

COMMENT ON DORSET LOCAL PLAN 2025 SITE LA/WEYM/012 “WYKE OLIVER FARM
(NORTH)”

- 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)
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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, the owners have consistently promised that they will build it with 50% affordable, 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 only achieved Viability by configuring it predominantly for 3-bedroomed houses. There is a grave risk that the developers 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/user_uploads/weymouth-neighbourhood-plan-december-2024-updated-january-2025-2-redacted-reduced.pdf Thus the site will neither be affordable nor will it be for the identified

housing needs of Weymouth. If it is to go forward, there should be a Design Requirement that it is predominantly 1-bedroomed housing.

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. Part of the site is within the exclusion zone of the LVNP SSSI and so this will have a heavy impact on design. In the 2016 West Dorset Plan this entire site was designed to be natural land.

<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."

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 1 shows subsidence in the adjoining Enkworth Rd, <https://drive.google.com/file/d/1bPlaSCLRi4vpnfuoQ0uy4hVScE6ShAQT/view?usp=sharing> . APPENDIX 2 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 from the Southdown Ridge and then down on this site APPENDIX 3

<https://drive.google.com/file/d/1vcDgXkMdanWFFtrfRP1rO3n5-ldTqMbF/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. The evidence shows that part of Wyke Oliver Farm has been demolished by flooding on the site. 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. The site in its current design has been shown to be 2 parcels, the northern one accessed via Wyke Oliver Farm but the southern parcel left isolated. There is no possibility of access to this from Wyke Oliver Close and there is a critical design issue because it would have to be built over the pressurised sewer, APPENDIX 4, which is not allowed:

https://drive.google.com/file/d/1FA_dj-jx43xRd8bIZ8wLTnLSBTe314Tp/view?usp=sharing In its Reg 14 consultation, link below, DC said: “198. Design - The Landscape & Urban Design team note that the build element of the scheme is divided into two parcels separated by a dry valley. Is the intention to link the sites through this dip or for the two communities to be physically separated?”

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 195-6 Dorset Council concluded its WNP Reg 14: “200.If this site is to be taken forward it is recommended the following additional evidence is collected in support of any site allocation. a) Further work to show the likely visual impact of development and how it could be satisfactorily accommodated within this sensitive landscape. b) Further work to show that satisfactory access could be delivered. 201. We understand that site promoters seek an extension to the Lorton Valley Nature Park on adjacent land. An ecological survey would be helpful to support this proposal.202. The Landscape & Urban Design team advise that many of these issues will have a bearing on the site layout and design. It is therefore recommended that these site constraints are investigated in advance of formal site allocation and coordinated 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” until such time.

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. “191. Criterion 6 - The Council’s NET note the commitment to transfer a total of 23ha of land to DWT, along with a sum to cover future maintenance. If this site is to be 27 allocated it is our view that the policy should require an additional sum to be transferred to DWT to mitigate for the inevitable increase in recreational activity which will occur (e.g. for increased presence of rangers, public engagement, signage, fencing etc.). 197. Lorton Valley Wildlife corridor - The Council’s NET note the allocations at Wyke Oliver Farm North is within the Lorton Valley wildlife corridor, as defined by the 'Urban Wildlife Corridors

and Stepping Stones: Weymouth & Portland Borough – Addendum (September 2020)¹. There is, therefore, significant conflict between this policy and policy WNP05 whose primary purpose is to protect these wildlife corridors.” The site design now shown is completely wrong.

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 development. The rising land to the north of Littlemoor Road is designated as part of the AONB. Development on the northern part of the site is likely to affect the setting of the AONB due to its elevated topography, whilst development of the southern part of the site would have a significant adverse impact on the landscape character of the Lorton Valley and on visual amenity, including for those using the Public Rights of Way which run close to the site. The Call for Sites submission proposes development of approx. 6ha. surrounding the existing farm, with reduced potential for landscape impact, and this part of the site may be suitable for development at a density of 25-30dph. The site is also outside but connected to the development boundary for Weymouth and under local and national policy it would be more appropriate for affordable housing on an exception site. It sits in an Important Open Gap defined under Policy ENV3 of the adopted Local Plan, although this designation is not proposed to be carried forward in the emerging Local Plan. The existing access would not be suitable for serving development of the whole site, and alternative access from Littlemoor Road would require additional land not within the site boundary. However, the existing access may be suitable for development at the scale proposed in the Call for Sites submission – this should be discussed with the highways authority. The western edge of the site falls within the Gas Pipeline Safeguarding Corridor, where built development within the safeguarding zone is generally resisted subject to advice from the National Grid and the Health and Safety Executive. A small amount of the site is within Flood Zone 2.” At page 165 of this document it concludes: “The site is located outside the development boundary and within land of local landscape importance and an important open gap. Unacceptable landscape impacts. An unsuitable site. Suitability: The site is located outside the development boundary and within land of local landscape importance and an important open gap. Existing development is already intrusive; particularly areas on upper slopes. Unacceptable landscape impacts. Farm buildings could be converted, development unacceptable in undulating and elevated open landscape.”

B. NATURAL ENVIRONMENT AND ECOLOGY

We rely on the extensive document already possession of DC:

<https://www.weymouthneighbourhoodplandemocracy.org.uk/commentary-on-sea> This is a carefully worked assessment of this particular site.

1. The most recent and intensive 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 74-78. Unhelpfully, the document enjoys latin page numbers as well and the pages in the physical document are xiii and 52-56. 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; 7 Red or Uncertain Flags out of 8; 2 Uncertain Flags and the 1 Neutral Flags is given to Historic Environment. 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. Climate Change is given the laughable description of “Mixed significant positive and minor negative effects likely”, it is not explained how Climate Change and dramatically increased rainfall over this site can be described as “significantly positive”. 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 and is just a very generic snapshot of all Dorset. For example, on this site it gives a severe negative (the most severe

negative possible) for Historic Environment whereas the AECOM report lists this as Uncertain. It is just very sloppy work. 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. 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 Broadwey 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”. It is clear that today there are officers working at DC who were involved in the earlier processes.

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 part of this site was left in as Site W1. However, bizarrely, “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. It is thought that it was a completely different area altogether. 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 2018 LUC Report “West Dorset, Weymouth and Portland Strategic Landscape and Heritage Study Stage 2 Assessment Weymouth as “Weymouth 5”
8. 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”

9. WEY14 Appears in the AECOM WNP Site Options and Assessments Report January 2023 on page 20 as "Bowleaze Cove"
10. Ditto page 35 as
WNP14
11. Ditto page
36 as LA/WEYM/012 as "Wyke Oliver Farm (North)"
12. Appears in the DC 2021 Sustainability Appraisal as "WEY G"
13. Appears in the WNP as site WNP25 "Wyke Oliver Farm"
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. This site did not appear at all and had been dropped as a possible development area in 2021.

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".

4. BIODIVERSITY

We rely on pages 52 (pdf page 74) and 53 of the WNP **SEA Statutory Report**, which compares **Biodiversity**. The Uncertain Flag states: "Overall, uncertain effects are considered likely if development comes forward on this site. This reflects uncertainty over the potential impacts on the nearby national biodiversity and geodiversity designations, and the hedgerows on the site boundaries, as well as the BAP Priority Habitat to the north of the 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 the combined site W1.

Much is made about the transfer of 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 page 2. 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 this site.

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 55: “The site is in proximity to the Dorset National Landscape, which is located north of the A353. Given the proximity, it is likely development (especially in the northern part of the site) will affect the setting of the designation. This is due to the open greenfield nature of the site – developing the land here would alter the settlement pattern of Littlemoor and result in urban sprawl in this part of the neighbourhood area. It is also due to the elevated topography in this part of the site – though it is noted there is screening adjacent to the northern boundary that will likely help with visual mitigation if it is maintained. The elevation of the site slopes downwards from the north, and then steeply inclines in the southern third. As such, developing the southern part of the site would likely have significant adverse impacts on the landscape character of the Lorton Valley and on the visual amenity of the area, which includes the PRoW on the western site boundary. The site, like the whole neighbourhood area, is within the National Character Areas (NCA) 138: Weymouth Lowlands, and the site sits within the ridge and vale local character area. Pressures on this landscape area includes new housing development, grazing, climate change (higher temperatures and more frequent drought conditions etc), and renewable energy development. Development of this site is bounded in the north by the A353, and by existing development to the east and west. The open nature of the site extends south, and it is considered that development could set the precedent for urban sprawl / coalescence effects, closing the existing gap between development to the east and west. Overall, negative effects are considered likely if this site is allocated. This reflects the potential negative impacts on the National Landscape to the north, and the loss of open greenfield land that forms a gap between development to the east and west. Development here has the potential to bring forward urban sprawl effects to the south.” It scores with a Red Flag, primarily for the reasons of coalescence with Littlemoor, loss of Green Gaps and loss of Wildlife Corridor, in contravention of other policies within WNP such as W14 9.21: “Any development proposals that are considered permissible should be accompanied by a landscape character assessment to establish that there will be no adverse visual impact on the character and sensitivity of the landscape”. In a different AECOM report <https://www.weymouthtowncouncil.gov.uk/wp-content/uploads/2023/01/Weymouth-Neighbourhood-Plan-Site-Assessment-Final-Report.pdf> at page 165 their SHLAA conclusion was

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

2. After 5 years work in the WNP, a vast amount 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. This site is entirely within “Important Open Gaps ENV3” and “Land of Local Landscape Importance ENV 3” adopted as present Policy.

4. <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.

D. HERITAGE

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. It is suggested that the authors of this report are confusing this site with the Jordan Hill area in the same report, the Roman Temple and so on. Sloppy work.

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 53 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 “Given the above, uncertain effects are concluded most likely. This is due to the uncertainty linked to the potential affects of flooding on development” it does not say that this Flood 3 Area has been identified as of being risk of being underwater from 2030 onwards APPENDIX 6

<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.

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 you, 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." In spite of what various "consultants" have said over the years, the Environment Agency is the defining body with regards to flooding and says specifically at page 243 "Land at Wyke Oliver Farm (North): Flood Zone 2 and 3"

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>

"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 decisionmaking 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 you, 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.” 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. Under Dorset Council Policy this site cannot go forward in the DLP unless and until this work has been done.

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 5

<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 6

<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.

4. Sewerage

The March 2024 reports <https://theriverstrust.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=YTIJKMDK3YZGTMJGXNY0ZMDI3LWJKOTQTY2FMZWISMZZJZGYZ&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 4

https://drive.google.com/file/d/1FA_dj-jx43xRd8bIZ8wLTnLSBTe314Tp/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.

5. SUDS Special Urban Drainage Systems

APPENDIX 3 above shows that developers believe water could run uphill into Attenuation Ponds on this site. In 2018, residents modelled the surface flows for the 2018 Planning Application, so this will be held by DC. APPENDIX 7

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

Surface water flows will accumulate at the bottom of the valley between the northern and southern parcels of this site. There is no possibility of attenuation ponds there because there is a pressurised sewer main and other infrastructure laid there. It is DC Policy that the water be contained on site. We have shown that little or no infiltration can take place because of the Geology. The flows can only go into the existing, overloaded buried conduit which extends about 1km into the Lodmoor SSSI. The flows can only go into the SSSI, which means that they would have to be cleaned carefully. 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

Community Wellbeing

We rely on page 54 of the SEA Statutory Report, which compares **Community**. This was given an “Uncertain” Flag. It states: “Weymouth has identified a need for additional housing, especially affordable housing. This site has the potential to deliver between 112 and 135 new homes, contributing towards the identified housing need for the area. 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. Whilst this site is outside of the existing development boundary, it is considered to be connected to it. As such, access to these services and facilities is relatively good through driving. It is noted there are a number of PRow on the western site boundary, that connect Littlemoor to the residential development off the B3159 that provides opportunities for active travel uptake. Overall, uncertain effects are considered likely if this site is allocated for development. It is of a size large enough to help meet housing targets in Weymouth and bring forward a good amount of affordable housing. However, given its location outside of the development boundary, there is uncertainty over how well it will connect to the main settlement of Weymouth and encourage community integration.” Key to this is that the consultants only ever conceived this site for 112-135 houses, both in their initial site selection and then when considering the Environmental Considerations. They have not done the work for the 250 homes planned in the WNP or the 554 houses now proposed in the DLP. All this work needs to be redone in the light of dramatically different figures. It was given a “negligible” to the joint site in the **2017 Appraisal** and the same to the **2018 Preferred Options**. In the Statutory Document for 2025 at page 84 it is shown now to have a “minor Positive Effect.

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 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 gives an

Uncertain Flag and states: “The Weymouth rail station is located approximately 2.6km from the site to the south-west; it 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 bus stops in proximity to the northern site boundary – approximately 75m to the north. These bus stops provide access to sustainable transport to locations including Weymouth town centre, Poundbury, Blandford, and Dorchester. Additionally, there is a PRow on the western site boundary that connects the 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 • In addition to the PRow and bus stops, the site is in proximity to the A353, which offers safe pedestrian and cycle access through pavement provision on both sides of the road. This strategic road allows for travel via private vehicle to the A354 to the north-east (providing access to Weymouth, Portland and Dorchester), the A352 to the north-east, and the B3155 to the west – which runs through Overcombe to reach Weymouth town centre. It is likely there will still be a continued reliance on private vehicles to access locations and services outside the neighbourhood area. • However, as it currently stands there is no existing access to the site – it could be established from Littlemoor Road / A354, but this would involve land not within the site boundary. As such, consultation with the local highways authority would be needed. In conclusion, while the site holds reasonable active / sustainable travel opportunities, uncertain effects are concluded. This reflects issues with access as well as the likelihood of bring forward high private vehicle use.”

4. The above is nonsense that: “This allows for access to services in the centre via the B3159.” This statement on page 56 is a nonsense that the nearest bus stop would be 75m away. <https://www.weymouthneighbourhoodplandemocracy.org.uk/wyke-oliver-bus-stop> Google Earth shows that the walking distance to a bus stop is 888m from the northern parcel and

https://earth.google.com/web/@50.64036873,-2.43526369,16.53255107a,1934.09786257d,.30y,0h,0t,0r/data=CgRCaggBMikKJwolCiExUIBIWFNOTC1TeHZjcGFxbkdNeHd2VVRNZ3ZGRFlmREcgAToDCgEwQgIIAEoICKy6gPYGEAE_EwQgIIAEoICN_OyloGEAE 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. The Environmental Report confirms: “This reflects issues with access as well as the likelihood of bring forward high private vehicle use.”

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

It confirms: “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://rdcpublic.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”. Everyone views this site in a two-dimensional manner. The bus stop at Charlbury Corner is at an elevation of 13m, Wyke Oliver Road dips down to 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 this site, 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 1.0 mile and 19min walking. The delicatessen at Charlbury Corner is 12min walk and 0.5mile 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”

Dorset Council said in its REG 14 response at page 197: ““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>

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LIST OF APPENDICES

APPENDIX 1 Enkworth Road Subsidence

<https://drive.google.com/file/d/1bPlaSCLRi4vpnfuoQ0uy4hVScE6ShAQ7/view?usp=sharing> .

APPENDIX 2 Geology Report

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

APPENDIX 3 Attenuation ponds Flowing uphill

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

APPENDIX 4 Wessex Water Drainage Network

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

APPENDIX 5 Environment Agency Flood Map Preston

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

APPENDIX 6 Climate Central 2030 Beach Road Flooding

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

APPENDIX 7 2018 Flood and Topography Submission

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

APPENDIX 8 Ardent – Transport scoping May 2023:

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