

**From:** Zoë Mason [REDACTED]  
**Sent:** 10 April 2025 13:23  
**To:** NeighbourhoodPlanning  
**Cc:** Helen Ashby-Ridgway  
**Subject:** Neighbourhood Plan Regulation 16 Consultation Responses [REDACTED]  
**Attachments:** W46\_ Transport and Travel(33648737.4).pdf; Environmental Objectives and Targets(33653361.3).pdf; Vision, Aims, Objectives - Weymouth NP consultation Response(33645032.5).pdf; W01\_ Shoreline Protection(33647020.4).pdf; W02\_ Conservation of the Natural environment(33647039.3).pdf; W03\_ Wildlife Habitats and Areas(33647049.3).pdf; W04\_ Wildlife Corridors(33647052.3).pdf; W05\_ Ecological Impact of Development(33647053.2).pdf; W06\_ Trees, Woodlands, Hedgerows(33647054.3).pdf; W07\_ Rights of Way and Access to the Countryside(33647055.1).pdf; W08\_ Coastal Green Recreation Areas(33647056.3).pdf; W12\_ Riversides(33647057.3).pdf; W13\_ Panoramas, Vistas and Views(33647058.3).pdf; W34\_ Sustainable Development(33647134.2).pdf; W40\_ Temporary Activities and Uses(33647188.3).pdf; W41\_ Sustainable Tourism Development(33648415.3).pdf; W45\_ Heritage Assets(33648662.2).pdf; 31473\_04 Submission Version Neighbourhood Plan Representations 10.04.2025.pdf

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Dear Sir/Madam,

On behalf of Haven Leisure Limited, please find attached representations to Weymouth Draft Neighbourhood Plan Regulation 16 Consultation.

Please do not hesitate to be in touch with me or my colleague, Helen Ashby-Ridgway, should you require clarification on any of the matters outlined within the attached.

Kind regards,

**Zoë Mason**  
**Planner**

BSc (Hons) MSc  
Lichfields, Blok, 1 Castle Park, Tower Hill, Bristol BS2 0JA

T [REDACTED] / M [REDACTED]  
E [REDACTED]

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Town Council Council Offices,  
Commercial Road,  
Weymouth  
DT4 8NG

**Date:** 29 April 2025

**Our ref:** [REDACTED]

To Whom It May Concern

## **Submission Version Draft Weymouth Neighbourhood Plan**

On behalf of our client, Haven Leisure Limited ('Haven'), please find below representations on the Submission Version Draft Weymouth Neighbourhood Plan (NP) (reg.16), published for comment until 10 April 2025. This letter has been updated in response to comments issued via email Nick Cardnell (Dorset Council Senior Planning Policy Officer) on 25 April 2025.

Haven is a subsidiary of Bourne Leisure Limited (Bourne Leisure). Bourne Leisure is the largest owner/operator of holiday parks in the UK and employs some 3,500 full time staff and 8,700 seasonal/part time staff, significantly contribution to the national tourist economy as well as local visitor economies. For context in Weymouth, Haven operates Weymouth Bay Holiday Park and Seaview Holiday Park under its Haven brand. Haven's Littlesea Holiday Park is located nearby in Chickerell.

Haven submitted representations on the previous draft of the NP (the 'Weymouth Neighbourhood Plan Regulation 14 Consultation') in December 2023. Haven recognises that some of our previous representations have led to amendments, and these changes are welcomed. Other representations have resulted in no change. Haven therefore provides the following representations with respect to the Submission Version Draft NP (Reg. 16) consultation:

### **Vision, Aims and Objectives**

- 1 Vision and Objectives
- 2 Environment Sustainability – Objectives and Targets

### **Landscape and Greenspace**

- 3 W01 – Shoreline Protection
- 4 W02 – Conservation of the Natural Environment
- 5 W03 – Wildlife Habitats and Areas

- 6 W04 – Wildlife Corridors
- 7 W05 – Ecological Impacts of Development
- 8 W06 - Trees, Woodlands and Hedgerows
- 9 W07 – Rights of Way, and Access to the Countryside
- 10 W08 – Coastal Green Recreation Areas
- 11 W12 – Riversides
- 12 W13 – Panoramas, Vistas and Views

### **Development and Homes Policies**

- 13 W34 – Sustainable Development

### **Jobs and Local Economy Policies**

- 14 W40 – Temporary Activities and Uses
- 15 W41 – Sustainable Tourism Development

### **Communities Policies**

- 16 W45 – Heritage Assets
- 17 W46 – Transport and Travel

We trust that these representations are clear and will assist in the examination of the draft Neighbourhood Plan. Please do not hesitate to contact me or my colleague, Zoë Mason, should you require clarification on any points made. We would also be grateful if you would continue to keep us informed on progress on the development of the emerging Neighbourhood Plan.

Yours faithfully



**Helen Ashby-Ridgway**

Planning Director

BSc (Hons) MSc MRTPI



# 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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First Name		Helen
Last Name		Ashby-Ridgway
Job Title(if relevant)		Planning Director

Organisation (if relevant)	Haven Leisure Limited	Lichfields
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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	Vision, Aims and Objectives
Policy	

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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.**

**Vision**

The submission Version Draft NP outlines the below vision:

*“By 2038, Weymouth will be a resilient coastal community with a diverse range of jobs and homes which meet the needs of residents for present generations without compromising the needs of future generations. The unique identities of our local neighbourhoods will be attractive to all age groups and will foster healthy and happy lifestyles”*

The NP does not recognise the significance of Weymouth's tourism and leisure industry. Tourism is a key driver of jobs and investment in Weymouth. The visitor economy is significant to the economic and social well-being of the town and therefore visitors should be recognised within the emerging Vision, particularly given that there are policies related to this sector within the emerging plan. Paragraph 10.51 of the NP identifies furthering the beneficial impact of tourism as an “*essential part*” of the Neighbourhood Area's approach to economic growth. Reference to encouraging tourism is set out in Aim 2 as an objective – this in itself is welcomed. However, a vision sets the scene for the remainder of the plan. In this vein, our client suggests that the reference to supporting the role and value of tourism within Weymouth would be a helpful way to frame the overarching intention for the Neighbourhood Plan.

**Environmental Sustainability Aim**

The Environmental Sustainability aim states:

*“To ensure development achieves or surpasses national and local agreed targets relating to the sustainable use of land and buildings, net-zero carbon emissions, improving biodiversity, and ensuring future resilience to climate change impacts.*

- *Carbon Neutrality - All new developments are expected to minimise the emissions of greenhouse gases and be as near to carbon neutral as is reasonably possible.*
- *Resource Efficiency - All new developments are expected to maximise the sustainable use of natural resources and the re-use and recycling of resources, and minimise energy consumption and waste.*

- *Biodiversity Enhancement - All new developments are expected to include measures to conserve and enhance the biodiversity of the area.*
- *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.”*

As set out in response to Section 7 of the Neighbourhood Plan, there is a need to ensure policies are clear and unambiguous. Some of the Aims set out here appear to be seeking to create policy e.g. the expectation that the development is to be as near to carbon neutral as possible. These are not repeated elsewhere in any of the policies set out in the remainder of the plan. The aim that development should ‘*achieve or surpass*’ national targets is therefore misleading. The objectives should be reframed to ensure that there is no ambiguity or conflict with the policies in the plan.

*Continue on a separate sheet if necessary*

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



The Vision, Aims and Objectives should be reviewed and reworded to:

1. Highlight the importance of tourism to the local economy;
2. Provide flexibility within targets for development of different types; and,
3. Outline only targets that are land use related.

*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: 10/04/2025

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# WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

**Friday 24 January 2025 until Thursday 10 April 2025**

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First Name		Helen
Last Name		Ashby-Ridgway
Job Title(if relevant)		Planning Director

Organisation (if relevant)	Haven Leisure Limited	Lichfields
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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	Environmental Sustainability
Policy	
Page	
Appendix	

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	Support
X	Object
	Make an observation

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It is not clear as to the intention of the Environmental Targets at paragraph 7.11. The supporting text is somewhat misleading on these as it says that they are to be adopted for the Neighbourhood Plan but there are restrictions on the extent that high standards can be imposed by policy and *'we have only been able to advocate and encourage the achievement of standards and finishes'* (paragraph 7.6). Many of the draft policies in the emerging plan reference the need to *'align'* with the environmental objectives and targets of the plan.

This approach is unsatisfactory and presents an ambiguous approach to the application of policies in the Neighbourhood Plan which is at odds with PPG Reference ID: 41-041-20140306 and NPPF Paragraph 16. The policies need to have sufficient clarity so that they can be applied consistently and with confidence by users of the plan. If the Neighbourhood Plan is to retain the Environmental Objectives and targets, it needs to be made absolutely clear that these are only aspirations. All policies that cross reference these Environmental Objectives and targets need to be amended to remove such reference. If any of the targets are intended to be policy, these need to be set out as a policy, justified (in accordance with PPG Reference ID: 41-040-20160211) and a consultation undertaken on these revised policies prior to the submission for examination.

If these objectives and targets are to form a new policy, Haven makes the following observations:

1. The objectives, targets and related policies must recognise that not all development is the same and should therefore not all be expected to meet the same requirements, for example, for caravans the adoption of electric based heating and hot water systems may not be possible due to the manufacturing supply limitations. Policies need to provide flexibility for development that is not a standard brick building.
2. Policies and targets need to be land-use related e.g. target 29 (equipment) requires equipment to be Class A energy-rated. This falls outside the remit of the planning system and should be either removed from the emerging NP as they do not meet the basic condition to have regard to national policies..

Without making the changes set out in the representations, the Neighbourhood Plan will fail basic conditions a and d.

*Continue on a separate sheet if necessary*

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

The Environmental Objectives and targets section is to be revised to make it clear that these are only aspirations.

Cross reference to the Environmental Objectives and targets within individual policies must be removed.

*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: 10/04/2025

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Regulation 16 Consultation

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Title		
First Name		Helen
Last Name		Ashby-Ridgway
Job Title(if relevant)		Planning Director

Organisation (if relevant)	Haven Leisure Limited	Lichfields
Address		████████████████████ ██████████
Postcode		██████████
Tel. No.		██████████
Email Address		██████████ ████████████████████

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	<i>Location of Text</i>
Whole document	
Section	
Policy	Policy W01: Shoreline Protection
Page	
Appendix	



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X	Support
	Object
	Make an observation

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The proposed policy W01 identifies:

*“Development proposals, specifically to prevent coastal erosion or flooding, and protect property and businesses, in areas designated by the South Devon and Dorset Shoreline Management Plan to be protected will be supported.”*

Proposals to support property and businesses within areas at risk of coastal erosion or flooding are welcomed.

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

N/A

*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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	<i>Location of Text</i>
Whole document	
Section	
Policy	W02: Conservation of the Natural Environment (and supporting text)
Page	
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.**

Draft Policy W02 states:

*"1. Areas of benefit to nature and geological conservation, such as country parks, nature parks and reserves must be retained and protected from detrimental negative impacts likely to arise from development.*

*2. Any development brought forward must ensure that it can be implemented without adverse effect upon the integrity of the Habitats sites. Proposals that will adversely affect the integrity of Habitats will not be supported.*

*3. Support is given to the recognition of wildlife areas at Wey Valley Watermeadows on land shown on Map 7."*

Part 1 of the draft policy is not sufficiently clear, contrary to the requirements of the Planning Practice Guidance with respect to plan-making (Paragraph: 041 Reference ID: 41-041-20140306 and NPPF Paragraph 16). The use of "such as" is ambiguous and does not sufficiently define in which cases this policy applies. The policy wording should establish the specific sites that are of relevance under this policy.

The same applies to draft paragraph 8.20, which states:

*"8.20 Policy W02 not only protects existing designated areas which benefit nature or geological conservation, it also supports the recognition of other areas where the purpose of protecting an important natural environment is clear and where enhancements will not only help safeguard the special character of the site from a habitat perspective, they can provide for an increase in responsible public access to appreciate nature."*

This wording creates an ambiguous position where it would not be clear for the decision-maker or the local community whether this policy applies. For this reason Part 1 requires amendments to ensure that it can meet basic condition d.

Part 2 of the draft policy repeats national policy. There is no need to repeat this requirement as best practice<sup>1</sup> guides that a neighbourhood plan should not repeat national or local plan policies, as such policies already apply and repeating them causes confusion.

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<sup>1</sup> [How to create a Neighbourhood Plan: Your step by step roadmap guide - Locality Neighbourhood Planning](#)

This paragraph should be removed from the Neighbourhood Plan and the policy amended to reflect the below wording.

*Continue on a separate sheet if necessary*

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

Additions in **bold** and deletions in ~~strikethrough~~.

1. Areas of benefit to nature and geological conservation, **namely** ~~such as~~ country parks, nature parks and reserves **identified in this plan or the local plan** must be retained and protected from detrimental negative impacts likely to arise from development.

~~2. Any development brought forward must ensure that it can be implemented without adverse effect upon the integrity of the Habitats sites. Proposals that will adversely affect the integrity of Habitats will not be supported.~~

~~32.~~ Support is given to the recognition of wildlife areas at Wey Valley Watermeadows on land shown on Map 7.”

Supporting paragraph 8.20 should be removed from the draft Neighbourhood Plan.

*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: \_\_\_\_\_  
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Policy	W03: Wildlife Habitats and Areas
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**4. Please use the box below to give reasons for your support or objection, or to make your observation.**

Draft Policy W03 States:

*"1. Development proposals that are likely to have a significant adverse effect on the integrity of habitats of local and national importance and the wild flora and fauna in those areas that form part of the ecological network will not be supported unless unavoidable due to exceptional circumstances and the proposed mitigation measures are proportionate to the status of the site and satisfy the requirements of the local planning authority.*

*2. Where impacts to biodiversity are identified, proposals must apply the mitigation hierarchy and do everything possible to firstly avoid then to minimise impacts. Compensation measures will be permissible as a last resort only.*

*3. Proposals to protect or restore any existing features, or to create new features of wildlife habitat, particularly where these form linkages between habitats within or beyond the site, will be encouraged and supported."*

The thrust of the policy intention is recognised and endorsed but in order for the draft policy to meet the basic conditions a and d, there is a need to review the approach taken.

There is no definition as to what is classified as an *"exceptional circumstance"* and the wording is open to interpretation.. This is in conflict with the Planning Practice Guidance that requires a Neighbourhood Plan to be clear and unambiguous (Paragraph: 041 Reference ID: 41-041-20140306 and the NPPF Paragraph 16). The draft policy should be amended to remove ambiguity.

There is no classification within the policy as to what is categorised as a habitat of *"local importance."* The supporting text of the policy outlines at paragraph 8.26 that the policy prevents adverse impact to sites recognised by the Dorset Environmental Records Centre (DERC) as having significant ecological value. These are outlined in Map 6, with sites of high potential for biodiversity enhancement identified in Map 8.

As set out in the representations to draft policy W04, the Maps create an in-effect blanket restriction to development across the majority of our client's land – and indeed Weymouth, without sufficient evidence to justify this. Reference to the wildlife corridors and stepping stones in Map 6 should not be used as the basis for restricting development within the emerging NP. The approach used does not demonstrate positive preparation and blanket restrictions need to be avoided in the same way as they are for Local Green Space designations. The policy and

supporting wording should be amended to identify *designated* sites of habitat importance to ensure consistency with the NPPF and local plan, and be positively framed to support development where it meets the criteria of the policy.

The DERC maps utilised have not been prepared through the undertaking of site-specific analysis as to the ecological value of each identified area within Map 6 and Map 8. Paragraph 8.34 states that the DERC maps will be kept current subject to input from field study and feedback from the public. This highlights that the maps can only ever be a starting point for review of ecological status of a site, as they are dependent on review and regular updates. The policy wording should support site-specific review of ecological and biodiversity impacts.

The recognition of the ability to provide compensation in part 2 of the draft policy is endorsed and is consistent with national policy and guidance.

Support for proposals that restore or create new wildlife habitat features in part 3 of the emerging policy is endorsed.

We propose amended wording to the policy to accommodate the above.

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

Additions in **bold** and deletions in ~~strikethrough~~.

*"1. Development proposals that are likely to have a significant adverse effect on the integrity of **designated** habitats of local and national importance ~~and the wild flora and fauna in those areas that form part of the ecological network~~ will not be supported unless unavoidable ~~due to exceptional circumstances~~ and the proposed mitigation measures are proportionate to the status of the site and satisfy the requirements of the local planning authority.*

*2. Where impacts to biodiversity are identified, proposals must apply the mitigation hierarchy and do everything possible to firstly avoid then to minimise impacts. Compensation measures will be permissible as a last resort only.*

*3. Proposals to protect or restore any existing features, or to create new features of wildlife habitat, particularly where these form linkages between habitats within or beyond the site, will be encouraged and supported."*

A plan should be included that identifies the designated habitats of local and national importance.

Reference to the DERC Maps 6 and 8 should be limited to reference documents that provide a helpful starting point for understanding the ecological networks. The reference should be made clear that these are not the designated areas.

*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: 10/04/2025  
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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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## 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	W04: Wildlife Corridors
Page	
Appendix	



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

	Support
X	Object
	Make an observation

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

Draft Policy W04 States:

*"1.All development proposals impacting the areas recognised as Wildlife Corridors on Map 6 should meet the requirements of the Dorset Biodiversity Appraisal Protocol.*

*2. Wherever appropriate, development proposals should demonstrate they take the opportunity to enhance and extend the network of Wildlife Corridors as a means of mitigating development impact with a focus on increasing biodiversity, wildlife value and general amenity value of these corridors.*

*3. Where Wildlife Corridors are disrupted as an unavoidable consequence of adjacent or nearby development, developers will be required to minimise the impact and to carry out remedial action in accordance with a scheme agreed with the Local Planning Authority."*

Part 1 of the proposed policy requires sites within the Wildlife Corridor to meet the requirements of the Dorset Biodiversity Appraisal Protocol (DBAP). Dorset Council already requires this for sites of 0.1ha or greater, and all planning applications must be submitted with a biodiversity checklist. Sites of less than 0.1ha must still comply with the national requirements for BNG, subject to the legislation requirements. Any considerations with respect to important habitat features will be addressed within any planning application in accordance with legislation, national and local policy. Part 1 is not necessary. To meet the DBAP for sites less than 0.1ha would be onerous, hence why there is such a threshold.

Paragraph 8.34 states that Map 6 is to be regularly updated based upon feedback from public and specialist organisations. If the use of the map, and the application of policy W04, might change, this doesn't represent a clear basis which users of the plan that can rely upon, in conflict with the Planning Practice Guidance (Paragraph: 041 Reference ID: 41-041-20140306) and the NPPF (Paragraph 16).

Map 6 provides a helpful starting point for considering the contribution that an individual site might have to the role in the wildlife network. However, it is vital that the delineations are not used to prevent development coming forward. The wildlife corridors identified in Map 6 are extensive – and cover most areas that are either not covered by other ecological designations or the urban area. It is important that the use of Map 6 is not used as means of introducing large swathes of quasi-designations which are not justified.

In the past, a similar approach has been sought in Neighbourhood Plans through the use of Local Green Spaces (LGS). This has been rejected. The PPG outlines that LGS should not be used in a way that undermines the aim of plan making to support sustainable development (Paragraph: 007 Reference ID: 37-007-20140306). The allocation of Wildlife Corridors and stepping stones, similarly, should not be used to prevent sustainable development, at odds with basic condition d.

We propose amended policy wording to accommodate the support of wildlife connectivity in a manner that supports sustainable development.

*Continue on a separate sheet if necessary*

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

Additions in **bold** and deletions in ~~striketrough~~.

~~"1. All development proposals impacting the areas recognised as Wildlife Corridors on Map 6 should meet the requirements of the Dorset Biodiversity Appraisal Protocol.~~

2. Wherever appropriate, development proposals should demonstrate they take the opportunity to enhance ~~and extend~~ the network of ~~Wildlife~~ **wildlife connectivity** ~~Corridors~~ as a means of mitigating development impact with a focus on increasing biodiversity, wildlife value and general amenity value of these corridors.

3. Where ~~Wildlife Corridors are~~ **wildlife connectivity is** disrupted as an unavoidable consequence of ~~adjacent or nearby~~ development, developers will be required to minimise the impact and to carry out remedial action in accordance with a scheme agreed with the Local Planning Authority."

*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: 10/04/2025

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

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

	<i>Location of Text</i>
Whole document	
Section	
Policy	W05: Ecological Impact of Development
Page	
Appendix	

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

	Support
X	Object
	Make an observation

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

Draft Policy W05 States:

*"1. Development proposals should comply with national legislation and the requirements of the Local Planning Authority and, unless statutorily exempt, must contribute to the enhancement of the natural environment by providing for a substantial Biodiversity Net Gain.*

*2. All development proposals should consider potential ecological impacts at an early stage in their design consistent with best practice guidance and identify an array of suitable habitats and other measures (e.g. bat les, swift bricks, bird boxes, retention of hedges and other heritage boundaries, green roofs, rainwater gardens etc) to be included in the development."*

Policy W05 represents a duplication of legislative requirements for mandatory Biodiversity Net Gain in almost every proposed development. This policy is therefore unnecessary.

Part 2 of the policy requires development to consider ecological impacts within its design process. The approach to ecological impacts is established by the Biodiversity Net Gain metric as part of the legislation. This part of the policy is considered unnecessary.

Paragraph 8.41 refers to 20% biodiversity net gain. The draft policy is not seeking 20% biodiversity net gain, and therefore this text should be amended accordingly to ensure that there is no ambiguity in the application of the policy.

Notwithstanding this point, this approach is not evidenced, and the referenced reports and links within paragraph 8.41 are not accessible through the provided links.

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

Policy W05 should be deleted.

Paragraph 8.41 should be deleted or rewritten to accord with legislation i.e. a requirement of a minimum of 10% net gain.

**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: 10/04/2025  
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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	W06: Trees, Woodlands, Hedgerows
Page	
Appendix	

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

	Support
X	Object
	Make an observation

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

Draft Policy W06 states:

*"1. Development proposals should avoid the loss of or damage to trees, woodland, orchards, or hedgerows that contribute positively to the character, biodiversity, and amenity of an area.*

*2. Development proposals which could result in loss or damage to ancient, protected, or veteran trees will not be supported.*

*3. Where loss or damage to trees, woodland, orchards, or hedgerows is unavoidable, development proposals must provide for appropriate replacement planting on the site with an indigenous species along with a method statement for the ongoing care and maintenance of that planting. The planting of new trees and hedgerows on the same basis will be supported.*

*4. Replacement planting should at least be on a two-for-one basis, adopt a 'right tree right place' approach and demonstrably increase the canopy cover on site consistent with an overall objective of a minimum 15% canopy cover over the plan period.*

Trees and woodlands provide valuable amenity and climate change roles. The thrust of the draft policy recognises that the loss of trees, woodlands and hedgerows should be avoided but sometimes it is necessary. This is welcomed.

Part 2 refers ancient, protected or veteran trees. It is assumed that 'protected' relates to those trees under a protection order or are protected by virtue of being located within a conservation area. This should be clarified within the policy to avoid ambiguity. Such protected trees may also need to be lost or have works undertaken to them. There are processes in place to consider if such trees should be removed. These are either considered individually or as part of wider development proposals. Arboricultural assessments are usually required. Limitations as set out in the emerging policy does not contribute to the achieving of sustainable development when looking at development proposals as a whole. This aspect of the draft policy should be reviewed. It is considered that Parts 1 and 3 of the draft policy adequately protect such trees and provides a positive framework for mitigation.

Part 2 of the policy regarding works to ancient or veteran trees does not have regard to NPPF paragraph 193c whereby works that result in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. There is no

evidence to justify a departure from national policy. This aspect of the draft policy should be removed.

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

*"1. Development proposals should avoid the loss of or damage to trees, woodland, orchards, or hedgerows that contribute positively to the character, biodiversity, and amenity of an area.*

*~~2. Development proposals which could result in loss or damage to ancient, protected, or veteran trees will not be supported.~~*

*3. Where loss or damage to trees, woodland, orchards, or hedgerows is unavoidable, development proposals must provide for appropriate replacement planting on the site with an indigenous species along with a method statement for the ongoing care and maintenance of that planting. The planting of new trees and hedgerows on the same basis will be supported.*

*4. Replacement planting should at least be on a two-for-one basis, adopt a 'right tree right place' approach and demonstrably increase the canopy cover on site consistent with an overall objective of a minimum 15% canopy cover over the plan period.*

*Continue on a separate sheet if necessary*

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X	Yes
	No

Signature: 

Date: 10/04/2025

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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	
Policy	W07: Rights of Way and Access to the Countryside
Page	
Appendix	

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

	Support
X	Object
	Make an observation

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

Draft Policy W07 states:

*"1. Public rights of way and other non-vehicular public access routes should be protected. Proposals for improvements or extensions to those that exist will be supported where there is no adverse or harmful impact on biodiversity.*

*2. New developments must ensure that existing footpaths, bridleways, cycleways and other rights of way are retained, or that any diversion would not result in an adverse impact on biodiversity, residential amenity, or the safety of the public.*

*3. Opportunities to connect major new developments via footpath, bridleway and cycleway links to the network of countryside and coastline footpaths should be maximised."*

Part 1 is ambiguous in reference to *"other non-vehicular public access routes"*, which is at odds with PPG (Reference ID: 41-041-20140306) and the NPPF (Paragraph 16). Policies need to be clearly worded so that decision-makers and local community fully understand the policy. It would ensure that the Neighbourhood Plan is committed to contributing to the achievement of sustainable development (basic condition d). This part of the policy should be omitted.

As drafted the Part 1 of the draft policy does not clearly distinguish between the meanings of adverse and harmful, thus contributing further to an ambiguous wording of the emerging policy.

Further, Parts 1 and 2 require that that there be no *"adverse or harmful impact"* on biodiversity as a result of works to public rights of way and no *"adverse impact on biodiversity, residential amenity, or the safety of the public,"* as a result of new development. Impacts to biodiversity, residential amenity of public safety can happen. Such impacts might be imperceptible or significant. Mitigation measures can be introduced to address any unacceptable impacts. In order to contribute to the achievement of sustainable development, as required by basic condition d, the draft policy should recognise that mitigation measures can be adopted to limit harmful impacts.

*Continue on a separate sheet if necessary*

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

Additions in **bold** and deletions in ~~strikethrough~~.

1. *Public rights of way ~~and other non-vehicular public access routes~~ should be protected. Proposals for improvements or extensions to those that exist will be supported where there is no **unacceptable** adverse ~~or harmful~~ impact on biodiversity.*

2. *New developments must ensure that existing **public rights of way** ~~footpaths~~, bridleways, cycleways and other rights of way are retained, or that any diversion would not result in an **unacceptable** adverse impact on biodiversity, residential amenity, or the safety of the public that cannot be mitigated.*

3. *Opportunities to connect major new developments via footpath, bridleway and cycleway links to the network of countryside and coastline footpaths should be maximised*

*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: 10/04/2025  
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	Other – please specify:-

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Whole document	
Section	
Policy	W08: Coastal green Recreation Areas
Page	
Appendix	

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

	Support
X	Object
	Make an observation

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

Draft Policy W08 states:

*“Coastal recreation areas shown on Map 10 are protected from development for purposes of public recreational access and enjoyment unless it is for:*

- i. coastal defence purposes; or*
- ii. for the improvement or extension of an existing built facility; or*
- iii. the provision of an additional unobtrusive small-scale public facility; or*
- iv. improved accessibility; or*
- v. enhanced recreation opportunities of an appropriate scale and nature; and*
- vi. enhances the quality and appearance of the built environment in relation to the coastal landscape and seascape.”*

There may be areas within the Neighbourhood Plan area that are suitable for such designation. A number of these criteria would contribute to achieving sustainable development in accordance with basic condition d.

Area 5 identified in Map 10 includes land owned by Haven Leisure Limited. There has been no direct engagement between those preparing the Neighbourhood Plan and Haven Leisure Limited to discuss the draft policy. There is no documentation in the Submission Plan’s evidence base that looks at the evidence to justify this designation. This is at odds with Planning Practice Guidance, which requires that *“Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan...”*.

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

Area 5 must be removed from designation as Coastal Recreational Area.

In the event that it is not removed, given that the policy suggests recreational use, the delineation of the parcel should be reviewed in full and restricted solely to the public rights of way in this area. This aspect of the policy should be subject to a focused consultation so that Haven Leisure Limited has the opportunity to review and comment.

If any such policy relating to Haven Leisure Limited's land is considered acceptable by the examiner it should make it clear the land is private and rights of access beyond the public right of way must not be assumed.

*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: 10/04/2025

*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

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First Name		Helen
Last Name		Ashby-Ridgway
Job Title(if relevant)		Planning Director

Organisation (if relevant)	Haven Leisure Limited	Lichfields
Address		<div style="background-color: black; width: 100%; height: 15px;"></div> <div style="background-color: black; width: 100%; height: 15px;"></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	
Policy	W12: Riversides
Page	
Appendix	



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

	Support
X	Object
	Make an observation

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

Draft Policy W12 States:

*"1. Development proposals to further safe and responsible access and recreation and tourism activity alongside the waterways shown on Map 14 will be supported if they conform with the NPPF requirements for development in higher flood risk areas.*

*2. Development proposals should take full account of natural river processes, and the ability for maintenance of the watercourse, including for flood risk management purposes.*

*3. Development proposals should be accompanied by a site-specific Flood Risk Assessment.*

*4. Development proposals should be consistent with the Environmental Objectives of the Neighbourhood Plan."*

Reference to the NPPF requirements in Part 1 is not necessary. Similarly, reference to a site-specific Flood Risk Assessment in Part 3 is not necessary. Both duplicate existing national policy requirements. These aspects of the draft policy do not have regard for national policy in accordance with basic condition a.

Point 4 of the draft policy is ambiguous in its requirement to be 'consistent' with the Objectives of the NP. If there are requirements from the objectives and/or targets that need to be met, these should be set out clearly within a policy or series of policies. The reference to 'consistent' is not clear nor precise and therefore does not accord with The Planning Practice Guidance (Reference ID: 41-041-20140306) and the NPPF (Paragraph 16).

*Continue on a separate sheet if necessary*

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

Part 4 of the policy should be removed.

*"1. Development proposals to further safe and responsible access and recreation and tourism activity alongside the waterways shown on Map 14 will be supported if they conform with the NPPF requirements for development in higher flood risk areas."*

*2. Development proposals should take full account of natural river processes, and the ability for maintenance of the watercourse, including for flood risk management purposes.*

*~~3. Development proposals should be accompanied by a site-specific Flood Risk Assessment.~~*

*~~4. Development proposals should be consistent with the Environmental Objectives of the Neighbourhood Plan."~~*

*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: 10/04/2025

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# WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

**Friday 24 January 2025 until Thursday 10 April 2025**

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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	
Policy	W13: Panoramas, Vistas and Views
Page	
Appendix	

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

	Support
X	Object
	Make an observation

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

Draft Policy W13 States:

*"1. Development proposals should respect important public panoramas, vistas, and views. Development proposals likely to impact on the area's important panoramas, vistas, and views, shown on Maps 15A to 15F inclusive and defined in the text in Table V.*

*2. Development proposals likely to impact on the area's important panoramas, vistas and views should demonstrate due regard to the local design guidance whenever available."*

The use of the word 'respect' in Part 1 of the draft policy is ambiguous and the second sentence of Part 1 of the draft policy is unfinished.

For both these reasons, the emerging policy is unclear in relation to the viewpoints and therefore the draft policy is therefore in conflict with the Planning Practice Guidance (Reference ID: 41-041-20140306) and the NPPF (Paragraph 16). This policy must be reconsulted on before the plan can be examined to give the local community and stakeholders a full opportunity to understand the specific requirements of the emerging plan.

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

This policy must be made clear and a focused consultation is required on this aspect of the plan.

*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: 10/04/2025

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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	W34: Sustainable Development
Page	
Appendix	

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

	Support
X	Object
	Make an observation

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

Draft Policy W34 states:

*"1. All new development should seek to achieve high standards of sustainability, and demonstrate that design, construction, and operation aligns with the strategic environmental objectives of the Neighbourhood Plan.*

*2. New development will be supported provided:*

- i. sustainable construction methods, water conservation measures, Suitable Drainage Design and permeable surfaces are integrated into the development proposals;*
- ii. energy conservation measures and renewable energy technology predominate;*
- iii. development will not result in unacceptable levels of light, noise, air, or water pollution;*
- iv. provision is made for access to the fastest possible broadband and other communication connections to all new properties; and*
- v. adequate provision is made for the safe and secure parking and storage of bikes and electric vehicles consistent with the prevailing standard of the Local Planning Authority.*

*3. The retrofitting of energy conservation measures and renewable energy technology is supported. Where planning permission is required, measures and installations should be designed to minimise visual impact and nuisance to adjoining uses. The sensitive retrofitting of historic buildings and buildings in Conservation Areas should follow the guidance provide by Historic England."*

It is unclear how Part 1 of the draft policy will be applied to development. The reference to *"aligns with the strategic environmental objectives of the Neighbourhood Plan"* is ambiguous and is in conflict with the Planning Practice Guidance (Reference ID: 41-041-20140306) and the NPPF (Paragraph 16). It is necessary for policies to be precise and clear so that the decision-maker and the local community understand how the policy is to be applied. If there are specific requirements from the strategic environmental objectives that are to be adopted as policy, these need to be clearly set out as policy, evidenced, consulted upon and examined as a policy. Without this, this part of the emerging policy must be removed.

Part 2 of the draft policy does not leave sufficient flexibility for different types of development. Not all development, for example the development of bases for the siting of caravans, can readily meet all the criteria set out at i to v. The same principle may apply to other types of development. Whilst it may be possible to meet these for dwellings or commercial buildings, these requirements set an

unachievable standard for other types of development. There is no evidence provided that recognises that such developments have been tested as part of the plan-making process.

By not recognising the limitations in meeting such criteria, the draft policy risks decision-makers refusing otherwise acceptable development contrary to basic condition d. The policy will need to be amended to incorporate flexibility for differing development types.

Part 2v of the draft policy represents duplication of Local Plan policy and should be removed in line with and the NPPF (Paragraph 16).

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

Additions in **bold** and deletions in ~~strikethrough~~.

*"1. All new development should seek to achieve high standards of sustainability **as far as considered appropriate for the type of development proposed.** ~~and demonstrate that design, construction, and operation aligns with the strategic environmental objectives of the Neighbourhood Plan.~~*

*2. New development will be supported provided, **where appropriate, it:***  
*i. sustainable construction methods, water conservation measures, Suitable Drainage Design and permeable surfaces are integrated into the development proposals;*  
*ii. energy conservation measures and renewable energy technology predominate;*  
*iii. development will not result in unacceptable levels of light, noise, air, or water pollution; **and,***  
*iv. provision is made for access to the fastest possible broadband and other communication connections to all new properties.; ~~and~~*  
*~~v. adequate provision is made for the safe and secure parking and storage of bikes and electric vehicles consistent with the prevailing standard of the Local Planning Authority.~~*

*3. The retrofitting of energy conservation measures and renewable energy technology is supported. Where planning permission is required, measures and installations should be designed to minimise visual impact and nuisance to adjoining uses. The sensitive retrofitting of historic buildings and buildings in Conservation Areas should follow the guidance provide by Historic England."*

*Continue on a separate sheet if necessary*

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x	Yes
	No

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

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

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

	<i>Location of Text</i>
Whole document	
Section	
Policy	W40: Temporary Activities and Uses
Page	
Appendix	



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

	Support
X	Object
	Make an observation

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

Draft Policy W40 states:

*"1. The temporary use of buildings and open spaces for organised events and activities, which require planning permission, will be supported provided that the proposed temporary use:*

- i. does not cause any significant adverse environmental problems;*
- ii. would not have significant harmful impacts on the amenities of neighbouring residents;*
- iii. would not have significant harmful impacts on the wider visitor experience; and*
- iv. there is a clear community and neighbour support for the period of use proposed.*

*2. Development proposals should demonstrate alignment with the strategic environmental objectives and targets of the Neighbourhood Plan."*

Haven Leisure Limited welcomes the intentions of draft Policy W40. However, there are specific matters that need to be addressed.

Criterion 1iv of the draft policy is ambiguous and is at risk of being misused to the extent that opportunities for sustainable development might be missed.

There are no quantifiable measures for community or neighbour support of a temporary use in the draft policy. The policy therefore does not accord with Planning Practice Guidance (Paragraph: 041 Reference ID: 41-041-20140306) and the NPPF (Paragraph 16).

There are sufficient tests within criteria i-iii to ensure local amenity and the environment is protected as part of the planning framework already in place. It is difficult to see why temporary events should be treated more onerously. This aspect of the policy will not contribute to the achievement of sustainable development required by basic condition d. This part of the draft policy should be removed.

Part 2 of the draft policy is ambiguous as it does not provide clarification as to how *"alignment"* is to be considered. This does not accord with the Planning Practice Guidance Paragraph: 041 Reference ID: 41-041-20140306 and the NPPF (Paragraph 16) and should be removed from the policy.

See also Haven Leisure Limited's wider comments regarding the proposed strategic environmental objectives.

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

Additions in **bold** and deletions in ~~strikethrough~~.

*"1. The temporary use of buildings and open spaces for organised events and activities, which require planning permission, will be supported provided that the proposed temporary use:*

- i. does not cause any significant adverse environmental problems;*
- ii. would not have significant harmful impacts on the amenities of neighbouring residents; **and**,*
- iii. would not have significant harmful impacts on the wider visitor experience.;  
~~and~~*
- iv. ~~there is a clear community and neighbour support for the period of use proposed.~~*

*~~2. Development proposals should demonstrate alignment with the strategic environmental objectives and targets of the Neighbourhood Plan."~~*

*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: 10/04/2025  
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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	W41: Sustainable Tourism Development
Page	
Appendix	

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

	Support
X	Object
	Make an observation

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

Draft Policy W41 states:

*"1. Sustainable tourism development proposals and/or extensions to or expansion of existing tourism uses that extend the tourism season, enhance the visitor economy and increase the quality and diversity of the tourism offer are supported in principle throughout the neighbourhood area. Development proposals should be consistent with the hierarchy of preference expressed in the Local Plan.*

*2. All proposals must be of a scale, type, and appearance appropriate to the character of the location and ensure that any impact upon designated or non-designated heritage assets (including assets of archaeological importance) and their settings have been assessed in accordance with national policy and guidance.*

*3. Development needs to be sympathetic to the wider environment and must not result in an adverse impact, individually or cumulatively, upon designated landscapes and sites of biodiversity importance.*

*4. Development that results in harmful impacts on local services, roads and other infrastructure will not be supported.*

*5. Development that delivers a wider environmental or community benefits will be encouraged.*

*6. Development proposals should demonstrate alignment with the strategic environmental objectives and targets of the Neighbourhood Plan and conformity with other relevant policies in the development plan."*

Haven Leisure Limited welcomes a positive framework for tourism development within the Neighbourhood Plan. Part 1 of the draft policy seeks to do this.

Given the reference to national policy in Part 2, it is considered that this is not needed as it creates duplication.

Part 3 of the draft policy is at odds with national policy. Paragraph 189 of the NPPF addresses developments within National Landscapes as well as development in their setting. For such developments '*development should be sensitively located and designed to avoid or minimise adverse impacts*'. The draft policy is not positively framed as it sets a higher threshold for the acceptability of development. Further, there is no reference to the ability to mitigate any adverse impacts. This part of the policy should be deleted as no evidence has been

provided to explain the deviation from national policy and therefore regard has not been duly given to basic condition a.

Part 4 is more onerous with respect to transport than those set out within the NPPF (paragraph 116), which states that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”* This policy has not had regard to the NPPF and no evidence has been provided to explain why a more onerous approach is proposed. As worded it risks that sustainable development could be prevented from coming forward.

Part 6 of the policy is ambiguous in its reference to the environmental objectives, as no definition is provided for *“alignment”* and what this requires. The policy is therefore in conflict with the Planning Practice Guidance (Paragraph: 041 Reference ID: 41-041-20140306). Further, and as set out in Haven Leisure Limited’s other representations to this consultation, the environmental objectives must not be used as policies. This part of the draft policy should be deleted.

Paragraph 10.56 of the supporting text of Policy W41 provides a definition for sustainable tourism, and states that *“sustainable tourism is an ethos that should underpin all tourism activities and is integral to all aspects of tourism development and management and not just an add-on.”* The assessment of sustainable tourism as an *“ethos”* is not quantifiable and does not provide a clear framework for developers or the local community to understand. The application of an *“ethos”* in the decision making process is ambiguous and this should be deleted. This part of the supportive text is not clear and does not accord with the requirements of the Planning Practice Guidance, as a decision maker would not have sufficient clarity in this regard to consistently apply Policy W41 with consideration of this paragraph. This definition should be deleted and the usual definition of sustainable development, as set out in the NPPF, be relied upon.

Paragraph 10.56 of the neighbourhood plan requires proposals for sustainable tourism to be accompanied by an environmental impact assessment. The appropriate thresholds for the requirement of an environmental impact assessment is set out within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the ‘2017 Regulations’).

The need to consider individual impacts of tourism development is already embedded in planning practice, policy, and recognised through the validation process. The need to submit various documents is applied on a case-by-case basis dependent on the nature and scale of development to avoid disproportionate and unnecessary information being prepared to accompany an application. There is no need for more onerous requirements. This paragraph should be removed from the draft Neighbourhood Plan.

*Continue on a separate sheet if necessary*

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

Additions in **bold** and deletions in ~~strikethrough~~.

*"1. Sustainable tourism development proposals and/or extensions to or expansion of existing tourism uses that extend the tourism season, enhance the visitor economy and increase the quality and diversity of the tourism offer are supported in principle throughout the neighbourhood area. Development proposals should be consistent with the hierarchy of preference expressed in the Local Plan.*

*2. All proposals must be of a scale, type, and appearance appropriate to the character of the location and ensure that any impact upon designated or non-designated heritage assets (including assets of archaeological importance) and their settings have been assessed in accordance with national policy and guidance.*

*3. Development needs to be sympathetic to the wider environment and must not result in an adverse impact, individually or cumulatively, upon designated landscapes and sites of biodiversity importance.*

*4. Development that results in harmful impacts **unacceptable impact, following mitigation**, on local services, roads and other infrastructure will not be supported.*

*5. Development that delivers a wider environmental or community benefits will be encouraged.*


*6. Development proposals should demonstrate alignment with the strategic environmental objectives and targets of the Neighbourhood Plan and conformity with other relevant policies in the development plan."*

Paragraph 10.56 should be removed from the supporting text.

*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: 10/04/2025

*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: [NeighbourhoodPlanning@dorsetcouncil.gov.uk](mailto:NeighbourhoodPlanning@dorsetcouncil.gov.uk)

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

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

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## Part A – Personal Details

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

	Personal Details *	Agent's Details *
Title		
First Name		Helen
Last Name		Ashby-Ridgway
Job Title(if relevant)		Planning Director

Organisation (if relevant)	Haven Leisure Limited	Lichfields
Address		<div style="background-color: black; width: 100%; height: 15px;"></div> <div style="background-color: black; width: 100%; height: 15px;"></div>
Postcode		<div style="background-color: black; width: 100%; height: 15px;"></div>
Tel. No.		<div style="background-color: black; width: 100%; height: 15px;"></div>
Email Address		<div style="background-color: black; width: 100%; height: 15px;"></div> <div style="background-color: black; width: 100%; 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.*

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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	W45: Heritage Assets
Page	
Appendix	

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

	Support
X	Object
	Make an observation

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

Draft Policy W45 states:

*"1. Development proposals should demonstrate, where relevant, that they respect and will cause no harm to heritage assets and their setting.*

*2. Development proposals affecting designated and non-designated heritage assets or the 11 designated Conserva on Areas shown on Map 28 should be accompanied by proportionate historic environment heritage impact assessments, demonstrating how any harm would be avoided, minimised, or mitigated.*

*3. Development proposals on previously undeveloped land should be accompanied by the results of an archaeological assessment of the development site.*

*4. Where appropriate, development should take opportunities within the setting of any designated and non-designated heritage assets to better reveal and enhance their significance."*

This policy should be deleted from the emerging plan.

Part 1 identifies that 'no harm' to heritage assets and their setting should be demonstrated in development proposals. This is inconsistent with policy in the NPPF (paragraphs 213 – 216), which outline that harm to the significance of a designated heritage asset "*should require clear and convincing justification*". National policy goes on to set out specific policies in relation to different types of heritage assets (including their setting) and thresholds of acceptability in relation to different levels of harm.

Part 1 of the draft policy does not have regard for the NPPF and is therefore at odds with basic condition a. There is no robust evidence has been provided to support a departure from policy (PPG Reference ID: 41-040-20160211 and NPPF Paragraph 16). This part of the draft policy should be deleted.

There may be occasions where harm is unavoidable. The NPPF provides a clear framework for such instances in order to contribute to the achievement of sustainable development. Part 1 does not seek to achieve this at odds with basic condition d.

National policy already has specific policies that deal with conservation areas and non-designated heritage assets that are the subject of Part 2 of the draft policy. This part of the draft policy should be deleted.

Part 3 of the draft policy requires an archaeological assessment for any development on previously undeveloped land. This approach would be onerous as not all sites within the Weymouth Neighbourhood Plan area are expected to have the potential archaeological significance. NPPF Paragraph 207 already requires developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation where a proposed site includes or the potential to include heritage assets with archaeological interest. This draft part of the policy should be deleted.

Part 4 repeats NPPF paragraph 219. There is no need to repeat this requirement as best practice<sup>1</sup> and NPPF paragraph 16 guides that a neighbourhood plan should not repeat national or local plan policies, as such policies already apply and repeating them causes confusion. This draft part of the policy can be deleted.

When the emerging policy is considered as a whole, against the basic conditions, against best practice and as it does not reflect upon locally specific matters, it appears that the policy can be deleted in full.

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

Delete emerging policy in full.

*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: 10/04/2025

*If submitting the form electronically, no signature is required.*

<sup>1</sup> [How to create a Neighbourhood Plan: Your step by step roadmap guide - Locality Neighbourhood Planning](#)



# WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

**Friday 24 January 2025 until Thursday 10 April 2025**

## Response Form

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

### **Please return completed forms to:**

Email: [NeighbourhoodPlanning@dorsetcouncil.gov.uk](mailto:NeighbourhoodPlanning@dorsetcouncil.gov.uk)

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

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

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## Part A – Personal Details

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

	Personal Details *	Agent's Details *
Title		
First Name		Helen
Last Name		Ashby-Ridgway
Job Title(if relevant)		Planning Director

Organisation (if relevant)	Haven Leisure Limited	Lichfields
Address		<div style="background-color: black; width: 100%; height: 15px;"></div> <div style="background-color: black; width: 100%; height: 15px;"></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	
Policy	W46: Transport and Travel
Page	
Appendix	

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

	Support
X	Object
	Make an observation

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

Draft Policy W46 states:

*"1. Development proposals should:*

*i. identify the realistic level of traffic it is likely to generate and demonstrate, through an appropriate assessment of traffic impacts, that any infrastructure or highways improvements necessary to mitigate the impact on the highway network have been identified and shall be delivered as part of the scheme;*

*ii. maximise Active Travel opportunities by making appropriate connections to the walking and cycling network within the area, and particularly to local shops, schools and services; and*

*iii. support public transport schemes and infrastructure wherever possible.*

*2. Development that would give rise to unacceptable highway dangers and/or air pollution will not be supported."*

There is no objection to the overall thrust of the emerging policy. However, there is a need to consider the specific wording.

National Planning Policy Framework (NPPF), paragraph 116, states, *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network, following mitigation would be severe, taking into account all reasonable future scenarios"*.

Having regard to this, Part 1i of the draft policy is more onerous in that it appears to require *any* impact upon the highway network to be mitigated when this may not be necessary to otherwise make the development acceptable

There is no justification in the emerging Neighbourhood Plan for any deviations away from the NPPF. As drafted the policy does not have regard for national policy, at odds with basic condition a.

In relation to Part 2 of the draft policy, the clause should add:

1. specific reference to the ability to mitigate the impacts of development upon highway safety and air pollution as part of development proposals; and
2. clarification that the policy would not support unacceptable impacts upon air pollution, rather than any impacts on air pollution.

Such changes would assist with ensuring that the emerging policy is unambiguous, and therefore not in line with PPG (Reference ID: 41-041-20140306). Doing so would provide clarity in the application of the policy by decision-makers and the understanding of the policy by the local community. It would ensure that the Neighbourhood Plan is committed to contributing to the achievement of sustainable development (basic condition d) by allowing the unacceptable impacts of an otherwise acceptable development be addressed and the development supported.

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

Additions in **bold** and deletions in ~~striketrough~~.

*"1. Development proposals should:*

*i. identify the realistic level of traffic it is likely to generate and demonstrate, through an appropriate assessment of traffic impacts, that any infrastructure or highways improvements necessary to mitigate ~~the~~ **severe** impacts on the highway network have been identified and shall be delivered as part of the scheme;*

*ii. maximise Active Travel opportunities by making appropriate connections to the walking and cycling network within the area, and particularly to local shops, schools and services; and*

*iii. support public transport schemes and infrastructure wherever possible.*

*2. **Following mitigation**, ~~D~~development that would give rise to unacceptable highway dangers and/or **unacceptable** air pollution, will not be supported."*

**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: 10/04/2025  
*If submitting the form electronically, no signature is required.*