

COMMENT ON DORSET LOCAL PLAN 2025 SITE LA/WEYM/013 "WYKE OLIVER FARM
(SOUTH)"

- a. Specific design requirements
- b. Natural environment and ecology
- c. Landscape and visual
- d. Heritage
- e. Flood risk
- f. Amenity, health, education
- g. Transport (access and movement)
- h. Green Belt (if applicable)
- i. Other issues

A. SPECIFIC DESIGN REQUIREMENTS

1. This is a protected greenfield site, and the people of Weymouth have been defrauded by the WNP after repeated assurances that the site would be built with a MINIMUM OF 50% AFFORDABLE HOUSING. National Policy has been changed and the site could now be built with ZERO affordable if the developer makes the case. Until now, Bellway have consistently promised that they will build it with 50% affordable, the most recent promise was to WTC in their presentation of 10 July 2023 "Bellway would therefore be able to provisionally confirm delivery of 50% affordable dwellings, subject to the allocation of a minimum of 230 dwellings (115 affordable dwellings). Bellway would be willing to partner up, and the following RP's have initially come back and said they would be willing to engage in further discussions: ABRI; Places for People; Stonewater; Sovereign. Aster, Magna Housing Sage have notified us they are not purchasing new s.106 units until January 2025." In the same document they go on to demonstrate Appendix 1

<https://drive.google.com/file/d/1mnDK7CMz3YoGsO43H305VWQ10q1ztxcQ/view?usp=sharing> that in Dorset they have only ever achieved 15-30% and they have presented no Budget Information to show that they can do this profitably on the site. The only budget in evidence to DC (from the similar and adjacent site Wyke Oliver Farm North) shows that this is not even a remote prospect unless it is manipulated for 3-bedroomed houses as against the proven need in Weymouth for 1-bedroomed Affordable Housing. Source:

<https://www.dorsetcouncil.gov.uk/documents/d/guest/weymouth-np-viability-report-compiled-sept-2024-redacted> . The Viability Evidence held by DC from the WNP shows that the site was deemed not viable on this basis. There is a grave risk that Bellway will promise 50% and then renege, choosing to pay a higher CIL instead to achieve their profit aims. This may please DC and Weymouth Council with extra spending money, but it will not be spent on Affordable Housing, which is the key Design Requirement. The need shown for Weymouth is 66% 1-bedroomed affordable housing, page 75 Weymouth Neighbourhood Plan

<https://consultation.dorsetcouncil.gov.uk/spatial-planning/weymouth-neighbourhood-plan/>

Contrast this with these real-life comments to the SG from the CEO of East Boro Housing Association: “Whilst I whole heartedly support the 50% sentiment of your aim on greenfield sites I would suggest unless the neighbourhood plan and its incorporation into the overall Dorset Council Local Plan is some years off and the economy/costs are different, the likelihood of developers being able to viably deliver 50% affordable in today’s market will be a significant challenge. You may end up with planning permissions that are not proceeded with or significant viability challenges that will then be decided by Dorset Council after planning permissions are granted. Either that or the land will need to be free and it still would be challenging for developers to build that % on a scheme and be able to subsidise them out of only the other half. Also from the affordable half you would likely need a significant % to be shared ownership to enable the Registered Provider to be realistic to help the developer. It is more complicated than just choosing a % when it comes to delivery and this is the most difficult economy I have seen to deliver affordable housing in my career (and I don’t say that lightly) add that all up and 50% affordable is a real challenge and believe me I want it but I am also a realist regarding the task. Taking 30% and getting a scheme delivered because it works is better than nothing if it does not proceed. You could say we have set it high to negotiate down but it costs £10’s of thousands and a long time to work up planning, get it submitted etc. it’s a big abortive cost risk if you then can’t get a viability challenge through that only really big developers may risk the potential abortive investment if at all given the amount of “in boundary” opportunities they may have with lower affordable % when the Dorset wide plan is approved. So I applaud the aim but it may not deliver results quickly and or possibly to the level you want due to viability and the economy.” Dorset Council have the power within the Local Plan to enforce 50% affordable in accordance with all these assurances. They also have the power to fix a minimum affordable level county-wide, or to allow developers to continue to renege on their promises on most sites, due to “Viability” reasons. CIL payments in lieu do not get affordable houses built.

2. Over the decades this site has been described as many things, most recently as Budmouth/Brackendown Avenues. The whole site is within the exclusion zone of the LVNP SSSI and so this will have a heavy impact on design. It has been decided after many years of consultation, and agreed with the present owners, that the west of the site is dramatically visible and harmful to the LVNP SSSI, so no construction can take place there at all or, if it does, it will have to be to a very high Design Requirement. It has been agreed with the owners that the western part of the site should be given over to increase the size of the LVNP and this has been the design proposed by the current adopted Local Plan, the 2016 West Dorset Plan

<https://www.dorsetcouncil.gov.uk/documents/35024/327480/West+Dorset%2C+Weymouth>

[+%26+Portland+Local+Plan+2015.pdf/e6f329e7-ec5b-52fc-7364-4a8726877184](#) and its subsequent reviews. Policy WEY 8 on page 143 states: “Land at Lodmoor will be permitted for tourism, low key recreation and ancillary uses, appropriate to its gateway location and its proximity to sensitive sites. Any development will be expected to be of a high quality design and relate positively to the adjoining public areas.” The central part of the site is well concealed from view for design purposes, especially lower down near Brackendown Avenue. The eastern part of the site is again very conspicuous, especially from the Furzey Cliff area, and Design would be a fundamental consideration on that part of the site bordering Budmouth and Brackendown Avenues as far back as the first hedgerow to the west.

APPENDIX 2

<https://drive.google.com/file/d/13-eZAgv2wkwzl6t9nj09oPh6OGJwkq79/view?usp=sharing>

3. The land is geologically unsound and so any development would need very extensive design to foundations to support construction and the cost would be prohibitive, especially for “affordable housing” APPENDIX 3 shows subsidence in Enkworth Rd, when this site was known as “land to the west of Enkworth Rd”

<https://drive.google.com/file/d/1bPlaSCLRi4vpnfuoQ0uy4hVScE6ShAQT/view?usp=sharing> .

APPENDIX 4 shows a Geology Report relating to both of these adjoining sites

<https://drive.google.com/file/d/1Qux5TbSemc1dpriOp1KeaCdLnhquDznY/view?usp=sharing>

There would need to be shown that a SUDS scheme is well designed: the last attempt from developers showed water flowing uphill on this site APPENDIX 5

<https://drive.google.com/file/d/1vcDgXkMdanWFFtrfRP1rO3n5-lDqMbF/view?usp=sharing>

This has not been done because of the certainty that surface water cannot be contained within the site, as per DC Policy, yet it cannot be discharged outside of the site because it can only be discharged into a Flood 3 catchment where DC has evidence in its possession that local houses have been flooded over the past 40 years or more. Furthermore, because this water could only discharge into the SSSI, it would need to be cleaned first.

4. Access is a particular constraint to the site. Over the decades, once the landowners realised there was no possibility to develop the site, they closed off the access to the site from Budmouth Avenue by building the Spanish style villas on Budmouth Avenue. This had been refused by Planning but allowed on appeal. They closed off access to the site from Brackendown Avenue by building at the “Southdown Farm” western end of that road. Dorset Highways have formally confirmed that at the very most, the Brackendown Access would be suitable for no more than 5 houses. Access from Eastdown Avenue has been proposed but this would conflict with the LVNP, it would be over 500m long before even reaching the beginning of the development and the geology of the site means it would be very costly. There is a critical design issue because it would have to be built over the pressurised sewer, APPENDIX 6, which is not allowed:

https://drive.google.com/file/d/1FA_dj-jx43xRd8bIZ8wLTnLSBTe314Tp/view?usp=sharing

5. It will clearly not be viable to conform with DC design policy that new homes should only have provision for 1 car, since cars will be the only viable way of reaching the site. See below.

6. At page 195 para 183 Dorset Council concluded its WNP Reg 14

<https://www.dorsetcouncil.gov.uk/documents/d/guest/full-reg-14-response> 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”. There is no evidence of this work having been done and therefore it is DC Policy that this site should be removed from consideration of “formal site allocation”.

7. The Local Plan Design ignores the fact that it was agreed for a large part of this site to be given over to the LVNP.

8. At pages 48-49 of the January 2023 document, also by AECOM and prepared by Niamh McDevitt Graduate Planner; Yanny Tsang Senior Town Planner; Tim Fearn Principal Planner; Una McGaughrin Associate Director

<https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2023/01/Weymouth-Neighbourhood-Plan-Site-Assessment-Final-Report.pdf> it states: “The site is potentially suitable for allocation for residential use. The site slopes noticeably towards the north, but is more level immediately north of the residential development on Brackendown Avenue. It comprises agricultural fields adjacent to the development boundary. The adopted Local Plan identifies it as having geological and local landscape interest, as well as forming part of an important gap. However, these designations are not proposed to be carried forward into the emerging Local Plan, and (subject to discussions with the Local Planning Authority) there is potential for part of the two fields north of Brackendown Avenue (approx. 2.5 ha.) to be developed at low density without adverse landscape impacts as they are more enclosed by the site’s topography. Development of the fields to the west of the site would result in significant adverse impacts on landscape character and visual amenity as they are exposed to long range views, including from the nature reserve and SSSI to the south and the Public Rights of Way which cross the site. A small amount of the site is within flood zone 2 and a site level sequential test may be needed before development could occur on this part of the site. Although access could be taken from Budmouth Avenue or the residential streets south of the site, these are all long and narrow culs-de-sac which are unlikely to have capacity to serve development of the whole site, and it is unlikely that the proposed capacity of 250 dwellings could be achieved without significant highways improvements. Consultation with the highways authority would be required.” At page 167 of this document, it concludes that, having considered the site as “potentially suitable”, it was actually “unsuitable”: “**Conclusion.** The site is located outside the development boundary and within land of local landscape importance and an important open gap. There are flooding and access concerns. **An unsuitable site.** Suitability: The site is located outside the development boundary and within

land of local landscape importance and an important open gap. There are flooding and access concerns.”

B. NATURAL ENVIRONMENT AND ECOLOGY

1. The most recent SEA studies are listed at

(a)

https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/12/Weymouth-NP-SEA_Environmental-Report-November-2024.pdf This has been submitted to DC by WTC in the WNP. It is listed as “November 2024”, but actually dated December, is very similar to the previous versions submitted on 5 September 2023 and 25th October 2023. The version dated 29th November 2024, was listed on the agenda for the WTC meeting on 20 November 2024 and was authorised by AECOM on 6 December 2024. The vote taken by WTC was unlawful on 20 November 2024 and was rerun 3 months later as a result of resident concerns.

We rely on the pdf pages 17 and 52-56. Unhelpfully, the document enjoys latin page numbers as well and the pages in the physical document are xiii and 30-34. This time there are only 8 Criteria, and one needs to refer back to the earlier studies between 2017 and 2021 to correlate the headings. Flooding is dropped but Transportation comes in; Soil and water are combined etc etc. In summary, this site scores No Likely Positive Effects out of the 8 Criteria; 4 Red Flags out of 8; 2 Uncertain Flags and the 2 Neutral Flags are given to Historic Environment and Land, Soil, Water Resources. We shall take out the Criteria of Transportation; Flooding; Community Wellbeing; Historic Environment; Land/Soil; Landscape and deal with these below. Under this chapter we deal with Biodiversity.

(b)

<https://www.dorsetcouncil.gov.uk/documents/d/guest/sa-report-for-dorset-local-plan-august-2025> Page 84 refers. Once again, the headings have been changed from previous studies making it very hard to compare like-with-like. This latest LUC study has 11 criteria and 5 of these are red flags so on balance it has moved from 50% red flags in 2024 to 45% red flags in 2025. Climate Change and Flooding has moved from “Uncertain” to “Negligible effect likely”. Clearly, this is a piece of desk research not taking into account the “baseline” data which the authors purport to have considered. However, it can be said to reflect the same SEA studies, negative for the site, carried out over the last 8 years or so. The AECOM report does show some qualifications for their authors, but the LUC document does not.

Certainly, the AECOM report goes into great detail as to how it reached its reasoning for this site and some of this has been quoted verbatim here. The LUC report, by contrast, cannot be regarded as safe for these purposes as there is no detail. Let us consider what LUC did for Dorset in 2018 at

<https://www.dorsetcouncil.gov.uk/documents/35024/285472/Weymouth+Stage+2+Assessments.pdf/6b8b40c2-3de6-eee9-53d0-c2d8fd993abf>

For some reason, the pdf pops up as “Dartmoor Landscape Sensitivity” and this is assumed to be just sloppy, cut-and-paste work. It refers to this site as “Weymouth 5” . Its conclusions were: “ **Summary of key sensitivities and guidance for sustainable development** Summary of key sensitivities: The following provides a summary of the key landscape and heritage sensitivities within the assessment area: · Locally prominent valley slopes and hill landform, with long views out to sea from higher ground. · Natural features within the landscape which form part of the wider habitat network, including hedgerows and trees. · The sense of separation and setting that the landscape provides to existing development at Littlemoor and Overcombe and notably the rural gap along the A353. · Open and expansive skylines, which break up the existing development. · High levels of tranquillity and strong rural character despite the close proximity of the urban environment. · The intervisibility of the landscape with the hills within Dorset AONB. · The inclusion of the landscape within the Southdown Ridge Area of Local Landscape Importance. **Guidance for sustainable development** Any new development should: · Be limited to areas of lower ground adjacent to existing settlement within Overcombe/Littlemore. Ensure development is in keeping with the style, form and vernacular of adjacent settlement. · Respect the role of the landscape as an undeveloped backdrop to existing settlement. · Preserve the sense of separation between the distinct urban areas of Overcombe and Littlemoor and the gap along the A353. · Retain the distinct visual character of the landscape, with long views including the sea and the tied island of Portland beyond and to the hills of Dorset AONB to the north. · Avoid the higher, more visually prominent slopes where development would impact on the undeveloped skylines. · Retain the natural features within the landscape including hedgerows and trees. Utilise these features to help screen development where appropriate. · Protect the qualities of the landscape which are recognised through its designation as part of the Southdown Ridge Area of Local Landscape Importance”

2. WTC in their NP have stated formally that this site failed for SEA reasons. This is confirmed by document <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/Compendium-of-Policy-Changes-to-Pre-Submission-Plan-November-2024-1.pdf> at page 2. This document was withheld from DC as part of the package for consideration by The Examiner of the WNP. It says: “**Policy deleted as a result of concerns raised regarding Biodiversity, Community Well-being, Landscape, and Transportation** in the SEA, Dorset Council and by residents”. This also states that it was deleted with input from Dorset Council. These SEA reasons were further confirmed on 10 February 2025 by the chair of the SG, Cllr Northam, in his address to a public meeting of residents. This recording is at https://drive.google.com/file/d/18jZAN8fHIIHgg4Dy_9xuaVAOWqaHQQn/view?usp=drivesdk at 26minutes and 36 seconds. This seems to indicate that DC had already reached its Policy conclusions under these headings, and it is surprising that, with this knowledge, it has pushed forward to include this site again against adopted policy.

3. BACKGROUND

This site was not mentioned in the extant Dorset Local Plan 2015. In February 2017 it appeared as Site G in the **Sustainability Appraisal Issues and Options** <https://www.dorsetcouncil.gov.uk/documents/35024/296265/Sustainability+Appraisal.pdf/86f627ea-0374-adf7-a5e3-a19101a23f50> as a combined Site G on page 48 with LA/WEYM/012. It came forward into the WNP as 2 sites because of the different ownership. At page 50 of the 2017 report, it shows the conclusions as being 6 Red Flags out of 11 criteria. **Biodiversity, Landscape and Climate Change** scored Red Flags and Community scored “negligible effect”. **Transportation** was not considered. **Flooding** scored a Red Flag in its own right along with **Climate Change** but was subsumed into “Climate Change” alone for the 2024 report. This is peculiar because the 2017 report listed at para 8.1.7 on page 51: “The River Wey and its tributaries, and the flood plains associated with this river system and other surface water features surrounding Weymouth, occupy large areas of the land surrounding the town. Development would result in adverse impacts upon water quality and expose property and residents to flooding in areas to the west of Broadway and Redland (areas I and K), in those areas surrounding the Lorton Valley Nature Park (areas F and G), around Preston (areas A and B) and the coastal areas to the West of Weymouth (areas M).” At page 54 of the same review the site also appeared as site W1 and there it achieved 5 red flags out of 12, with Flooding moving from “strong negative effect” to “negligible effect”. This is accounted for by the DC ignoring strong resident complaints about flooding in the SE Corner of the site, more of this below under Flooding. DC issued a false Statutory Declaration relating to flooding and even refused 3 times to release a document prepared by an officer to show this. DC finally had to release the document and re-issue a correct Statutory Declaration as a result of a Freedom of Information request. It is clear that today there are officers working at DC who were involved in the earlier 2018 process.

After this 2017 Review, in 2018 came forward the **Sustainability Appraisal Preferred Options** conclusions

<https://www.dorsetcouncil.gov.uk/documents/35024/296265/20180802+-+Sustainability+Appraisal+Preferred+Options+%28FINAL%29.pdf/4c515ee5-159c-4b10-d646-24ec390b9735>

which was to form policy until discontinued when West Dorset DC ceased and DC was formed. In this, at page 80, the combined site G had disappeared and basically only WNP24 came in as Site W1. However, for reasons unknown, “Land at Wyke Oliver Farm” appeared on page 83 as a policy WEY14 and no map at all was contained in this document to show its location. The evolution of “WEY14” has been tracked over the years as:

1. West Dorset and Weymouth draft Local Plan June 2012 WEY14 was “land to the south of Lorton Lane”
2. Ditto June 2013 WEY14 was “Bowleaze Cove”

3. Doesn't figure in the extant lawful Local Plan at the moment (2015)? Page 149 shows WEY14 as "Bowleaze Cove"
 4. Appears in the 2017 Local Plan Sustainability Appraisal Issues and Options Review at pages 48-52 as "Area G" with no other designation but shown on Map
 5. Appears in the 2018 Local Plan Sustainability Appraisal Preferred Options Reviews at pages 80-85 as "WEY14 Land at Wyke Oliver Farm" but is not shown on any map in that document for clarification as to location or content
 6. Appears on page 3 of Dorset Environmental Records Centre Ecological Survey September 2021 as WEY14 "Redlands Farm, Wey Valley"
 7. Appears in Dorset Council Local Plan consultation 2021 summary of responses – Weymouth on page 24 as WEY14 reverting back to "Land south of Wey Valley"
 8. WEY14 Appears in the AECOM WNP Site Options and Assessments Report January 2023 on page 20 as "Bowleaze Cove"
 9. Ditto
- page 35 as
- WNP14
10. Ditto
- page
- 36 as LA/WEYM/013 as "Wyke Oliver Farm (South)"
11. Appears in the DC 2021 Sustainability Appraisal as "02_WEY: Wyke Oliver Farm (South)"
 12. Appears in the DC 2021 Sustainability Appraisal as "WEY G"
 13. Appears in the WNP as site WNP24 "Land off Budmouth Avenue"
 14. Has appeared from time to time as "Land to the west of Enkworth Road"

After the 2017 and 2018 Reviews by West Dorset, DC itself was responsible for the January 2021 Review. The authorship and professional qualifications of all these reviews are not clear. The latest SEA prepared by respected consultancy AECOM involved E.B. Graduate Environmental Planner; R.P. Principal Environmental Planner; C.B. Associate Director and N.C.B. Technical Director. At page 21 of

<https://www.dorsetcouncil.gov.uk/documents/35024/307470/DCLP-Jan-2021-SA-non-technical-summary.pdf/3aa46d10-e790-b82e-8966-a013f566e39a> the site is now called 02_WEY:

Wyke Oliver Farm South" as part of the "Central Dorset Functional Area". There is no map appended so it is not clear what this is or where it is following the confusing nomenclature adopted over the decades as above. Whatever this site is, it scored 3 out of 12 Red Flags.

Bizarrely, at page 205 of

<https://www.dorsetcouncil.gov.uk/documents/35024/285538/DCLP-jan-2021-vol-2-central-dorset.pdf/e80498e5-b868-3b20-2882-8d00ddbb46e1>

the DC 2021 Local Plan reviews, this site disappears completely and is shown as neither a major, nor indeed any, kind of development opportunity. It does, however, pop up again in the associated January 2021 Review

<https://www.dorsetcouncil.gov.uk/documents/35024/307470/DCLP-Jan-2021-SA+reduced.pdf/00cdaaf8-87f8-e74e-0ac0-423383e50467> shown as WEY G. On page 183 it says: “Potential for small scale development in the south eastern section of this area incorporating mitigation against potential impacts upon wildlife and landscape”. It is not clear whether this means part of this site in the SE sector of WEY G or whether it is supposed to be W1 which appears and disappears with regularity. On page 182 it goes back to scoring 4 Red Flags but now there are only 11 Criteria. At document <https://www.dorsetcouncil.gov.uk/documents/35024/3473866/Final+Consultation+Summary+-+Weymouth.pdf/a36b5832-102f-81c9-251f-b77fa31790fe> from the same consultation, at page 24 it shows that this site does not figure at all as a “Main development opportunity”.

Part of this site was purchased by Bellway Homes after 2018, it was shown by Land Registry as Title DT53032 with a consideration of £670,000. Bellway and its agents met with Cllr Northam of WTC and Cllr Northam became the chair of the SG of the WNP. It is not known what assurances Bellway received that gave it the confidence to purchase (as opposed to option) but the site then reappears in the draft WTC WNP.

WTC have formally confirmed its belief in the document “How to work with landowners and the development industry” APPENDIX 7

<https://drive.google.com/file/d/1dy-bPrNIAkF0ElrvhyprGrOmrhORyuDn/view?usp=sharing> and by a formal Freedom of Information request it confirmed that the SG did not follow the guidelines: “If you do arrange meetings with developers....consider having a third party present in order to ensure independence and impartiality; Keep a note of any meetings and calls; and make clear at the outset that discussions are not binding; Ensure the community are aware of what you are doing and why; Make sure that the wider community is aware of any meetings with developers or landowners and report back on the outcomes of any meetings”. The minutes of the SG of the WNP reveal that there were numerous contacts with Bellway and its agents by telephone, ZOOM/TEAMS etc but it appears that this was not documented or shared with the people of Weymouth. Bellway have confirmed that: “It has always been explained as such during our extensive past discussions with members of the Steering Group”

<https://www.dorsetcouncil.gov.uk/documents/d/guest/25-07-22-covering-letter-redacted> NP’s are supposed to be a democratic bottom-up approach driven by residents and not a top-down approach driven by politicians. The Town Clerk of Weymouth has cautioned the SG of WNP not to minute matters which they would rather keep from residents:

“Confidentiality and the Importance Going Forward: Jane reminded everyone that conversations held within the steering group meetings which are not minuted are to be treated as confidential.”

<https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2025/05/17.03.2025-Neighbourhood-Plan-Steering-Group-Meeting-Notes.pdf>

In 2018 the planning application APPENDIX 8 resulted in this leaflet from Cllr Harris, the LibDem Leader of WTC, “If this proposal is adopted into the Local Plan by our council, houses will undoubtedly be built”.

https://drive.google.com/file/d/1z6rOs_X-66PjyBx6cOljSIs8xjn9jrh_/view?usp=sharing Cllr Harris pointed out that the developer was able to make water run uphill as shown in their application APPENDIX 5 above. When local Preston Councillors suggested to residents that 500 houses might be built in Preston, Cllr Harris wrote that was “Lies” and Cllr Northam tried to get the councillors sanctioned. With somewhere in the region of 1,456 houses now being proposed by DC, it is hoped that DC can reach their own conclusions about who the “liars” are on Weymouth Town Council in this scenario between the politicians and the people.

4. BIODIVERSITY

We rely on pages 31 and 53 of the **SEA Statutory Report**, which compares **Biodiversity**. The Red Flag states: “Biodiversity and geodiversity: This site is adjacent to the nationally designated Lodmoor Site of Special Scientific Interest (SSSI), which is located to the south. It is also approximately 700m north-west of the internationally designated Isle of Portland to Studland Cliffs Special Area of Conservation (SAC) and the South Dorset Coast SSSI. The site falls within SSSI Impact Risk Zones (IRZs) for the types of development that are likely to be taken forward through the neighbourhood plan (i.e., residential, rural residential, and rural non-residential). Development in the area adjacent to the SSSI could lead to negative effects on biodiversity, for example through the loss or fragmentation of habitats, which reduces connectivity. Additionally, pressure on the SAC includes recreational uses (e.g., walking and climbing) and livestock grazing. As allocating this site for development could result in increased pressure, consultation with Natural England will be required if this site is allocated for development. This site is also seen to be suitable for habitat creation and expansion by Natural England, as it overlaps with a Network Enhancement Zone 1 and Network Enhancement Zone 2 in its southern half, as well as areas of Network Expansion Zone to the east and west. According to guidance provided by Natural England, Network Enhancement Zones are land that connects existing patches of primary and associated habitats that is likely to be suitable for habitat creation, and Network Expansion Zones include land outside of the Network Enhancement Zones that are potentially suitable for expanding, linking and / or joining networks across the landscape. As such, development on this site should focus on expanding and joining up existing habitat patches and improving biodiversity connectivity⁸. In terms of features present within the site, there is a small area of traditional orchard Biodiversity Action Plan (BAP) Priority Habitat in the south-west, and is adjacent to an extensive area of coastal and floodplain grazing marsh associated with the Lodmoor SSSI to the south, as well as reedbeds to the south and deciduous woodland to the west. These habitats could be disturbed by development on this site through increased noise and light pollution. There is vegetation on the site boundaries in this location that should be retained

and enhanced as far as possible to avoid biodiversity impacts and to help deliver biodiversity connectivity and net gains. Overall, negative effects are considered likely if development comes forward on this site. This reflects the proximity of the site to the SSSI and SAC designations, and the additional BAP Priority Habitats within the site boundaries as well as in proximity.” This was given a Red Flag to this site. It was given a Red Flag to the joint site in the **2017 Appraisal** and a Red Flag to the **2018 Preferred Options** for WNP24. In the Statutory SEA Document for 2025 it continues to be shown for WNP24, although this site had been dropped, at page 31 as a Red Flag. It is pointed out that the entire site is within the exclusion zone of the LVNP SSSI. The site indicated for WNP24 on page 30, by this time, was no longer accurate as far as **Biodiversity** was concerned because it had been agreed to drop fully one-half of the site at the west and give it over to the SSSI, restricting development to just the portion north of Brackendown Avenue.

Much is made about the transfer of 31.9ha of land (WNP24 8.5ha and WNP25 23ha) to the Lorton Valley Nature Park as shown in the Statutory Bundle <https://www.dorsetcouncil.gov.uk/documents/d/guest/change-summary-wnp-policies-post-reg-14-november-2024> at pages 2 and 4. “WNP24: Land at Budmouth Avenue – removed as an allocation due to the negative impacts of the development identified in the Strategic Environmental Assessment (SEA) and reflected in the comments made by a significant number of residents in the area. This removes the potential for 230 homes on a mixed development with 50% affordable homes, and the transfer of 8.5ha land to Lorton Valley Nature Park and the creation of allotment and car parking access to LVNP but removes the likely adverse effects as identified in the SEA, namely, Biodiversity and Geodiversity, Community Wellbeing, Landscape, Transportation and which are considered as difficult to mitigate on this site”. Thus the extent of the site now shown is entirely misleading and false. At page 82 of <https://www.dorsetcouncil.gov.uk/documents/d/guest/reg-14-analysis-final-28-02-2024> Dorset Wildlife Trust stated: “These proposed allocations are those which are anticipated to have the potential for greatest impacts on biodiversity.” The WNP now approved by The Examiner and going forward to referendum explicitly safeguards this transfer as a condition for the adjoining Wyke Oliver site and, by implication, for this site too, although clearly it was not considered as part of The Examination, except to confirm it was excluded.

C. LANDSCAPE AND VISUAL

1. Both Environment Assessments prepared by West Dorset in 2017, 2018, as well as the SEA in 2023, which states at page 33: “Landscape: The Dorset Area of Outstanding Natural Beauty (AONB) is located approximately 750m north of the site. Effects are likely to be limited due to the existing built form to the north and east of this site, as well as areas of higher elevation outside of the site to the north. The site adjoins existing development to the south and east, comprising agricultural fields along Weymouth’s development boundary.

Development at this site will act as an urban extension, and could set precedent for future growth into the open countryside to the north and west. There is potential for this growth to lead to the merging of settlements if this continued – specifically Overcombe and Littlemoor. The gradient of this site slopes noticeably downwards from the north, but is more level adjacent to the Brackendown Avenue development on the southern boundary, and is relatively level in an east-west direction until the most eastern field - where it slopes down to the east. It is likely development of this site will impact on views out of the residential development along Brackendown Avenue and Budmouth Avenue. Additionally, development of the fields in the western part of the site would result in significant negative effects on the landscape character and visual amenity, as they are exposed to long range views including from the Lodmoor SSSI to the south and the public right of way that crosses the site. Overall, negative effects are considered likely if this site is allocated. This reflects the site's elevation and the likely visual impact on views from the site across the surrounding area, including the public right of way and the SSSI, and views into the site from existing development. It also reflects the potential for future development to the north and west, as well as the potential for coalescence between settlements.” Further: “The site slopes noticeably towards the north, but is more level immediately north of the residential development on Brackendown Avenue. It comprises agricultural fields adjacent to the development boundary. The adopted Local Plan identifies it as having geological and local landscape interest, as well as forming part of an important gap. However, these designations are not proposed to be carried forward into the emerging Local Plan, and (subject to discussions with the Local Planning Authority) there is potential for part of the two fields north of Brackendown Avenue (approx. 2.5 ha.) to be developed at low density without adverse landscape impacts as they are more enclosed by the site's topography. Development of the fields to the west of the site would result in significant adverse impacts on landscape character and visual amenity as they are exposed to long range views, including from the nature reserve and SSSI to the south and the Public Rights of Way which cross the site. A small amount of the site is within flood zone 2 and a site level sequential test may be needed before development could occur on this part of the site”. The WNP scores this as a Red Flag, primarily for the reasons of coalescence with Littlemoor, loss of Green Gaps and loss of Wildlife Corridor, in contravention of other policies within WNP such as W14 9.21: “Any development proposals that are considered permissible should be accompanied by a landscape character assessment to establish that there will be no adverse visual impact on the character and sensitivity of the landscape”. In a different AECOM report <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2023/01/Weymouth-Neighbourhood-Plan-Site-Assessment-Final-Report.pdf> at page 167 their SHLAA conclusion was: “The site is located outside the development boundary and within land of local landscape importance and an important open gap. Unacceptable landscape impacts. **An unsuitable site.** Suitability: The site is located outside the development boundary and within land of local landscape importance and an important open gap. There are flooding and access concerns.

2. After 5 years work in the WNP, a vast amount of the western end of this site was deleted from construction in favour of retaining within the LVNP and SSSI. This accords with the last policy adopted in the 2016 West Dorset Local Plan.
3. When dropping this site from the WNP, the SG also accepted that there were Landscape issues to the east of the site, which were prominently on view from the protected Jurassic Coast walk and busy tourist areas at Furzy Cliff, see photo APPENDIX 2 above
4. This site is entirely within “Important Open Gaps ENV3” and “Land of Local Landscape Importance ENV 3” adopted as present Policy.
5. At the time of the last Planning Application for this site, the Planners wrote APPENDIX 9, <https://drive.google.com/file/d/1rW8KsbhERWZg5ynJxHVGs8tMDA0UfFu/view?usp=sharing>

In particular I draw your attention to the Stage 2 Assessment for Weymouth - <https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/local-plan-review/pdf/evidence/weymouth-stage-2-assessments.pdf>. Note from Editor, this link is now broken and replaced by <https://www.dorsetcouncil.gov.uk/documents/35024/285472/Weymouth+Stage+2+Assessments.pdf/6b8b40c2-3de6-eee9-53d0-c2d8fd993abf> Pages 23 on refer. The Stage 2 report includes an assessment of the wider Wyke Oliver / Southdown Farm area (shown as Assessment Area: Weymouth 5) and concluded that this wider area is of ‘moderate-high’ landscape sensitivity.

The Stage 2 assessment highlights some key characteristics, such as: the separation the landscape provides between Littlemoor and Overcombe / Preston; the locally prominent hill slopes; and views in and out of this area. Although much of the WEY14 site is concealed by existing development in views across Lodmoor from Preston Road, parts of the site are visible west of Overcombe Court and from more elevated positions along Bowlease Cove Way.

If this site is to be taken forward through the Local Plan Review, it is considered that further work is required to show the likely visual impact of development and how it could be satisfactorily accommodated within this sensitive landscape. <https://drive.google.com/file/d/1rW8KsbhERWZg5ynJxHVGs8tMDA0UfFu/view?usp=sharing>

D. HERITAGE

There is a possibility of a Roman Temple within the site, but this has not been investigated. <https://www.dorsetcouncil.gov.uk/documents/35024/287887/Consultation+responses+summary+-+Chapter+7+Weymouth+%28summary+document%29+FINAL.pdf/23bb57bb-3993-9623-002b-2398634ec637> The pages are not numbered but this is shown at page 13 of the 19

page pdf. “Heritage · Dry weather crop markings suggest the potential presence of a historic Roman temple on the site. This needs to be investigated.” If a Roman Temple is indeed on the site, it would give the site the same protection as the nearby Jordan Temple on Bowleaze Coveaway. It is not explained how this site has now acquired a deeply negative status for Historic Environment in the August 2025 Reg 18. There has been no previous “baseline” work done on this subject to give rise to this conclusion, which seems to apply generally to most of the Weymouth sites.

E. FLOOD RISK

1. There is no dispute that Flooding is the single greatest threat to Weymouth through Climate Change. Both Dorset and Weymouth Councils have been fashionable to declare Climate and Ecological Emergencies as far back as 2019. The DC comment on page 196 of their Reg 14 says under para 194: “Flooding – a lack of criterion referring to flood risk is a concern”. At page 197 para 202 Dorset Council concluded its Reg 14 with: “It is therefore recommended that these site constraints are investigated in advance of formal site allocation and co-ordinated through ‘initial’ master planning work reflecting an iterative process to site design”. The site has been formally allocated and there is no sign of this work having been done.

Strangely, the Statutory SEA only makes oblique reference to this and denies Flooding a separate chapter, even though it was a separate chapter in both the 2017 and 2018 Local Plan Reviews. On page 32 it gives it an “Uncertain” Flag and it has ignored all evidence submitted over decades by residents to the Council (under whichever name it was operating at the time). It is only correct in that it says that water not contained within the site can only be discharged into “an area of high surface water risk”. It does not say that this Flood 3 Area has been identified as of being risk of being underwater from 2030 onwards APPENDIX 11 <https://drive.google.com/file/d/10nRUeRDmJhBPmQSVCSfQq7pr0yBf7JPq/view?usp=sharing>

It does not say that it can only discharge into a SSSI and that any water discharged will need to be cleaned. This site failed in its Viability Assessment in the WNP but was voted through at draft stage by WTC. The SG of the WNP then, in its own words, got their Viability Consultant to “tweak” it so that it marginally passed. WTC then voted at the next draft to exclude the site. It was deleted apparently for Environmental reasons.

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 major flood risks to the east of the town centre. In their Reg 14

<https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/11/FULL-Reg-14-Response.pdf> when considering this site, 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).” It goes on: “We note that there are some locations that are outside of the previously agreed Sequential Test area, such near as Lodmoor. Whilst these sites may be outside of the flood risk areas themselves as they are elevated on made ground. We would highlight that the access to these sites may be unsafe due to flood depths and velocities, from beach over topping or failing, so this should be considered this requirement as National Planning Guidance would indicate that they should have safe dry access over their lifetime. We would highlight that the Council’s Emergency Planners should be involved in this decision-making element. We do not normally comment on, or approve the adequacy of, flood emergency response procedures, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. Planning practice guidance (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development. We also advise you undertake appropriate consultation with your, local planning authority, emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 167 of the NPPF and the guiding principles of the PPG. You should therefore consider the implications for access/egress with respect to flooding on any allocations including those where the development site may be at low risk. The plan should ensure that a suitable buffer distance is maintained between any proposed development and any watercourse/waterbody/flood defence, in order to maintain access, protect biodiversity and avoid impacts to flood defence

infrastructure. Without this the plan may not be compliant with national policy and will likely fail the basic conditions for neighbourhood plans.”

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 this site.

2. How does this show in evidence? The document

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

shows that there have been 92 Flood Warnings associated with this site over the past 5 years. The number of warnings is accelerating as Climate Change takes hold. The Environment Agency Flood Map for Preston is shown at APPENDIX 10

<https://drive.google.com/file/d/1oOEcfOug-7ZTelumxzfMfMxysgDpA5pp/view?usp=sharing>

3. National Policy now is that surface water flows must allow for a 50% uplift over historical figures. Weymouth has recently experienced rainfall which was more than 30% greater than since records began. The latest scientific evidence APPENDIX 11

<https://drive.google.com/file/d/10nRUeRDmJhBPmQSVCSfQq7pr0yBf7JPq/view?usp=sharing>

is that Overcombe Corner and the Preston Beach Road could be underwater by 2030 and this main artery into Weymouth affected. This is not because of sea flooding – the sea defence is high enough for rising sea levels and all that is needed are sluice gates at the entry points into the Lodmoor Marshes to contain the sea level rise. The main danger is that the Lodmoor Marshes are the drain for all the hills around, including this site, and so the beach road will be flooded from behind, as well as the Overcombe Corner area, Southdown Avenue and so on. Development on this site is going to create massive, new, rapid flows of water to known downstream Flood 3 areas. Bellway write at page 36

<https://www.dorsetcouncil.gov.uk/documents/35024/3473860/Final+consultation+summary+-+Omission+Sites.pdf/bf804d64-a720-92e3-3bfe-0f1dfc1afe1b> “Bellway is cognisant that the development of the site could have potential to exacerbate the risk of flooding elsewhere unless attenuation and SUDS form an integral part of any scheme”.

4. DC issued a false Statutory Declaration relating to flooding and even refused 3 times to release a document prepared by an officer to show this. DC finally had to release the document and re-issue a correct Statutory Declaration as a result of a Freedom of Information request.

5. The previous Planning has made it clear that this is a long-standing problem, see APPENDIX 9. Bellway say about this site at page 36:

<https://www.dorsetcouncil.gov.uk/documents/35024/3473860/Final+consultation+summary+-+Omission+Sites.pdf/bf804d64-a720-92e3-3bfe-0f1dfc1afe1b>

“the risk of surface water flooding is negligible” but this is not true and resident videos are in the possession of DC to give some scale of the problem:

https://drive.google.com/file/d/1-yZcsxZoDO78vVDcriIYVPKh6XDGSfd-/view?usp=drive_link

https://drive.google.com/file/d/1-rBNBbmPreFfduMruGFWMxZTLTuHmkFe/view?usp=drive_link

https://drive.google.com/file/d/1-l6ZawC2zF8P7YUDVtib-eWK8G2OrHFfa/view?usp=drive_link

https://drive.google.com/file/d/1-f2SLsfpgnHjQ38_NNvwc2dEppTNHRbe/view?usp=drive_link

6. Springs

Bellway made a presentation to the WNP SG on 10 July 2023 (in secrecy, not shared with the public) “Having Reviewed the historic maps back to 1888 there is no other reference of springs on or nearby to the site” which is not sound. APPENDIX 12:

https://drive.google.com/file/d/1MC2BBudjoH_Sw2_nWjMycZeQklluOaw1/view?usp=sharing

The drilling rig brought in by Bellway over 3 days in April 2022 was not lawful as no licence had been obtained. The historic spring, now to the west of Bodkin Lane was built over but causes flows elsewhere on the Weymouth Bay Estate and houses between Brackendown Avenue and Southdown Avenue all complain on this as they pass their surface water downhill to each other in a cascade. It’s very much a “Whack-a-Mole” situation and the suppressed spring now appears to rise directly on the land owned by Bellway, DT53032 and video evidence of this running in July (so year-round) can be accessed here at APPENDIX 13:

https://drive.google.com/file/d/1QRisICW2uV7oXP05dD380sEjbuZbG63_/view?usp=sharing

The location of this video is at Point TP23 on the above Bellway chart, it is not known what the difference is between “TP” and “WS” in the Bellway description, except that they give groundwater depths under the “WS” nomenclature. The video was made during July and flows all year round so it is not possible that Bellway could have missed it during April. Their tenant farmer is certainly well aware of it and avoids it for planting.

Investigation needs to be made of the historic tunnel running across nearby, as evidenced by the “Ventilators” and “Air Shaft” to this tunnel on the 1901 map APPENDIX 14 shows this map with a modern-day overlay.

<https://drive.google.com/file/d/1ORN4AbFRNAXSYnui4f8QSD2hrstjdbk/view?usp=sharing>

The tunnel originated at the junction of Coombe Valley Road/Littlemoor Road and was designed to bring mains water across the Weymouth Bay Estate. 2 Ventilators have been

built over on Budmouth Avenue and the last SW Ventilator is shown today as buried on Eastdown Avenue. It is likely this tunnel will be a conduit for springs and surface water to follow. There are also sink holes within 200m to the west of the site, which can be evidenced from the public right of way running up and over to Littlemoor. We have not gone onto private land to examine whether these sink holes extend onto the site, but they do confirm the presence of water running underground on and close to the site.

7. Sewerage

The March 2024 reports <https://therivertrust.org/sewage-map> from the Environment Agency show that Wessex Water have doubled their raw sewage discharges (in line with the national average) at the 2 key Preston beach outlets numbered WSX0989 (Melcombe Avenue) and WSX10065 (Overcombe Beach). Weymouth in 2025 lost its key Blue Flag Beach Status as a direct result of these discharges of raw sewage. In August 2025 there was an E.coli outbreak in the main beach bathing water

<https://www.dorsetecho.co.uk/news/25478760.rainfall-blamed-spike-pollution-weymouth-beach/?callback=in&code=YTJKMDK3YZGTMJGXNY0ZMDI3LWJKOTQTY2FMZWIS5MZZJZGYZ&state=e5341f3be7964dcfb4d627199ece9e67>

“Despite one of the driest months on record Dorset Council says the contamination is likely to have been caused by rainfall.

The poor figures are almost certain to have cost the town a Blue Flag award for next year, as happened this season as a result of poor summer figures in 2024.

Said a Dorset Council spokesperson: "There is no investigation underway, as the recent spike in water quality samples is likely to be attributed to rainfall. The increase in faecal contamination is a result of rainwater 'washing' material into the sea. This contamination originates from the water catchment area, which for Weymouth Beach includes the River Wey, and a sizable area of farmland. This reflects the natural flow of water toward the sea.”

Dorset Council is aware that this is not isolated and recently the swim from Lyme to Charmouth was cancelled because the sea water quality was deemed a danger to public health.

The APPENDIX 6

https://drive.google.com/file/d/1FA_dj-jx43xRd8blZ8wLTnLSBTe314Tp/view?usp=sharing supplied by Wessex Water shows that there are 2 vital sewerage pumping stations within the Lodmoor Sea Marsh susceptible to loss if the 2030 scenario occurs. These 2 pumping stations handle the entire sewage for East Weymouth and Preston right up to parts of Littlemoor.

<https://floodassist.co.uk/flood-warnings/flood-area-info/dorset/111fwcecd022/dorset-coast-at-preston-beach> shows that there have been 13 Flood Warnings threatening these pumping stations during the past 5 years. Wessex Water acknowledge that the main sewer works in West Weymouth, serving the entire area, is hopelessly overwhelmed and leads to these regular “emergency” discharges. There are outline plans for this to be addressed in the 2040’s, well after the life of this Local plan. Wessex Water is one of the companies whose Chief Executives have had their bonus stopped by the Government for underperformance.

In Planning Terms, sewerage is not usually a consideration as every development has the right to insist on a connection to the system, come-what-may. In this case, however, sewage discharges can only lead to loss of tourism business for Weymouth, which is a vital economic consideration for the town and for Dorset as a whole. This means that Planning Weight does need to be given in order to protect the local economy.

8. SUDS

APPENDIX 5 above shows that developers believe water could run uphill into Attenuation Ponds. In 2018, residents modelled the surface flows for the 2018 Planning Application, so this will be held by DC. APPENDIX 15

https://drive.google.com/file/d/1uN_ae3ld9vBWnvl5NlAwidzS1K4Cf_cE/view?usp=sharing .

Surface water flows will accumulate at the bottom, SE Corner of the site at the right angle formed by Budmouth and Brackendown Avenues. It cannot be contained or infiltrated, as admitted by Bellway, the developer in APPENDIX 12 and the geology report at APPENDIX 4 above explains about the strata. Bellway’s words: “The site is underlaid by Clay of which (sic) is not conducive for infiltration”. There is no possibility of ducting the water to the existing road drains. It is DC Policy that the water be contained on site. Wessex Water have already refused application from residents to undertake flow ducting into their storm drains because it will feed into a Flood 3 Zone. This is shown in APPENDIX 6. Elsewhere, tankage might have been possible for time release but not in this case for discharge into Flood 3.

The flows can only go into the SSSI, which means that they would have to be cleaned carefully. Bellway has not explained this. The Viability Consultant, in preparing figures <https://www.dorsetcouncil.gov.uk/documents/d/guest/weymouth-np-viability-report-compiled-sept-2024-redacted> confirms at page 11: “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.” Most things are humanly possible if enough money is thrown at it and so SUDS costing has not been done for this site. Even if it were, it would not lawfully be possible to discharge into a Flood 3 area.

F. AMENITY, HEALTH, EDUCATION

Under site selection policy

<https://www.dorsetcouncil.gov.uk/w/het-site-selection-background-paper-2025#4-selecting-site-opportunities-for-consultation> it states:

Amenity 4.1.42. In this context we have taken amenity to include planning considerations like potential overshadowing, overlooking/loss of privacy, noise and smells.

Clearly this site slopes steeply above the existing 100 properties on Budmouth and Brackendown Avenues which back onto the site. They would, therefore, be significantly blighted by overlooking from the proposed new development. The height difference means that normal mitigation measures such as fencing would be ineffective.

The same document goes on: “Planning history – we have noted any relevant planning history. Where an earlier planning decision highlights a planning issue that might be equally applicable to development being considered through site opportunities we may discount a site from further consideration.” This site has considerable, earlier Planning History, most recently 2018. As a result of the owners not doing what was repeatedly asked of them “if this site is to go forward in the Local Plan Review”, this site was dropped from the 2021 Review.

Community Wellbeing

We rely on page 18 of the SEA Statutory Report, which compares **Community**. This was given a Red Flag to WNP24. It states: “Community wellbeing Weymouth has identified a need for additional housing, especially affordable housing. As the site is relatively large in size, there is likely to be potential to deliver a level of affordable housing, to help meet local needs. It is recognised that as the size of the site increases, so does the potential to deliver affordable homes – with the potential for long term positive effects. Weymouth is well served by services, facilities and amenities – offering a number of green spaces, health services including Weymouth hospital; as well as GP practices and dental surgeries, sports facilities, retail opportunities, grocery stores, educational infrastructure and a number of independent businesses. However, this site is outside of the existing development boundary of Weymouth town. Access to these services and facilities would therefore be relatively limited, with development extending the urban built form to the north and east. This is unlikely to support a cohesive, connected community, with new development distant from the town centre. It is noted that a public right of way (PRoW) crosses the site, which would likely allows for safe active travel and exercise – if retained. The site sits within an open area of land. Allocating it for development would contribute to the closing of the gap between Overcombe to the south-east and Littlemoor to the north. This could lead to coalescence effects if further development were to come forward to the north and west of this site. • Given the above, negative effects are considered likely if this site is allocated for development. This site is located outside the developed area, and whilst it has the potential

to bring forward a good level of housing (especially affordable housing), it would be difficult to access the services (sic) and facilities in Weymouth. As such allocating it would not promote a cohesive community. Additionally, developing this site could contribute to closing the gap between two individual settlements and communities.” It was given a “negligible” to the joint site in the **2017 Appraisal** and the same to the **2018 Preferred Options** for WNP24. In the Statutory Document for 2025 it continues to be shown for WNP24, although this site had been dropped and it is not clear why AECOM would still want to include it, at page 32 as a Red Flag at page 54. Some of the differences are:

A. WNP24 says: “new development distant from the town centre”. This is explored more below under “**Transportation**”.

B. WNP24 gets a Red Flag: “Allocating it for development would contribute to the closing of the gap between Overcombe to the south-east and Littlemoor to the north. This could lead to coalescence effects if further development were to come forward to the north and west of this site.”

C. WNP24 confirms: “it would be difficult to access the services (sic) and facilities in Weymouth.” This is explored more below under “**Transportation**”.

Health

The local GP facilities in Preston Road could never cope with ANY of the proposed new developments. There is already a 4-5 week waiting time for an appointment.

G. TRANSPORT (ACCESS AND MOVEMENT)

1. The landowner’s (Bellway) submission to the WNP was that: “although access could be taken from Budmouth Avenue or the residential streets south of the site, these are all long and narrow cul-de-sacs which are unlikely to have capacity to serve development of the whole site, and it is unlikely that the proposed capacity of 250 dwellings could be achieved without significant highways improvements.

2. Dorset Highways have reported that the proposed Brackendown Access is impossible to serve more than 5 dwellings because the access is simply too narrow. The access via Moordown would involve a road construction of 510m before it even reaches the site and then would have to cross a pressurised sewer and impact on the LVNP SSSI. Having a sole access from Budmouth Avenue, which was only ever conceived as an occasional tractor access to work the field, would be intolerable in this quiet cul-de-sac as admitted above. The site cannot support a 1-vehicle-per-household Policy because of its remoteness and there would be hundreds of car movements every day. There would then be further significant traffic congestion onto Preston Road, especially if both this site and the neighbouring site go ahead jointly. There are already more than 630 houses on the Weymouth Bay Estate to access Preston Road from the 2 accesses at Melstock Avenue and Wyke Oliver Road and DC plans are now to add a further 779 houses, more than doubling the congestion, especially

since the new and more distant houses proposed will rely disproportionately on private car transport. Walking and cycling are ruled out both by distance and elevation from transport connections and shopping availability. Also, demographically, the existing 630 houses have a high retired content whereas the new housing is supposed to be at least 50% “affordable”, implying not well-off retired people often using the nearby busses but younger people of working age relying on private car transport. Thinking again of the “affordable” question, there are only very limited, small and expensive food stores locally and there are no public transport connections to discount shops in the area. Attempts to run a bus route 4A just a few yards closer in on the estate from Preston Road were dropped as unsuccessful in the past.

3. We rely on page 34 of the SEA Statutory Report,

https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2024/12/Weymouth-NP-SEA_Environmental-Report-November-2024.pdf which compares **Transportation**. It states: “

Transportation There is a rail station in the neighbourhood area, though it is located approximately 2km from the site. The Weymouth station offers hourly services to locations including (but not limited to) London Waterloo, Southampton and Basingstoke, and less frequent direct services to Bristol Parkway. There are no bus stops within a suitable distance to this site – the nearest being located on Sunningdale Rise to the east, approximately 740m away. However, there is a public right of way crossing the site in a northsouth direction, connecting Louviers Road to the north with residential development off the B3159 to the south. This allows for access to services in the centre via the B3159. This footpath should be retained to allow for safe active transportation methods. There is limited access to the strategic road network. Access could come from Budmouth Avenue or other residential streets in close proximity, but these tend to be long and narrow cul-de-sacs that are unlikely to have capacity to serve the whole site. As such, it is likely consultation with the highways authority will be required for this site to confirm suitable access. It is likely there will still be a continued reliance on private vehicles to access locations and services outside the neighbourhood area. In conclusion, negative effects are concluded likely for this SEA theme through development of this site. This reflects the complexities for allowing access to the site and the lack of feasible sustainable transport opportunities, given the distance to the rail station and the nearest bus stop”.

This was given a Red Flag to WNP24. It was not given as a criterion in either the 2017 or 2018 reports referred to above.

4. The above is nonsense that: “This allows for access to services in the centre via the B3159.” This statement on page 34 is misleading that the nearest bus stop was 740m away. This might have been to the entry of the site, but the mid-site point is over 900m away and the end of the site is about 1000m away.

<https://earth.google.com/web/@50.63916088,-2.43760881,40.9362659a,4026.02428963d,30y,0h,0t,0r/data=CgRCaggBMikKJwolCiExdUcxVmNGNDRrS1Zwd2g1ZmRLSDNTOV9mbTlkbb>

[npEUnogAToDCgEwQgIIAEolCN_0yloGEAE](#) 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. 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.”

The WNP has a Policy W51, Traffic Impact: “**Development proposals to reduce the volume and impact of motor vehicles**” therefore making the site unsustainable for **Transportation**. It is the policy of DC that new sites should be walkable or cyclable, which it is clearly not. It will clearly not be viable to conform with DC policy that new homes should only have provision for 1 car, since cars will be the only viable way of reaching the site.

5. The site does not conform to policy for walking, cycling and public transport in Weymouth. A 60-page report from May 2023 by Ardent Consulting Engineers, prepared for the SG of the WNP has not been sent to you as part of the Supporting Documents of the WNP. APPENDIX 16 shows:

https://drive.google.com/file/d/19hCyEiklHuBAWmcR3_P1f9y0ui-oYAJU/view?usp=sharing

Ardent utilised number 75 Budmouth Avenue as the starting point for the site, but this is not correct. From there, the site extends about 300-400m westwards so, as an average, 200m needs to be added on to all their figures. They suggest that the preferred maximum for walking to Weymouth town centre should be 800m but in fact it is 3400m and they do not show this. The report advocates cycling instead, but many people in social housing have impairments limiting their ability to cycle. It says that the nearest bus stop (Sunningdale Rise on Preston Road) is “approx. 750m” away. Add the average 200m into the site, gives 1000m walk to the nearest bus stop and 1200m for some. The report says: “**It is generally recognised that bus stops should be located so that the maximum walking distance from any dwelling is 400m**”. It is noted that in Manual for Streets, published by the Department for Transport

<https://rdcpbublic.blob.core.windows.net/website-uploads/2022/11/CD8.05-Pages-from-Manual-for-Streets.pdf>

‘Walkable Neighbourhoods are typically characterised by having a range of additional facilities within 10 minutes (up to 800m) walking distance of residential area which residents may access comfortably on foot’. Note the use of the word “comfortably”. Despite these factors, Ardent’s report concludes: “**It is reasonable to consider that the site is accessible by a variety of sustainable modes of transport and can be considered a suitable location with regards to sustainability**”. However, everyone views this site in a two-dimensional manner. The bus stop at Sunningdale Rise is at an elevation of 11m and the top of the site is at an elevation of 45m. Consequently, people are expected to walk with their shopping for up to 1200m and in the process climb the equivalent of a 12-storey building. No one would put social housing clients in a 12-storey tower block and expect them to walk up it! It is unlikely that residents will want to cycle such a climb either.

These challenges imply that car ownership will be essential, contradicting policy aspirations for new developments to be limited to 1 car per dwelling. There are no viable food shops in the vicinity of WNP24, especially for less affluent people. There are only 3 convenience stores. The SPAR at Preston Road is more than 1mile and 24min walking. JOYS at Overcombe Corner is 0.5mile and 12min walking. The delicatessen at Charlbury Corner is 19min walk and almost 1mile away. These distances should also be considered with the 12-storey climb. The only bus service from Preston Road takes one between Preston and central Weymouth, again nowhere near supermarkets except for a Tesco Express in Weymouth. Contrast this with Bincombe Park, where there is a full-facility shopping complex (including discount shopping) directly adjacent to the site. The site is not a “walkable neighbourhood”.

H. GREEN BELT

This site is not within the Green Belt as presently defined by Dorset Council. It is a protected, Greenfield site outside of the DDB and all the reasons for not changing its status have been given above. It has not been given Planning Permission in the past because of all the known factors and nothing new has come to light to give cause to change that status. Indeed, things like increased flooding risk due to climate change have only increased the reasons to protect the site and the vulnerable surrounding areas. Dorset Council are among the largest landowners in Dorset and it is clear that to achieve the kind of housing figures sought by Government, new towns would need to be created with commensurate facilities. Trying to ram ever more houses into unsuitable locations and then expecting the present facilities to cope is totally unrealistic. If all the figures now proposed by DC for Preston were realised, the population would virtually double and yet there is not one word given to how the infrastructure should cope.

I. OTHER ISSUES

1. The site lies outside of the Defined Development Boundary
2. The site is designated as an Important Open Gap
3. The site is part of the Lorton Valley Corridor
4. Dorset Council have written that “the WNP is not viable, deliverable or achievable”
5. This site is possibly unique out of the many sites considered by this latest Local Plan Review in that it has gone through Planning before and at least some of the Planners from the last attempt at West Dorset are still with Planning in Dorset Council. It has appeared, disappeared, and reappeared from Local Plan Reviews many times. It has been studied in minute detail as part of the WNP, has been included and then again positively excluded. It has been well and truly flogged to death. Therefore, the Sound Planning Reasons as to why

the site can never be developed are well known. It is worth quoting from Planning Policy (APPENDIX 9):

“I am writing to you as the agents for the owners of the site WEY14: Land at Wyke Oliver Farm identified in the Preferred Options consultation document for the West Dorset, Weymouth & Portland Local Plan Review. As you may be aware a very well-attended drop-in event was held in Preston Village Hall on 8th August 2018 and the proposals have subsequently given rise to a number of concerns regarding the suitability of the site.

I recently attended a meeting with local residents and local councillors. Following that meeting, a number of key issues have been identified. If your clients wish to progress the site through the Local Plan Review, then my view is that further information would be required to demonstrate that these key issues could be satisfactorily addressed. The key issues where further information is required are:

- **Flooding (from run-off and potentially from groundwater springs);**
- **Land instability (as a result of the underlying geology);**
- **Landscape and visual impact; and**
- **Access to the site.**

It would be helpful if further information was also provided on other matters, such as ecology and transport. I have briefly outlined the issues below and I would be happy to discuss them with you in more detail, if that would be helpful.

Flooding

Paragraph 7.5.49 of the Preferred Options document identifies an issue with surface water from the site discharging into the Preston Brook and the associated flood alleviation scheme, which has inherent limitations. This is still considered to be a relevant issue that needs to be addressed, but discussions between the Flood Risk Management Team at Dorset County Council (DCC) and local residents, have led to two further surface water discharge catchments being identified, each with reported downstream flood risk and inherent limitations.

I have attached a note from Susan Woodhouse, Project Engineer in the Flood Risk Management Team at DCC, which shows the further catchments discharging to:

- **Budmouth Avenue (and Bodkin Lane); and**
- **The eastern end of Brackendown Avenue (in the vicinity of Pinemoor Close and Southdown Farm).**

The note includes photographic evidence of flooding in the gardens of 57 and 59 Budmouth Avenue. Local residents have indicated to me that after passing through their gardens, the flood water is then channelled down Bodkin Lane where flooding has also been experienced.

The note shows a small catchment above Pinemoor Close and the more recent development at Southdown Farm. Local residents have also reported flooding issues in this area.

Historic Ordnance Survey maps indicate the presence of springs in this area and local residents have also reported spring flows from within the site. This may give rise to flooding issues, both within the WEY14 site and affecting existing development in the area. When meeting local residents, I was also shown photographs of historic flooding around the Wyke Oliver Farm buildings.

If this site is to be taken forward through the Local Plan Review, it is considered that further work is required to investigate the issues of flood risk, downstream limitations and springs. These issues need to be assessed and a suitable drainage strategy, which takes account of the underlying geology (see below), needs to be developed.

Land Instability

In a meeting I attended with local residents, the issue of land instability was highlighted. I was told

that a number of properties in the area have suffered from subsidence and I was also able to observe cracks in boundary walls, pavements and in other structures on the existing housing estate.

I am informed that the instability of the land is a result of the underlying geology where strata with a degree of porosity (grits and limestones) overlie impermeable strata (i.e. clays). It is thought that this geology also gives rise to the springs in the area.

If this site is to be taken forward through the Local Plan Review, it is considered that further work is required to investigate the issue of land stability. It would need to be demonstrated that the WEY14 site could be made stable and that development upon it would not trigger landsliding or subsidence within or beyond the site.

The underlying geology may also have implications for any drainage strategy. The impermeable clay, which may have very limited capacity for infiltration and percolation, may limit the options for sustainable urban drainage solutions.

Landscape and Visual Impact

In order to support the Local Plan Review, the council commissioned a landscape and heritage study, which is online here -

<https://www.dorsetforyou.gov.uk/planning-buildings-land/planning->

policy/west-dorset-and-weymouth-portland/local-plan-review/evidence/landscape-and-heritage-study.aspx.

In particular I draw your attention to the Stage 2 Assessment for Weymouth -

<https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/local-plan-review/pdf/evidence/weymouth-stage-2-assessments.pdf>.

Note from Editor: the working link is now

<https://www.dorsetcouncil.gov.uk/documents/35024/285472/Weymouth+Stage+2+Assessments.pdf/6b8b40c2-3de6-eee9-53d0-c2d8fd993abf> at pages 23 on.

The Stage 2 report includes an assessment of the wider Wyke Oliver / Southdown Farm area (shown as Assessment Area: Weymouth 5) and concluded that this wider area is of 'moderate-high' landscape sensitivity.

The Stage 2 assessment highlights some key characteristics, such as: the separation the landscape provides between Littlemoor and Overcombe / Preston; the locally prominent hill slopes; and views in and out of this area. Although much of the WEY14 site is concealed by existing development in views across Lodmoor from Preston Road, parts of the site are visible west of Overcombe Court and from more elevated positions along Bowleaze Cove Way.

If this site is to be taken forward through the Local Plan Review, it is considered that further work is required to show the likely visual impact of development and how it could be satisfactorily accommodated within this sensitive landscape.

Site Access

An indicative layout of the WEY14 site appears on Page 195 of the Preferred Options consultation document. This shows three potential vehicular access points from: Wyke Oliver Close; Budmouth Avenue; and Pinemoor Close, off Brackendown Avenue. A number of issues have been identified with these potential vehicular access points, which may include the need to acquire third party land.

I have been informed by local residents that there is a strip of third party land at the end of Wyke Oliver Close, which would need to be acquired in order for vehicular access to be provided. It has also been pointed out that access from this point would require the provision of a fairly long section of road (with no development on either side) in an elevated position between Wyke Oliver Close and the WEY14 site. This would be expensive to provide and likely to be intrusive in the landscape.

The potential access between 77 and 79 Budmouth Avenue appears to have a strip of third party land between the end of the adopted highway and the gated access to the WEY14 site. In addition to the third party land issue, there may also be issues with land stability and residential amenity. There is an electricity sub-station located on the northern side of the

access, with cracks in the wall to the rear of it, and as the ground rises up towards the gate into the field, there is a retaining wall in the garden of no.77, which also shows some cracking. The rising ground means that a new access may result in some overlooking of the garden and property at no.77, without suitable mitigation.

The third potential access point is at the end of Pinemoor Close towards the western end of Brackendown Avenue. It is understood that there is a strip of third party land between the end of the adopted highway and the gate into the WEY14 site. Also this strip of third party land is only wide enough to accommodate a single vehicle: if two-way vehicular access is to be provided here, additional land would need to be acquired, most likely from the garden of no. 5 Pinemoor Close.

The indicative layout shows land to the west of this access as 'strategic landscaping'. However, much of this land is the subject of a planning agreement to provide allotments (with access and parking) as part of the adjacent Southdown Farm development. The developer of this site went into liquidation before the land could be transferred to the council and resolution of this issue is still being negotiated.

If this site is to be taken forward through the Local Plan Review, it is considered that further work is required to show that satisfactory access could be delivered. The council would need to be convinced that any planning issues and any ownership / access rights issues could be overcome to enable the site to be delivered.

Transport

Local people have expressed concern about additional traffic generation from the site and the impacts on the local road network. Further work to show the impacts of additional traffic would be helpful. As part of any such work, the safety of the junction of Melstock Avenue with Preston Road should be examined, where there is a blind summit on Preston Road to the south of the junction.

Ecology

As you may be aware, the WEY14 site is proposed in conjunction with Policy WEY16, which seeks an extension to the Lorton Valley Nature Park on adjacent land, some of which I understand to be in the ownership of your clients. An ecological survey would be helpful to support these policies.

Public Interest and Freedom of Information (FOI)

There has been considerable public interest in this site and it has attracted many responses to the Preferred Options consultation. As a result I intend to keep the local community and

local councillors informed of progress, by copying this e-mail to them. My intention is to make any further information on the issues identified above publically available. In any event, you should be aware that any correspondence or information you provide to the council may be the subject of a Freedom of Information request.

Regards

Trevor Warrick

Spatial Policy and Implementation Manager

Therefore, the Planners have said multiple times: “If this site is to be taken forward through the Local Plan Review”, then these multiple things need to be done. They have not been done in the 8 years which has been available to the developers and therefore DC cannot possibly now take this into the current Local Plan Review. Dorset Council said in its REG 14 response: ““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”.

<https://www.dorsetcouncil.gov.uk/documents/d/guest/full-reg-14-response>

The 100 houses on Budmouth and Brackendown Avenues which directly back on to the site feel that DC will therefore unlawfully blight their houses for several years to come and construction cannot possibly hope to proceed. Planners have recently written to me to say that the system is “perverse”. If this site continues to be included against all the evidence presented, we will apply for a Judicial Review because such a decision would indeed be “perverse” and irrational.

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LIST OF APPENDICES

APPENDIX 1 Bellway Presentation 10 July 2023

<https://drive.google.com/file/d/1mnDK7CMz3YoGsO43H305VWQ10q1ztxcQ/view?usp=sharing>

APPENDIX 2 Photo of site from the East

<https://drive.google.com/file/d/13-eZAgv2wkwl6t9nj09oPh6OGJwkq79/view?usp=sharing>

APPENDIX 3 Enkworth Road Subsidence

<https://drive.google.com/file/d/1bPlaSCLRi4vpnfuoQ0uy4hVScE6ShAQT/view?usp=sharing> .

APPENDIX 4 Geology Report

<https://drive.google.com/file/d/1Qux5TbSemc1dpri0p1KeaCdLnhquDznY/view?usp=sharing>

APPENDIX 5 Attenuation ponds Flowing uphill

<https://drive.google.com/file/d/1vcDgXkMdanWFFtrfRP1rO3n5-ldTqMbF/view?usp=sharing>

APPENDIX 6 Wessex Water Drainage Network

https://drive.google.com/file/d/1FA_dj-jx43xRd8bIZ8wLTnLSBTe314Tp/view?usp=sharing

APPENDIX 7 How to Work with Developers

<https://drive.google.com/file/d/1dy-bPrNIAkF0ElrvhypRGrOmrhORyuDn/view?usp=sharing>

APPENDIX 8 LibDem Flyer Object to Budmouth

https://drive.google.com/file/d/1z6rOs_X-66PiyBx6cOljSIs8xjn9jrh_/view?usp=sharing

APPENDIX 9 Planning Letter to Developers

<https://drive.google.com/file/d/1rW8KsbhERWZg5ynJxHVGs8tMDA0UfFu/view?usp=sharing>

APPENDIX 10 Environment Agency Flood Map Preston

<https://drive.google.com/file/d/1oOEcfOUq-7ZTelumxzfMfMxysgDpA5pp/view?usp=sharing>

APPENDIX 11 Climate Central 2030 Beach Road Flooding

<https://drive.google.com/file/d/10nRUeRDmJhBPmQSVCSfQq7pr0yBf7JPq/view?usp=sharing>

APPENDIX 12 Bellway Drilling and Bore Holes

https://drive.google.com/file/d/1MC2BBudjoH_Sw2_nWjMycZeQklluOaw1/view?usp=sharing

APPENDIX 13 Bellway Springs Video

https://drive.google.com/file/d/1QRisICW2uV7oXP05dD380sEjbuZbG63_/view?usp=sharing

APPENDIX 14 1901 map, spring + modern day overlay

<https://drive.google.com/file/d/1ORN4AbFRNAXSYnui4f8OSJD2hrstjdbk/view?usp=sharing>

APPENDIX 15 2018 Flood and Topography Submission

https://drive.google.com/file/d/1uN_ae3ld9vBWnvl5NlAwidzS1K4Cf_cE/view?usp=sharing

APPENDIX 16 Ardent – Transport scoping May 2023:

https://drive.google.com/file/d/19hCyEikIHuBAWmcR3_P1f9y0ui-oYAJU/view?usp=sharing