbourhood Plan will want to involve themselves fully in the process. It is important therefore that proper checks and balances are put in place so that those not directly involved in the process, but still part of the community, have some buy-in to the finished product and don't just see it as the work of a few dominant individuals.
		Policy H&P3 Key Views and Key Views Report
		On page 34 of the Sutton Poyntz Neighbourhood Plan under 'Justification and Supporting Evidence for Policy H&P3', reference is made to an independent survey, which identified 15 important views that might be suitable for designation. The plan says, "These were reviewed by the Housing and Planning Sub-Group and ratified by the Steering Group who recognised that in a village of the size of Sutton Poyntz, 15 views were probably excessive and so only iconic views were selected."
		Minutes of the housing sub group meeting state "that those sites included must be seen as chosen fairly and that failure to do so would cause landowners to 'put up barriers' and in this respect urged caution when considering 'key views'. As evidence it is

		noted that view 5 is blocked by the solid gate at the entrance to Pudding's Field. This view was not considered suitable for adoption and the consultants felt the view in question was better demonstrated by their view 6 – the view north east from Plaisters Lane, close to Morlands.
		I would agree with the consultants view and am therefore disappointed that view 6 was not included in the final version of the plan, particularly as it would also reinforce the 'country lane feel' that the plan identifies as one of the distinguishing features of Plaisters Lane North.
		On page 15 of the Consultation Statement, the final paragraph of the main issues raised as a result of the specific consultation on local heritage assets, key views and local green space simply records the decision of the Steering Group. This was 'to accept the Housing & Planning Sub-Group recommendation for a much-reduced list of 'the most important' key views to be included in the draft Neighbourhood Plan'. There is no record of who attended the April 2018 meeting of the Housing & Planning Sub-Group, where it was decided what 'the most important' key views were. I believe this decision should have been put to the village for them to choose.
		Consultation process and audit trail
		There has been proper consultation from the outset and whilst the views of a range of stake holders have been obtained, there is no clear audit trail setting out how concerns and issues raised have been addressed and the process changed as a result.
12	Peter	Policy BNE 2 Local Green Spaces, G5 Marshy Ground by Osmington Brook
	Broatch	We strongly object to the proposed designation of land around Osmington Brook (G5) as a Local Green Space in the draft Sutton Poyntz Neighbourhood Plan. In the draft plan the reasons for inclusion is listed as Recreation and Beauty.
		As regards to Recreation, a public footpath borders the area on the southern side, but since the footpath runs adjacent to thick scrub and woodland the area is obscured from view. There is no public access to the area. As regards Beauty, the points above apply.
		This area is already protected by AONB status, and we therefore cannot see the special reasons why this land needs to be designated as a Green Space in the Neighbourhood Plan
13	Pru Bollam	Section 4.4 Heritage, 4.4.2 Introduction and Overview; sub heading: 'What makes Sutton Poyntz Special?'
		A correction is proposed to the last paragraph for accuracy. 'Outside the core, there are a scattering of older dwellings that are not listed, as well as a group of 1930's houses, mainly but not all designed by E Wamsley Lewis, ARIBA (founder of the Weymouth Civic Society), where the use of the then cheapest available materials recreates the ancient vernacular.'
		It is clear from a letter in the Wamsley Lewis archive deposited in the Dorset History Centre that the choice of materials was for economy, the clients having requested the cheapest possible houses.

14 Richard Crocker & family

Background

We became aware of the Sutton Poyntz Neighbourhood Plan and the potential impact on our land and property during its Stage Two Survey in December 2017. We were advised by Dorset Council that we should seek to meaningfully engage with the Neighbourhood Plan Steering Group on the issues which impacted us. We have responded to the Steering Group's public consultations, submitted numerous letters and attended nearly every Steering Group meeting since December 2017. We submitted a detailed consultation response to the regulation 14 consultation (please see Annex T1- we are respondent No.14).

We also attended the Steering Group meeting during which the consultation feedback was discussed (22 January 2019). Many of our concerns however still stand. We are also alarmed to find the Steering Group have implemented some significant policy changes to the Regulation 14 version of the Neighbourhood Plan without engagement or notification to the impacted stakeholders (this specifically relates to policy BNE 1.4).

Section 1.7 Management and Monitoring

We welcome many of the changes to this section of the plan from the Regulation 14 version. We however consider an annual report on the progress and effectiveness of the neighbourhood plan to be disproportionate in relation to the strategic gains the Plan is set to deliver.

We recommend the reporting interval should be increased to 2 or 5 years. The monitored annual changes are set to be minimal and would not result in a worthwhile report.

We continue to object to the proposal that the Sutton Poyntz Society undertake a monitoring role of the Plan. This would result in a minority of un-elected village members "policing"/ "monitoring" the majority. It is important to recognise that the Sutton Poyntz Society is not held in high esteem by every village member and by establishing the Society as the sole monitoring group it runs the risk of creating deeper divisions within the village community. We formally support the proposal within the Plan of a mixed monitoring group including town councillors, local authority representatives and community volunteers.

We urge Weymouth Town Council to create a balanced monitoring group with diverse membership to ensure the neutrality of the group's function.

The Plan fails to set out what exactly a monitoring body would/could monitor and what action, if any, it could take against its residents. The plan states that the Sutton Poyntz Society's monitoring "would function with a light touch".

To help allay impacted village members fears the plan should explain what a light touch monitoring function would look like.

Weymouth Town Council should invite impacted stakeholders and village members to a meeting to develop the monitoring model for the Sutton Poyntz Neighbourhood Development Plan.

Policy BNE 1- Protection and Enhancement of Wildlife Habitat in Relation to New Development

During the Regulation 14 consultation in November 2018 policy BNE1.4 read as follows: "All development proposals for sites

which directly adjoin the Green Corridor will be expected to include a Biodiversity Appraisal and Biodiversity Mitigation Plan"

In the May 2019 version of the Sutton Poyntz Neighbourhood Development Plan policy BNE 1.4 now reads as follows: "All development proposals within the area defined as the Green Corridor, with the exception of existing residential or business premises but including any size rural barn, will be expected to include a Biodiversity Appraisal and Biodiversity Mitigation Plan"

This policy has changed significantly and has gone from having no impact, to directly impacting those land owners within the green corridor.

Amendments were made to policy BNE1 "to address concerns raised by WPBC" (Consultation Statement, p.18). Weymouth & Portland Borough Council response to the Regulation 14 consultation can be found in Annex T- Respondent 17. WPBC suggest that policy BNE1.4 be removed from the plan. WPBC state "that this policy overly complicates an already established process", they say that the harm from planning applications below 0.1 ha in size are considered to be minimal and not significant enough to seek, as standard, a Biodiversity Appraisal or Biodiversity Mitigation Plan.

The steering group amendment to BNE1.4 has not resolved the issue raised by WPBC and has significantly increased the impact on green corridor landowners with no discussion or engagement with the impacted parties.

We support WPBC recommendation and ask that Policy BNE1.4 be removed from the plan. If the Steering Group continue to disregard WPBC advice we request that Policy BNE1.4 be brought in line with existing planning application requirements and only apply to applications over 0.1 ha. The Steering Group should directly notify the land owners impacted by BNE1.4 out of courtesy.

Policy BNE 2- Local Green Spaces

Policy BNE2 lists the 3 "special circumstances" when development will be considered in the Local Green Space (LGS) designated areas.

During the Regulation 14 Consultation we identified additional development exceptions which apply to BNE 2 as set out in the National Planning Policy Framework (NPPF) which were ignored by the steering group (Please see Annex T- Respondent 14).

The additional exceptions to policy BNE 2 are: Paragraphs 143-147 of the newly updated NPPF2. Paragraphs 143-147 of the NPPF set out exceptions for when building on green belt land can be permitted. Paragraphs 143-147 of the NPPF apply to policy BNE 2 because Paragraph 20 of "Government Guidelines on Open space, sports and recreation facilities, public rights of way and local green space"3 states that: "Designating a green area as Local Green Space would give it protection consistent with that in respect of Green Belt [land]".

Please can the planning authority consider this correction and ensure our factual amendment is implemented. We request the exceptions list contained within BNE 2 makes reference to Paragraphs 143-147 of the NPPF which sets out development exceptions for green belt land.

Policy BNE 2 – Local Green Spaces – G10 Riverside woodland area

We are the land owners of G10 (Riverside woodland area). It is our small holding in the village.

We have objected to the designation of G10 since we were informed of its potential designation via the Stage Two Survey in December 2017. The Steering Group did not engage with, or notify, the impacted landowners prior to the release of the survey and the Stage Two Survey did not include any evidence to support the proposed designations. The Steering Group only sought to engage the impacted landowners in January 2018, after the conclusion of the Stage Two survey. Since January 2018, we have urged the Steering Group to ensure any LGS designation is based on sound and robust evidence. It was as a result of our engagement and insistence that an independent assessment of candidate LGS sites was carried out by a consultant (reference 37 for the Plan).

We continue to feel the supporting evidence to this designation is not sufficiently robust.

The Plan lists the reasons (criteria) for our land (G10) being designated as LGS as: beauty, wildlife, recreation and historic

Category 1 beauty

Beauty is claimed as people who walk along Puddledock Lane (the street parallel to G10) can look into our woodland (G10). The woodland is private land and the reported beauty and views into the woodland cannot be guaranteed. Land management and the fencing of boundary lines remains the responsibility of the land owner. As beauty cannot be guaranteed it cannot form the basis for LGS designation.

Category 3 recreation value

G10 has no public access and is private land and as such we do not feel it meets the recreational value specification, as it has no multi-functional use or recreational use. The Steering Group believe that Puddledock Lane which runs parallel to the woodland "enables the recreational and amenity value of the proposed area [G10], including its beauty and tranquillity". We strongly object to the recreational value of G10 being derived from the neighbouring public right of way (Puddledock Lane). G10 does not meet the specification for recreational value and it cannot form the basis for LGS designation.

Category 4 historic value

The fact the woodland lies within the "historic core" of the village does not mean it is, itself, historic. G10 does not contain any significant historic relicts and the age of the trees and shrubs within the woodland are not of significant age. G10 does not have any historic value and historic value cannot form the basis for LGS designation.

Category 2 wildlife (biodiversity) value.

The Steering Group replied to our comments raised during the Regulation 14 consultation on the quality of biodiversity data (See Annex T respondent No.14). Our objection has been refined in light of their response.

The independent LGS report (reference 37 within the Plan) references only six data sources to support its LGS

recommendations.

Disappointingly the impacted land owners were not initially provided with these reports nor were they all publicly available. The impacted land owners had to ask to see the evidence.

The Sutton Poyntz Place Appraisal, Hedgerow Survey & List of Priority Species are published as annexes to the Plan: Annex 1, 3 and 4 respectively.

- Sutton Poyntz Neighbourhood Plan Place Appraisal
- Hedgerow Survey; 2017. The hedge in our land (G10) is referred to as FF and runs along the south side of Puddledock Lane.
- List of Priority Biodiversity Species and habitat within Sutton Poyntz Neighbourhood Plan Area- Species locator 20 & 22 are reported in G10.

However, the Fish Survey (2015 & 2016) referenced within the LGS report is not published. We feel that all evidence used to support LGS designation must be publicly available. If the Fish survey data cannot be published the evidence cannot be used to support LGS designation. Sutton Poyntz Steering Group must disclose all evidence used to support LGS designation and must publish the Fish Survey. If the Fish survey data cannot be published the evidence and reference should be removed from the Plan and associated annexes.

Our overarching concern raised during the Regulation 14 consultation was that the biodiversity data collected by village members, including the Sutton Poyntz Biodiversity Group, is not performed by experts and their data is not independently verified. This concern remains. The Steering Group in response to our objection state that data collected by Sutton Poyntz Biodiversity Group is submitted to the Dorset Environmental Records Centre, who validate the data themselves through accredited recorders (Annex T- respondent No.14). This is pleasing to hear. However, it is important to ensure only validated biodiversity data is used to support LGS designation. We therefore request that biodiversity data collected by village members must have been verified by DERC before it can be used as evidence to support LGS designation.

The Steering Group must identify the biodiversity data collected by village members and the local Biodiversity Group which has been verified by DERC to the Local Authority as well as to the impacted land owners.

Biodiversity data collected by village members must be verified by DERC before it can be used as evidence to support LGS designation. All un-validated data must be deleted from the Plan and associated annexes.

We request that the LPA scrutinise the reported grounds for LGS designation of G10 and the supporting evidence. We ask that you share your thoughts with us as to whether the evidence used to support each criteria is sufficient.

Section 4.4: Heritage & 5.4 Community Aspirations in relation to Heritage

The Heritage Asset assessment criteria used within the Heritage Report (reference 47 for the Plan) were not consulted on. Historic England recommends that heritage asset assessment criteria should be tested through public consultation (Historic

England Advice Note 7, Local Heritage Listing).

It should also be noted that owners of the properties included within the Heritage Report (reference 47 for the Plan) were not offered a route of appeal to challenge their inclusion within the list. The disagreement with property owners was merely paused as a result of the Steering Group agreeing to move the heritage asset list to a community aspiration, rather than a policy.

The report at 47 has not been endorsed by the village. Should the LPA develop a local heritage list for Sutton Poyntz they would engage the community again and work to develop Heritage Asset assessment criteria with the community and afford those impacted property owners an appeals process.

Consultation process

This submission marks the end of a very long and trying period for my family. The Steering Group's cavalier approach to policy development has caused much upset. Both LGS and Heritage Asset policy proposals demonstrated their disregard to the impact these policies would have on village members. They never sought to establish a collaborative policy approach. It felt that engagement with those impacted by policy proposals was consistently an afterthought. We had to commit large quantities of our free time over a period of 14 months, attending the monthly Steering Group meetings to ensure the group did not push through policies without sound evidence and proper stakeholder engagement.

Some of the frustrations we felt at the beginning of the Plan process remain. Why the protections afforded by AONB and conservation area status was not sufficient? The added value of the Sutton Poyntz Development Plan remains unclear? The only justification the Steering Group have provided is that the LPA have failed to manage the AONB and conservation area affectively.

Frustratingly the vast majority of the Plan's consultation meetings were held during the village's Friday Coffee mornings (10:00) with no other alternative engagement events planned for those that worked. And the offer of a dedicated meeting with the Heritage Asset consultant for those properties including within the initial heritage asset list was offered with only 4 days notice and it was also held during the working day.

At the end of the process we feel exhausted and feel less of a member of the community than at the beginning. This Plan process has not been unifying it has been divisive. Proposed designation of our private property (land at G10) without prior consultation represents the dictatorial approach of the Steering Group.

Relationships have been damaged we shall never be open to any co-operation with local groups in relation to our land.

We feel like the village we moved into as a young family over 20 years ago, no longer exists. Our children cannot afford to live here, and the Plan does not address affordable housing needs. It seems like the village no longer wishes to welcome young families, rather it wishes to establish itself as a retirement village. If you look at what this neighbourhood plan seeks to deliver there is no perceivable social development other than an ageing population and preservation in aspect.

		Hearing
		We formally request an audience with the Plan's Independent Assessor, once appointed, to discuss our consultation response.
15	Sheena	Consultation process
	Dearness	I strongly dispute the statement that I received a survey plan in November 2018. Since then the announcement of meetings has been sketchy; questions not answered but 'stated' at meetings; and I have not been kept informed of meetings but expected to check on their site for notifications. Other villagers I have spoken too have not been aware of the lead up to the submission plan.
		The Emphasis Placed on Bio-diversity
		The submission plan defines Sutton Poyntz as an area where bio-diversity is the most significant issue and in need of protection. The plan area is already an Area of Outstanding Natural Beauty (AONB) and Site of Special Scientific Interest (SSSI). I question why there is the need for further protection and what from?
		Various recent planning applications are cited as evidence.
		While the Steering Group have sought to ensure that it is of paramount importance. I suspect the new Weymouth Town Council will dismiss these issues if a landowner on the peripheral of the village chooses to sell off a sizeable chunk of land. The previous Council had done so at the sites cited now with Planning Permissions.
		Future monitoring of Bio-diversity
		The Steering Group, set their sights on including three pieces land on privately owned property and using non-natural habitat raison d'etre for inclusion of the privately owned land in the Bio-diversity Plan on two of the sites that adjoin each other.
		I wish to point out that Leyland hedging hardly constitutes being part of a 'natural corridor for wildlife' and nor do the fragments of shrubs or overgrown bushes on the boundary or within two of the sites.
		The owners of the larger site identified for protection, took precautions from the actual flooding that occurred a few years back from the high hills behind the village and put in a lake which solved the problem immediately. The landowner also planted Poplar trees which are notoriously good for soaking up water. Clearly the Steering Group was unaware of such good land management taking place? Further they did not identify the need for a Flood Report for an area rich in springs high in the surrounding upland.
		Vision Statement at 3.1
		The vision strategy already exists. There does not need to be a 'vision' due to the regular numerous social events, coffee mornings, bi-yearly fete held in the village; a local pub; a bus service; food stores nearby and other facilities – all within easy reach.

		Other than dis-encouraging the owners of the Springhead to hold less functions unless they release a little more ground on their site for much-needed parking, it would appear the Steering Group have not put forward any suggestions to counteract the high traffic when there are events. Something on parking ought to have been resolved and put into the recent submission plan.
		Opportunities for Employment in the village
		There is no planned provision for business units. Instead the survey directed the responders to think that most of the villagers are professionals and in a position to work from home some days (or everyday). Businesses working from home need to be registered and have signs up to show they are a business. How many do? How would such businesses be noted? There is nothing in the Plan to encourage young people to either come into the village to work or the offspring of the residents of this village, to find work.
		Housing
		The plan has put forward a figure of twenty new houses. Where are those going? Presumably these will be infill/garden plots? This will no doubt create wealth for those who release their land however the project to try and identify these pieces of garden deteriorated under public scrutiny.
		AP 5.4.3 – Local List of Heritage Assets
		The Steering Group were provided with a Heritage report by an Architect which is fundamentally about identifying interesting buildings that add to the beauty of the village. This survey was carried out pragmatically without using prudent procedures good manners and was an approach that has upset many people. Most the houses that were to be designated have been removed but only after time and effort by the owners to prove the houses simply did not fit the heritage-description.
		The Powers of the Steering Group
		The plan is determined to keep this village 'as a retirement village' with little regard to working with the villagers other than posting emails and paper exercises. People to whom I have spoken have been unaware of the meetings or further developments until now.
		The Town Council should not designate the Neighbourhood Plan Steering Group as a monitoring body. The new Town Council should continue within their own designated powers by (a) considering planning permissions as they come in and (b) protecting the area through the existing designations already placed on the land.
16	Simon	Section 4.5 - Housing and Planning
	Grant- Jones	It is with some amazement that the proposals are only in favour of 1 new home per year being built over the next twenty years, although "if necessary, at higher density will be supported, as will houses of a higher specification suitable as retirement homes that will encourage residents to downsize releasing larger homes for families". This Village is fast becoming an open plan retirement Village inhabited by an ageing population of mainly affluent retired professionals. If young families could afford the

larger houses that the present residents are downsizing from then they would clearly be moving into the Village already as these homes currently become available.

What this Village needs is some affordable housing, social housing or housing schemes such as shared ownership enabling young families on an average wage to afford to live here.

The plan states that we live in a vibrant village, it was very much more vibrant when we had tied cottages, linked to the two farms that used to be in the Village, allowing all classes of people to live here and not just the retired, or more affluent individuals.

The housing issue seems to be more about what the Village does not want more than what it really needs to be able to sustain and attract a new and younger generation of Villagers.

AP 5.6.2 - Provision of a Children's Play Area

The suggestion of using the Springhead play area as a facility for local children is a very poor suggestion as it provides a "quick fix" to almost dismiss the question of a permanent play area. The Springhead is a private business and would have to satisfy several issues with regard to insurance, accountability and management. Has anyone actually asked the owners of the Springhead for their views?

Section 4.2 – Employment, Business, Tourism (Including information technology and communication)

What about trying to incorporate some purpose-built business units into the plan to allow the people that live in the Village to also be able to work in it.

Policy BNE 2 - Local Green Spaces, G9 Puddledock Allotments (Herbies Garden)

I object to my land being labelled by the committee as "Puddledock Allotments" and designated as local green space. Green space within a neighbourhood plan normally refers to green vegetated areas that are used by or are important to the public, such as parks, formal public gardens and areas of recreation such as sports areas and public allotments. My land does not fall into any of these categories as it is a private garden, not open to the public, locked and fenced and used by my Wife and I, and only by us for our exclusive private use.

We have no intention to try to develop the land and, in our opinion, our land has ample protection from development, it is in an area of outstanding natural beauty, it is outside of the development boundary and more importantly we are inside a conservation area and we can prove that none of the criteria for listing can be overwhelmingly satisfied. We believe that our land will be de-valued if it becomes greenspace.

I notice that on page 14 there are four criteria (Beauty, Wildlife, Recreation & Historic) that are listed to support the argument. I note that all except category 1 are listed as being relevant and are marked "yes" in the table of reasons for designation. I dispute their findings for the following reasons:

Category 2 Wildlife

Whilst I acknowledge that our land hosts a variety of bird species which we go to great lengths to attract, some statements in the independent assessment were inaccurate and misleading.

It is possible that bats and "breeding woodpeckers" frequent my land, as they probably do in most other gardens and open spaces in the village. We positively discourage woodpeckers from our garden as they damage our nest boxes and destroy our beehives. I can confirm that there are not, and have not ever been, woodpeckers breeding on my land.

We also take great steps to discourage, control and eradicate vermin such as squirrels, Rats, Moles and Corvids with some degree of success. We have erected suitable fencing around the whole perimeter of the garden to stop Deer from eating our crops and from Foxes and Badgers from attacking our Chickens. It is therefore very difficult for wildlife to transit freely through our garden and access other potential habitats. Which does not give the statement mentioned on page 14 of the draft validity for our land.

Page 48 of the draft plan also shows that we have grass snakes and slow worms on our property; we acknowledge that slow worms are sometimes seen in the summer. I have never seen a grass snake in the garden in the 25 years that I have lived here.

Category 3 Recreation

My land, although used for horticultural purposes, has never been allotments. It is not open to the public and has always been in private ownership with the first record of the land being used as additional garden by residents of Puddledock Cottages from 1952. When we acquired the land in 2012 we allowed existing plot holders to carry on under our tenure with new written agreements. The plots have never been referred to as "allotments".

I can confirm that rather than have the steering committee label us as "a community recreational facility" which could have implications on how we are able to use the land in the future, we have terminated our agreements with existing plot holders and as from 31st December 2018 there is no one else other than my Wife and I who will have access to the garden which we use for growing our fruit and vegetables and for keeping our bees and chickens. Therefore, the recreational value to the local community no longer exists and I request that it be disregarded from the list of criteria.

Category 4 Historic

What is Historic about a piece of land that once formed part of a farm and is now used as a garden. To my knowledge there are no great historic occurrences that have taken place here. The farm buildings and yard (with the exception of the Dairy House, Sutton House and Puddledock Cottages) have all been razed to the ground and re-built as modern housing, although these remaining original properties have been extensively altered, added to and modernised. Modern housing has also been built along the length of Puddledock lane from the East end to Puddledock Cottages.

Management and monitoring

I strongly believe that the neighbourhood plan should be monitored and managed by the new unitary authority and not the

		Sutton Poyntz society or any form of the neighbourhood plan steering group or any future incarnation of that group. The committee are keen to manage the plan themselves. They state that it will be managed by them "with a light touch", what exactly does that mean?
		My Wife and I have already experienced poor communication, undemocratic decisions, lack of consultation with affected landowners and positive constructive exclusion of residents with regard to information with consultation meetings held at very short notice and within working hours where Villagers who work were unable to get time off at short notice and therefore get the chance to question any findings. At least two homeowners in our terrace of four cottages were not given any information by the committee as they do not live at the properties and relied on me to relay any information to them. We were also not given the opportunity to question Brian Wilson, the independent consultant who looked at and assessed the criteria for greenspaces.
		I support the fact that a local plan needs to be made and that the main idea is to plan ahead and move forward for the good of the community and for the improvement and introduction of new facilities and the preservation of the existing, but this plan and the way that it has been administered gives me no confidence that these goals will be achieved. The process has caused division within the community and anxiety and unrest amongst the affected landowners and householders, with poor communication inaccurate minuting of meetings, unanswered questions and assumption by the committee that they are acting for the majority.
17	Sport England	Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Standard response to Neighbourhood Plans attached.
18	Terry	General Process
	Pegrum	The preparation of a Neighbourhood Plan by volunteers has clearly proved a time consuming and complex business, with the gathering of evidence, engagement with stakeholders and preparation of documents. It is appreciated that the volunteers are seeking what is best for the village and have worked hard to produce the draft Neighbourhood Plan.
		My concerns commenced with the publication of the Stage 2 Survey in advance of discussions with landowners. This meant that proposals affecting landowners were put forward before they had been informed e.g. location of key views, green spaces and local listing.
		My main objection to the questionnaire is that it was not supported properly with information about the need for sustainable development. Residents are often resistant to change and when presented with a question about how much housing is required (Q14) will suggest as few as possible, with little consideration of needs. Residents should be made aware of these needs to allow them to make informed responses.
		Neighbourhood Plans are supposed to provide opportunities for communities to positively plan to deliver sustainable development. The NPPF (2012) paragraph 7 is quoted. Sustainable development is not simply about protecting the

environment, or public transport, but is a balance between economic, social and environmental factors. Neither one is considered to take precedence without justification. The NPPF also sets out a 'presumption in favour of sustainable development', that both Local and Neighbourhood Plans should reflect. NPPF (2012) paragraph 14 is quoted.

This clearly sets out that plans should seek to meet objectively assessed needs. It is therefore important for a plan to be properly informed by the evidence of these needs. NPPF (2012) paragraph 16 is quoted.

The Adopted West Dorset, Weymouth and Portland Local Plan confirms the presumption in favour of sustainable development within its first and overriding policy. The NPPF (2012) paragraph 184 is quoted.

The adopted Local Plan for the area identifies: "A continuing supply of housing land is needed to help meet the changing demographic and social needs of the area, and to help reduce the need to travel and promote economic growth and social inclusion." The Neighbourhood Plan should reflect this strategic approach.

Through the Neighbourhood Plan process to date, there has been no clear evidence of needs identified to inform decisions, particularly housing. Without this, residents are unable to respond informatively, and the Neighbourhood Plan cannot fulfil its main function of meeting local needs. Failing to provide residents with information on housing needs, particularly affordable will ultimately have resulted in less support for development. Consequently, I consider the responses to the Stage 2 Survey do not provide an informed set of opinions that should be relied upon to advise the Neighbourhood Plan.

Vision and Objectives

Within the proposed Vision the delivery of new development is included. This is a presumption, and does not therefore project benefits that future development can bring, particularly in terms of social and economic sustainability. The NPPF seeks to 'significantly boost the supply of housing' and this is supported by identification of the need for a continuing supply of housing to meet local needs, included within the adopted Local Plan. The Neighbourhood Plan does not comply with this approach and should not portray such a resistant approach.

Policy H&P2 Housing Numbers and Size

I believe this policy is flawed, as it fails to reflect the needs of the village. It has not been constructed on the basis of any analysis of needs, but rather the responses to the Stage Two survey, which, I consider did not provide informed responses. The Neighbourhood Plan does not present any information about the village's needs, and there have been no published supporting documents considering the issue. A Village Housing Needs Survey was undertaken, but no reference is made to the responses. The draft Plan should use the information from the survey results, alongside information readily available from the District Council and other sources, to inform the policy. Evidence based facts should be considered more important than opinion when identifying the needs of the Plan.

The justification text states that the Neighbourhood Plan is not an allocation plan, and it should be for the Local Plan to deliver new housing. This fails to grasp the opportunity for the community to decide where new development should take place to

meet local needs. The text sets out that because the village has limited public transport and employment opportunities it is effectively an unsustainable location for more than about 20 new homes to be built over the next twenty years. This is incorrect interpretation of sustainability. It also makes an out of date assumption that people need to travel to workplaces. Firstly, many households do not work i.e. retired, and many others either work from home, or have the ability for flexible working, so that they do not have to visit workplaces on a regular basis. Additionally, it assumes that facilities and services can only be accessed by residents travelling. Again, our world has changed, so that these are now regularly available either on-line, or are delivered e.g. food shopping.

The draft Plan states that approximately 20 homes can be built within the existing Village boundary. It is understood that there has been an assessment of where these could be delivered, but this has not been made public to show that the proposed development sites are available, achievable or appropriate. The character of the village is such that there is no obvious brownfield land capable of redevelopment, so opportunities can only exist through using garden space, or by knocking down dwellings to make way for more. Both of these have significant drawbacks, as the former can lead to cramming of development and the latter would not make commercial sense. If this is to be the strategy there needs to be evidence presented publicly that it is achievable.

The District Council has prepared a Strategic Housing and Economic Land Availability Assessment (SHELAA). This shows very few locations within the Village where landowners have put forward their land for development, certainly not enough to deliver 20 dwellings. The Neighbourhood Plan needs to show that the new dwellings it believes are required have a realistic prospect of being delivered before dismissing the prospect of extending the Village boundary. It should be noted that the SHELAA identifies a series of locations on the edge of the village which it considers have potential for development.

Affordable Housing

One of the most important issues that the Neighbourhood Plan should consider is the provision of affordable housing. It is very important that Village residents are not forced out of their community because of an inability to access appropriate homes. Sutton Poyntz is a very attractive, desirable village, and this results in very high house prices. The Zoopla website identifies average house prices for the Village at £482,000. This is good news for those residents well-housed, but for those who wish to live in their community, particularly the young, there is no reasonable prospect of finding somewhere to live.

Figures obtained from the District Council show that there are 1,669 households on the Weymouth and Portland housing register. The Council does not have detailed figures for Sutton Poyntz, as it is included within the wider Preston Ward. A table of the number of individuals on the housing register in Preston Ward is provided. It is reasonable to assume that some of these have close connections with Sutton Poyntz and would wish to live in the Village.

These figures only represent those currently on the register, so do not identify the future needs, which are particularly likely to include the elderly who need to move to specially adapted accommodation, and the young seeking to leave home. The community should aim to provide for these needs and the Neighbourhood Plan should therefore be more positive in its

		approach to delivering new homes.
		Conclusion
19		I do not consider the draft Neighbourhood Plan provides a sound basis to deliver the needs of Sutton Poyntz over the next twenty years. It is a preservationist plan, in that it seeks to avoid change. There is no clear evidence to identify local housing needs, particularly affordable, and as a result, an arbitrary housing target has been chosen. Additionally, there is no clear evidence that the strategy of delivering this housing within the village boundary has a reasonable prospect of success. I therefore request that a Housing Paper is produced to deal with these matters. This should then provide the necessary information to enable an informed debate in the village as to what is actually required and how it can be delivered. This can then be used to prepare a sound Neighbourhood Plan.
	Weymouth Civic	Our congratulations go to the Sutton Poyntz Society and Neighbourhood Forum on the production of the Plan, which clearly represents a considerable body of work on the part of the Forum and the residents of the village.
	Society	We generally support the Plan, including the section on Community Aspirations, showing what is important to residents of the village, and ideas for future improvements, and we will bear the whole document in mind when considering planning applications for the village.

Late

20	Natural England	Natural England has no comment to make with regards to the likely impact on designated sites. Policy BNE1.4 Protection and enhancement of wildlife habitat in relation to new development Natural England would like to highlight that the Planning Authority is signed up to using the Dorset Protocol for the submission of a Biodiversity Mitigation and Enhancement Plan when certain triggers are met. We are supportive of the inclusion of the BMEP in policy, however BNE1.4 identifies when a BMEP is necessary which is not consistent with the risk thresholds set out in the Dorset Protocol. Excluding the need for a BMEP for existing business and residential buildings undermines the purpose of the protocol in ensuring protected species (bats) under the Wildlife and Countryside Act 1981 (as amended) and the Habitat Regulations 2017 are adequately considered. Natural England recommends that the policy wording is amended to better reflect
		the protocol thresholds.