



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

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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: 100px; height: 15px;"></div>	
Postcode	<div style="background-color: black; width: 60px; height: 15px;"></div>	
Tel. No.	<div style="background-color: black; width: 120px; height: 15px;"></div>	
Email Address	<div style="background-color: black; width: 250px; height: 15px;"></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.*

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	W17
Page	84
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.

W17 Housing Mix

This policy states: "The proposed housing mixes on major sites should be based on an up-to-date local housing needs analysis." The Plan figures on page 75 show the need is for 66% of 1-bedroomed homes but PolicyW20 has been worked for Viability by considering only 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 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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	<i>Location of Text</i>
Whole document	
Section	
Policy	W18 2(i)
Page	85
Appendix	

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

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W18 Affordable Housing

This policy says at 2(i): “the proposals meet the minimum target of at least 35% affordable housing on brownfield sites and at least 50% on greenfield sites unless a Financial Viability Assessment or other material consideration demonstrates a robust justification for a different percentage.” The 50% on greenfield sites is a requirement of national legislation and is not open to variance by the WNP, particularly by something as loose as the assessment referred to, which has no criteria. This site cannot be treated as an Exception Site as it lies outside the DDB and Dorset Council policy states in their

document <https://moderngov.dorsetcouncil.gov.uk/documents/s21982/20201208%20-%20Section%204%20-%20Housing.pdf> :

“4.4.1. An exception site is a small site that is allowed as an exception to normal local plan policies, in areas where housing would not normally be permitted, in order to deliver affordable housing in perpetuity. Requiring these exception sites to provide 100% affordable housing keeps land values relatively low, helping to meet identified local housing

needs. 4.4.2. Exception sites should be small scale (proportionate in size to the existing settlement) and located within or on the edge of villages or towns. Small-scale exception sites within the green belt may be appropriate in accordance with national policy for green belt and the impact of the proposal on the Green Belt purposes. Larger-scale sites that could result in unbalanced communities are not normally acceptable as exception sites.

4.4.10. National policy indicates that small numbers of market homes may be permitted on rural exception sites at a local planning authority’s discretion. This is not supported because it: would reduce the likelihood of 100% affordable housing sites being delivered”

Policy W20 cannot be an Exception Site because it is neither small nor 100% Affordable.

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	<i>Location of Text</i>
Whole document	
Section	9.45-9.54
Policy	W19
Page	88-90
Appendix	

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W19 Site Allocations

At point (2) the WNP says: “2. Support for development proposals on each of the allocated sites will be subject to them satisfying the criteria set out in their respective Neighbourhood Plan policy and conforming to all other relevant Policies in the Neighbourhood Plan.” We are showing that site W20 conflicts with so many other policies of the WNP.

Para 9.45 has been altered from the previous text in the October 2023 draft at para 9.51 on page 70 (page 73 pdf) which said: “Sites allocated for development by policy WNP23 have emerged as those most supported by the community” <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/Weymouth-Neighbourhood-Pre-Submission-Plan-v2.5.1-1.pdf> . Clearly democracy has been failed because there is no support from the community for Policy W20.

At para 9.50 on page 89 of the WNP it says that the selection of sites to be allocated was made after the SEA Environmental Report. This report is deeply flawed for site W20 as it considers only 112-137 houses instead of the 250-270 allocated in the plan. An exhaustive Commentary on the SEA has been made. The Maps referred to are

at: https://drive.google.com/open?id=1nzjLG3WUI408g6Tf-Wx8N2NCL33IW_h0&usp=drive_fs and the text is

at https://docs.google.com/document/d/1WAZZRlawNM1jp0NAHLVhf65-ptyvT4NK?rtpof=true&usp=drive_fs

At para 9.52 on page 89 it says: “The criteria of the individual allocation policies that follow, reflect the need to address the identified development constraints of each site and ensure that the resultant development is suitable, sustainable, and beneficial for neighbourhood area, as well as satisfying the requirements of NPPF para. 135, which states that developments should: • function well and add to the overall quality of the area • be visually attractive as a result of good architecture, layout and landscaping • be sympathetic to local character and history, including the surrounding built environment and landscape setting • establish”. It is shown in the SEA report that the site W20 is not sustainable because of the red flag for landscape. The SHLAA assessment says that this site is not suitable.

At para 9.54 on page 90 it says: “To meet the local affordable housing need 3 sites are allocated on Greenfield sites across 16.7ha providing 425 Homes with 212 Affordable (70% to Rent, 30 to Buy). The loss of Greenfield land is compensated for by adjacent land 31.9ha being allocated for either Public Open Space or added to the Lorton Vally (sic) Nature Park. This preserves Green Gaps and wildlife corridors between Littlemoor and Preston”. Having dropped site WNP24 from the Plan, it is no longer sure that the 23ha of land at Site W20 can be transferred to the LVNP. The chart Table B on page 92 is also wrong.

Continue on a separate sheet if necessary

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Please drop Policy W20 from the WNP

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	<i>Location of Text</i>
Whole document	
Section	
Policy	W20 (1)
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.

W20 Land at Wyke Oliver Farm North

At para 9.50 on page 89 of the WNP it says that the selection of sites to be allocated was made after the SEA Environmental Report. https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/12/Weymouth-NP-SEA_Environmental-Report-November-2024.pdf This report is deeply flawed for site W20 as it considers only 112-137 houses instead of the 250-270 allocated in the plan. An exhaustive Commentary on the SEA has been made. The Maps referred to are at: https://drive.google.com/open?id=1nztLG3WUI408g6Tf-Wx8N2NCL33IW_h0&usp=drive_fs and the text is at https://docs.google.com/document/d/1WAZZRlawNM1jp0NAHLVhf65-ptyvT4NK?rtpof=true&usp=drive_fs This shows that there is no possibility of Site W20 having “adequate provision” for public transport.

Continue on a separate sheet if necessary

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	<i>Location of Text</i>
Whole document	
Section	Map 19
Policy	W20
Page	96
Appendix	

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Map 19 at page 96 of WNP shows 2 distinct sites within the site. It shows only 1 vehicle access for the northern sector and none for the southern sector. It shows that this would not be possible without demolishing existing property. There is no access possible between the 2 sectors as there is a buried foul sewer and a pressurised sewer in this valley, shown at Map 10 https://drive.google.com/open?id=1nzjLG3WUI408g6Tf-Wx8N2NCL33IW_h0&usp=drive_fs . In their Reg 14 response, Wessex Water https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/Wessex-Water-Response-Weymouth-Neighbourhood-Plan-Reg-14-Consultation-Feedback-Form-Dec-2023_.pdf say: "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."

Continue on a separate sheet if necessary

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Whole document	
Section	
Policy	W20 4 (iv)
Page	94
Appendix	

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At Policy 4(iv) it states: "a drainage regime that minimises flood risk and the impact of the development on local water courses;". There is a 'Development Proposal' but nothing to "address this criteria". There is a detailed budget for the site in the Viability Assessment <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/Weymouth-NP-Viability-Report-Compiled-Sept-2024.pdf> at pages 89-96 of the pdf in the Annexe 3 and 3b which shows the site having a profit of no more than £100 on a turnover of £71,185,402. The developer has now walked away from the site. There is no allowance shown for the obligatory contribution to maintaining the 23ha of land supposed to be ceded to LVNP nor for any sewerage contribution to Wessex Water in respect of upgrading the present overwhelmed system where the EA shows emergency discharges to local bathing waters has doubled in the past 2 years. There is commentary at page 10 of the report as follows: "It is obviously impossible to test the financial impact that the imposition of an unknown share of an unknown cost might have on the viability of ordinary development. Moreover, viability assessments are required to test the impact of policies that are known in effect now and those that are proposed in the document under review – the Neighbourhood Plan. 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." This makes it clear that SUDS has not been considered and that, with a profit of only £100, there is no "headroom" for it. Since the effect of passing the WNP would bring this site from outside the DDB to inside it, Policy W20 should be excluded NOW because it is simply not deliverable or achievable. This artificial concept of "Viability" does need to be put against real world concepts. The Map 19 on page 96 of the WNP does not show contours. This is shown at: https://drive.google.com/open?id=1-UuXf1EjivhoPRdG_VT8m0bv1mAf93CO&usp=drive_fs The southern slope of the northern section and the northern slope of the southern section both slope steeply downwards into the Flood Zone 3 shown on page 65 of the Plan. All surface water flows must go into that valley since SUDS and Attenuation Ponds do not work on the steep slopes of hills. However, no SUDS can be built in that valley since Wessex Water make it clear that can

be no building on or near their buried foul sewer and pressurised sewer in that valley, as shown on page 10 of these maps: https://drive.google.com/open?id=1nzjLG3WUI408g6Tf-Wx8N2NCL33IW_h0&usp=drive_fs . Therefore, there will be loss of whatever infiltration there is currently on these slopes, but the water will rush downhill into the flood 3 Zone. Wessex Water have said that all water needs to be dealt with on site and the LLFA agree that the downstream system is severely at risk, with proven flooding already of houses below. The Viability Report does not cover the subject of National Policy about the Building Safety Levy. In 2022 this was reported as being around £2000-£3000 per new house but recent figures for the south of the country put this nearer to £3000-£5000 per house. Final Government figures are awaited.

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Section	9.63-9.67
Policy	W20 5
Page	94-95
Appendix	

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x	Object
	Make an observation

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At Policy (5) and para 9.63 and 9.67 there is reference to ceding 23ha to the LVNP but this is unlikely to proceed as site WNP24 was dropped and there is no access from W20 to LVNP. It is unlikely this 23ha can exist in isolation from the LVNP. 9.67 says this is Map 20, but it is not. It is Map 19.

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>

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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>	
Email Address	<div style="background-color: black; width: 250px; 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	9.61
Policy	W20
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.

At para 9.61 it says: "Following a robust analysis and selection process, which included community consultations". It does not show that the community is overwhelmingly against development at this site because of flooding. In the third consultation <https://www.dorsetcouncil.gov.uk/documents/d/guest/3rd-engagement-report> at page 3 it shows some percentage figures to questions 7 and 8 and that 573 residents took part. This was the largest ever response from the community until it was exceeded by the formal Reg14 consultation. This showed that 64% of the community was against development on land outside the DDB, such as W20. It shows 137 people responded before a public meeting on 25th January and one may assume that could have come from the greater Weymouth area. However, the 436 who responded after 23 January will have been primarily from the Preston Neighbourhood and the voting was turned from 32% in favour before 23 January to 74 against after 23 January. This was once it had become known that 500 houses were forecast for the Preston Neighbourhood – it subsequently turned out that the true figure was 570 but 2 sites were removed (90 at Old Tip and 240 at Budmouth Avenue) leaving the 250-270 at Wyke Oliver Farm.

In the box "Relevant Environmental Targets" on page 95 of the WNP Objective 4 Targets 26 and 31 (as defined on page 25 of the plan) are not met.

It should be confirmed under W20, if allowed to stay in the Plan, that it cannot be an Exception Site. Page 125 of the Plan says at 9.150: "Much of the land outside the DDB however is protected from development by other policies in the Neighbourhood Plan. This land will not be suitable for exception site residential development"

Continue on a separate sheet if necessary

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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	9.70
Policy	W21
Page	98
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 98 Land at Redlands

Para 9.70 says Map 21 but it actually Map 20. This was pointed out on page 25 of the Health

Check <https://www.dorsetcouncil.gov.uk/documents/d/guest/weymouth-neighbourhood-plan-health-check-november-2024> but was not done.

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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x	Yes
	No

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	<i>Location of Text</i>
Whole document	
Section	
Policy	W30 (3)
Page	125
Appendix	

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x	Object
	Make an observation

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Policy W30 Exception Site Development

This policy is incorrect at (3) where it says: "Exception site housing schemes should normally comprise 100% affordable housing". Dorset Council policy is clear that Exception Sites need to be 100% Affordable Housing: <https://modern.gov.dorsetcouncil.gov.uk/documents/s21982/20201208%20-%20Section%204%20-%20Housing.pdf> : so, the word "normally" should be removed

"4.4.1. An exception site is a small site that is allowed as an exception to normal local plan policies, in areas where housing would not normally be permitted, in order to deliver affordable housing in perpetuity. Requiring these exception sites to provide 100% affordable housing keeps land values relatively low, helping to meet identified local housing needs. **4.4.2.** Exception sites should be small scale (proportionate in size to the existing settlement) and located within or on the edge of villages or towns. Small-scale exception sites within the green belt may be appropriate in accordance with national policy for green belt and the impact of the proposal on the Green Belt purposes. Larger-scale sites that could result in unbalanced communities are not normally acceptable as exception sites.

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 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	9.149
Policy	W30
Page	125
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.

This states: Schemes should satisfy a local affordable housing need in terms of size of dwellings and tenure mix”. Policy W20 has been worked on Viability of 6% 1-bedroomed houses whereas page 75 of the Plan shows that the need is for 66% 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 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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Whole document	
Section	9.150
Policy	W30
Page	125
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.

This states: "Much of the land outside the DDB however is protected by other policies in the Neighbourhood Plan. This land will not be suitable for exception site residential development." Site W20 is outside the DDB and to allow it to go ahead for development would conflict with multiple other Policies as has been shown by my group Preston Against Flooding

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
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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	9.170-9.173
Policy	W33
Page	133
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.

Policy W33 Timing of Infrastructure

Para 9.170-9.173 are conflicted by W20. It is stated: "The efficacy and capacity of the area's flood defence infrastructure is of constant concern. It has recently been reviewed." This is only true for Weymouth Town Centre and the Flood Zone 3 areas east of Greenhill have not been considered. It is further stated: "Development should only be permitted where it is supported by appropriate infrastructure that is provided in a timely manner. Development proposals should include a realistic assessment of their impact on the existing local infrastructure, services and facilities and demonstrate how any such impacts will be addressed so as not to disbenefit existing residents and businesses or harm the natural or physical environment." With regard to sewage spills, there is only reference to the town centre and not the spills from Greenhill and Bowleaze emergency discharges as listed by the EA. It is made clear that Wessex Water may not make the infrastructure improvements until 2045, or after the life of this Plan, so the proposed development at W20 conflicts with this policy. <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.

<input checked="" type="checkbox"/>	Yes
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	<i>Location of Text</i>
Whole document	
Section	
Policy	W34 1 and 2
Page	135
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.

Policy W34 Sustainable Development

The proposed development W20 cannot be sustainable because it is not financially viable to include SUDS. There is a detailed budget for the site in the Viability Assessment <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/Weymouth-NP-Viability-Report-Compiled-Sept-2024.pdf> at pages 89-96 of the pdf in the Annexe 3 and 3b which shows the site having a profit of no more than £100 on a turnover of £71,185,402. The developer has now walked away from the site. There is no allowance shown for the obligatory contribution to maintaining the 23ha of land supposed to be ceded to LVNP nor for any sewerage contribution to Wessex Water in respect of upgrading the present overwhelmed system where the EA shows emergency discharges to local bathing waters has doubled in the past 2 years. There is commentary at page 10 of the report as follows: "It is obviously impossible to test the financial impact that the imposition of an unknown share of an unknown cost might have on the viability of ordinary development. Moreover, viability assessments are required to test the impact of policies that are known in effect now and those that are proposed in the document under review – the Neighbourhood Plan. 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." This makes it clear that SUDS has not been considered and that, with a profit of only £100, there is no "headroom" for it. Since the effect of passing the WNP would bring this site from outside the DDB to inside it, Policy W20 should be excluded NOW because it is simply not deliverable or achievable. This artificial concept of "Viability" does need to be put against real world concepts. The Map 19 on page 96 of the WNP does not show contours. This is shown at: https://drive.google.com/open?id=1-UuXf1EjivhoPRdG_VT8mObv1mAf93CO&usp=drive_fs The southern slope of the northern section and the northern slope of the southern section both slope steeply downwards into the Flood Zone 3 shown on page 65 of the Plan. All surface water flows must go into that valley since SUDS and Attenuation Ponds do not work on the steep slopes of hills. However, no SUDS can be built in that valley since Wessex Water make it clear that can be no building on or near their buried foul sewer and pressurised sewer in

that valley, as shown on page 10 of these maps: https://drive.google.com/open?id=1nzjLG3WUI408g6Tf-Wx8N2NCL33IW_h0&usp=drive_fs . Therefore, there will be loss of whatever infiltration there is currently on these slopes, but the water will rush downhill into the flood 3 Zone. Wessex Water have said that all water needs to be dealt with on site and the LLFA agree that the downstream system is severely at risk, with proven flooding already of houses below.

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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	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	9.178-9.180
Policy	W34
Page	135-136
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 9.178 makes it clear: "The installation of an appropriate SuDS system is critical given the growing flood risk in much of the area. Development proposals should demonstrate that the volume and rate of surface water run-off onto adjacent land and traffic routes is either at a lower or equal level to that prior to the development." W20 is simply not possible without discharging water from site to increase the risk to downstream flooding in a flood Zone 3. **At para 9.180** it states: "Reducing pollution is an often repeated request at community consultations. Air pollution from road traffic is of great concern and highlighted by action being taken in the large cities. The pollution of our water courses is a constant threat". Discharges from site W20 can only be made into the Lodmoor SSSI and it has not been shown how any SUDS scheme at W20 can clean the discharges to such a water course.

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

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>

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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>	
Email Address	<div style="background-color: black; width: 250px; 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	11.4
Policy	W43 Section 11 Communities and Neighbourhoods
Page	158
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.

Policy W43 Communities and Neighbourhoods

On page 158 of the Plan at 11.4 it states: "reducing the impact of the motor vehicle". Site W20 conflicts with this by showing "high private vehicle use" in the SEA 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.

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

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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	W44 (4)
Page	159
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.

Policy W44 Design

At point 4 it states: "Development should not increase the risk of flooding and/or exacerbate existing drainage problems and should be designed to maximise the retention of surface water on the development site and to minimise run-off". Site W20 will definitely increase the risk of flooding and it will be impossible to retain surface water on the site; it will be discharged into a Flood Zone 3 area.

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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<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	11.18-11.19
Policy	W46
Page	164
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.

Policy W46 Transport and Travel

At 11.18 on page 164 of the WNP it states: “The new Local Plan is likely to encourage the move away from car dependency towards healthy, lower carbon travel choices and lifestyles. The policy requires significant new developments to be located close enough to existing facilities or deliver viable new facilities to make walking and cycling a realistic choice. This approach has been taken into account by the housing policies of the Neighbourhood Plan.”. Site W20 does not do this as the AECOM consultant states under Transportation that: “the likelihood of (sic) bring forward high private vehicle use.” Page 56 of their report (pdf page 78) refers https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/12/Weymouth-NP-SEA_Environmental-Report-November-2024.pdf

At 11.19 of the WNP it states: “Adequate provision to ensure a local public transport service can serve the residents of major new residential developments should be an integral part of the design and layout of any scheme.” At para 9.50 on page 89 of the WNP it says that the selection of sites to be allocated was made after the SEA Environmental Report. https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/12/Weymouth-NP-SEA_Environmental-Report-November-2024.pdf This report is deeply flawed for site W20 as it considers only 112-137 houses instead of the 250-270 allocated in the plan. An exhaustive Commentary on the SEA has been made. The Maps referred to are at: https://drive.google.com/open?id=1nzjLG3WUI408g6Tf-Wx8N2NCL33IW_h0&usp=drive_fs and the text is at https://docs.google.com/document/d/1WAZZRlawNM1jp0NAHLVhf65-ptyvT4NK?rtmpof=true&usp=drive_fs This shows that there is no possibility of Site W20 having “adequate provision” for public transport.

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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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	11.22
Policy	W47
Page	165
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.

W47 Public Transport

At para 11.22 on page 165 of the WNP it states: "Neighbourhood Plans are encouraged by the NPPF (para. 116) to promote public transport use." At 11.19 of the WNP it states: "Adequate provision to ensure a local public transport service can serve the residents of major new residential developments should be an integral part of the design and layout of any scheme." At para 9.50 on page 89 of the WNP it says that the selection of sites to be allocated was made after the SEA Environmental Report. https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/12/Weymouth-NP-SEA_Environmental-Report-November-2024.pdf This report is deeply flawed for site W20 as it considers only 112-137 houses instead of the 250-270 allocated in the plan. An exhaustive Commentary on the SEA has been made. The Maps referred to are at: https://drive.google.com/open?id=1nzjLG3WUI408g6Tf-Wx8N2NCL33IW_h0&usp=drive_fs and the text is at https://docs.google.com/document/d/1WAZZRlawNM1jp0NAHLVhf65-ptyvT4NK?rtopof=true&usp=drive_fs This shows that there is no possibility of Site W20 having "adequate provision" for public transport.

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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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	11.39
Policy	W51
Page	171
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.

W51 Traffic Impact

At (1) it states: "1. Development proposals to reduce the volume and impact of motor vehicles". AT 11.39 on same page it states: "The NPPF para. 108 requires plans to ensure the "potential impacts of development on transport networks can be addressed... "opportunities to promote walking, cycling and public transport use are identified and pursued". Site W20 does not do this as the AECOM consultant states under Transportation that: "the likelihood of (sic) bring forward high private vehicle use." Page 56 of their report (pdf page 78) refers https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/12/Weymouth-NP-SEA_Environmental-Report-November-2024.pdf

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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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	Sustainable Environments Flooding
Policy	13 Aspirations – Sustainable Environments
Page	192
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.

SECTION 13 OF WNP "ASPIRATIONS"

At page 192 of WNP under "Sustainable Environments" it states: "• In high risk areas develop a community flood plan". It is admitted throughout the Plan that the Preston Brook Valley is a Flood Zone 3 risk. A Flood Risk was done only for Weymouth Town Centre and not for this area. The community flood plan should be developed and considered before putting forward development proposals such as W20 which can only void into this Flood Zone 3 area.

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"/>	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	Communities – Walkable Communities
Policy	13 Aspirations – Communities
Page	194
Appendix	

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

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x	Object
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At page 194 of WNP under “Walkable Communities” it states: “Support the creation of walkable neighbourhoods where all facilities are within a ten-minute walk and maintain existing pedestrian access routes”. Policy W20 is in violation of this: The contours are shown at: https://drive.google.com/open?id=1-UuXf1EjivhoPRdG_VT8mObv1mAf93CO&usp=drive_fs so, before considering the distances which people have to walk, they also have to climb effectively up to a 10-storey building.

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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<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	Communities – Walkable Communities
Policy	13 Aspirations – Communities
Page	194
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.

A. It is a nonsense to say for Policy 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

There are no facilities within a 10-minute walk of some of the houses proposed for Site W20 but beyond this there is just one, small up-market delicatessen at Charlbury Corner, certainly not “all facilities”.

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

Signature: _____ Date: _____
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WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

Friday 24 January 2025 until Thursday 10 April 2025

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Job Title(if relevant)		

Organisation (if relevant)	Preston Against Flooding	
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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	Environmental Sustainability – Climate Change Management
Policy	
Page	203

Appendix	A
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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.

APPENDIX A WEYMOUTH SUPPORTING ENVIRONMENTAL TARGETS

At Page 203 of WNP it states: "Climate Change Management - All new developments are expected to result in no increase in the risk of flooding and provide adequate resilience to extreme weather events". The Policy at W20 can ONLY increase the risk of flooding:

The proposed development W20 cannot be sustainable because it is not financially viable to include SUDS. There is a detailed budget for the site in the Viability Assessment <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/Weymouth-NP-Viability-Report-Compiled-Sept-2024.pdf> at pages 89-96 of the pdf in the Annexe 3 and 3b which shows the site having a profit of no more than £100 on a turnover of £71,185,402. The developer has now walked away from the site. There is no allowance shown for the obligatory contribution to maintaining the 23ha of land supposed to be ceded to LVNP nor for any sewerage contribution to Wessex Water in respect of upgrading the present overwhelmed system where the EA shows emergency discharges to local bathing waters has doubled in the past 2 years. There is commentary at page 10 of the report as follows: "It is obviously impossible to test the financial impact that the imposition of an unknown share of an unknown cost might have on the viability of ordinary development. Moreover, viability assessments are required to test the impact of policies that are known in effect now and those that are proposed in the document under review – the Neighbourhood Plan. 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." This makes it clear that SUDS has not been considered and that, with a profit of only £100, there is no "headroom" for it. Since the effect of passing the WNP would bring this site from outside the DDB to inside it, Policy W20 should be excluded NOW because it is simply not deliverable or achievable. This artificial concept of "Viability" does need to be put against real world concepts. The Map 19 on page 96 of the WNP does not show contours. This is shown at: https://drive.google.com/open?id=1-UuXf1EjivhoPRdG_VT8mObv1mAf93CO&usp=drive_fs The southern slope of the northern section and the northern slope of the southern section both

slope steeply downwards into the Flood Zone 3 shown on page 65 of the Plan. All surface water flows must go into that valley since SUDS and Attenuation Ponds do not work on the steep slopes of hills. However, no SUDS can be built in that valley since Wessex Water make it clear that can be no building on or near their buried foul sewer and pressurised sewer in that valley, as shown on page 10 of these

maps: https://drive.google.com/open?id=1nzjLG3WUI408g6Tf-Wx8N2NCL33IW_h0&usp=drive_fs . Therefore, there will be loss of

whatever infiltration there is currently on these slopes, but the water will rush downhill into the flood 3 Zone. Wessex Water have said that all water needs to be dealt with on site and the LLFA agree that the downstream system is severely at risk, with proven flooding already of houses below.

Para 9.178 makes it clear: “The installation of an appropriate SuDS system is critical given the growing flood risk in much of the area. Development proposals should demonstrate that the volume and rate of surface water run-off onto adjacent land and traffic routes is either at a lower or equal level to that prior to the development.” W20 is simply not possible without discharging water from site to increase the risk to downstream flooding in a flood Zone 3. At para 9.180 it states: “Reducing pollution is an often repeated request at community consultations. Air pollution from road traffic is of great concern and highlighted by action being taken in the large cities. The pollution of our water courses is a constant threat”. Discharges from site W20 can only be made into the Lodmoor SSSI and it has not been shown how any SUDS scheme at W20 can clean the discharges to such a water course.

As to “extreme weather events” the LLFA have said that it is now necessary to allow for increased surface water flows of 45-50% above today’s levels and this has not been considered within 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.

x	Yes
	No

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Part B – Representation

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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	Objective 4 Climate Change Management
Policy	
Page	219
Appendix	A

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 219 of the WNP under OBJECTIVE 4 CLIMATE CHANGE MANAGEMENT it states: "Extreme weather events intensifying across the globe present an urgent need to adapt our buildings, infrastructure and communities to the impacts of the climate emergency. From extreme heat in our summers to repeated flash flooding across the UK, 60% of the UK's climate-related risks are currently rated in the most severe urgency category. It is recognised that there is a need to set science based targets and measurable metrics for climate resilience which at the time of writing are not available but are expected to become so during the life of the Weymouth Neighbourhood Plan and will be a matter for review. The measures outlined in Targets 1 to 25 will each contribute to climate change management to varying degrees. Other factors do however need to be considered. Significant for Weymouth are the effects of coastal and surface water flooding. Coastal management is a strategic issue addressed through the Shoreline Management Plans as per W01 of the draft Weymouth Neighbourhood Plan (5). The topography of the area in which steep calcareous grassland with little vegetation and multiple underwater springs create excessive surface water run-off into the chalk bed rivers of the lower valleys and then enter the sea creates a significant flood risk, particularly at times of high tide. Whilst some of these contributing factors cannot be controlled at source and mitigation is necessary, other contributors to floodwater generation such as run-off from impervious surfaces within new developments can be addressed."

The comment "at the time of writing" is not strictly true. The LLFA of Dorset Council has confirmed that provision already needs to be made NOW to deal with surface water run-offs 45-50% greater than today. Policy W20 conflicts with this because it has been confirmed that there is no possibility of dealing with this extra amount of surface water when the site already voids into a 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

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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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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	Target 31
Policy	
Page	223
Appendix	A

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 TARGET 31 "SUSTAINABLE TRANSPORT" on page 223 of the WNP it states: "• Promote walking- People are encouraged and supported to get walking. • Reclaim places for communities - Green routes and spaces are designed with communities and open to all Local authorities have in recent years set a range of distance criteria for 'walkability' (10); the following distances from a neighbourhood centre are typical and provide a useful reference point. Key services e.g. Surgeries, Food Shops, Social Hubs - within 800 metres (10 minutes single journey); Bus stops – within 400 metres (5 minute single journey); Primary schools – within 800 metres; Green space over 2 Ha – within 1 kilometre (12 minutes journey); Play parks and small open spaces – within 400 metres". Site W20 has been shown that most or all of the new homes planned do not meet this target.

The SEA uses 800m or 10 minutes as acceptable walking distance to a bus stop but Target 31 conflicts with this by halving the time and distance

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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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	W23C (viii)
Page	107
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.

Policy 23C Lodmoor Old Tip South Section

Page 107 of the Plan At Policy 2 (viii) it states: “the development should include a compliant level of affordable housing including social housing and provide a high quality of design and landscaping”. At page 292 of the minutes of Weymouth Full Council held on 20th November 2024 and ratified in Full Council on 15 January 2025, Cllr Northam stated to the Council: “Cllr Northam responded that Lodmoor Tip is no longer included for housing.” This statement appears to be false and development should be deleted from the Plan. Dorset Council, as owner, have said all along that they do not agree with development at this site so it is incomprehensible as to how the site even made it into the Sites Considered for Allocation.

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

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	Support
x	Object
	Make an observation

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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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	<i>Location of Text</i>
Whole document	
Section	
Policy	W19
Page	88
Appendix	

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

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x	Object
	Make an observation

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The Dorset Council 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 WNP allocated sites without any sign of this work having been done. The WNP should follow the recommendations of Dorset Council

Continue on a separate sheet if necessary

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

The WNP should be paused until these recommendations from Dorset Council have been carried out.

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	
Policy	W20
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 Dorset Council 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 WNP allocated sites without any sign of this work having been done. The WNP should follow the recommendations of Dorset Council

Continue on a separate sheet if necessary

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

The WNP should be paused until these recommendations from Dorset Council have been carried out.

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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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></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.*

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	
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Page	94
Appendix	

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

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.

Continue on a separate sheet if necessary

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

The WNP should be paused until these recommendations have been carried out.

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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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	W20
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 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 ([REDACTED]). 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 [REDACTED] 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."

Continue on a separate sheet if necessary

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

The WNP should be amended to include the representations of the Dorset LLFA.

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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Job Title(if relevant)		

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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
x	Other – please specify:- This is a correction to my email of 3 April which duplicated web links, this is the correct version

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	8.80
Policy	W12 and Map 14
Page	64-65

Appendix	
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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 Plan does not take into consideration specifically the formal Flood Warnings issued historically in the area of planned development in Weymouth and specifically for Policy W20 which can only discharge into these Flood 3 risk areas

Please see: <https://floodassist.co.uk/flood-warnings/flood-area-info/dorset/111fwcecd022/dorset-coast-at-preston-beach>

With 14 flood warnings for the past 5 years in the catchment basin for new development proposed at Preston and specifically the only possible outflow area for Policy W20 of the Plan and

The 93 flood warnings over the past 5 years for Weymouth overall <https://floodassist.co.uk/flood-warnings/flood-area-info/dorset/111wafweyr/weymouth-rivers-and-streams>

which relates to page 65 of the WNP.

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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Tel. No.	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div>	
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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	8.80
Policy	W12 and Map 14
Page	64-65
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.

The Foreword only refers to flooding in Weymouth Town Centre and no work has been done to consider the risks east of Greenhill in Weymouth.

The Plan does not take into consideration specifically the formal Flood Warnings issued historically in the area of planned development in Weymouth and specifically for Policy W20 which can only disgorge into these Flood 3 risk areas

Please see: <https://floodassist.co.uk/flood-warnings/flood-area-info/dorset/111wafweyr/weymouth-rivers-and-streams>

With 14 flood warnings for the past 5 years in the catchment basin for new development proposed at Preston and specifically the only possible outflow area for Policy W20 of the Plan and

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which relates to page 65 of the WNP.

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 because of the flooding risks, which means Policy W20 is not sustainable

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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Email Address	<div></div>	

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Part B – Representation

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

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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 Weymouth Neighbourhood Area
Policy	2.3
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.

This Section only refers to flooding tangentially but should consider the published data to give the context. No work has been done in the Plan to consider the risks east of Greenhill in Weymouth.

The Plan does not take into consideration specifically the formal Flood Warnings issued historically in the area of planned development in Weymouth and specifically for Policy W20 which can only discharge into these Flood 3 risk areas

Please see: <https://floodassist.co.uk/flood-warnings/flood-area-info/dorset/111wafweyr/weymouth-rivers-and-streams>

With 14 flood warnings for the past 5 years in the catchment basin for new development proposed at Preston and specifically the only possible outflow area for Policy W20 of the Plan and

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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 because of the flooding risks, which means Policy W20 is not sustainable

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

x	Submission Plan
	Consultation Statement
	Basic Conditions Statement
x	Other – please specify:- This is a correction to my email of 3 April which duplicated web links, this is the correct version

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 Visions Aims and Objectives
Policy	AIM Climate Change Management
Page	19

Appendix	
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x	Object
	Make an observation

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which relates to page 65 of the WNP.

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 checked="" type="checkbox"/>	Other – please specify:- This is a correction to my email of 3 April which duplicated web links, this is the correct version

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	<i>Location of Text</i>
Whole document	
Section	7.3-7.4
Policy	7 Environmental Sustainability
Page	23

Appendix	
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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 Plan does not take into consideration specifically the formal Flood Warnings issued historically in the area of planned development in Weymouth and specifically for Policy W20 which can only discharge into these Flood 3 risk areas

Please see: <https://floodassist.co.uk/flood-warnings/flood-area-info/dorset/111fwcecd022/dorset-coast-at-preston-beach>

With 14 flood warnings for the past 5 years in the catchment basin for new development proposed at Preston and specifically the only possible outflow area for Policy W20 of the Plan and

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which relates to page 65 of the WNP.

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:

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

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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>	
Email Address	<div style="background-color: black; width: 250px; 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
x	Other – please specify:- This is a correction to my email of 3 April which duplicated web links, this is the correct version

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	7.9
Policy	7 Environmental Sustainability
Page	24

Appendix	
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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.

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which relates to page 65 of the WNP.

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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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 checked="" type="checkbox"/>	Other – please specify:- This is a correction to my email of 3 April which duplicated web links, this is the correct version

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	8.12
Policy	8 Landscape and Greenspace
Page	28

Appendix	
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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.

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which relates to page 65 of the WNP.

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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Regulation 16 Consultation

Friday 24 January 2025 until Thursday 10 April 2025

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Job Title(if relevant)		

Organisation (if relevant)	Preston Against Flooding	
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Tel. No.	<div></div>	
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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 checked="" type="checkbox"/>	Other – please specify:- This is a correction to my email of 3 April which duplicated web links, this is the correct version

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	8.13-8.21
Policy	W01
Page	30-31

Appendix	
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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.

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which relates to page 65 of the WNP.

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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Regulation 16 Consultation

Friday 24 January 2025 until Thursday 10 April 2025

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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>	

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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 checked="" type="checkbox"/>	Other – please specify:- This is a correction to my email of 3 April which duplicated web links, this is the correct version

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 Relevant Environmental Targets Objective 4
Policy	W20
Page	95

Appendix	
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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.

THIS IS A CORRECTION TO PREVIOUS COMMENT

The Plan does not take into consideration specifically the formal Flood Warnings issued historically in the area of planned development in Weymouth and specifically for Policy W20 which can only discharge into these Flood 3 risk areas

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which relates to page 65 of the WNP.

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: _____
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Job Title(if relevant)		

Organisation (if relevant)	Preston Against Flooding	
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1. To which document does the comment relate? *Please tick one box only.*

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	Consultation Statement
	Basic Conditions Statement
x	Other – please specify:- This is a correction to my email of 3 April which duplicated web links, this is the correct version

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	9.171 and 9.173
Policy	W33
Page	133

Appendix	
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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.

THIS IS A CORRECTION TO PREVIOUS COMMENT

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which relates to page 65 of the WNP.

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

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<input checked="" type="checkbox"/>	Other – please specify:- This is a correction to my email of 3 April which duplicated web links, this is the correct version

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	9.178
Policy	W34
Page	135

Appendix	
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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.

THIS IS A CORRECTION TO PREVIOUS COMMENT

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which relates to page 65 of the WNP.

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
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x	Other – please specify:- This is a correction to my email of 3 April which duplicated web links, this is the correct version

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	W44 Policy 4
Page	159

Appendix	
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x	Object
	Make an observation

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<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input checked="" type="checkbox"/>	Other – please specify:- This is a correction to my email of 3 April which duplicated web links, this is the correct version

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	13 Weymouth Community Aspirations
Policy	Sustainable Environments - Flooding
Page	192

Appendix	
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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.

THIS IS A CORRECTION TO PREVIOUS COMMENT

The Plan does not take into consideration specifically the formal Flood Warnings issued historically in the area of planned development in Weymouth and specifically for Policy W20 which can only discharge into these Flood 3 risk areas

Please see: <https://floodassist.co.uk/flood-warnings/flood-area-info/dorset/111fwcecd022/dorset-coast-at-preston-beach>

With 14 flood warnings for the past 5 years in the catchment basin for new development proposed at Preston and specifically the only possible outflow area for Policy W20 of the Plan and

The 93 flood warnings over the past 5 years for Weymouth overall <https://floodassist.co.uk/flood-warnings/flood-area-info/dorset/111wafweyr/weymouth-rivers-and-streams>

which relates to page 65 of the WNP.

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: _____
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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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Email:

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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>	
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	Basic Conditions Statement
x	Other – please specify:- This is a correction to my email of 3 April which duplicated web links, this is the correct version

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	Environmental Sustainability – Climate Change
Page	203

Appendix	A
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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.

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which relates to page 65 of the WNP.

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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Part B – Representation

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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	Target 26
Policy	Climate Change Management
Page	219
Appendix	A

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 Plan does not consider historical data and that Policy W20 can only discharge into a Flood 3 area. This Section only refers to flooding tangentially but should consider the published data to give the context. No work has been done in the Plan to consider the risks east of Greenhill in Weymouth.

The Plan does not take into consideration specifically the formal Flood Warnings issued historically in the area of planned development in Weymouth and specifically for Policy W20 which can only discharge into these Flood 3 risk areas

Please see: <https://floodassist.co.uk/flood-warnings/flood-area-info/dorset/111wafweyr/weymouth-rivers-and-streams>

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which relates to page 65 of the WNP.

It is inevitable that Policy W20 will increase the risk of flooding

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 because of the flooding risks, which means Policy W20 is not sustainable. The Plan should be paused to allow the LLFA to carry out a formal assessment of future flood risk as they have done for Weymouth Town Centre

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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Part B – Representation

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

	Submission Plan
x	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	x
Section	
Policy	
Page	
Appendix	

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

	Support
x	Object
	Make an observation

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"Several documents will accompany the submission version of the Neighbourhood Plan. We are obliged by Neighbourhood Planning Regulation 1521 to produce a Consultation Statement²², which "should reveal the quality and effectiveness of the consultation that has informed the plan proposals", and a Basic Conditions Statement²³, setting out how the Neighbourhood Plan meets the basic conditions (see para. 4.4)."

I'd like to highlight that the views of these **573 respondents were initially ignored** and only later incorporated. Additionally, the **limited engagement** in the consultation process—just **30 participants?**—raises serious concerns about the legitimacy of the pre-submission document.

Moreover, the use of **SurveyMonkey** for submissions was problematic, as it **failed to provide confirmation emails** upon receipt. I had to personally email **Councillor Northam** to verify that my response had been received.

It would also be worth mentioning the **delayed publication** of the final draft of the plan with **Weymouth Town Council (WTC)**, further limiting opportunities for proper scrutiny and public engagement.

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 because of the flooding risks, which means Policy W20 is not sustainable. The Plan should be paused to allow the LLFA to carry out a formal assessment of future flood risk as they have done for Weymouth Town Centre

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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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	9.4-9.6
Policy	9 Development and Homes
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.

"In August 2024, Dorset Council informed the Steering Group that there were 1,166 applications to the Housing Register for homes in Weymouth. This is an increase of 207 since September 2023. Of these applications, 513 have a local connection, and 653 do not. The figure for numbers in Temporary Accommodation has increased in the same period from 158 to 163. This includes 50 households with 99 children. There is movement on the figures, with only 1 household having been in Temporary Accommodation for more than 6 weeks. As can be seen in the table below, these are categorised in bands A-D according to urgency of need. The average waiting time on the housing register across Weymouth and Portland ranges from 289 days for Band A to 678 days for Band D, with an average across the bands of 366 days. Since 2021, 471 households have been found homes via the Housing Register process."

The FOI response (DC/8684) from Dorset Council states: "There are 546 applicants on the register in Weymouth and active on the Housing Register from 1 July 2023 until January 2025." In August 2024, the Steering Group and Councillor Northam, by extension, asserted that their data above on page 74 indicates 1,166 applicants, including both local (513) and non-local connections (653) that should not have been included, contradicting DC Housing Allocation Policy - [link below](#). They also falsely claim this represents an increase of 207 from previously stated figures from September 2023, yet their table **shows a decrease of 30 local connections** on the Housing Register (down from 543 to

513)!

<https://www.dorsetcouncil.gov.uk/documents/35024/282001/Dorset%20Council%20Housing%20Allocation%20Policy.pdf/64df5103-bcc0-bc16-85db-6be2d1fd967>

Presenting the data in this way is highly misleading. According to the FOI response, the average number of new applications to the Weymouth Housing Register ranges between twenty and forty per month, with the majority classified as Band D or Low Housing Need.

Continue on a separate sheet if necessary

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

The Plan should be paused to allow the Housing Needs to be calculated accurately. The Steering Group were engaged about this by residents and the Full Council were addressed several times as well in public but nothing was done

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	
Policy	W17
Page	84
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.

New residential development should provide or contribute to a mix of housing tenure types and sizes to help maintain mixed, balanced, and inclusive communities within the neighbourhood plan area. The proposed housing mixes on major sites should be based on an up-to-date local housing needs analysis."

At face value, **Policy W17** sets out a broadly acceptable goal: to encourage a mix of housing tenures and sizes that support inclusive communities and respond to local needs. However, this policy is **too vague and lacks enforceable obligations**, making it difficult to see how it will effectively shape development or address Weymouth's acute housing issues.

The policy's requirement that "housing mixes on major sites should be based on an up-to-date local housing needs analysis" appears to be forward-looking. However, in practice, the **most recent Housing Needs Assessment (HNA 2024)**—which clearly demonstrates that the overwhelming demand is for **one- and two-bedroom affordable homes**—has **not been adequately reflected in the housing mix proposed by AECOM**. AECOM's modelling favours larger homes (three- and four-bedroom), ignoring evidence such as:

- FOI data showing consistent monthly demand for **Band A and B one-bedroom homes** in 2024;
- **Table 4-4 (HNA 2024)** confirming that lower-income local households can only afford **starter homes**, not large family homes;
- HNA 2024's own projection of a need for **242 affordable homes per annum**, of which many must be one- or two-bedroom.

The **language of W17**—"should provide or contribute to" and "based on"—is **non-committal and unenforceable**, offering too much flexibility to developers who may prioritise profitability over community need. Without minimum thresholds or required proportions by

tenure/size type, developers can still push forward schemes that are **heavily skewed toward market-rate, larger properties** under the guise of “balanced communities,” while failing to meet the real demand evidenced by housing register data and local affordability metrics.

Furthermore, W17 does not appear to **directly reference or bind development proposals to the specific findings** in the HNA. This leaves room for subjective interpretation and **risks diluting the influence of the housing needs data altogether**, especially if viability arguments are used to bypass affordable and small-unit provision.

The **Weymouth Housing Registers** shows that the most urgent need is for **smaller, affordable rented properties**, and average waiting times for Bands A–D are long (289–678 days). With **very limited land for development in Weymouth**, it is inefficient and counterproductive to allow under-regulated policies like W17 to enable the construction of homes that will **not be occupied by local people** or **won’t sell without being offloaded to out-of-county housing associations**.

Policy W20 conflicts wildly with this. The need is for 66% 1-bedroomed housing but W20 only illustrates 6%; this was done to enable it to scrape through on the Viability Assessment.

Continue on a separate sheet if necessary

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

The Plan should be paused to allow the Housing Needs to be calculated correctly. It should be paused for the Viability Assessment to be redone for site W20 to reflect the needs and not to squeeze it through the 50% threshold for Affordable Housing

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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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	W18
Page	85
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.

Policy W18 presents a bold ambition to prioritise affordable housing in Weymouth, setting targets of 35% affordable homes on brownfield sites and 50% on greenfield sites. While this appears commendable, the policy falls short in addressing the actual needs of the community when scrutinised alongside available data and delivery trends.

Strengths of Policy W18:

- **High targets:** The proposed 35–50% affordable housing thresholds exceed many national and local benchmarks.
- **Tenure mix:** A 70/30 split favouring affordable and social rent reflects housing needs assessments.
- **Local connection emphasis:** Prioritising local residents supports community stability.
- **On-site provision:** The policy discourages off-site contributions unless absolutely necessary.
- **In-perpetuity provision:** This ensures affordable homes remain accessible over the long term.

However, several major weaknesses undermine these intentions:

1. Financial Viability Loopholes Risk Diluting the Targets

- Developers may use **Financial Viability Assessments (FVAs)** to justify providing fewer affordable homes, particularly on costlier brownfield sites.
- In practice, this has already happened: **only 13% of homes delivered in 2021–2022 were affordable**, far below the policy's target.
- Without stricter enforcement, the policy risks becoming **aspirational rather than impactful**.

2. Policy Is Out of Step with Actual Housing Need

- According to the 2024 Housing Needs Assessment (HNA), **Weymouth requires 242 new affordable homes per annum—134 for rent and 108 for ownership**.

- Even if W18's targets were fully met, the policy would yield **only 72 affordable homes per year**, meeting just **29.7% of identified need**.
- There is **no mention of bedroom size targets**, despite FOI data and HNA 2024 showing clear demand for one- and two-bedroom homes, especially for Bands A and B.

3. Oversupply of Larger Homes Is Not Addressed

- The AECOM-recommended housing mix encourages a **high proportion of three- and four-bedroom homes**, which are not in demand locally.
- These homes risk remaining **unsold or being offloaded to large housing associations**, potentially leading to an influx of social tenants from outside Dorset.
- This contradicts the stated aim of prioritising local housing needs and community cohesion.

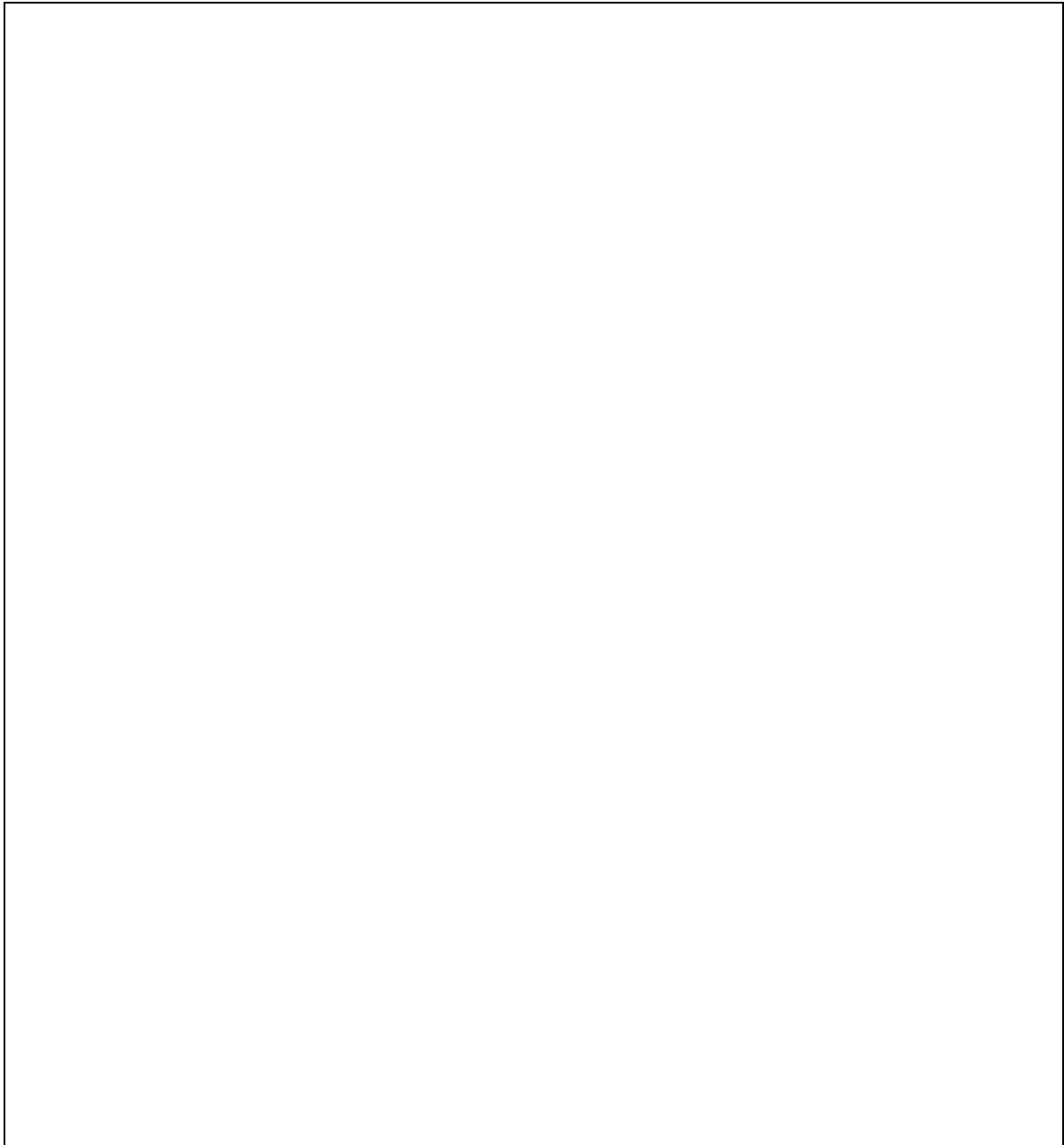
4. Small Sites Exemptions Weaken Affordable Delivery

- Developments of **2–9 units are allowed to pay financial contributions instead of delivering on-site affordable housing**.
- This is problematic in a town like Weymouth, where **infill development and smaller sites make up a large proportion** of new housing.
- By not requiring on-site affordable homes in these cases, the policy misses an opportunity to provide the smaller, more affordable units actually needed.

5. Lack of Bedroom Size Requirements Is a Missed Opportunity

- Both HNA 2024 (Table 4-4) and FOI data show **overwhelming need for one-bedroom homes**, followed by two-bedrooms.
- Yet W18 provides no minimum percentage or emphasis on small dwellings, allowing developers to focus on larger, more profitable homes.
- This limits housing access for those most in need, including single-person and low-income households.

In Summary: While W18 is a step in the right direction, it is **insufficient to meet Weymouth's actual affordable housing needs**. Without stronger enforcement mechanisms, specific bedroom size requirements, and less reliance on viability assessments, the policy is unlikely to resolve the crisis it acknowledges. It must be revised using local data already available—such as FOI housing register data and the latest HNA—to ensure affordable housing delivery is realistic, enforceable, and tailored to the real needs of local residents.



Continue on a separate sheet if necessary

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

The Plan should be paused to allow the Housing Needs to be calculated correctly. It should be paused for the Viability Assessment to be redone for site W20 to reflect the needs and not to squeeze it through the 50% threshold for Affordable Housing

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.