

4 April 2025
Weymouth NP Representation



Spatial Planning
Dorset Council
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Dear Sir / Madam

RESPONSE TO WEYMOUTH NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION

Savills have prepared this representation on behalf of Dorset Healthcare University NHS Foundation Trust (hereafter referred to as "Dorset Healthcare") in response to the Regulation 16 Consultation of the Weymouth Neighbourhood Plan (WNP).

Introduction

Dorset Healthcare owns Westhaven Hospital, which is located off Radipole Lane, DT4 0QE in Weymouth. Westhaven Hospital serves the communities of Weymouth and Portland. It is a 24-hour operational facility providing NHS care to patients providing short term admissions for rehabilitation, frailty intervention and end-of-life care. It works with Weymouth and Portland Community Hospitals to provide additional support for the wider area and a wide range of programs and apprenticeship roles to train new healthcare professionals along with the other nearby Community Hospitals.

The site comprises hospital buildings and associated surface level car parking, with trees and hedges present between buildings and around the car parks. A bank of trees and shrubs separates the Site from the adjacent Weymouth Golf Course to the north.

As a general principle, it is important that local planning policies do not fetter the ability for Dorset Healthcare to deliver healthcare services from Westhaven Hospital now or in the future.

Ecological Network

The WNP designates the Site as a 'Wildlife Corridor and Stepping Stones' as part of the ecological network on Map 6 (page 33) and Map 8 (page 38). The glossary of the WNP defines:

- Stepping Stones as '*Pockets of habitat that, while not necessarily connected, facilitates the movement of species across otherwise inhospitable landscapes*' (page 201 of the WNP)
- Wildlife Corridors as '*Areas of habitat connecting wildlife populations*' (page 202 of the WNP).

The images below show the extent of the ecological networks in this part of Weymouth. The Site is denoted by a red star.

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Figure 1: The map on the left is a screenshot of Map 6 from the WNP (page 33). The map on the right is a screenshot of Map 8 from the WNP (page 38). These maps show Westhaven Hospital as falling within the Ecological Network. Stars indicate the approximate site location.

Whilst Map 6 is specifically stated in draft policy W04 (page 39), draft policy W03 (page 35) refers to the ecological network that is outlined in the maps above. These policies state that:

Policy W03: Wildlife Habitats and Areas

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.

and:

Policy W04: Wildlife Corridors

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.

Paragraph 8.26 of the WNP states that ‘Policy W03 complements policy ENV2 of the West Dorset, Weymouth & Portland Local Plan as the areas identified are recognised by the Dorset Environmental Records Centre (DERC) as having significant ecological value’. Whilst there is little public availability to access the DERC records, in the ‘Urban Wildlife Corridors and Stepping Stones – Weymouth & Portland Borough ADDENDUM September 2020’¹ the most recent ecological network map does not cover the Site. Please see Figure 2.

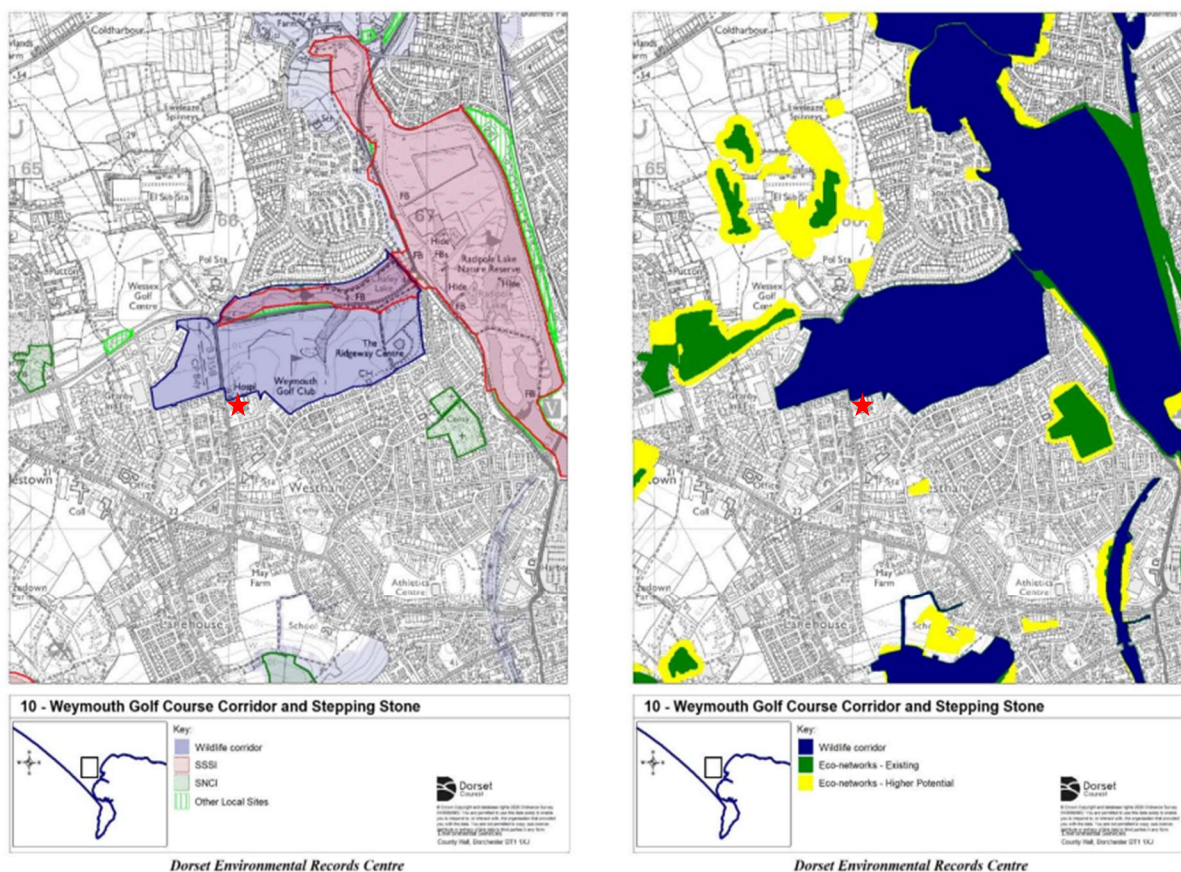


Figure 2 is a screenshot of page 15 of the Urban Wildlife Corridors and Stepping Stones – Weymouth & Portland Borough ADDENDUM September 2020. Stars indicate the approximate site location.

Paragraph 30 of the NPPF states that “...Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.” Paragraph 32 of the NPPF also states “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”

The supporting document for the WNP does not show Westhaven Hospital as being located within the Ecological Network. This means that the evidence suggests that Westhaven Hospital is within the Ecological Network and is not up to date, nor are Map 6 and Map 8 accurate in following the evidence found in the supporting documents. It is therefore unclear why the WNP has included the Site within the ecological network.

¹ Link found in the Strategic Environmental Assessment for the Weymouth Neighbourhood Plan (November 2024) prepared by AECOM on page 10 - e Microsoft Word - Weymouth & Portland Addendum DRAFT (4) (dorsetlnp.org.uk)

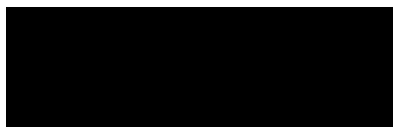
Whilst it is noted that 'wildlife corridors' are discussed within the sub-text of the West Dorset Local Plan, this terminology is not written in the wording of adopted local plan policies. Policy ENV2 of the Local Plan states that "...iv) in other locations, including locally identified wildlife sites and water-bodies, where significant harm to nature conservation interests cannot be avoided, it should be mitigated .. Features of nature conservation interests should be safeguarded by development".

Dorset Healthcare is concerned that the Site has been included within the above designations when it largely comprises buildings and hard-surfaced car parking areas. It questions whether it actually meets the definition of an Ecological Network or Wildlife Corridor as set out in the WNP. No evidence appears to have been submitted as part of the WNP to substantiate this.

If the Site is included within these areas, there is a risk that Policies W03 and W04 could unnecessarily restrict development proposals that Dorset Healthcare may want to bring forward in the future to maintain or improve healthcare provision locally. It therefore **objects** to the site's inclusion within the ecological networks on Map 6 and Map 8 and, by association, policies W03 and W04. To resolve this objection, Maps 6 and 8 should be redrawn to exclude Westhaven Hospital.

We do hope that you will be able to take our comments into account. Please contact me should you have any questions.

Yours sincerely



Emma Ralphs
Planner



WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

Friday 24 January 2025 until Thursday 10 April 2025

Response Form

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

Please return completed forms to:

Email: NeighbourhoodPlanning@dorsetcouncil.gov.uk

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

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

Part A – Personal Details

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

	Personal Details *	Agent's Details *
Title		Miss
First Name		Emma
Last Name		Ralphs
Job Title(if relevant)		Planner

Organisation (if relevant)	Dorset Healthcare University NHS Foundation Trust	Savills UK Limited
Address		██████████ ██████████ ██████████
Postcode		██████████
Tel. No.		
Email Address		████████████████████████████████████████

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

Part B – Representation

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

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

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

	<i>Location of Text</i>
Whole document	
Section	
Policy	W03: Wildlife Habitats and Areas
Page	33 and 38
Appendix	

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

	Support
x	Object
	Make an observation

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

Please see the representation letter for further information.

Dorset Healthcare **objects** to the extent of the Ecological Network corridor on Map 6 and Map 8. Given that draft policy W03: Wildlife Habitats and Areas refers to this map, we therefore object to the wording of this policy.

Continue on a separate sheet if necessary

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

To amend this, Dorset Healthcare asks that Map 6 and Map 8 be redrawn to not include Westhaven Hospital, as shown in the Weymouth Neighbourhood Plan supporting documents - Strategic Environmental Assessment for the Weymouth Neighbourhood Plan (November 2024) prepared by AECOM on page 10 - e Microsoft Word - Weymouth & Portland Addendum DRAFT (4) (dorsetlnp.org.uk).

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

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.*

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Whole document	
Section	
Policy	W04: Wildlife Corridors
Page	33 and 38
Appendix	

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

<input type="checkbox"/>	Support
<input checked="" type="checkbox"/>	Object
<input type="checkbox"/>	Make an observation

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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.