



WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

Friday 24 January 2025 until Thursday 10 April 2025

Response Form

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

Please return completed forms to:

Email: NeighbourhoodPlanning@dorsetcouncil.gov.uk

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

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

Part A – Personal Details

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

	Personal Details *	Agent's Details *
Title		MR
First Name		Simon
Last Name		Packer
Job Title(if relevant)		Director

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

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

Part B – Representation

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

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

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

	<i>Location of Text</i>
Whole document	See attached representations
Section	
Policy	
Page	
Appendix	

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

x	Support
	Object
x	Make an observation

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

See attached representations

Continue on a separate sheet if necessary

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

See attached representations

Continue on a separate sheet if necessary

6. Do you wish to be notified of Dorset Council's decision to make or refuse to make the neighbourhood plan? Please tick one box only.

x	Yes
	No

Signature: _____
_____09.04.25_____

Date:

If submitting the form electronically, no signature is required.

9 April 2025

Delivered by email and post

Planning Policy
Dorset Council
County Hall
Colliton Park
Dorchester
DT1 1XJ

Ref: [REDACTED]

Dear Sir/Madam

WEYMOUTH NEIGHBOURHOOD PLAN REGULATION 16 SUBMISSION STAGE - REPRESENTATIONS ON BEHALF OF THE LANDOWNERS

On behalf of my clients, the landowners of the site at Wyke Oliver Farm North, please find set out below representations to the Weymouth Neighbourhood Plan Draft Regulation 16 (WNP).

My clients own the land at Wyke Oliver Farm North, as proposed to be allocated for approximately 250 mixed affordable and market housing, community space, and an extension to the Lorton Valley Nature Park, as set out in Policy W19 and W20 of the WNP.

Section 6 : Vision, Aims and Objectives

My client supports the overall vision of the WNP and related aims and objectives relating to environmental, greenspace, housing and the economy. My clients are committed to delivering a high quality and sustainable new development and leaving lasting legacy for the local community.

My client notes and agrees with the reference at paragraph 2.19 of the WNP that *'the resilience of our communities however is being tested by the failure or closure of local services and facilities, contributing to poor health and lower education outcomes; and the lack of job and housing opportunities is leading to increased dissatisfaction and alienation and a deterioration of community life.'* In particular as landowners within the community, my clients agree that the significance of delivering jobs and homes for Weymouth is vital in securing a resilient and thriving community and economy.

It is noted that the Environmental Sustainability aim refers to *'achieving or surpassing national and local agreed targets for sustainability'* (our underling). Whilst *surpassing* targets is referred to as an aspiration, and as such this is more than reasonable, any related policy objectives that go beyond current national or development plan policy will need to be suitably justified. Those relating to carbon neutrality and resource efficiency are less well defined within both national and development plan policy.

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More specifically, my client supports Aim 2 reference to deliver at least the national mandatory 10% Biodiversity Net Gain (BNG), with the expectation that a higher percentage will be sought where possible. However, the related objectives set out within Appendix A refer to delivering a minimum of 20% bio-diversity net gain, currently extending beyond the 10% minimum enshrined within the Environment Act 2023.

My client is keen to deliver BNG enhancements as part of any future development of the allocated site, but only where it is reasonable and practical to do so. At this stage this is difficult to be certain, and as such **it is recommend that objective at Appendix A be amended to remove the reference to requiring delivery of a minimum of 20% BNG, and to be consistent this be replaced to be more aspirational in line with Aim 2 and other similar references within the Plan.**

More specifically, the aim to achieve the highest sustainability standards for all new development is broadly supported. The standards required for new homes are set out within part L of the building regulations. These regulations are anticipated to be upgraded to the Future Homes Standard at some point in 2025, requiring low carbon heating and world-leading levels of energy efficiency.

My client also acknowledges the aim of exploring and prioritising opportunities for the redevelopment of brownfield land. This is also highlighted within national policies. It is important to recognise that potential brownfield opportunities will not be of sufficient scale to meet all housing needs of the NP, and often that the delivery of affordable housing is compromised by viability associated with the redevelopment of such land, e.g. demolition, contamination. This is indirectly acknowledged within the NP through the allocation of greenfield sites that will secure significant affordable housing delivery.

My client is broadly supportive of the environmental targets and related objectives. These are set out as within national policy. It is noted that each policy of the NP refers back to these targets and objectives, and further comments on related policies are referred to below. **The NP should acknowledge that the targets and objectives of national policy are subject to change, and therefore reliance on specific targets needs to be suitably qualified to reflect this.**

Section 8 : Landscapes and Greenspace

The significance of the sensitive landscape designations and greenspaces within the NP is rightly highlighted. My client agrees that it is important to ensure that these areas are suitably safeguarded, and that adverse impacts are minimised, particularly those areas of national and/or international significance.

My client acknowledges and supports the necessary balance that the NP sets out in the approach to securing vital affordable and market housing delivery and safeguarding local landscape and ecological designations. It is noted that the identification of housing allocations can in themselves provide opportunities for securing land for benefit of public open space and ecological enhancements. To this end, my client supports the allocation of land as a significant extension to Lorton Valley Country Park as part of the wider allocation of the site at Wyke Oliver Farm North within Policy WNP25.

This balance should be applied consistently throughout the policies of the NP.

Map 6 of the WNP identifies a Network of Ecological Sites and Wildlife Corridors. Map 8 of the WNP identifies Existing and Higher Potential Ecological networks. My client's land, and the related residential led allocation of Wyke Oliver Farm North at Policy W19 and W20 of the WNP, is included as a Wildlife Corridor on Map 6 and as an Existing Ecological Network on Map 8.

Policy W3 of the NP states at criteria 1 that *development proposals that are likely to have a significant adverse effect on the integrity of habitats of local and national importance and the wild flora and fauna in those areas that form part of the ecological network will not be supported unless unavoidable due to exceptional circumstances and the proposed mitigation measures are proportionate to the status of the site and satisfy the requirements of the local planning authority.*

Policy W4 of the NP does acknowledge at criteria 3 that where *'wildlife Corridors are disrupted as an unavoidable consequence of adjacent or nearby development, developers will be required to minimise the impact and to carry out remedial action in accordance with a scheme agreed with the Local Planning Authority.'* However, this does not reflect where the identified networks also form part of residential led allocations such as at Policy W20 of the WNP.

Given the above, **my client would recommend that the wording of Policy W3 and W4 and the related supporting paragraphs are amended to cross refer to the residential led allocations of the Plan that form part of these designations. More specifically, in respect of Policy W20 and the residential led allocation at Wyke Oliver Farm North, that this includes the permanent transfer of land as an extension to the Lorton Valley Nature Reserve to provide a long term benefit as an enhanced ecological site and wildlife corridor.**

Policy W09 identifies Green Gaps which are *'fundamental to retaining and protecting the special character and setting of local settlement areas and preventing coalescence'*, and where *'development proposals in the designated green gaps will not be supported unless it can be demonstrated that the development is for: i. measures to prevent flooding; or, ii. improvements to access to the countryside; or iii. enhancement of recreation activities; or, iv. for essential agricultural uses.*

The allocation at Policy W20 is included within the Green Gap between Littleton and Preston/Overcombe. Para 8.69 of the WNP does qualify the above policy by confirming that *'Wyke Oliver Hill is a significant landscape feature that together with the ridge further south provides an open green wedge of aesthetic value and helps provide a backcloth to existing development'*, and *'The site allocation arising from Policy W20 provides for future protection of the remaining gap through transfer of 23 Hectare of land to Lorton Valley Nature Park. '*

My client agrees with this broad statement but recommends that the interaction between the green gaps and the allocation should be more explicit. **My client would recommend that the wording of Policy W09 and the annotation of Map 11A are amended. The start of bullet point 2 should include reference to 'With the exception of those areas also allocated for residential led development elsewhere in the Plan, development proposals...'**

The supporting text at para 8.69 should also be updated to refer more specifically to the **higher parts of the Policy W20 allocation forming the more significant role in providing a green gap between Littleton and Overcombe/Preston, and that these are suitably safeguarded in the long term as forming part of the transfer of land as an extension of the Lorton Valley Nature Reserve.**

Similarly, for clarity and consistency, **Map 11A should be updated to exclude that part of Policy W20 identified as the extent of residential development from the Green Gap designation.**

Development and Homes (Section 9)

In accordance with National Planning Policy Framework paragraph 69 and 70, Dorset Council as strategic policy making authority have identified a minimum housing requirement of 3,225 dwellings to be accommodated within the WNP area in the period 2021-2038, as set out within Appendix 2 of the emerging Dorset Council Local Plan (DCLP) (Appendix 2).

However, the emerging requirement set out within the DCLP of 1,793 net additional dwellings per annum (dpa) has been superseded following the publication of the updated Standard Method in December 2024. As the emerging Plan was not sufficiently advanced to qualify for the transitional arrangements, it will be necessary for the housing requirement set out in the updated Standard Method to be planned for within the DCLP. This is confirmed at 3,219 dpa.

However, it would be reasonable to progress the Plan on the basis that it has accommodated the necessary requirement for Weymouth identified within the DCLP at the time of its submission. In accordance with paragraph 70 of the NPPF, this figure did reflect the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority at the time. An early review would be necessary to respond to the DCLP once adopted, when updated housing requirements for Weymouth will be confirmed.

My client notes the significant evidence that has been prepared in support of the NP approach to maximising the delivery of affordable housing. This builds on the existing evidence of significant need. The Housing Needs Assessment (2024) in particular outlines the challenges with affordability (average house prices vs average income), the extent of people on the affordable housing register, and in temporary accommodation. It estimates that up to 3,388 new affordable homes of all tenures are required over the plan period, (242 per annum) to meet identified needs¹.

In addition, my client notes historical challenges of meeting this level of provision based development plan policy that relies upon 35% affordable homes on all sites of 10 dwellings or more to secure the vast majority of affordable housing.

Against this backdrop my client is fully supportive of the delivery of affordable housing being a key priority of the NP. Specifically, that the NP *'endorsed the Affordable Homes Paper produced by the Neighbourhood Plan Steering Group which seeks to maximises the provision of affordable homes, giving primacy to the needs of the local community.'*²

Accordingly, **my client supports the approach of identifying residential allocations on greenfield sites as set out within Policy W19, and specifically the allocation of the site at Land at Wyke Oliver Farm North under Policy W20, as a means of providing a significant contribution toward meeting the extensive affordable housing requirement.**

Wyke Oliver Farm North – Policy W20 and Map 19

It is noted that the greenfield site allocations, including Land at Wyke Oliver Farm North in Policy W20, were selected following a rigorous and independent assessment within a Site Options Assessment Report and Strategic Environmental Assessment prepared by consultants Aecom on behalf of the NP Steering Group, and following detailed community consultation.

¹ Paragraph 1.2.10 – note this assumes plan period of 2024-2038

² Paragraph 9.10

More specifically, my client would highlight that the site is located within a reasonable walking distance of a number of key services and facilities, including but not limited to:

- Preston Road Surgery
- Rowlands Pharmacy
- SPAR providing a Post Office and convenience store
- St Andrew's Primary School
- Westfield Arts College

Access to these services is facilitated by a network of footways within the vicinity of the site, including those along both sides of Wyke Oliver Road and the shared footway/cycleways along the B3155 Preston Road and A353 Littlemoor Road respectively as well as walking/cycling routes using the public right of way network through the Country Park to the west.

Any future development proposals will take up the opportunity to connect to this existing pedestrian/cycle infrastructure and will also deliver a network of permeable routes within the site to encourage travel by active modes and where possible provide shorter routes for local journeys through the site, including any opportunities to deliver improvements to routes identified.

The nearest bus stops are located on Preston Road, approximately a 600m walk from the site. These bus stops are served by the 4, 5, 10A, X12 and X54 bus routes, which provide useful connections to the nearby destinations of Weymouth and Dorchester, with the no. 4 bus route operating at 30-minute frequencies throughout a typical weekday. The nearest railway station is Upwey, which is accessible via the no 10A bus service, and provides frequent services to destinations including Weymouth, Southampton Central, Dorchester and London Waterloo.

There are therefore good opportunities for residents to access wider facilities and services, including employment opportunities by public transport, as well as the proposed to be extended Country Park.

Specific comments are made below in relation to Policy W20, specific criteria and the related Map 19 where it is considered they may benefit from further reassurance and/or clarity.

Highway Access

Highway consultants, i-Transport, have undertaken an assessment of the opportunities to access the site from Wyke Oliver Road. Access is proposed from Wyke Oliver Road in line with the draft allocation and initial design work has been undertaken on the proposed arrangement which would extend Wyke Oliver Road into the site. Further survey work is planned, and an access design will be refined in due course in consultation with DC Highways.

The access design will ensure that safe and suitable access can be provided to the site for all users, in line with national and local transport policy, and will comply with relevant guidance in Manual for Streets (MfS), e.g. appropriate visibility will be achieved and the junction will be designed to comfortably accommodate the movements of cars, emergency vehicles and refuse vehicles.

Highway Capacity

Given the sustainable location of the site and the opportunities to access sustainable transport modes, the transport strategy for the site will seek to prioritise walking, cycling and public transport modes for local journeys.

Based on an initial assessment the highway consultant estimates that a development in line with the proposed allocation would be expected to generate approximately 120-130 two-way vehicle movements in the peak periods, which broadly equates to around two additional vehicle movements during the busiest periods of the day. Based on their on-site observations, the highway consultant is also comfortable that there is capacity on the existing network in the vicinity of the site to accommodate this level of increase in vehicular movements (i.e. at the Wyke Oliver Road/Preston Road junction, the Preston Road/Littlemoor Road roundabout and the Preston Beach Roundabout).

Site Capacity

Landscape consultants have undertaken an initial assessment to assess the impact of the development of the allocation on the wider landscape. This has identified that the extent of development area identified on Map 19 will not have a significant adverse impact on the setting of the Dorset National Landscape designation (former AONB), the separation of Littlemoor and Overcombe/Preston or the immediate landscape setting.

My client supports the related criteria 4 (i – iii) and the opportunity this provides to include suitable boundary treatments and new planting to further mitigate any impact.

It is noted that the capacity of the site is referred to as '*approximately 250 dwellings*'. The net developable area identified on the accompanying plan equates to 9 hectares. Assuming a density of 30 dwellings per hectare (a reasonable density to use on the basis it is regarded as a suitable balance between making efficient use of land but responding to the site context), this would equate to approximately 270 dwellings. On this basis **my client considers that it is reasonable that Policy W20 be updated to refer to approximately 270 dwellings.**

This would be consistent with increasing the opportunity for providing market but particularly affordable housing, a key objective of the WNP. The increase is not so significant that it would prejudice the evidence base to support the allocation, particularly given the .

Given the need to provide connectivity between the two parcels identified for residential development **on Map 19, it is recommended that it be updated to add an annotation that identified an indicative north-south vehicle access connection between the parcels.**

Community Provision

Criteria vi. of Policy W19 confirms that any future proposal should make '*provision of a community focus agreed with the Local Planning Authority*'. My client agrees that it is important to provide a development with a community focus that will benefit the existing and wider community, proportionate to the scale of the proposed allocation.

However, my client considers that the Policy would benefit from further clarification of what form this 'community focus' might take. **At this stage, it is recommended that additional reference is made to this being '*proportionate to the scale of development proposed in the allocation, taking account of existing community facilities and services in the locality.*'**

Affordable Housing

My client notes that Policy W18 (Affordable Housing) within built-up areas requires provision of at least 50% on greenfield sites. This is consistent with residential led allocations in the Plan which seek 50% affordable. However, Policy W18 also includes reference to this being required unless a '*Financial Viability Assessment or other material consideration demonstrates a robust justification for a different percentage*'.

Whilst my client continues to support the ambition to secure 50%, and is committed to delivery on this basis, it is important to provide some similar flexibility to allow for the possibility for unexpected costs once more detailed site assessments and/or preliminary site works are undertaken. **It is therefore recommended that similar flexibility be incorporated within Policy W20 (2) to that included within Policy W18.**

Jobs and Economy Plan (Section 10)

My client supports the approach to regenerating, reinvigorating and diversifying the economy and attractiveness of Weymouth as a place to invest and live.

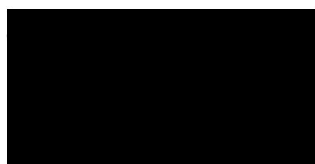
The relationship between the delivery of new housing, and affordable housing in particular, is particularly noted and supported as critical to ensuring that the economically active younger generation do not migrate away from the town. Providing housing that is genuinely affordable in combination with attractive employment opportunities is paramount to the town's future.

This is rightly engrained within the NP Vision, and given a suitable level of primacy in related policies.

Communities (Section 11)

My client is broadly supportive of the related policies insofar as they seek to promote clean, safe, sustainable, and affordable travel and reduce reliance on the car, safeguard community facilities, encouraging sports and recreation, safeguarding our heritage and enhancing public spaces.

Yours sincerely



Simon Packer
Director

