

Mr Glenn van der Pas

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WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

Friday 24 January 2025 until Thursday 10 April 2025

Response Form

The proposed Weymouth Neighbourhood Plan has been submitted to Dorset Council for examination. The neighbourhood plan and supporting documentation can be viewed on Dorset Council's website: <https://www.dorsetcouncil.gov.uk/w/weymouth-neighbourhood-plan>

Please return completed forms to:

Email: NeighbourhoodPlanning@dorsetcouncil.gov.uk

Post: Spatial Planning, Dorset Council, County Hall, Colliton Park,
Dorchester, DT1 1XJ

Deadline: **End of Thursday 10 April 2025.** Representations received after this date will not be accepted.

Part A – Personal Details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. By submitting this response form you consent to your information being disclosed to third parties for this purpose, personal details will not be visible on our website, although they will be shown on paper copies that will be sent to the independent examiner and available for inspection. Your information will be retained by the Council in line with its retention schedule and privacy policy (www.dorsetcouncil.gov.uk/privacypolicy). Your data will be destroyed when the plan becomes redundant.

	Personal Details *	Agent's Details *
Title	Mr	
First Name	Glenn	
Last Name	Van der Pas	
Job Title(if relevant)		

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Email Address	<div></div>	

**If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.*

Part B – Representation

1. To which document does the comment relate? *Please tick one box only.*

	Submission Plan
	Consultation Statement
	Basic Conditions Statement
	Other – please specify:- Strategic Environment Assessment

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	x
Section	
Policy	
Page	
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Please refer to this link:

<https://www.weymouthneighbourhoodplandemocracy.org.uk/commentary-on-sea>

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop PolicyW20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
	No

Signature: _____ Date: _____
If submitting the form electronically, no signature is required.

Commentary on SEA

Commentary on SEA as it relates to Policy W20

1. The SEA report is listed at https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/12/Weymouth-NP-SEA_Environmental-Report-November-2024.pdf in the documentation submitted to DC. It is listed as “November 2024”, is very similar to the previous versions submitted on 5 September 2023 and 25th October 2023. This version is dated 29th November 2024, was listed on the agenda for the WTC meeting on 20 November 2024 and was authorised by AECOM on 6 December 2024. It was, therefore, not available, as a key document, to WTC Full Council, or considered by them, when they voted to submit the WNP to DC. **The fundamental flaw with this document is that it only considers 41% of the capacity of the site, 112-135 homes, instead of the 250 allocated in the WNP and the 270 desired by the developer is his REG14 submission.**

2. In considering why policy WNP24 was dropped from WNP but the adjoining site WNP25 continued to go forward as W20, it is vital to consider the SEA.

3. This is because it was confirmed by WTC that the reason for dropping WNP24 was due to SEA reasons. This is confirmed by document <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/Compendium-of-Policy-Changes-to-Pre-Submission-Plan-November-2024-1.pdf> at page 2. This document has not been submitted to DC as part of the package for consideration by The Inspector. It says: “Policy deleted as a result of concerns raised regarding **Biodiversity, Community Well-being, Landscape, and Transportation** in the SEA, Dorset Council and by residents”. These SEA reasons were further confirmed on 10 February 2025 by the chair of the SG, Cllr Northam, in his address to a public meeting of residents. This recording is at https://drive.google.com/file/d/18jZAN8fHlIHgg4Dy_9xuaVAOWqaHQQQn/view?usp=drivesdk at 26minutes and 36 seconds. WNP24 and the new W20 are essentially the same field and therefore the SEA conclusions should be similar.

4. BACKGROUND

Neither WNP24/WNP25/W20 were mentioned in the extant Dorset Local Plan 2015. In February 2017 they both appeared as Site G in the **Sustainability Appraisal Issues and Options** <https://www.dorsetcouncil.gov.uk/documents/35024/296265/Sustainability+A>

[ppraisal.pdf/86f627ea-0374-adf7-a5e3-a19101a23f50](#) as a combined Site G on page 48. They came forward into the WNP as 2 sites because of the different ownership. At page 50 of the 2017 report, it shows the conclusions as being 6 Red Flags out of 11 criteria. **Biodiversity, Landscape and Climate Change** scored Red Flags and Community scored “negligible effect”. **Transportation** was not considered. **Flooding** scored a Red Flag in its own right along with **Climate Change** but was subsumed into “Climate Change” alone for the 2024 report. This is peculiar because the 2017 report listed at para 8.1.7 on page 51: “The River Wey and its tributaries, and the flood plains associated with this river system and other surface water features surrounding Weymouth, occupy large areas of the land surrounding the town. Development would result in adverse impacts upon water quality and expose property and residents to flooding in areas to the west of Broadway and Redland (areas I and K), in those areas surrounding the Lorton Valley Nature Park (areas F and G), around Preston (areas A and B) and the coastal areas to the West of Weymouth (areas M).”

After this 2017 Review, in 2018 came forward the **Sustainability Appraisal Preferred Options** conclusions <https://www.dorsetcouncil.gov.uk/documents/35024/296265/20180802+-+Sustainability+Appraisal+Preferred+Options+%28FINAL%29.pdf/4c515ee5-159c-4b10-d646-24ec390b9735> which was to form policy until discontinued when West Dorset DC ceased and DC was formed. In this, at page 80, the combined site G had disappeared and basically only WNP24 came in as Site W1. However, for reasons unknown, “Land at Wyke Oliver Farm” appeared on page 83 as a policy WEY14 and no map at all was contained in this document to show its location. The evolution of “WEY14” has been tracked over the years as:

1. West Dorset and Weymouth draft Local Plan June 2012 WEY14 was “land to the south of Lorton Lane”
2. Ditto June 2013 WEY14 was “Bowleaze Cove”
3. Doesn’t figure in the extant lawful Local Plan at the moment (2015)? Page 149 shows WEY14 as “Bowleaze Cove”
4. Appears in the 2017 Local Plan Sustainability Appraisal Issues and Options Review at pages 48-52 as “Area G” with no other designation but shown on Map
5. Appears in the 2018 Local Plan Sustainability Appraisal Preferred Options Reviews at pages 80-85 as “WEY14 Land at Wyke Oliver Farm” but is not shown on any map in that document for clarification as to location or content
6. Appears on page 3 of Dorset Environmental Records Centre Ecological Survey September 2021 as WEY14 “Redlands Farm, Wey Valley”

7. Appears in Dorset Council Local Plan consultation 2021 summary of responses – Weymouth on page 24 as WEY14 reverting back to “Land south of Wey Valley”
8. WEY14 Appears in the AECOM WNP Site Options and Assessments Report January 2023 on page 20 as “Bowleaze Cove”
9. Ditto p
age 35 as WNP14
10. Ditto p
age 36 as LA/WEYM/012 as “Wyke Oliver Farm (North)”
11. Appears in draft of WNP as Policy WNP25 Land at Wyke Oliver Farm North
12. Appears in statutory document WNP as W20 Land at Wyke Oliver Farm North
13. Appears in statutory consultation WNP document Viability Report on page 2 in contents as WNP25 Land at Wyke Oliver Farm North
14. Appears in statutory consultation WNP document Viability Report in unnumbered pages Annexe 3 over many pages as WNP14 Land at Wyke Oliver Farm North

5. BIODIVERSITY

We rely on pages 31 and 53 of the **SEA Statutory Report**, which compares **Biodiversity**. This was given a Red Flag to WNP24 and an “uncertain” flag to WNP25. It was given a Red Flag to the joint site in the **2017 Appraisal** and a Red Flag to the **2018 Preferred Options** for WNP24. In the Statutory SEA Document for 2025 it continues to be shown for WNP24, although this site had been dropped, at page 31 as a Red Flag and now downgraded for WNP25/W20 at page 53 as an “uncertain” effect. On reading, both are incredibly similar in description with regard, for example, to proximity to the SSSI. The site indicated for WNP24 on page 30, by this time, was no longer accurate as far as **Biodiversity** was concerned because it had been agreed to drop fully one-half of the site at the west and give it over to the SSSI, restricting development to just the portion north of Brackendown Avenue. So, the **BAP Priority Habitats** took little or no prominence and both sites should, probably, have scored “uncertain” and neither “Red”. This can be better visualised at the 3 maps on pages 1-3 of the attached pdf.

Much is made about the transfer of 31.9ha of land (WNP24 8.5ha and WNP25 23ha) to the Lorton Valley Nature Park as shown in the Statutory Bundle <https://www.dorsetcouncil.gov.uk/documents/d/guest/change-summary-wnp-policies-post-reg-14-november-2024> at pages 2 and 4. This is simply no longer the case once WNP24 was dropped because the transfer of land by the owners was conditional on development going ahead. This shown on Map 2 in the attachment. The portion coloured orange must now be considered lost for the LVNP and, as a result, W20 land for either Dorset Wildlife Trust or LVNP coloured blue is no longer contiguous with the Reserve and there is no evidence to show that it will be viable in isolation. There is no certainty at all that residents in W20 will have access to LVNP as it stands, over the orange land, which will now presumably remain farmed under the ownership of Southdown Farm. At page 82 of <https://www.dorsetcouncil.gov.uk/documents/d/guest/reg-14-analysis-final-28-02-2024> Dorset Wildlife Trust stated: “These proposed allocations are those which are anticipated to have the potential for greatest impacts on biodiversity.” The assurance of this transfer formed the basis of DC’s comments in Reg 14 about WNP25 and is now unsafe.

6. Community Wellbeing

We rely on pages 32 and 54 of the SEA Statutory Report, which compares **Community**. This was given a Red Flag to WNP24 and an “uncertain” flag to WNP25. It was given a “negligible” to the joint site in the **2017 Appraisal** and the same to the **2018 Preferred Options** for WNP24. In the Statutory Document for 2025 it continues to be shown for WNP24, although this site had been dropped and it is not clear why AECOM would still want to include it, at page 32 as a Red Flag and “uncertain” WNP25/W20 at page 54. Some of the differences are:

1. WNP24, but not WNP25/W20 says: “new development distant from the town centre”. Actually, WNP25/W20 is as, or more, distant from Weymouth as can be seen from the attached maps. This is explored more below under **“Transportation”**.
2. For W20, this section of the SEA at pages 52 and 54 falsely lists it as: “the potential to deliver between 112-135 new homes”, whereas Policy W20 calls for 250 and the developer for 270 homes. Its categorisation as “uncertain” is therefore deeply flawed.
3. WNP24 gets a Red Flag: “Allocating it for development would contribute to the closing of the gap between Overcombe to the south-east and Littlemoor to the north. This could lead to coalescence effects if further development were to come forward to the north and west of this site.” This effect is missing entirely

from WNP25/W20, which is actually to the north. The coalescence effects of W20 are all too obvious.

4. WN24 confirms: “it would be difficult to access the servives (sic) and facilities in Weymouth.” W20 says: “there is uncertainty over how well it will connect to the main settlement of Weymouth”. This is explored more below under “**Transportation**”.

7. Landscape

All 4 documents from 2017, 2018, WNP24 and WNP25/W20 score this as a Red Flag, primarily for the reasons of coalescence with Littlemoor, loss of Green Gaps and loss of Wildlife Corridor, in contravention of other policies within WNP such as W14 9.21: “Any development proposals that are considered permissible should be accompanied by a landscape character assessment to establish that there will be no adverse visual impact on the character and sensitivity of the landscape”. In a different AECOM report <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2023/01/Weymouth-Neighbourhood-Plan-Site-Assessment-Final-Report.pdf> at page 165 their SHLAA conclusion was: “The site is located outside the development boundary and within land of local landscape importance and an important open gap. Unacceptable landscape impacts. An unsuitable site.

Suitability: The site is located outside the development boundary and within land of local landscape importance and an important open gap. Existing development is already intrusive; particularly areas on upper slopes. Unacceptable landscape impacts. Farm buildings could be converted, development unacceptable in undulating and elevated open landscape”

8. Transportation

We rely on pages 34 and 56 of the SEA Statutory Report, which compares **Transportation**. This was given a Red Flag to WNP24 and an “uncertain” flag to WNP25. It was not given as a criterion in either the 2017 or 2018 reports referred to above.

A. It is a nonsense in both WNP24 and W20 that: “This allows for access to services in the centre via the B3159.” This is illustrated on maps 4 and 5 of the attached pdf. If the footpaths were even in existence (which they are not) google earth shows it to be well in excess of 2km by foot to reach the B3159. Nor is the B3159 reachable by bus. It is a nonsense (map 6) that “There are bus stops in proximity to the northern site boundary – approximately 75m to the north”. The bus stop to the north is shown on Map 6A as 255m from the centre of the northern part of the site and either impossible or much

further from the southern part of the site. There are no services from this stop which go along the B3159. Just a few times a day it might be possible to catch a bus to Dorchester from this stop, then change route further along the line at Littlemoor for the B3159 bus to Weymouth. Even the bus stop shown closest to the northern part of the total site (the southern part of the site is much further) would also involve great elevation changes of at least a 10-storey building, make it further unwalkable. No account has been taken of changes in elevation in the area. The bus stop at Charlbury Corner, for example, is at an elevation of 13m and the top of the site is 40+m. Walking around the hills would add many hundreds of metres instead of the “as the crow flies” approach (Map 7 at least 723m). Map 8 shows that the statement in WNP24 on page 34 is misleading that the nearest bus stop was 740m away. This might have been to the entry of the site, but Map 8 shows the median point to be 885m away and the end of the site to be about 1000m away.

B. Page 82 of WNP at 9.30 suggests that a “walkable” neighbourhood should have facilities “within 800m”. Dorset Council has no policy on this in NP’s since each site is different. This particularly applies to W20 with the very large changes in elevation, making both walking and cycling very challenging. Policy suggested by Sustrans in 2022 <https://www.sustrans.org.uk/our-blog/research/walkable-neighbourhoods-building-in-the-right-places-to-reduce-car-dependency/> was that “LPAs should develop [Supplementary Planning Documents](#) that set accessibility standards based on 800m walking and wheeling distances to key services, and 400m to bus stops.” Map 9 shows the practicable bus stop at Charlbury Corner to be no less than 800m away using a mixture of “crow flies” and existing roads, evidently final site design will make this much further.

C. In giving an “uncertain” status to W20, the SEA report concludes there will be: “high private vehicle use” to the site for the above reasons, in contradiction to Policy W51, Traffic Impact: “Development proposals to reduce the volume and impact of motor vehicles” therefore making the site unsustainable for **Transportation**.

9. Climate Change and Flooding

There is no dispute that Flooding is the single greatest threat to Weymouth through Climate Change. The DC comment on page 196 of their Reg 14 says under para 194: “Flooding – a lack of criterion referring to flood risk is a concern”. At page 197 para 202 Dorset Council concluded its Reg 14 with: “It is therefore recommended that these site constraints are investigated in advance of formal site allocation and co-ordinated through ‘initial’ master planning work reflecting an iterative process to site design”. The site has been formally allocated and there is no sign of this work having been done.

Strangely, the SEA only makes oblique reference to this and denies Flooding a separate chapter, even though it was a separate chapter in both the 2017 and 2018 Local Plan Reviews. On page 54 under **Land, soil and water resources** it says: “there are no watercourses on the site.” This is not true. The valley existing where the southern slope of the northern sector of the site drains together with the northern slope of the southern sector is a watercourse. It drains into a culvert at the Farm, whence it is ducted underground in a culvert for over 1000m into the Lodmoor Marshes. It cannot cope with serious rainfall and was notably the cause in the 1980’s of the Farm being flooded, a wall demolished to allow the internal water to escape, which flooded nearby houses. Buried within this valley is a pressurised sewer main from Littlemoor to Lodmoor Marshes, see schematic from Wessex Water on Map 10 in the attachment, where the sewer is orange and the second culvert blue containing surface water run-off from Littlemoor. Wessex Water confirm this as “Draft Policy WNP25: Land at Wyke Oliver Farm North There is an existing pressured pumping (rising main) which crosses the proposed development site. There must be no building over or near the main. This is to ensure that buildings do not damage the pipe and to enable continued access for future maintenance and repair" at page 3 of their Reg 14 submission https://www.dorsetcouncil.gov.uk/documents/d/guest/wessex-water-response-weymouth-neighbourhood-plan-reg-14-consultation-feedback-form-dec-2023_redacted

There is a small area of Flood Zone 3 on the site (where the 2 slopes drain together) and Map 14 on page 65 of WNP makes this clear, along with the stretches of Wyke Oliver Road which are Flood Zone 3 and then the whole of the transit down to the marshes.

On the first page at para 5 of <https://www.dorsetcouncil.gov.uk/documents/d/guest/change-summary-wnp-policies-post-reg-14-november-2024> it says: “A significant concern raised by residents, and the Environment Agency has been the Flood Risk both from climate change increasing wave surge, sea levels, rain and storm incidence”. This relates only to Weymouth Town Centre and no work was undertaken to consider the other 2 major flood risks to the east of the town centre and at W20. In their Reg 14 <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/FULL-Reg-14-Response.pdf> when considering site WNP25/W20 Wyke Oliver the Environment Agency said at page 243: “A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time. To assist in the preparation of any document towards achieving sustainable development we have

identified the key environmental issues within our remit that are relevant to this neighbourhood area and the proposed allocated sites and provide guidance on any actions you need to undertake. We also provide hyperlinks to where you can obtain further information and advice to help support your neighbourhood plan. Flood Risk The neighbourhood plan area and the some of the proposed allocated sites are located within Flood Zone 2 and 3. In accordance with the National Planning Policy Framework (NPPF) paragraphs 159-164, we remind you that the Sequential Test should be satisfied as your plan is proposing development or promoting growth. This should ensure development is directed to the areas of lowest risk of flooding, taking climate change into account. The application of the Sequential Test should be informed by the Local Planning Authority's Strategic Flood Risk Assessment (SFRA)." The SG of WNP acknowledges this at pages 4 and 5 of document <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/Reg-14-Analysis-Final-28.02.2024.pdf> There is no evidence in the WNP that this advice from EA, particularly sequential testing and FCERM, has been carried out, nor the advice to consider "Issues of contamination and flood risk at Lodmoor". It further said: "ensure policiesWNP17, WNP20, WNP39....." but this has not been done nor carried through the changed Policy Numbers in the formal submission of WNP and not applied to Policy W20.

The EA is clear about Climate Change above and the latest guidelines are that surface water flows 45% above today's values must be incorporated. This has not been done in spite of proven history of flooding to local houses from the Preston Brook and overwhelmed culvert of more than 1000m leading to Lodmoor Marshes.

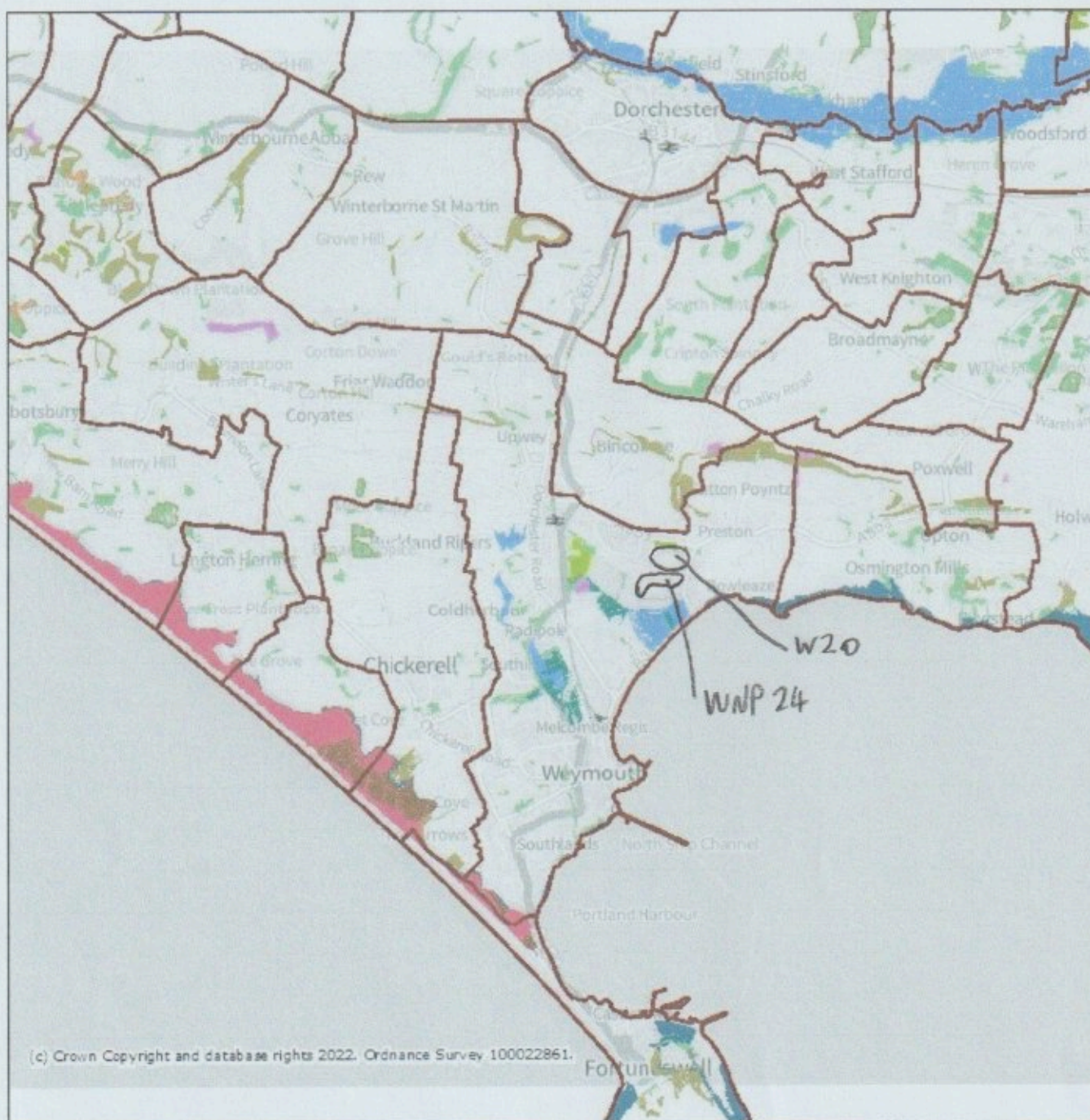
The Dorset Council Flood Risk Management Team at page 232 in their Reg 14 response said: "Land at Wyke Oliver Farm North Due to existing downstream flooding issues and constraints in the form of a long stretch of culvert, rainwater harvesting, and water re-use should be the first priority for inclusion within the proposed surface water management strategy. This could help to reduce the volumes of surface water making its way downstream and therefore reduce the risk of flooding. Applicant must demonstrate that the SuDS hierarchy has been followed and infiltration must be prioritised as the proposed means of surface water management. A developer will need to demonstrate that they have carried out site specific ground investigations. Infiltration rates are likely to vary across the site due to the varying geology and careful consideration will be required in order to locate SuDS features appropriately. Care should be taken to carry out infiltration testing to the standards set in BRE Digest 365 at the depth and location of any proposed infiltration-based SuDS. Groundwater monitoring across the course of the year will be required in order to demonstrate that

groundwater will not impact the functioning and reduce the attenuation volume of any proposed soakaway features. Attenuation of surface water and a restricted discharge to the adjacent watercourse may be considered in the event that infiltration is proven not to be viable but as there is a significant constraint in the form of a long stretch of downstream culvert the LLFA may require additional restrictions on surface water discharge above and beyond greenfield rate in order to minimise risk to downstream areas. Open SuDS must be prioritised with multifunctional benefits including improvements to amenity, biodiversity and water quality". In their response to this, the SG wrote at page 106 of:

<https://www.dorsetcouncil.gov.uk/documents/d/guest/reg-14-analysis-final-28-02-2024> "Refer, in the supporting text, to comments by the Flood Risk Management Team and the required evidence and supporting documents". This has not been done in the WNP under policy W20.

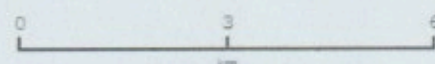
The residents have consistently brought this to the attention of the SG but, if there were any doubt, this is the text which Cllr Orrell, Mayor of Weymouth and respected GP, wrote in January 2025: "I note the references to climate change and flooding. I fully comprehend the science in this area and the various impacts calibrated by degrees of warming.

Preston is certainly at risk. We have had briefings from the Environment Agency over the last decade which set out the firm predictions. I grew up in the area with my parental home at [REDACTED] just up from the old Streamside Hotel (where we had our wedding reception). The stream it was beside also ran through our garden. I have seen it flood on several occasions and reach nearby bungalows built in the flood plain. The whole valley is at risk up to my old surgery near Chalbury corner. The sea wall will not last the century. The whole matter needs to be an area for substantial investment and redesign even without any new houses."



Legend

- Parishes (GB)
- Priority Habitat Inventory - Maritime Cliffs and Slopes (England)
- Priority Habitat Inventory - Mudflats (England)
- Priority Habitat Inventory - Saline Lagoons (England)
- Priority Habitat Inventory - Coastal and Floodplain Grazing Marsh (England)
- Priority Habitat Inventory - Good quality semi-improved grassland (Non Priority) (England)
- Priority Habitat Inventory - Lowland Calcareous Grassland (England)
- Priority Habitat Inventory - Lowland Meadows (England)
- Priority Habitat Inventory - Reedbeds (England)



Projection = OSGB36

xmin = 347500

ymin = 73190

xmax = 387000

ymax = 91670

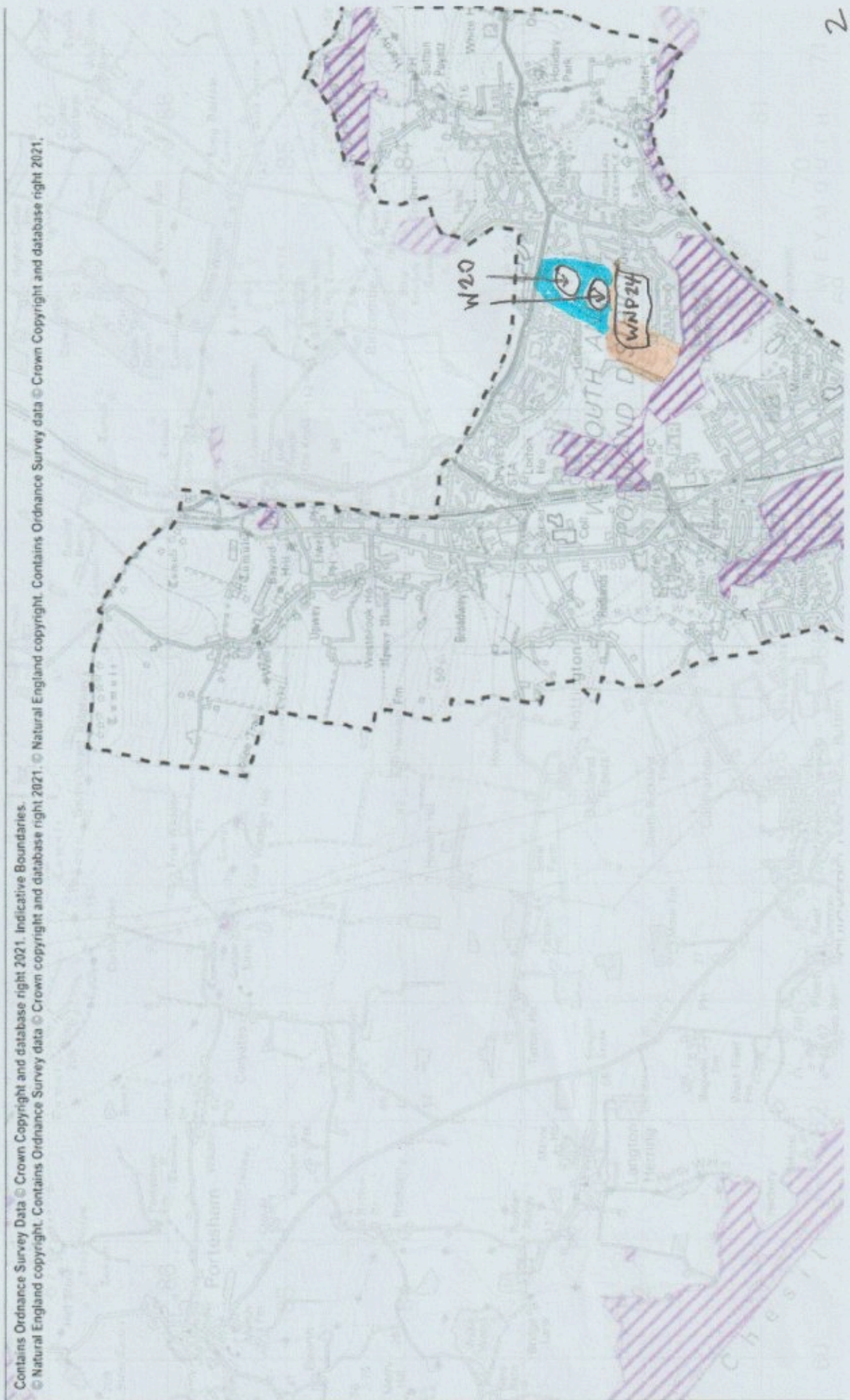
Map produced by MAGIC on 28 April, 2022.
Copyright resides with the data suppliers and the map must not be reproduced without their permission. Some information in MAGIC is a snapshot of the information that is being maintained or continually updated by the originating organisation. Please refer to the metadata for details as information may be illustrative or representative rather than definitive at this stage.

Figure 3.3: Biodiversity Action Plan (BAP) Priority habitats in the neighbourhood area

Strategic Environmental Assessment (SEA) for the Weymouth Neighbourhood Plan

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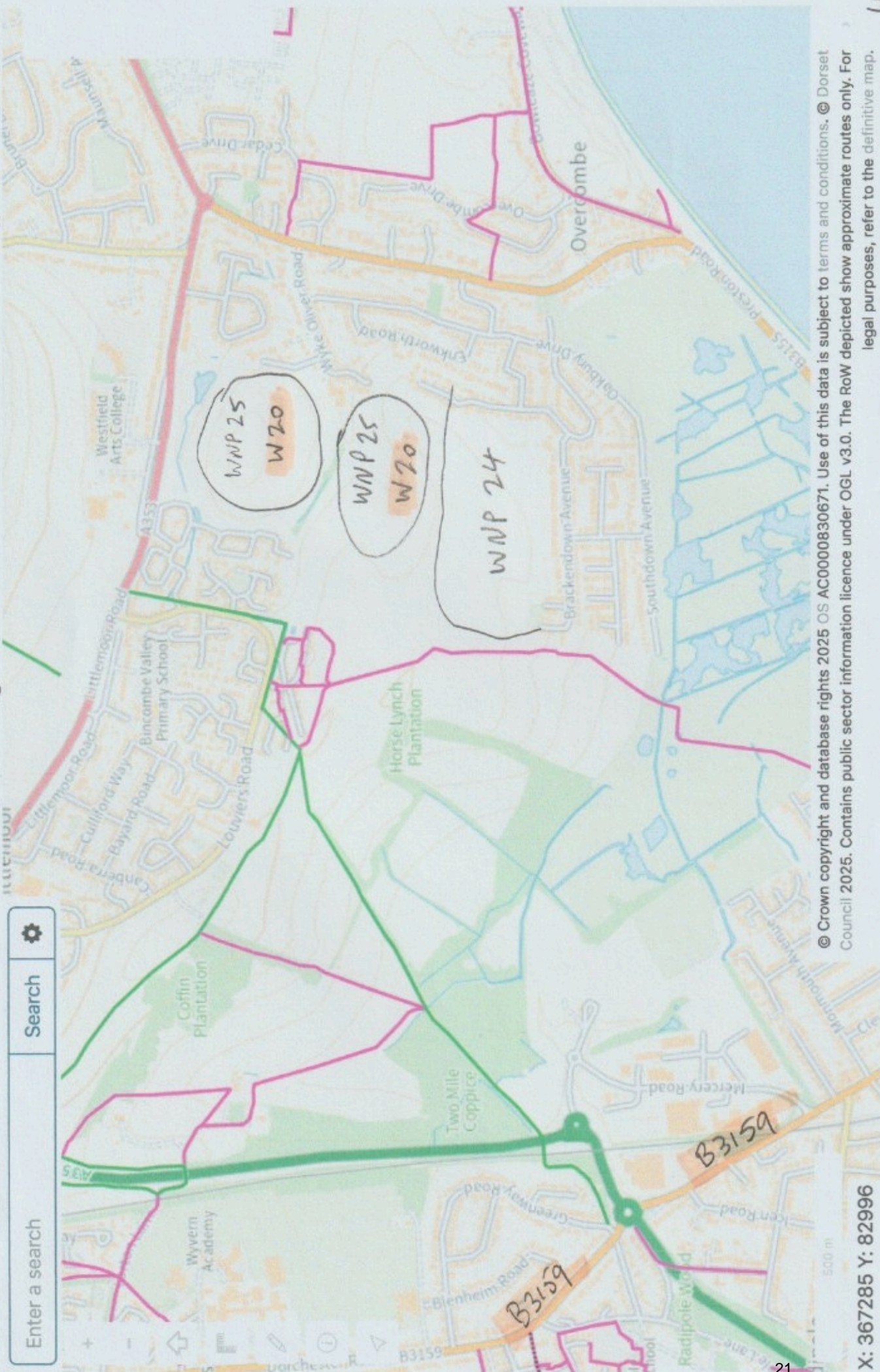


Map 20: Allocated Residential Development Sites



PRoW. purple
Bridleway green

DorsetExplorer Help Change version



© Crown copyright and database rights 2025 OS AC0000830671. Use of this data is subject to terms and conditions. © Dorset Council 2025. Contains public sector information licence under OGL v3.0. The RoW depicted show approximate routes only. For legal purposes, refer to the definitive map.

X: 367285 Y: 82996



Map 19: Land at Wyke Oliver Farm North





WNP 24 bus stop

Prestatun

Measure

Click points on the map to measure

Length
895.25 m

Done

Done

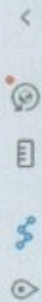
Layers

Google 100% Data attribution 30/03/2016

300 m

Camera: 3,182 ft

W20, bus stop + facilities



Path or polygon

Click points on the map to

Length
797.09 m

Done



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1. To which document does the comment relate? Please tick one box only.

x	Submission Plan
	Consultation Statement
	Basic Conditions Statement
	Other – please specify:-

2. To which part of the document does the comment relate? Please identify the text that you are commenting on, where appropriate.

	<i>Location of Text</i>
Whole document	
Section	Foreword
Policy	
Page	Unnumbered page
Appendix	

3. Do you wish to? Please tick one box only.

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

I comment on the Process and the Lack of Democracy in response to the Foreword

1. My submission is that the Weymouth Neighbourhood Plan (WNP) has been a political process carried out by the LibDem controlled Weymouth Town Council) WTC and, in particular, to support their flagship policy of Affordable Housing. The opening line says that "Weymouth Town Council determined that a Plan was required for the whole of Weymouth rather than individual Plans from each area". Residents were not asked what they thought but the Government says Neighbourhood Plans (NP) are supposed to be a bottom-up process led by residents and not a top-down process imposed by politicians. Weymouth is not a 'Neighbourhood', it is a conurbation of approx 54,000 and a feature running through the published Minutes of the Steering Group (SG) is that the people did not feel engaged about their local area and, as a consequence, it was constantly minuted that engagement was very poor. I will show that the SG relied on an input from just 34 residents for their policies, that is 0.06% of the population.
2. The leader of WTC is Libdem Cllr Harris and the chair of the SG is Libdem Cllr Northam. Both of these people strongly objected to the democracy of residents of Sutton Poyntz to form their NP. When they did this, WTC voted to reject the SP's Plan but Dorset Council subsequently allowed it. It is a curiosity, therefore, that there is a plan-within-a-plan and the Sutton Poyntz NP shows within the WNP against the wishes of WTC. Cllr Harris and Cllr Northam did a copy-and-paste submission in opposition "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." <https://www.dorsetcouncil.gov.uk/documents/35024/294468/Sutton+Poyntz+Neighbourhood+Plan+-+Summary+of+reps.pdf/e44be6fc-87ce-07d3-8179-6db48a75bdbf>

3. It has been a feature of the WNP that the SG has worked in secrecy whereas normal business of WTC takes place through democratic committees and these committees meet and discuss in public and the business is video recorded for dissemination and full minutes of decisions are provided. The SG composition was not approved by residents, they have met in secrecy, they change their composition by their own internal elections, are unaccountable to the people, there is dissent within which is voted on in secrecy and not made public. The WNP states: "Steering Group members have supported regular monthly meetings". "Supported" should say "attended" and these meetings are poorly supported by very truncated public minutes. I hope The Inspector will examine these and agree that they can only possibly have any sense to those people who were actually present.
4. WTC declared a Climate and Ecological Emergency in 2019. This Foreword talks about "major concern", "critical" and "flooding in the Town Centre". The plan was substantially delayed while waiting for Dorset Council to provide current flood information for the town centre. Residents to the east of Weymouth, in Preston, have submitted complaints about flooding to their Council over decades but this area has been ignored by the WNP as regards flooding. It has been known for many years that Weymouth and Preston will be underwater and was confirmed on 24 April 2022 by this link: <https://www.dorsetecho.co.uk/news/20090052.areas-weymouth-underwater-2030/>
5. The Foreword goes on to say that the approx. 1,450 Reg 14 Consultation responses have been "analysed" and this led to a mandate of 147 responses in favour of the plan and 141 against (Page 20 of the Consultation Statement). Importantly, Policy W20 of the Plan (previously Policy WNP25) has been omitted from this Statement, but WTC published that there had been about 1450 Reg 14 responses from this Consultation in December 2023. Despite residents FOI requests, and more than 1 year elapsing, WTC have not published a breakdown of this, the largest consultation response over 5 years. Document <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/12/Reg-14-Consultation-Analysis-of-Post-Codes.pdf> shows that there is overwhelmingly negative comments from residents affected by flooding to the east of Weymouth.
6. The closing statement of the Foreword thanks residents for "responding to our surveys that have shaped a plan for all of us". It has been a feature of the process that the "surveys" were subjective, selective, undemocratic, and rejected when they did not suit the political objective. On the face of it, the SG constantly implored residents to react and comment. In particular for the 3rd Consultation an inflexible questionnaire was put forward for response, but no free

comment allowed. This questionnaire (Survey Monkey) could only be responded to on a basis of '1 per household' not per resident and so as many as half of the residents were not able to respond. WTC subsequently apologised for this and promised to improve. But this consultation achieved the largest ever response of 573 people. Please see page 14 of the Consultation Statement. The SG say that there was "interference" to their process by the very people they implored to comment. The "interference" was that Preston Councillors called a public meeting on 25 Jan 2023 during this very tight consultation period of 17-30 January to explain their concerns that 500 new houses would be built in Preston. The Consultation Statement <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/12/WNP-Consultation-Statement-December-2024-4.pdf> at page 14 does not show that from the 573 responses about building 500 new houses 18% were in favour, 64% were not and 18% didn't know. This is all documented extensively on the site weymouthneighbourhoodplandemocracy.org.uk. The Party-Political leaflets from the time are at <https://www.weymouthneighbourhoodplandemocracy.org.uk/the-leaflets>. Cllr Northam reported the Preston Councillors to Jonathan Mair, the Dorset Director of Legal & Democratic (Monitoring Officer) for sanction for their behaviour. Cllr Harris wrote that the Preston leaflet was "lies" as to the 500 houses, but the figure subsequently became apparent at 570. Mr Mair refused to become engaged in this. Cllr Northam then wrote to Locality for their advice, they responded with the advice "you might also want to re-survey individuals to gauge their views on the sites". This is all shown at <https://www.weymouthneighbourhoodplandemocracy.org.uk/dorset-council-democratic-director> and <https://www.weymouthneighbourhoodplandemocracy.org.uk/my-letters-to-the-dorset-officer-for-democracy>. He did not do this. Instead, he organised the 4th Consultation which resulted in a response from 34 residents (0.06%) across the whole of Weymouth and just 9 people from Preston. The Preston session was held on a Bank Holiday Friday afternoon in late August 2023, with little or no publicity and the admission that the advert for the Dorset Echo had "been delayed" somehow.

7. To this day the SG have refused to meet with residents from Preston wanting to engage with them on a resident-to-resident basis to inform them of the particular difficulties in the area for people making decisions when they don't live there and seem to work from a paper-based 2-D view of the area and allocated housing sites which they have never visited and have refused site meetings with concerned residents. Mr Cheeseman has been a member of the SG since its

inception and he wrote in the Dorset Echo on 22nd May 2024 (<https://acrobat.adobe.com/id/urn:aaid:sc:EU:edc3a30c-0dc4-4c62-85a1-a8211c97cca0?locale=en-US&x-product=AdobeHome%2F1.0&guid=521eed3-fd99-4ea7-80c4-e0e6e0b5e2cd&mv2=ahome&viewer%21megaVerb=group-discover>) "if you want to talk to us about the plan and its contents then you can come and talk to us". His comments about the "wealthy and vocal residents of Preston" said it all. I have been trying to meet with the SG since my email of 11 April 2024 and so Mr Cheeseman's words are disingenuous. The Chair of the SG, Cllr Northam, also assured Weymouth Town Council in Full Council on 20th November 2024 that he would meet with residents but has refused to do so since.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop PolicyW20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

Signature: _____ Date: _____
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1. To which document does the comment relate? *Please tick one box only.*

x	Submission Plan
	Consultation Statement
	Basic Conditions Statement
	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	Introduction 1.1
Policy	
Page	1
Appendix	

3. Do you wish to? Please tick one box only.

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Para 1.1. “applies to the parished area”. In April 2024 the boundaries of Weymouth were changed to the north and west and, in particular, a very large area added to the north, shown in orange <https://acrobat.adobe.com/id/urn:aaid:sc:EU:4b9e096d-5725-4d9a-93c7-a1fef6dea893?locale=en-US&x-product=AdobeHome%2F1.0&guid=9b953cf7-f1d7-4fcb-a060-7915e69c40e3&mv2=ahome&viewer%21megaVerb=group-discover> . This now brings in the substantial 500+ new houses at the development Bincombe Park, who should not now be excluded from the WNP. There are no policies for this significant new area. It also leaves a substantial area adjoining Bincombe Park to the east which appears to be far more suitable for development than the W20 Policy site “Wyke Oliver” just to the south across Littlemoor Road. It would now be possible to both build within the WNP at W20 as well as apply to build to the north opposite because it would not be protected by NP policies. Indeed, there is already a prominent advertising board displayed by DJ Developments offering this land for speculation. It is also not disclosed in WNP that Dorset Council (officers Nick Cardnell and Ed Gerry) have agreed that housing needs do not need to be confined to Map 1. Therefore, the WNP is already obsolete and should be paused and re-considered under these new boundaries and all the development possibilities that come from that. At a Full Council meeting of WTC held on 26 February 2025 boundaries were again raised by the public but Councillors voted to proceed with the outdated boundaries. There was a crucial meeting held between WTC and DC on 31 May 2024. https://docs.google.com/document/d/1-e1FZvlfjEwjkdPV0AsDQvx968PUvDGd?rtpof=true&usp=drive_fs This shows the concerns from WTC about boundaries prior to that meeting and in particular about the opportunities now possible on the northern boundary and the inclusion of the 500+ houses at Bincombe Park to be brought into the Plan. It reflects the difficulties WTC had had in identifying suitable development sites, the preponderance in the Preston area and the Party-Political difficulties between the LibDems controlling WTC and the Conservatives controlling Preston. The final agenda was drawn up to exclude these issues since it would have meant pausing the Plan whilst the

obsolete boundaries were sorted out. Nick Cardnell from DC has said that the agenda change was at the behest of WTC and not from the DC side.

“Jurisdiction of Weymouth Town Council”.

In 2024 the Weymouth town clerk wrote repeatedly that the WNP was not WTC, it was run by a “Steering Group” who were unaccountable, unelected, met in secret without any public scrutiny, changed membership by their own internal elections and people came and went. The wording used was: “The production of the Neighbourhood Plan is led by a steering group, not Weymouth Town Council”

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop PolicyW20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
	No

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<input checked="" type="checkbox"/>	Submission Plan
<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	Introduction 1.2
Policy	
Page	1
Appendix	

3. Do you wish to? Please tick one box only.

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Para 1.2 "Sutton Poyntz Plan is respected". The Libdem Leader of WTC Cllr Harris and the Libdem chair of the Steering Group fought hard against the Sutton Poyntz NP saying that they should be able to decide their own future but should subside into the Weymouth Conurbation. As a result, the SP NP was voted down by WTC and only allowed by the intervention of Dorset Council. No other areas of Weymouth were to be allowed to have their own NP's by edict of

WTC. <https://www.dorsetcouncil.gov.uk/documents/35024/294468/Sutton+Poyntz+Neighbourhood+Plan+-+Summary+of+reps.pdf/e44be6fc-87ce-07d3-8179-6db48a75bdbf>

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop PolicyW20 from the WNP

Continue on a separate sheet if necessary

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	Other – please specify:-

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	<i>Location of Text</i>
Whole document	
Section	Introduction 1.4
Policy	
Page	1
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Para 1.4 "Strategic Policies in the Local Plan" There is no definition of this, but it is assumed to be the 228-page document West Dorset, Weymouth & Portland Local Plan 2015. This document is not shown to be listed for consideration by WTC or DC among the thousands of pages listed for comment and so the WNP can only be properly considered when laid against the West Dorset, Weymouth & Portland Local Plan 2015

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop PolicyW20 from the WNP

Continue on a separate sheet if necessary

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x	Yes
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	<i>Location of Text</i>
Whole document	
Section	Map 1
Policy	
Page	3
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 3 Map 1. This map is obsolete and believed to have been replaced by map in April 2024 with changed boundaries and officers of Dorset Council Nick Cardnell and Ed Gerry have confirmed that development need not be confined to the old parish boundaries of Weymouth. <https://acrobat.adobe.com/id/urn:aaid:sc:EU:4b9e096d-5725-4d9a-93c7-a1fef6dea893?locale=en-US&x-product=AdobeHome%2F1.0&guid=9b953cf7-f1d7-4fcb-a060-7915e69c40e3&mv2=ahome&viewer%21megaVerb=group-discover> .

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop PolicyW20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
	No

Signature: _____ Date: _____
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WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

Friday 24 January 2025 until Thursday 10 April 2025

Response Form

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	Personal Details *	Agent's Details *
Title	Mr	
First Name	Glenn	
Last Name	Van der Pas	
Job Title(if relevant)		

Organisation (if relevant)	Preston Against Flooding	
Address	<div style="background-color: black; width: 150px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 80px; height: 15px; margin-bottom: 5px;"></div>	
Postcode	<div style="background-color: black; width: 60px; height: 15px; margin-bottom: 5px;"></div>	
Tel. No.	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div>	
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Part B – Representation

1. To which document does the comment relate? *Please tick one box only.*

x	Submission Plan
	Consultation Statement
	Basic Conditions Statement
	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	2.3
Policy	
Page	5
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 5 para 2.3 "Lodmoor have extensive reed beds and areas of open water from the flood plain". This is not correct and Lodmoor is not "open water" or a "flood plain" under this definition but it is part of the sea with a causeway built across it and as such should be designated as "tidal water" as the sea pours in out on every tide through the many interconnectors which have no sluice gates or any preventative controls

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop PolicyW20 from the WNP

Continue on a separate sheet if necessary

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x	Yes
	No

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<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	2.10 and 2.11
Policy	
Page	6
Appendix	

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	Support
x	Object
	Make an observation

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Page 6 2.10 and 2.11. Preston is described as lacking community facilities and Overcombe is described as “access to services and jobs is somewhat limited”. Yet at Policy W20 the largest single housing development in the WNP is to be put there

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop PolicyW20 from the WNP

Continue on a separate sheet if necessary

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	Basic Conditions Statement
	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	2.14
Policy	
Page	7
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 7 Para 2.14 "Preparing a Neighbourhood Plan for an area of the size of Weymouthis challenging". This is because Neighbourhoods were not to be allowed to have NP's once Sutton Poyntz had done that and it was a political decision of WTC to refuse that and to impose a Neighbourhood Conurbation without the agreement of the people. This para refers to Key Findings and Messages Document https://www.dorsetcouncil.gov.uk/documents/d/guest/weymouth_h_np_key_findings_and_messages . The very first sentence of this document says: Key Local Findings from the Evidence: • The neighbourhood area is a series of distinct settlements and communities each with their own unique identity

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop PolicyW20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
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<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	3.8
Policy	
Page	12
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 12 para 3.8. The WNP does not consider other relevant documents because it runs counter to their plans for development. In particular, the SEA on Policy W20 limits itself to about one-half of the number of houses contemplated and ignores the conflicting work done in the years before: <https://www.dorsetcouncil.gov.uk/documents/35024/296265/Sustainability+Appraisal.pdf/86f627ea-0374-adf7-a5e3-a19101a23f50> as a combined Site G on page 48. February 2017
<https://www.dorsetcouncil.gov.uk/documents/35024/296265/20180802+-+Sustainability+Appraisal+Preferred+Options+%28FINAL%29.pdf/4c515ee5-159c-4b10-d646-24ec390b9735> at page 80, August 2018
<https://www.dorsetcouncil.gov.uk/documents/35024/307470/DCLP-Jan-2021-SA+reduced.pdf/00cdaaf8-87f8-e74e-0ac0-423383e50467> . Site WEY G had reappeared at page 180(pdf page 183). January 2021

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop PolicyW20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
	No

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x	Submission Plan
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	Basic Conditions Statement
	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	5.9
Policy	
Page	16
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 16 para 5.9. The SEA is deeply flawed, especially with regard to Policy W20 because it considers only one-half of the number of houses to be built. This is dealt with in a separate Commentary on SEA.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop PolicyW20 from the WNP

Continue on a separate sheet if necessary

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x	Submission Plan
	Consultation Statement
	Basic Conditions Statement
	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	6
Policy	Development and Homes AIM 1
Page	20
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 20 Aim 1: “establish an appropriate mix of dwellings on new developments”. The figures shown in WNP are that there is a demand of 60+% for 1-bedroomed homes but Policy W20 achieves its viability approval by assessing it for about 6% of 1-bedroomed homes.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop PolicyW20 from the WNP

Continue on a separate sheet if necessary

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x	Yes
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	Consultation Statement
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	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	6
Policy	Environmental Sustainability AIM shown in blue
Page	19
Appendix	

3. Do you wish to? Please tick one box only.

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 19 Blue Aim "Climate Change Management" says "All new developments are expected to result in no increase in the risk of flooding and provide resilience to extreme weather events". This conflicts with Policy W20 where evidence has been provided (but not included in any part of the WNP) that shows present and historic flooding can only be exacerbated by flooding through reducing infiltration land with buildings and taking no account of the LLFA advice that provision must be made for a 45% increase in surface water run off caused by Climate Change. No attempt on W20 has been made to address water for this development which lies in a Flood 3 Area and can only disgorge to other Flood 3 areas.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop PolicyW20 from the WNP

Continue on a separate sheet if necessary

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	<i>Location of Text</i>
Whole document	
Section	6
Policy	Communities AIM 2
Page	21
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 21 Aim 2: "Aim 2: - Allocate sustainable sites for new homes and jobs which are within walking distance to town or a neighbourhood centre". Policy W20 is not within walking distance of either a town or a neighbourhood centre. This is shown in the Commentary on the SEA https://docs.google.com/document/d/1WAZZRlawNM1jp0NAHLVhf65-ptyvT4NK?rtpof=true&usp=drive_fs on the maps at https://drive.google.com/open?id=1nzjLG3WUI408g6Tf-Wx8N2NCL33IW_h0&usp=drive_fs

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

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Job Title(if relevant)		

Organisation (if relevant)	Preston Against Flooding	
Address	<div></div> <div></div>	
Postcode	<div></div>	
Tel. No.	<div></div>	
Email Address	<div></div>	

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Part B – Representation

1. To which document does the comment relate? *Please tick one box only.*

<input checked="" type="checkbox"/>	Submission Plan
<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	6
Policy	Communities AIM 5
Page	22
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

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Page 22 Aim 5 "Reduce Car Movements". On Page 56 of the SEA <https://www.dorsetcouncil.gov.uk/documents/d/guest/weymouth-np-sea-environmental-report-november-2024> It is clear that site W20 has "the likelihood of (sic) bring forward high private vehicle use." Throughout the report on this site, the consultant makes these comments based on just 112-135 new homes (p52, p54,) whereas the WNP pencils in 250 homes and the (now-departed) developer was asking for 270 homes

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
	No

Signature: _____ Date: _____
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WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

Friday 24 January 2025 until Thursday 10 April 2025

Response Form

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Tel. No.	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div>	
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	Basic Conditions Statement
	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	7
Policy	Environmental Sustainability section 7.2
Page	23
Appendix	

3. Do you wish to? Please tick one box only.

	Support
x	Object
	Make an observation

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Page 23 Para 7.2 "rising sea levels". No consideration has been made in the plan about this except for the town centre. The flooding areas to the east of the town and particularly the River Jordan and Preston Brook have not been considered. There are constant government flood warnings to residents about this (floodline.uk/111WAFWEYR, latest flood warnings were issued on 23 and 26 November 2024 and 4 December 2024) and the flood map on page 65 makes this clear, as well as the proposed W20 development site voiding into Flood Zone 3 areas without any mitigation being put forward. This is unsound.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

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	Basic Conditions Statement
	Other – please specify:-

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	<i>Location of Text</i>
Whole document	
Section	7
Policy	Environmental Sustainability section 7.3
Page	23
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

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Page 23 Para 7.3. This says: "Consistent with the Town Council's declaration and action plan is the preparation of a Neighbourhood Plan that promotes sustainable development and is pro-active in its approach to mitigating and adapting to climate change, including building community resilience by taking into account the long-term implications for flood risk, coastal change, water supply". The definition of Sustainable Development is that existing residents should not be put in harm's way by new development. Policy W20 would do this with flooding and increased raw sewage discharges to bathing waters.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

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	Consultation Statement
	Basic Conditions Statement
	Other – please specify:-

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	<i>Location of Text</i>
Whole document	
Section	7
Policy	Environmental Sustainability section 7.4
Page	23
Appendix	

3. Do you wish to? Please tick one box only.

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 23 para 7.4 “Wherever required, it also means physical flood protection and effective sustainable drainage systems”. In regards to Policy W20, none of this has been done. The Viability Report <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/Weymouth-NP-Viability-Report-Compiled-Sept-2024.pdf> at page 11 states: “We cannot test the impact of flooding prevention costs. What we can do is identify the potential scale of spare capacity – or “headroom” into which such a policy might be inserted.” At around pages 79 (the page numbering of the report ceases at this stage in Appendix 3) it shows clearly that the budget for a turnover of £70,360,182 can only make a profit of £100 and so there is no “headroom” for SUDS and therefore this Allocated Site should be dropped. The developer has walked away from it. The housing mix is distorted with 7% of 1-bedroomed houses whereas the identified need is for 66% of 1-bedroomed and it is believed this unsuitable mix was chosen to make the site artificially “Viable”. These figures are shown on page 75 on the Plan in the tables.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

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	Consultation Statement
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	Other – please specify:-

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	<i>Location of Text</i>
Whole document	
Section	7
Policy	Environmental Sustainability section 7.5
Page	23
Appendix	

3. Do you wish to? Please tick one box only.

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

At page 75 of the SEA. https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/12/Weymouth-NP-SEA_Environmental-Report-November-2024.pdf it says: "Land at Wyke Oliver Farm North – A small strip of land in the middle of the site, to the west of Wyke Oliver Farm, is within Flood Zone 2 / 3 and at medium / high risk of surface water flooding. In addition, the site borders an area of land within Flood Zone 2 / 3 and at medium / high risk of surface water flooding to the north." This report is completely flawed because it repeatedly refers to W20 on pages 52, 54 as having a capacity of 112-135 homes whereas the Plan calls for 250 homes and the developer (now quit) wanted 270 homes (Reg14 Morrish Homes). W20 used to be called WNP25 and before that WEY14. It was one and part of WNP24 (since dropped, citing the SEA as its reason) which was for 240 homes. Therefore, the SEA has wrongly cited all its criteria on one half of the proposal and its weighting, therefore, is deeply flawed. WNP24 (as the same field) has 4 red flags out of 8 (see page xiii) (A) based on 240 homes and W20 (page xiii) (E) has 6 "uncertains" or not knowns out of 8 criteria, 1 red flag and 1 "no effect". It has no "positive effect" on environment at all. Clearly, had the consultant based the findings on 250/270 homes the findings would have been different. This conflicts with page 77 of WNP at para 9.14 which states: "Affordable Homes (at 50% for 400 homes) outweighs the adverse impacts identified in the SEA". This figure of 400 is false if one adds the consultant's 112-135 together with Policy W21 Redlands at 150 homes, gives 262 to 285, not 400. The same consultant AECOM in its Final Assessment Report <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2023/01/Weymouth-Neighbourhood-Plan-Site-Assessment-Final-Report.pdf> at page 165 and 166 discounts the W20 site in its Conclusions: "The site is located outside the development boundary and within land of local landscape importance and an important open gap. Unacceptable landscape impacts. An unsuitable site. Suitability: The site is located outside the development boundary and within land of local landscape importance and an important open gap. Existing development is already intrusive; particularly areas on upper slopes. Unacceptable landscape impacts. Farm buildings could be converted, development unacceptable in undulating and elevated open landscape."

The WNP Character Area

Assessment <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/WEY-Character-Asassessment-2021.pdf> at pages 7 and 9 confirms: "Lodmoor Nature reserve and an area to the south of Broadway and north of Nottingham have large areas prone to flooding". These reasons are listed as a Constraint on the Plan. In contradiction to this AECOM report, the 2017 West Dorset, Weymouth & Portland Local Plan Review of 328 pages, <https://www.dorsetcouncil.gov.uk/documents/35024/296265/Sustainability+Appraisal.pdf/86f627ea-0374-adf7-a5e3-a19101a23f50> equates closely with Policy W20 as "Area G" at pages 48, 50 and 51 shows site W20 to have 6 red flags out of 11 criteria, 4 negligible effects with housing as the 1 positive effect. The red flags were for: Biodiversity, Water, Air, Climate Change, Flooding & Coastal Change and Landscape. The conclusions drawn on page 51 were: "8.1.7 The River Wey and its tributaries, and the flood plains associated with this river system and other surface water features surrounding Weymouth, occupy large areas of the land surrounding the town. Development would result in adverse impacts upon water quality and expose property and residents to flooding in areas to the west of Broadway and Redland (areas I and K), in those areas surrounding the Lorton Valley Nature Park (areas F and G), around Preston (areas A and B) and the coastal areas to the West of Weymouth (areas M). It says further: "8.1.9 In terms of landscape impacts, whilst the more central areas of Weymouth are not designated as Dorset AONB, areas to the north, east and west are. There are a number of open gaps which are of aesthetically importance, as well as maintaining local character, such as the gap between Sutton Poyntz and Preston, and between Littlemoor and Preston/Overcombe. The coastline both to the east and west of Weymouth is designated as the East Devon and Dorset World Heritage Site." W20 is the same field as the Policy WNP24 which was dropped for the reason given that it failed the SEA test with 4 red flags out of 8, 2 neutral and 2 uncertain. It is clear that, had the SEA Consultant proceeded correctly with an analysis of 250/270 homes instead of halving it to 112-135, the conclusions would have been very different and, dare one say, identical to WNP24? WNP24 has changed names and boundaries many times over the years of failed development attempts and in this same 2017 report, at pages 53 and 54, it is labelled W1 and broadly equates to WNP24. Consistent with this recent SEA report, it scored then 5 red flags out of 11 criteria, only 1 positive effect (housing) and 5 neutral effects. The conclusion stated at page 54 under 8.2.6 was: "Development at Option W1 would greatly decrease the width of the wildlife corridor between Lodmoor SSSI and Lorton Valley Nature Park and the open countryside to the north, resulting in significant effects upon biodiversity. Also, W1 is adjacent to the Lodmoor SSSI and Lorton Valley Nature Park, and development here may increase

recreational pressure, resulting in significant impacts upon these wildlife designations”

Continue on a separate sheet if necessary

- 5. Please give details of any suggested modifications in the box below.**

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

<input checked="checked" type="checkbox"/>	Yes
<input type="checkbox"/>	No

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x	Submission Plan
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	Other – please specify:-

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	<i>Location of Text</i>
Whole document	
Section	7
Policy	Environmental Sustainability section 7.9
Page	24
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

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Page 24 Para 7.9 This is the key statement about Policy W20 in the whole document: "Any plan made now that does not consider radical reductions in carbon and help build our resilience to things like flooding will simply not be fit for purpose". W20 only exacerbates the Flood Zone 3 problems immeasurably and so the WNP is not "fit for purpose"

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

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	<i>Location of Text</i>
Whole document	
Section	7
Policy	Environmental Targets Objective 4 (26)
Page	25
Appendix	

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x	Object
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Page 25 Objective 4 (26) Sustainable drainage Systems. The steeply sloping site is unsuitable for normal SUDS and the Viability Report shows this factor has been omitted from costings in order to artificially make it "Viable". The water can only go into an already overloaded and flooding culverted system 1058m long and cause more flooding at the site in Flood Zone 3 and further downstream in Flood 3. See Reg 14 comments from LLFA and Wessex Water. Further, this water can only discharge into the Lodmoor Reserve, which is a nationally significant protected site (see page 31 8.18 and map 6 page 33) and so, even if SUDS were possible, the costs would be far higher because the water would need to be cleaned before discharge.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

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Part B – Representation

1. To which document does the comment relate? *Please tick one box only.*

x	Submission Plan
	Consultation Statement
	Basic Conditions Statement
	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	8.11
Policy	
Page	28
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 28 Para 8.11 "The area's greenspaces play a significant role in flood alleviation. Many are low-lying and prone to flooding". This is clear for Policy W20 and removing this area of infiltration, but changing it to highspeed run-off due to its inclines, will not lead to flood alleviation.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
	No

Signature: _____ Date: _____
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WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

Friday 24 January 2025 until Thursday 10 April 2025

Response Form

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	Personal Details *	Agent's Details *
Title	Mr	
First Name	Glenn	
Last Name	Van der Pas	
Job Title(if relevant)		

Organisation (if relevant)	Preston Against Flooding	
Address	<div style="background-color: black; width: 150px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 80px; height: 15px; margin-bottom: 5px;"></div>	
Postcode	<div style="background-color: black; width: 60px; height: 15px; margin-bottom: 5px;"></div>	
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	Consultation Statement
	Basic Conditions Statement
	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	8.13
Policy	
Page	30
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 30 Para 8.13 "Para 177 of the NPPF requires plans to avoid inappropriate development in vulnerable areas, whilst not exacerbating the impacts of physical changes to the coast". Policy W20 is a vulnerable area in Flood 3 and the Lodmoor Reserve is part of the sea and the coast and will be physically changed by Policy W20 discharges.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
	No

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<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	8.16
Policy	
Page	30
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 30 Para 8.16. Flooding has only been considered for Weymouth Town Centre and the area to the east of Greenhill has been ignored even though it is Flood Zone 3

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

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<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	8
Policy	W02
Page	31
Appendix	

3. Do you wish to? Please tick one box only.

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 31 Policy W02. (2) "Any development brought forward must ensure that it can be implemented with adverse effect upon the integrity of the Habitat sites. Proposals that will adversely affect the integrity of Habitats will not be supported". Development site W20 conflicts with this through water discharges in Flood 3 of uncleaned water. Sewerage is avoided in the WNP as being outside its remit. W20 will discharge sewage into an overloaded system which has increased its untreated "emergency" discharges by 100% at Bowleaze Cove (Environment Agency site WSX0770 from 20.3 to 39.9 between 2021 and 2023) and Melcombe avenue (EA site WSX0989 from 3.07 to 6.57 between 2021 and 2023). Wessex Water has said that improvements are unlikely until into the 2040's so the entire life of this Plan is blighted. All this sewage sweeps from east to west in Weymouth and Ringstead Bays through a quirk of currents at all states of the tide <https://images.app.goo.gl/tfqJnWfJoZVdUaiYA> and so is immediately thrown onto Weymouth Town Beach, a premier bathing area which has just lost its Blue Flag award through presence of sewage <https://www.dorsetecho.co.uk/news/24837673.weymouth-beach-risk-losing-blue-flag-status-due-pollution/>

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
	No

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	Consultation Statement
	Basic Conditions Statement
	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	9.6
Policy	
Page	75
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 75 Housing Needs for 1-bedroomed properties. This table shows the need at 66% but the Viability Report <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/Weymouth-NP-Viability-Report-Compiled-Sept-2024.pdf> has been calculated for Policy W20 at 6% need for 1-bedroomed in order to make it “viable” artificially

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
	No

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Part B – Representation

1. To which document does the comment relate? *Please tick one box only.*

<input checked="" type="checkbox"/>	Submission Plan
<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	9.14
Policy	
Page	77
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 77 para 9.14. the statement "Affordable Homes (at 50% for 400 homes) outweighs the adverse impacts identified in the SEA." is false if the consultant's figures of 112-135 for Policy W20 is added to the figure of 150 homes under Policy W21 so is the figures 262-285 and not 400.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
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<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	
Policy	W14
Page	78
Appendix	

3. Do you wish to? Please tick one box only.

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 78 Policy W14. In the April 2023 draft plan <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2023/10/Weymouth-NP-Initial-Draft-April-2023.pdf> at page 61 It was stated: "Development shall be focused within the defined development boundary as identified in the Plan". In 2024 the boundaries of Weymouth were altered to include land which would have been more appropriate for development and this could have been incorporated into the Plan, according to emails from Ed Gerry and Nick Cardnell at DC in May 2024. But the policy W14 has not been adapted to take into account the 2024 boundary changes. Policy W14 further says that: "Development on brownfield sites....shall be prioritised" but all previously identified Brownfield Sites have not been pursued and policy W19 shows all Residential Development taking place on Greenfield sites". There are much better development sites available nearby which are just outside the 2020 boundaries and next door to the existing 2024 boundaries

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

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x	Yes
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	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	9.21
Policy	
Page	78
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 78 para 9.21 Page 88 Para 9.45 If one looks at the previous draft of the Plan <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/Weymouth-Neighbourhood-Pre-Submission-Plan-v2.5.1-1.pdf> at page 70 under 9.51 "Sites allocated for development by policy WNP23 have emerged as those most supported by the community to achieve our housing objectives." We can see the untruth that the community supported those housing objectives. This has now been quietly corrected and dropped.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
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x	Submission Plan
	Consultation Statement
	Basic Conditions Statement
	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	
Policy	W20 (4)
Page	94
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Page 94 Policy W20 at (4) states: "Development proposals should conform with relevant policies in the Neighbourhood Plan and satisfactorily address the following criteria: "iv. a drainage regime that minimises flood risk and the impact of the development on local water courses; "viii. alignment with the environmental objectives and targets of the Neighbourhood Plan". It is a Development Proposal but there is no drainage regime provided that minimises flood risk, indeed flood risk has not been addressed at all by any of the consultants. Nor has the impact on Lodmoor Reserve as the water course to receive all the flows. It is in conflict with the following environmental objectives and targets of the Plan:

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

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Last Name	Van der Pas	
Job Title(if relevant)		

Organisation (if relevant)	Preston Against Flooding	
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x	Submission Plan
	Consultation Statement
	Basic Conditions Statement
	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	
Policy	W20 (5)
Page	94
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

The Viability Report does not take into account these costs for capital and maintenance and is therefore unsound.

Now that Policy WNP24 has been dropped, Policy W20 is no longer contiguous with the LVNP and these 23ha appear to exist in isolation distant from the National Reserve. It is not clear whether Dorset Wildlife Trust or similar would be interested under these changed circumstances

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
	No

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WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

Friday 24 January 2025 until Thursday 10 April 2025

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	<i>Location of Text</i>
Whole document	
Section	8.18-8.21
Policy	W02
Page	30
Appendix	

3. Do you wish to? *Please tick one box only.*

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x	Object
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W02 Conservation of the Natural Environment

This Policy says at (1): “country parks, nature parks and reserves must be retained and protected from detrimental negative impacts likely to arise from development.’ Policy W20 can only void into the LVNP SSSI and country park of national significance. The run-off also has the potential to bring pollution to a nature site. The sites are confirmed at 8.18. At 8.20 it says Policy W02 “not only protects existing designated areas”. It does not protect LVNP of 8.18. At para 8.21: “Policy W02 supports all measures to enhance the resilience of all the protected sites and to gain and maintain a favourable condition for all SSSI sites in accordance with UK government's 25 year environmental plan, 2018.” Policy W20 cannot enhance the SSSI it can only be detrimental.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
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Whole document	
Section	8.13
Policy	W01
Page	30
Appendix	

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x	Object
	Make an observation

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W01 Shoreline Protection

Para 8.13 says: “para. 177 of the NPPF requires plans to avoid inappropriate development in vulnerable areas, whilst not exacerbating the impacts of physical changes to the coast.” Policy W20 can ONLY drain into the Flood Zone 3 Lodmoor SSSI, which is a sea marsh already liable to flood by 2030 <https://www.dorsetecho.co.uk/news/24516938.areas-weymouth-portland-underwater/> and so W20 will add to flood risk and loss of LVNP to the sea

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

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	<i>Location of Text</i>
Whole document	
Section	8.30
Policy	W03
Page	36
Appendix	

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	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

W03 Wildlife Habitats and Areas

At para 8.30 it says: "Development impacting national and locally important sites will only be supported in the most exceptional and unavoidable circumstances". Development at Policy W20 could simply have been avoided had the WNP considered areas outside of the parish boundaries, as it was entitled to do. In 2024 the boundaries of Weymouth were changed to bring in some of this land but that has not been reflected in the Plan, e.g. Bincombe Park of 500+ houses at Littlemoor. There is evidence of Crested Newts on and around site W20

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

<input checked="" type="checkbox"/>	Yes
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	<i>Location of Text</i>
Whole document	
Section	
Policy	W04
Page	39
Appendix	

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x	Object
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W04 Wildlife Corridors

Policy W20 conflicts with policy W04 because the wildlife corridor will be reduced in width to approx. 130m, house-to-house, (Map 19 page 96) and this is not sufficient to retain wildlife such as deer, who will not approach to within 65m of noisy development, traffic etc.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

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Whole document	
Section	
Policy	W09
Page	48
Appendix	

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x	Object
	Make an observation

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W09 Green Gaps

At Para 1 and 3 it is clear that development should not bring “coalescence” or alter the “landscape character”. This is expanded at para 8.66. Site W20 conflicts with this because the significant existing green Gap is to be closed down to 165m wide (Map 12 page 96). Site W20 scores a red flag https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/12/Weymouth-NP-SEA_Environmental-Report-November-2024.pdf at page 55 (page 77 of pdf) which says: “The open nature of the site extends south, and it is considered that development could set the precedent for urban sprawl / coalescence effects, closing the existing gap between development to the east and west. Overall, negative effects are considered likely if this site is allocated. This reflects the potential negative impacts on the National Landscape to the north, and the loss of open greenfield land that forms a gap between development to the east and west. Development here has the potential to bring forward urban sprawl effects to the south.” There has been eastwards creeping infill by development at Littlemoor (Lodmoor Sands) towards W20 because W20 was always protected. There should be no further westwards creeping infill as coalescence.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

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Whole document	
Section	8.69
Policy	W09
Page	49
Appendix	

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At para 8.69 the Plan states: "The site allocation arising from policy W20 provides for future protection of the remaining gap through transfer of 23 Hectare of land to Lorton Valley Nature Park." This may not necessarily be true, and the Plan has not been altered to reflect that site WNP24 was dropped and will remove the connection from W20 to the LVNP. There is no update shown from either Dorset Wildlife Trust or the SSSI that they are prepared to take on the land as an isolation, nor from any developer showing willingness to make the financial contribution to such bodies to maintain these 23ha.

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

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Whole document	
Section	8.79-8.80
Policy	W12
Page	64
Appendix	

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x	Object
	Make an observation

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W12 Riversides

At (3) it is stated: "Development proposals should be accompanied by a site-specific Flood Risk Assessment." Policy W20 is a development proposal but no Flood Risk Assessment has been provided and so the WNP should not have the effect of changing the Development Boundary of Weymouth unless and until it can be proved that W20 will not cause more risk of flooding. At 8.79 it talks of "flooding because of tidal effects" (Map 14 page 65). There is a distinct difference not shown for the Lodmoor Flood Zone because it is sea marsh where the levels rise and fall with every tide. The rest of Weymouth Flood 3 causes flooding mainly by surface water run off not being evacuated to sea, either because of sea levels or high rainfall but the Lodmoor Marshes and main arterial road Preston Beach Road could be lost to the sea by 2030 <https://www.dorsetecho.co.uk/news/24516938.areas-weymouth-portland-underwater/> At 8.80 it says: " The NPPF (para. 165) makes clear that inappropriate development in areas at risk of flooding "should be avoided"

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Please drop Policy W20 from the WNP

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Whole document	
Section	9.21
Policy	W14
Page	78
Appendix	

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x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

W14 Development Boundaries

At para 9.21 it says: "Any development proposals that are considered permissible should be accompanied by a landscape character assessment to establish that there will be no adverse visual impact on the character and sensitivity of the landscape." This has not been done for Policy W20, or if it has in the form of the SEA, W20 fails with a red flag for Landscape

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

Signature: _____ Date: _____
If submitting the form electronically, no signature is required.



WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

Friday 24 January 2025 until Thursday 10 April 2025

Response Form

The proposed Weymouth Neighbourhood Plan has been submitted to Dorset Council for examination. The neighbourhood plan and supporting documentation can be viewed on Dorset Council's website: <https://www.dorsetcouncil.gov.uk/w/weymouth-neighbourhood-plan>

Please return completed forms to:

Email:

Post: Spatial Planning, Dorset Council, County Hall, Colliton Park,
Dorchester, DT1 1XJ

Deadline: **End of Thursday 10 April 2025.** Representations received after this date will not be accepted.

Part A – Personal Details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. By submitting this response form you consent to your information being disclosed to third parties for this purpose, personal details will not be visible on our website, although they will be shown on paper copies that will be sent to the independent examiner and available for inspection. Your information will be retained by the Council in line with its retention schedule and privacy policy (www.dorsetcouncil.gov.uk/privacypolicy). Your data will be destroyed when the plan becomes redundant.

	Personal Details *	Agent's Details *
Title	Mr	
First Name	Glenn	
Last Name	Van der Pas	
Job Title(if relevant)		

Organisation (if relevant)	Preston Against Flooding	
Address	<div></div> <div></div>	
Postcode	<div></div>	
Tel. No.	<div></div>	
Email Address	<div></div>	

**If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.*

Part B – Representation

1. To which document does the comment relate? *Please tick one box only.*

<input checked="" type="checkbox"/>	Submission Plan
<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	
Policy	W16 2 and 3
Page	81
Appendix	

3. Do you wish to? *Please tick one box only.*

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

W16 Major Housing Sites

Under Policy 2 it says: "Development proposals should take account of the concept of 'Walkable Neighbourhoods' and include links to new or existing community facilities that will promote walking, cycling and sustainable transport". Policy W20 is in conflict with this because it will promote private car use as shown in the SEA for the site on page 56 of the AECOM report: "This reflects issues with access as well as the likelihood of (sic) bring forward high private vehicle use".

Under Policy 3 it says: "application should be accompanied by an appropriate landscape and visual impact assessment,". This has not been done, or if it has been done under the SEA report, it attracts a red flag at page 33 in the AECOM report

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
	No

Signature: _____ Date: _____
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WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

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Part B – Representation

1. To which document does the comment relate? *Please tick one box only.*

<input checked="" type="checkbox"/>	Submission Plan
<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other – please specify:-

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	9.30-9.31
Policy	W16
Page	82
Appendix	

3. Do you wish to? Please tick one box only.

	Support
x	Object
	Make an observation

4. Please use the box below to give reasons for your support or objection, or to make your observation.

Policies 9.30 and 9.31 are conflicted by Policy W20 with regard to Walkable Neighbourhoods. We rely on pages 34 and 56 of the SEA Statutory Report, which compares **Transportation**. This was given a Red Flag to WNP24 and an “uncertain” flag to W20/WNP25. It was not given as a criterion in either the 2017 or 2018 Review of Dorset Local Plan reports.

A. It is a nonsense for W20 that: “This allows for access to services in the centre via the B3159.” This is illustrated on maps 4 and 5 https://drive.google.com/open?id=1nzjLG3WUI408g6Tf-Wx8N2NCL33IW_h0&usp=drive_fs. If the footpaths were even in existence (which they are not) google earth shows it to be well in excess of 2km by foot to reach the B3159. Nor is the B3159 reachable by bus. It is a nonsense (map 6) that “There are bus stops in proximity to the northern site boundary – approximately 75m to the north”. The bus stop to the north is shown on Map 6A as 255m from the centre of the northern part of the site and either impossible or much further from the southern part of the site. There are no services from this stop which go along the B3159. Just a few times a day it might be possible to catch a bus to Dorchester from this stop, then change route further along the line at Littlemoor for the B3159 bus to Weymouth. Even the bus stop shown closest to the northern part of the total site (the southern part of the site is much further) would also involve great elevation changes of at least a 10-storey building, make it further unwalkable. No account has been taken of changes in elevation in the area. The bus stop at Charlbury Corner, for example, is at an elevation of 13m and the top of the site is 40+m. Walking around the hills would add many hundreds of metres instead of the “as the crow flies” approach (Map 7 at least 723m). Map 8 shows that the statement in WNP24 on page 34 is misleading that the nearest bus stop was 740m away. This might have been to the entry of the site, but Map 8 shows the median point to be 885m away and the end of the site to be about 1000m away.

B. Page 82 of WNP at 9.30 suggests that a “walkable” neighbourhood should have facilities “within 800m”. Dorset Council has no policy on this in NP’s since each site is different. This particularly applies to W20 with the very large changes in elevation, making both walking and cycling very challenging. Policy suggested by Sustrans in

2022 <https://www.sustrans.org.uk/our-blog/research/walkable-neighbourhoods-building-in-the-right-places-to-reduce-car-dependency/> was that “LPAs should develop [Supplementary Planning Documents](#) that set accessibility standards based on 800m walking and wheeling distances to key services, and 400m to bus stops.” Map 9 shows the practicable bus stop at Charlbury Corner to be no less than 800m away using a mixture of “crow flies” and existing roads, evidently final site design will make this much further.

C. In giving an “uncertain” status to W20, the SEA report concludes there will be: “high private vehicle use” to the site for the above reasons, in contradiction to Policy W51, Traffic Impact: “Development proposals to reduce the volume and impact of motor vehicles” therefore making the site unsustainable for **Transportation**. The Maps referred to above are available at https://drive.google.com/open?id=1nzjLG3WUI408g6Tf-Wx8N2NCL33IW_h0&usp=drive_fs

Continue on a separate sheet if necessary

5. Please give details of any suggested modifications in the box below.

Please drop Policy W20 from the WNP

Continue on a separate sheet if necessary

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<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

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