

Intelligent Plans and Examinations (IPE)
Ltd
3 Princes Street
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Date: 20 June 2025

Ref: Weymouth

Officer: Nick Cardnell



NeighbourhoodPlanning@dorsetcouncil.gov.uk

Dear Mr Carnaby

WEYMOUTH NEIGHBOURHOOD PLAN EXAMINERS QUESTIONS

Thank you for circulating the Examiner's procedural letter and questions in respect of the Weymouth Neighbourhood Plan dated 2 June 2025. In response, please find enclosed Dorset Councils reply to the questions directly (or jointly) addressed to us. We understand that Weymouth Town Council has responded separately to their set of questions.

I can also confirm that I have arranged for both responses to be published on the Dorset Council website.

If you have any queries, please do not hesitate to contact me.

Yours sincerely,

Nick Cardnell
Senior Planning Officer
Spatial Planning

INDEPENDENT EXAMINATION OF THE WEYMOUTH

NEIGHBOURHOOD DEVELOPMENT PLAN

EXAMINER: Andrew Mead BSc (Hons) MRTPI MIQ

ANNEX

From my initial reading of the Weymouth Neighbourhood Development Plan, the supporting evidence and the representations that have been made to the Plan, I have the following questions for WTC and/or DC. I have requested the submission of responses by **Monday 23 June 2025**, although an earlier response would be much appreciated. All of the points set out below flow from the requirement to satisfy the Basic Conditions.

Questions to Weymouth Town Council (WTC), Dorset Council (DC), or both (WTC and DC).

Specific questions of clarification to the Councils are listed below, but I am happy to receive comments from either Council on any of the questions which are not directed at them in the first instance.

Where relevant, when I make reference to points raised by specific parties in the Regulation 16 response, I shall merely refer to the party rather than repeat the Regulation.

Dorset Council has responded in green italics.

1 The Neighbourhood Plan Area

Q to WTC. Given points 2 – 4 raised by DC, would it be more accurate to add the following phrase to the end of the final sentence of paragraph 1.7 of the Plan?

“... with the exception of the Littlemoor Urban extension and the top of Plaisters Lane, Sutton Poyntz as shown on Map 1a.”

2. Strategic Environmental Objectives (SEO) and Supporting Environmental Targets (SET)

Q to WTC and DC. Considering the DC points 36 – 37 commenting on the Strategic Environmental Objectives (SEO) and Supporting Environmental Targets (SET), numerous policies in the Plan include a Clause requiring: “Alignment with the environmental objectives and targets of the Neighbourhood Plan”, or similar. Examples are seen at Policies W12, W14, W20, W21, W22, W23A, W23C, W24, etc. Are the SEO those set out in Chapter 6 of the Plan which follow the various Aims? In addition, are the SET found on page 25 and at Appendix A of the Plan on pages 207 – 223? If so, the suggestion from DC seems sensible that, rather than repeat the Clause for many of the policies, a general overarching policy could be included. This could state, for example:

“Proposals for development should aim to meet the Relevant Environmental Objectives and aspire to achieve the Environmental Targets in Table X (p 25) and, where appropriate, Appendix A of the Plan.”

I would welcome comments from both Councils.

Dorset Council response: We are content with this proposed approach.

3. Viability

Q to WTC. Within the DC points 73 – 77, queries were made that Policies W05, W15 and W18 may not have been viability tested due to the final version of the Plan not being considered in the Viability Report. DC suggests that the viability evidence should be either updated, or the new requirements be deleted. DC also suggests, as an alternative, that the Plan states the new requirements do not need to be met if it is found during the consideration of a planning application that they would result in the development being unviable. I would welcome the comments of WTC.

Dorset Council response: The recent Government decision to end Neighbourhood Plan funding and technical support means we think it now unlikely that the group will be able to update the supporting Viability Report as originally suggested. In this context, we would suggest the remaining options are preferred, either to delete the new requirement or for viability to be considered through the planning application processes.

4. Policy W02: Conservation of the Natural Environment

- a) **Q to WTC.** Clause 3 supports the recognition of wildlife areas at Wey Valley Watermeadows. This land, shown on Map 7, is mostly within the Land at Redlands Farm allocation (Policy W21; Map 20) where it is identified in the site but not in the actual “development area”. What is the aim of Policy W02 Clause 3, particularly as most of the site is also proposed as Local Green Space (See LGS5 and LGS6) and would be protected from inappropriate development under Policy W09?
- b) **Q to WTC.** Following points 47 and 48 made by DC, should the issue be dealt with in Policy W21?
- c) **Q to WTC.** In any event, should the land defined in Policy W03 coincide with the land outside the development area in Policy W21; Map20?

5. Policy W05: Ecological Impact of Development

Q to WTC and DC. Policy W05 Clause 2 indicates that, when considering development proposals, “a substantial Biodiversity Net Gain” is sought. Taking into account the comments from DC (point 54), and the contents of paragraph 8.41 of the Plan, I am considering recommending the final phrase of Clause 2 be modified to:

“... by providing for a Biodiversity Net Gain of at least 20%, subject to viability, judged on a case by case basis.”

I would be grateful for comments from both Councils on this suggestion.

Dorset Council response: *We are still concerned that the requirement to submit a viability assessment on a case by case basis could become unduly burdensome. For example, a proposal where the costs of meeting 20% biodiversity net gain would require viability assessment could be considered overly onerous for the applicant to prepare and for Dorset Council to assess.*

[Biodiversity Net Gain FAQs - Frequently Asked Questions | Local Government Association](#)

Advice from the Planning Advisory Service (PAS) explains “The [DEFRA evidence base and impact assessment](#) considers that the 10% requirement is unlikely to significantly affect viability issues for development. DLUHC and Defra are not aware of any evidence to the

contrary. Essentially the 10% set out in legislation is mandatory and therefore there is no scope for LPAs to allow a reduction on viability grounds. If developers submit above 10% this is voluntary and anything above 10% would be subject to negotiation (and possibly would include viability justification) as part of planning application discussions with the LPA. If LPAs set the requirement higher than 10% in local policy, they would have to justify the level set in policy as part of their Local Plan process.”

Biodiversity Net Gain in Local Plans and Strategic Planning | Local Government Association

Further PAS guidance continues “LPAs do not need to repeat the mandatory requirement for BNG in policy. They should also make sure that they do not include policies or guidance which are incompatible with this framework.”

“Some local authorities are considering setting a policy for a BNG target **above 10%**. This will need to be backed up by appropriate evidence, including that the approach taken will be viable.”

For example, the Kent Nature Partnership net gain group has published a county-wide strategic viability assessment to understand the implications of a 20% BNG approach for Kent: <https://kentnature.org.uk/nature-recovery/biodiversity-net-gain/>.

In summary:

- A shift from 10% to 15% or 20% BNG will not materially affect viability in the majority of instances when delivered on-site or off-site.
- The biggest cost in most cases is to get to mandatory, minimum 10% BNG. The increase to 15% or 20% BNG in most cases costs much less and is generally negligible.
- Because the BNG costs are low when compared to other policy costs, in no cases are they likely to be what renders development unviable.
- Local Authorities who wish to pursue BNG in excess of 10% will need a local viability assessment to support it. However, this study shows an assessment is likely to demonstrate viability will not be negatively impacted (to a material extent) for BNG increases of up to 20%. Because costs are small BNG is unlikely to impact the viability threshold significantly.
- If onsite provision is how the majority of BNG is delivered, this could have implications on land take as a result of lowering of average housing densities. However, as the majority of this burden relates to the mandatory 10% BNG, and the increase to get to 15% and 20% BNG are comparably small, this should not be seen as a reason for not going beyond the 10% but is a consideration for LPAs.

In conclusion, evidence prepared elsewhere, such as Kent, indicates that the biggest cost in most cases is to get to mandatory, minimum 10% BNG. The increase to 15% or 20% BNG in most cases costs much less and is generally negligible. However, they advise other Local Authorities who wish to pursue BNG in excess of 10% will need a local viability assessment to support it. As we are not aware of any locally prepared evidence that would justify a requirement for 20% BNG we are uncertain of the implications on development. Alternatively, assessing schemes on a case by case basis could be overly burdensome for developers to prepare and Dorset Council to assess, potentially slowing down the consideration of and granting of planning permission for otherwise acceptable development.

6. Policy W08: Coastal Green Recreation Areas

a) Q to WTC. Do Sites 2 or 3 in the Coastal Green Recreation Areas: Map 10 include the allocation under Local Plan Policy WEY9 Bincleaves Cove (See DC point 61)? If so, the Map should be amended to exclude it and please could an alternative Map be submitted?

b) Q to WTC. Area 5 in the list of Coastal Green Recreation Areas is privately owned land, albeit with the South West Coast Path passing through it. What is the justification for the inclusion of this site in the list?

7. Policy W09: Green Gaps

Dorset Council response: We have been approached by Weymouth Town Council for assistance with updating the Green Gaps map in response to Q7a, b & c. This request reflects the recent withdrawal of support and funding for Neighbourhood Planning by the Government via Locality. Dorset Council are happy to commit to this work in collaboration with Weymouth Town Council after the Examiners final recommendations are known.

a) Q to WTC. Maps 11A and 11B show Green Gaps which include existing planning permissions at Sites 2 and 4. Shouldn't the areas of planning permission be removed from within the Green Gap?

b) Q to WTC. Similarly, shouldn't the areas within the Neighbourhood Plan Site Development Boundary be removed from the Green Gaps (Sites 1 and 2)? If they are to remain, what is their purpose?

c) Q to WTC. There also appears to be an ambiguous area of planning permission which may (or may not) be shaded as a Green Gap north of Site 1 which I would be pleased to have clarified.

d) Q to WTC. I would also be grateful for the reason why "Land Transferred to a Public Body" is included on the Green Gaps Maps and which, in my assessment, adds confusion?

8. Policy W10: Local Green Space (LGS)

a) Q to WTC and DC. DC has commented that LGS016, 017 and 021 should not be LGS because each site is designated as highways land and may be required for highways purposes in the future. However, when applying Green Belt guidance as correctly described in Policy W10 and the National Planning Policy Framework (NPPF, December 2023)¹, it seems to me that an LGS designation does not necessarily preclude highways works. Do the Councils have any comments?

Dorset Council response: We acknowledge that certain forms of development such as local transport infrastructure are not inappropriate in the Green Belt provided, they preserve its openness or do not conflict with the purposes of land within it. (NPPF 2023, Paragraph 155 c).

Highway land however has permitted development rights, meaning certain types of development can proceed without requiring planning permission. This could potentially

¹ A revised version of the NPPF was published in December 2023. All references in this examination read across to the December 2023 version. Whilst the latest iteration of NPPF was published on 12 December 2024, Paragraph 239 of that document includes transitional arrangements for neighbourhood plans, stating that the new NPPF only applies to neighbourhood plans submitted after 12 March 2025. In this case of this Plan, it was submitted to Dorset Council prior to that date.

contradict the purpose of an LGS designation, which aims to protect green spaces for their local significance. Additionally, Highway land may also be needed for future transport schemes, further reducing its suitability for designation as a long-term LGS.

b) Q to WTC. Does the Council have any comments on the objections by DC to LGS09 and LGS013?

c) Q to DC. DC comments that LGS015 is already protected under the Broadwey Conservation Area, implying that no further protection is required. Yet the degree of protection from development in the Conservation Area regime is totally different to that in an LGS. Why should LGS015 not be designated as LGS?

***Dorset Council response:** The land has another designation as Conservation Area which offers a level of protection. As described in Dorset Council's comments, this fact does not necessarily preclude or support designation of the land as Local Green Space. NPPG Paragraph: 011 Reference ID: 37-011-20140306 states "Different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space." WTC have not evidenced the consideration of the additional benefit of Local Green Space designation.*

It is likely to be found that the status of the area as a Conservation Area would not preclude the site coming forward as a development opportunity at a later date but instead would likely only provide a level of protection in terms of the design of any development within the Conservation area. Unless it was found that the park had particular historic significance.

The site is not a Registered Park or Garden and it is not specifically mentioned in the assessment in the West Dorset, Weymouth and Portland Local Plan Policies Maps - Background Document 2015 (paragraphs 3.43 and 3.44). As such it may benefit from additional Local Green Space protection to restrict development.

Without undertaking an assessment of the site and heritage status of the land, justification has not been provided by WTC detailing that there is a benefit of the additional protection. There is no evidence or understanding this difference.

The additional designation as a Local Green Space most likely will afford the land additional protection by the existing designation as detailed above. Therefore, it is likely to be worthwhile designating this area, particularly as the community are in favour of it, justification is however needed in the form of a short paragraph or bullet points outlining why.

d) Q to WTC. Many representations have been received which support the designation of Greenhill Gardens as LGS. It would be helpful to explain why was the site not proposed as LGS in the Plan? I would also be pleased to receive a plan delineating the land to assist my understanding.

9. Policy W11: Incidental Open Space (IOS)

Q to WTC. What is the reasoning behind the identification of the IOS and LGS in Southill Garden Village in Figure 8 (LGS) on page 231 and Map C4 (IOS) on page 281. Most are the same areas of land. If the sites are to become LGS, is the IOS designation not superfluous?

10. Policy W12: Riversides

Q to DC. With reference to the DC point 69, please could the Council suggest a suitable rewording of Policy W11 to include the phrase:

“... unless other suitable mitigation measures can be put in place.”

Dorset Council response: *It should be inserted into paragraph 8.80 as follows:*

Most of the land either side of the rivers is flood zone 3b. The NPPF (para. 165) makes clear that inappropriate development in areas at risk of flooding “should be avoided”. The Environment Agency identifies what it considers to be ‘water-compatible’ development that could take place in flood zone 3b unless other suitable mitigation measures can be put in place.’

11. Policy W13: Panoramas, Vistas and Views

Q to WTC and DC. To my mind, the second sentence of Clause 1 does not make sense. A suggested rewording of the policy is:

“Development proposals likely to have a significant impact on the important public panoramas, vistas and views identified on Maps 15A – F and defined in the accompanying Tables should demonstrate due regard to the local design guidance whenever available and should be accompanied by a Landscape and Visual Impact Assessment (LVIA).”

I would be pleased to have the comments of both Councils on this suggestion.

Dorset Council response: *Agreed.*

Development and Homes

12. Q to WTC. I assume that in paragraph 9.53, the final sentence should be:

“... Table B and Map 18”.

13. Q to DC. In point 72 of the representations, DC supports paragraph 9.8 of the Plan and the following table on page 76. Therefore, notwithstanding the reservations about the capacity of the allocations (See Dorset Council point 114), does the Council accept that the NP has fulfilled its obligation towards the provision of housing numbers as advised in paragraph 29 of NPPF?

Dorset Council response: *We are content that the Weymouth Neighbourhood Plan has been prepared positively, does not promote less development than envisioned through the Adopted West Dorset, Weymouth & Portland Local Plan (2015) or the policies within the emerging Dorset Council Local Plan (2021), or undermine those strategic policies.*

With reference to NPPF (2023) paragraph 68, we can confirm that the figures within the Neighbourhood Plan, paragraph 9.8 and table on page 76 reflect “the most recently available planning strategy of the local planning authority,”.

We acknowledge that recent government changes to the standard methodology significantly increases housing need across Dorset but without an updated development strategy it is currently not possible to determine a revised housing requirement figure for Weymouth. Dorset Council is seeking to consult on a revised development strategy, site options and an approach to calculating the neighbourhood housing requirement figure later in the Summer

(August 2025) however as drafted, this document will still not be sufficiently advanced to provide an agreed revised spatial strategy that takes account of the significant increase in the housing need figure for the Dorset Council area.

14. Policy W14: Development Boundaries

Q to WTC and DC. Clause 1 of Policy W14 states that: “Development on brownfield sites within the defined development boundaries shall be prioritised in the Development Plan.” How is this to be implemented? I would be grateful for comments from both Councils.

Dorset Council response: *We recognise the Neighbourhood Plan sets out a clear intention to prioritise and facilitate brownfield site development (Development and Homes, aim 2 and Policy 14, criterion 1) but as submitted the Plan has only one brownfield site allocation (Policy 24) and few other mechanisms to achieve this aim.*

Early drafts of the Weymouth Neighbourhood Plan sought to allocate specific sites within Weymouth Town Centre where there is a high concentration of brownfield sites in public ownership and suitable for redevelopment. However, in February 2024 we published an updated Level 2 Strategic Flood Risk Report which identified several different sources of flooding in Weymouth Town Centre.

Dorset Council provided the group with a flooding note on the 28 June 2024 explaining the implications for several proposed brownfield allocations and the options available to them. In summary, without a significant delay to the Neighbourhood Plan it was considered unlikely that the group could demonstrate development would be safe over its lifetime. The Weymouth Harbour and Esplanade Flood and Coastal Erosion Risk Management (FCERM) Scheme and its outline Business Case is currently a work in progress. In these circumstances the group considered it appropriate to remove elements of their brownfield aspirations from the Plan to be able to progress.

Nevertheless, Policy W39 Weymouth Town Centre and Policy W32 Town Centre Car Parks are both supportive of redevelopment opportunities in Weymouth Town Centre. In addition, Dorset Council is currently refreshing the Weymouth Town Centre Masterplan to support the redevelopment of sites and improve associated public realm and transport connections. The Masterplan will be delivery focused. We are therefore content that in combination with the emerging Flood risk work, Weymouth Master Plan refresh and supportive Neighbourhood Plan position, redevelopment of brownfield sites can be achieved.

In this context, it may be more appropriate for Aim 2 & Policy W14 to be rephrased as support for brownfield sites within the defined development boundary.

15. Policy W16: Major Housing Sites

Q to WTC and DC. Criterion i refers to Lifetime Home Standards. Has this not now been superseded by M4(2) of the Building Regulations?

Dorset Council response: *This is our understanding.*

- [*Lifetime Homes - CAE*](#)
- [*Raising accessibility standards for new homes: summary of consultation responses and government response - GOV.UK*](#)

16. Policy W19: Site Allocations

Q to WTC and DC. Paragraph 6.7 of the Report to inform the Habitats Regulations Assessment (AECOM, November 2024) suggested an addition to Policy W19 which I am minded to recommend. Do both Councils agree with this?

Dorset Council response: *We have no concerns with the inclusion of the suggested wording in paragraph 6.7 of the supporting Habitats Regulation Assessment.*

17. Policy W20: Land at Wyke Oliver Farm North

a) **Q to WTC.** I assume the map reference should be to Map 19?

b) **Q to DC.** The SEA appears to assess the site on the basis of 112-135 dwellings (p 52, paragraph 3; p 54, paragraph 1). Although the SEA later comments that, under Policy W20, the site is allocated for 250 homes, is DC satisfied with the adequacy of the assessment?

Dorset Council response: *We are satisfied with the adequacy of the assessment.*

The 112-135 residential capacity for Wyke Oliver Farm North (WNP14) appears to originate from the [230113 Weymouth Neighbourhood Plan Site Assessment - Final Report \(January 2023\)](#).

The site boundary and residential capacity for this site option was then assessed through the [Weymouth NP SEA Interim Environmental Report v1.0 060923 \(September 2023\)](#). Shortly after, the Town Council consulted on their Regulation 14 Draft Plan (October 2023) with a revised site capacity of 250 dwellings at Wyke Oliver Farm North (WNP25).

The [Weymouth NP SEA Environmental Report V3.0 291124 \(November 2024\)](#) is an updated report to accompany the submission Plan. Chapter 4 acts as a summary of the reasonable alternatives considered through the Plan making process including Wyke Oliver Farm North (Site E). The indicative site capacity is recorded as 112-135 dwellings reflecting the estimate at the time.

Plan making is an iterative process and can mean site capacities can often be updated as new information becomes available. Chapter 5 is an appraisal of the submission version of the Neighbourhood Plan and contains the final site capacity of 250 dwellings for Wyke Oliver Farm North (W20).

Procedurally, we do not have a concern with the different site capacity estimates as they simply reflect the iterative nature of Plan making. We are content the final site estimate is clearly stated in Chapter 5 and that the report is an adequate assessment.

c) **Q to DC.** Is DC satisfied with Clause 2 of Policy W20, or should the 50% affordable housing proportion be made subject to a viability assessment?

Dorset Council response: *The addition of a viability clause would be welcomed as the supporting viability assessment highlighted the importance of sensitivity testing and is at a point in time.*

- d) **Q to DC.** Does Clause 4 iv satisfy the requirements for surface water management advised by the Dorset Council Flood Risk Management Team in the comments of 28 January 2025? If not, what should the criterion state?

Dorset Council response: *Clause 4 iv could be clarified further:*

Development proposals should be supported by a surface water management strategy.

Supporting text could clarify the key components of the surface water management strategy.

- Development must prioritise rainwater harvesting and water re-use as primary measures for managing surface water.*
- Proposals must demonstrate adherence to the SuDS hierarchy, prioritising infiltration-based SuDS, and restricted surface water discharge to mitigate downstream flood risk.*
- Where feasible, open SuDS should be prioritised to deliver multifunctional benefits, including improvements to biodiversity, water quality, and amenity value.*

- e) **Q to DC.** Is the Council satisfied that appropriate safe vehicular and pedestrian access can be gained to and from the site?

Dorset Council response: *The Highways Team have previously indicated that through the planning process the developer would be required to provide a Transport Assessment which includes detailed forecast traffic movements on the local network and a Travel Plan which would include targets to mitigate against traffic generation on the network, both of which would be fully assessed by Highways during the consultation period.*

The Transport Development Management Team add that there are local characteristics that other parties may need to consider, such as the adjacent building and wall which if listed could impact whether an access road could be constructed / provided. Safe and suitable access for all users may be achievable once further detail comes forward, which may mean acquiring third party land etc. Existing approach roads and junctions from Wyke Oliver Road appear suitable, further analysis would be required hence the TA to consider whether mitigation work is needed and thus deliverable and justified.

- f) **Q to WTC.** What is meant by “community focus” in criterion vi.

- g) **Q to WTC and DC.** Would development in W20 intrude into the Lorton Valley Wildlife Corridor and, if so, how could any harmful effects be mitigated? Comments from both Councils would be welcomed.

Dorset Council response: *The Council's NET has previously noted the allocations at Wyke Oliver Farm North is within the Lorton Valley wildlife corridor, as defined by the 'Urban Wildlife Corridors and Stepping Stones: Weymouth & Portland Borough – Addendum (September 2020)'. There is, therefore, significant conflict between this policy and policy W04 whose primary purpose is to protect these wildlife corridors.*

NET do however acknowledge that the policy requires transfer of 23ha of land to a suitable public body such as DWT which, if managed appropriately, may go some way to mitigating impacts on the wildlife corridor.

The Planning Policy Team would add that there is a need to balance the need for housing against the objective to protect this wildlife corridor. It should be noted, that in terms of the

hierarchy of wildlife sites the wildlife corridor is not of international or national importance but rather is of local importance.

18. Policy W21: Land at Redlands Farm.

a) Q to DC. Is DC satisfied with Clause 2, or should the 50% affordable housing proportion be made subject to a viability assessment?

Dorset Council response: The addition of a viability clause would be welcomed as the supporting viability assessment highlighted the importance of sensitivity testing and is a point in time.

b) Q to DC. Does Clause 4 xii satisfy the requirements for surface water management advised by the Dorset Council Flood Risk Management Team in the comments of 28 January 2025? If not, what should the criterion state?

Dorset Council response: Clause 4 xii could be clarified further:

Development proposals should be supported by a surface water management strategy.

Supporting text could clarify the key components of the surface water management strategy.

- Development must prioritise rainwater harvesting and water re-use as primary measures for managing surface water.*
- Proposals must demonstrate adherence to the SuDS hierarchy, prioritising infiltration-based SuDS, and restricted surface water discharge to mitigate downstream flood risk.*
- Where feasible, open SuDS should be prioritised to deliver multifunctional benefits, including improvements to biodiversity, water quality, and amenity value.*

c) Q to WTC. I refer to DC's points 148 – 150 and would be pleased to have comments from WTC.

19. Policy W22: Land off Beverley Road, Littlemoor.

a) Q to DC. Is DC satisfied with Clause 2 vii, or should the 50% affordable housing proportion be made subject to a viability assessment?

Dorset Council response: The addition of a viability clause would be welcomed as the supporting viability assessment highlighted the importance of sensitivity testing and is a point in time.

b) Q to WTC. How can access be achieved to the site?

Dorset Council response: The Transport Development Management Team add that safe and suitable access for all users must be achievable, not certain whether third party land etc would be required, also the area has gradient challenges.

c) Q to DC. Does DC consider the requirements for surface water management advised by the Dorset Council Flood Risk Management Team in the comments of 28 January 2025 should be added either as a criterion or a separate Clause and, if so, what should it say?

Dorset Council response: Clause 2 could be clarified further:

Development proposals should be supported by a surface water management strategy.

Supporting text could clarify the key components of the surface water management strategy.

- *Development must prioritise rainwater harvesting and water re-use as primary measures for managing surface water.*
- *Proposals must demonstrate adherence to the SuDS hierarchy, prioritising infiltration-based SuDS, and restricted surface water discharge to mitigate downstream flood risk.*
- *Where feasible, open SuDS should be prioritised to deliver multifunctional benefits, including improvements to biodiversity, water quality, and amenity value.*

The LLFA would like to add the additional advice note to the policy or supporting text.

Developers of this site must not fill in, interfere with or build within the existing attenuation feature and adequate space must be left around it for maintenance purposes.

20. Policy W23A: Lodmoor Old Tip – North Section

Q to WTC and DC. DC owns the site and has stated it is not available for the proposed use (See DC point 164). Therefore, if that is the case, should Policy W23A be deleted? I would be grateful for comments from both Councils.

Dorset Council response: *The Dorset Council Assets Team control the land and have confirmed that it is not available for employment. The Policy Team would add that on this basis the site is unavailable for development and the site allocation can be deleted.*

21. Policy W23B: Lodmoor Old Tip – Mid-Section

Q to WTC and DC. Does DC intend to retain the Household Recycling Centre on the site as indicated in DC point 180? Is the intention to develop the site for leisure uses side by side with the waste management operations? Comments from both Councils would be welcome.

Dorset Council response: *The Commercial Waste and Strategy team have previously explained that this proposed area is located on the closed former Lodmoor Landfill Site. It includes the Household Recycling Centre (HRC) and the Waste Transfer Station (WTS) leased to Eco Sustainable Solutions.*

The HRC is popular and well used by residents, and Dorset Reclaim making drop offs from the Bulky Item collection service they operate on behalf of Dorset Council. There are no plans to relocate the HRC and no alternative site has been identified.

Dorset Council uses the WTS for green waste and street sweepings. The nearest potential alternative is the new Blandford WTS, currently under construction, however, this would be subject to Environment Agency capacity approvals. If unavailable, the next option would be Parley in Christchurch. These alternatives would adversely affect current service operations.

The Planning policy team would add. The Adopted Local Plan Policy WEY8 permits tourism, low key recreation and ancillary uses, appropriate to its gateway location and its proximity to sensitive sites. Paragraph 7.3.26 clarifies “It is important to the tourism economy as it forms part of the Lodmoor Country Park and contains the major tourist attraction of the Sea Life Centre, and associated facilities such as mini golf, a leisure ranch, and miniature railway. The area is also used for car parking, events and the household waste and recycling facilities.”

On reflection, a key difference between Policy WEY8 and Policy W23B is their geographic scopes. Policy WEY8 covers a far larger area that allows more sensitive uses (leisure) to be located away from the Household Recycling Centre (HRC) and the waste transfer station. An

unintended consequence of Policy W23B cross referencing to the wider Policy WEY8 on a smaller site area is the flexibility within the Local Plan policy has been lost.

Given there is currently no intention to relocate the Household Recycling Centre (HRC) and the waste transfer station, we would suggest this policy is deleted or the area extended, to allow greater flexibility, as originally intended.

22. Policy W23C: Lodmoor Old Tip – South Section

a) **Q to WTC.** Clause 2 viii indicates that a “compliant level of affordable housing” should be included. What does this mean? Is the site being proposed as an allocation for residential use as well as leisure use?

b) **Q to DC.** Given that Policy WEY8 of the Local Plan states that: “Land at Lodmoor will be permitted for tourism, low key recreation and ancillary uses, ...”, does the residential development which is proposed under Policy W23C viii mean that that the policy does not generally conform with the strategic policies of the Local Plan?

***Dorset Council response:** It is understood that the reference to residential development under clause 2 viii is a drafting error and that no residential development is proposed on this site.*

c) **Q to DC.** In addition, is residential development on this site compatible with a high risk of flooding on adjoining land? Does the site satisfy the requirements of sequential testing advised in the NPPF before its allocation for residential use?

***Dorset Council response:** It is understood that the reference to residential development under clause 2 viii is a drafting error and that no residential development is proposed on this site.*

23. Policy W24: Land at Jubilee Sidings

a) **Q to WTC.** Clause 2 i states that the development shall provide “residential particularly social housing”. This is too imprecise for a policy. Please could it be rephrased?

b) **Q to DC.** Does DC wish to suggest any criterion which should be included so far as Flood Risk and Surface Water Management is concerned?

***Dorset Council response:** We are content that clause 4 covers the requirement for a flood risk assessment however clause 4 could be clarified further to cover flood risk safety.*

Development will be safe over its lifetime (in particular the opportunities to form safe access to and from the site, and to evacuate during a flood).

Regarding surface water management, Clause 4 could be clarified further.

Development proposals should be supported by a surface water management strategy.

Supporting text could clarify the key components of the surface water management strategy.

- Development must prioritise rainwater harvesting and water re-use as primary measures for managing surface water.*
- Proposals must demonstrate adherence to the SuDS hierarchy, prioritising infiltration-based SuDS, and restricted surface water discharge to mitigate downstream flood risk.*
- Where feasible, open SuDS should be prioritised to deliver multifunctional benefits, including improvements to biodiversity, water quality, and amenity value.*

Regarding Clause 3ii).

We note the Environment Agency representation has confirmed the withdrawal of its standing advice for Weymouth Town Centre. In this context it is suggested that clause 3ii) is modified to refer to National Standing Advice.

24. Policy W25: Land at Mount Pleasant Old Tip – Transport Interchange

Q to WTC. What does the acronym PEV stand for in Clause 4?

25. Policy W27: Community Housing Schemes

Q to WTC. DC raises some fundamental deficiencies with the policy in point 214. Please could WTC redraft the policy accommodating the issues raised and so enabling it to have regard to national policy?

26. Policy W30: Exception Site Development

a) Q to WTC. DC suggests clarifying the policy by dividing it into two; First Home Exception Sites and Rural Exception Sites (See DC point 242). Please could WTC redraft the policy in that style.

b) Q to WTC. Clause 5 states that “a small proportion of open market homes with a permanent residency condition” may be acceptable within an exception housing scheme. What is a permanent residency condition and what is the evidence to justify it?

27. Policy W31: Principal Residency Requirements

a) Q to WTC. Paragraph 9.152 of the Plan indicates the concern “... that, unrestrained, further open market housing development may increase the number of second homes and increase the number of people moving into the area whose buying power will force up local prices disadvantaging local people.” However, DC has commented (DC point 251) that there is limited evidence to suggest that second homes are the main issue, rather the data suggests it is vacant homes. This is illustrated by the DC Background Paper in support of the emerging Dorset Local Plan which found that Weymouth has one of the lowest percentages of second home ownership in Dorset, between 0.6% to 1.5% depending on the source of the evidence (DC point 253). Therefore, on that basis, would Policy W31 make a significant difference to enabling housing to be more affordable to local people?

b) Q to WTC. Paragraph 9.157 states “... all new dwellings built during the Plan period.” I assume this means in the area designated in Policy W31 and Map 26, not the whole Plan area?

c) Q to WTC. DC (point 250) suggests that consideration should be given to the application of Policy W31 to MSOAs 044B; 044C and 044E where the percentage of vacant and second homes rises above 20%. Please could a map be submitted delineating those MSOAs?

28. Policy W34: Sustainable Development

Q to WTC. Clause 2 ii states: “energy conservation measures and renewable energy technology predominate.” What does this mean in practice and how can the requirement be enforced through development management?

29. Policy W35: Loss of Business Premises

Q to WTC. DC lists some informative points in 276 to 282. Please could WTC consider redrafting Policy W35 to ensure that it generally conforms with Policy ECON3 of the Local Plan, including reducing the 18 months marketing period to 12 months?

30. Policy W36: New Business Development

a) Q to WTC and DC. Clause 1 iv. Would expressing the requirement as follows satisfy DC point 284:

“in the case of retail use outside the town centre, not resulting in an over provision in the locality”?

I would be pleased to have comments from both Councils.

Dorset Council response: *The suggested wording would address our concern raised at point 284 and can be supported.*

b) Q to WTC. Should there be additional Assessments listed in Clause 4?

31. Policy W37: Mixed Use Employment Schemes

a) Q to WTC. The strategic approach of Policy ECON2 of the Local Plan is explained in paragraph 4.3.4 in so far as, in considering proposals for mixed use redevelopment, the aim is to retain an equivalent amount of jobs on the site. This is in direct conflict with the intention stated in paragraph 10.31 of the Neighbourhood Plan for 30% of the previous number of jobs to be a reasonable target. Does the WTC have any comments?

b) Q to WTC. How would criterion v be implemented? See DC point 292. If a redevelopment scheme is judged acceptable by passing all the tests set by the policies of the Development Plan, how can redevelopment be effectively prioritised ahead of conversion?

c) Q to WTC. In view of Policy W18. Clause 2 i, shouldn't paragraph 10.31 read 35% affordable homes instead of 50%?

32. Policy W39: Weymouth Town Centre

a) Q to WTC and DC. Would the following suggested rephrasing of Clause 2 iv meet the reservations of DC in point 299?

“Where appropriate, to provide housing to meet local needs including at least 35% of affordable homes;”

Dorset Council response: *The suggested wording would address our two concerns raised at point 299 and can be supported.*

b) Q to WTC and DC. In Clause 4, the phrase: “... make better use of the upper floors and underused floorspace ...” appears too subjective to be used for development management. Would “... more intensive use ...” more be effective? I would be pleased to have comments from both Councils.

Dorset Council response: *We agree the suggested wording is more precise for development management purposes and can be supported.*

33. Policy W40: Temporary Activities and Uses.

Q to WTC. The comments made by DC in points 304 and 305 about temporary planning permissions are quite accurate. The evidence in paragraphs 10.46 – 10.50 of the Plan suggests that the aim of the policy is to support seasonal uses subject to the criteria which are listed. Therefore, should the policy heading be “*Seasonal Activities and Uses*” and in Clause 1, the words “temporary” be replaced by “seasonal”?

34. Policy W43: Community Energy Schemes

Q to WTC. Paragraph 10.67 states that: “... community investment opportunities should be offered first to those residing in the area and at least 33% of a Community Energy project should be owned by residents of the Plan area”. What is the basis for 33% and how will this be implemented?

35. Policy W57: New Burial Grounds

a) Q to DC. DC comments (preceding DC point 337) that burial grounds are allowed in the countryside provided they meet need and accord with other policies of the (Local?) Plan. What is the basis of this statement?

Dorset Council response: Cemeteries are listed within the supporting text to Policy COM4 as an example type of open space, sports and recreation facility. Policy COM4 permits new or improved open space or recreation facilities provided they are well-located to its main catchment population and would not generate significant single purpose trips. Proposals for recreational facilities can be located away from settlements if they require a countryside location, and their scale is in keeping with the surrounding environment.

b) Q to WTC and DC. Assuming the above is correct, and taking into account the DC point to include local need, landscape and access considerations in the policy, I would be pleased to have comments on the following rephrasing of Policy W57:

“Proposals for new burial grounds will be supported in principle, subject to local need, the avoidance of significant harm to both residential amenity and the landscape and the provision of suitable access which would not cause severe danger to traffic.”

Dorset Council response: The rephrasing of the policy reflects our comments raised at point 337 and can be supported.

The rephrasing however loses reference to the requirements of the Environment Agency. A detailed survey is required to determine the most appropriate location for burial grounds with the expectation that the Environment Agency are consulted to check ground conditions and any danger of water pollution.

- [Protecting groundwater from human burials - GOV.UK](#)
- [Cemeteries and burials: groundwater risk assessments - GOV.UK](#)