



## WEYMOUTH NEIGHBOURHOOD PLAN

Regulation 16 Consultation

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

### Response Form

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

**Please return completed forms to:**

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

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

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

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### Part A – Personal Details

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

	Personal Details *	Agent's Details *
Title	Mr	
First Name	Nick	
Last Name	Guildford	
Job Title(if relevant)	Senior Planning Manager	

Organisation (if relevant)	C G Fry and Son Ltd	
Address	[REDACTED] [REDACTED]	
Postcode	[REDACTED]	
Tel. No.	[REDACTED]	
Email Address	[REDACTED]	

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

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## Part B – Representation

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

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

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

	<i>Location of Text</i>
Whole document	Refer to submitted statement of comments.
Section	
Policy	
Page	
Appendix	

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

X	Support
X	Object
X	Make an observation

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

Refer to submitted statement of comments.

*Continue on a separate sheet if necessary*

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

Refer to submitted statement of comments.

*Continue on a separate sheet if necessary*

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

X	Yes
	No

Signature: \_\_\_\_\_ Date: \_\_9<sup>th</sup> April 2025\_\_\_\_\_  
*If submitting the form electronically, no signature is required.*



## Weymouth Neighbourhood Plan

### Regulation 16 Consultation

#### Representations by C G Fry & Son Ltd

April 2025

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### Introduction

C G Fry & Son Ltd acknowledge the hard work and effort that has gone into preparation of the Weymouth Neighbourhood Plan (WNP) and in particular welcome the allocation of land at Redlands Farm for new homes (Policy W21).

As highlighted through previous submissions on the WNP concern is however raised in respect of the robustness of the evidence base on viability that supports the plan. This includes the requirement for 50% affordable housing on greenfield sites and sustainable construction standards, both of which exceed and are therefore ***not in general conformity with the development plan for the area***. Other policies and standards referred to within the WNP also replicate and in many instances exceed those already set through national standards e.g. through Building Regulations and mandatory Biodiversity Net Gain without sufficient evidence that those increased requirements will not hinder the deliverability of development, as such they are ***not considered to give appropriate regard to national policies and advice***.

A Neighbourhood Plan should not seek to repeat, replace or impose unrealistic aspirations on the strategic policies of the Local Plan (in this case the policies of the adopted West Dorset, Weymouth & Portland Local Plan and the emerging Dorset Local Plan), or repeat or duplicate national planning policy or existing policies in the Local Plan. Doing so has the capacity to cause ambiguity and reduce the effectiveness of the combined approach for decision making purposes, resulting in uncertainty for all parties. Regarding this matter we have drawn out specific concerns within our comments but would urge the Examiner to review the plan as a whole as much of it is considered to fall foul this general principle.

The comments made follow the same order as the policies in the WNP with suggested modifications to policies set out with text proposed to be deleted struck through and amended text in bold.

References to the National Planning Policy Framework (NPPF) within these comments relate to the December 2023 version on the basis that the WNP has been submitted under



the transitional arrangements set out within paragraph 239 of the December 2024 NPPF, and as such is considered against the December 2023 version.

### **Policy W03: Wildlife Habitats and Areas**

This policy merely duplicates requirements that are already set out within either national or local policy and is therefore unnecessary and should be deleted.

If retained, it should be amended to be consistent with the Local Plan and NPPF, for example criterion should be revised to be consistent with paragraph 186 of the NPPF.

### **Policy W05: Ecological Impact of Development**

While we have no objection to the requirements of this policy for the most part, it simply replicates existing policy and is therefore unnecessary to include within the NP and should therefore be deleted.

Should the policy be retained we object to the reference in criterion 1. to providing a *substantial* Biodiversity Net Gain, along with the supporting text at paragraph 8.41 which states that a figure of at least 20% is called for wherever possible in alignment with the Supporting Environmental Targets (Objective 3 Target 22) in Appendix A, comments of on which are set out below.

The introduction of mandatory Biodiversity Net Gain (BNG) came into force for large sites on 12<sup>th</sup> February 2024, and for small site from 2<sup>nd</sup> April 2024 and requires 10% BNG to be provided through the Environment Act. There has been a significant amount of work undertaken by key stakeholders including DEFRA, Natural England, and the Future Homes Hub to establish this requirement as a sound basis for achieving the objective of ensuring new development contributes to the enhancement of the natural environment.

The WNP should not deviate from this requirement and indeed does not even need to repeat it, as made clear within Planning Practice Guidance, which states:

*'Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher*



*percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.'* (Paragraph: 006  
Reference ID: 74-006-20240214)

None of the above criteria have been met, in particular the potential impact on viability, the Bailey Venning Viability Report (BVVR), November 2024 reviewing only the 10% requirement. It is noted that paragraph 2.24 of the BVVR refers to having doubled the allowance for BNG to £2,000/unit however it is clear from the Appraisal Summary sheets in the Annexes that this is not the case, with reference to £998/unit.

There are significant additional costs associated with BNG (varying depending on the type of habitat but on average around £25,000 per unit), which must be fully accounted for through the viability assessment work supporting the WNP if any reference beyond the mandatory requirement for 10% is to be included.

As currently worded Policy W05 is not considered to meet basic condition a) in terms of having regard to national policies and advice in respect of BNG.

### ***Suggested modifications***

Policy W05 should therefore for be deleted or if retained, criterion 1 amended as set out below:

Policy W05: Ecological Impact of Development

1. Development proposals should comply with national legislation and the requirements of the Local Planning Authority and, unless statutorily exempt, must contribute to the enhancement of the natural environment by providing for **10% a substantial Biodiversity Net Gain**

References to 20% BNG within supporting text and Appendix A of the WNP should be deleted.

### **Policy W14: Development Boundaries**

To meet basic condition e), in terms of ensuring that the WNP is consistent with the emerging Dorset Local Plan in respect of proposed allocations of land for development within and adjoining the Neighbourhood Plan Area that are required to meet the wider housing and development needs of the area, specific reference should be made within



Policy W14 to such development not being resisted. Without the suggested modification to criterion 3 below there is concern that the NP could inadvertently be used to prevent development that Dorset Council deem appropriate, undermining the Local Plan.

***Suggested modification***

3. Outside of the defined development boundaries, development should be strictly controlled to safeguard the unique character, natural beauty, agricultural value, and environmental significance of countryside areas within the neighbourhood area **unless identified for development through other strategic policies contained in the development plan for the area**

**Policy W16: Major Housing Sites**

As noted through comments submitted on the Reg 14 WNP, criterion 1 i) of Policy W16 requires 10% of dwellings to satisfy Lifetime Homes Standards, a standard which was superseded by M4(2) Part M of the Building Regulations in 2015.

It is for this exact reason that requirements that are already addressed through Building Regulations should not be repeated within development plans (including Neighbourhood Plans), the regime being separate from the planning process.

***Suggested modifications***

Criterion 1 i. should therefore be deleted. If retained the wording should be updated as set out below:

- i. a minimum of 10% of dwellings that satisfy ~~Lifetime Homes Standards~~ **M4(2) Accessible and adaptable dwellings.**

There are several requirements set out within Policy W16 related to details that should be submitted in support of a planning application. These requirements are rightly covered through national legislation and the local planning authority's validation list and do not need to be duplicated within the WNP, doing so potentially leading to conflict and uncertainty. For this reason, criterion 3. and 4. of Policy W16 should be deleted to ensure compliance with basic conditions a) and e).





## Policy W18: Affordable Housing

While noted that criterion 2i. of the affordable housing policy has been amended from the Reg 14 version to state *'unless a Financial Viability Assessment or other material consideration demonstrate a robust justification for a different percentage'* we maintain the previous concerns raised and object to the requirement for at least 50% affordable housing on greenfield sites set out within Policy W18.

This requirement could have serious implications for the delivery of development sites and must be robustly justified through the viability study that supports the WNP for it to meet basic condition e) (general conformity with the strategic policies contained in the development plan for the area), where in this case it deviates from the adopted and emerging local plan position. For the reasons set out this is not considered to be the case.

As highlighted through comments on the Reg 14 WNP, the adopted West Dorset, Weymouth & Portland Local Plan 2015 sets the required affordable housing percentage for Weymouth at 35%. This figure was determined following detailed viability assessment tested at Examination.

The Dorset Local Plan Viability Assessment (DLPVA - May 2022)<sup>1</sup> undertaken for Dorset Council to support preparation of its Local Plan (LP) notes at paragraph 7.2 that *'Weymouth is a lower value area'*, as such putting greater pressure on the ability to deliver a higher proportion of affordable housing than other parts of Dorset. This was set in the context of a requirement in the range of 20% to 30% affordable housing being proposed for Weymouth through the Dorset Local Plan. This is acknowledged at paragraph 3.3 of the BVVR which on the matter of new policy requirements in the WNP states:

*'The first and most eye-catching of these is the introduction of a 50% target for affordable housing on those allocated sites which are on greenfield land. This, of course represents a large increase over the adopted 35% target but also a point of differentiation relative to the emerging Dorset Local Plan – which currently proposes a Requirement in the range of 20% to 30%.'*

A figure somewhere between 20% and 30% should therefore be considered the baseline for affordable housing provision in Weymouth. The only exception to this would be if viability

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<sup>1</sup> <https://www.dorsetcouncil.gov.uk/w/dorset-council-area-viability-assessment>



evidence in support of the WNP clearly demonstrated that a higher affordable housing requirement was viable.

What is clear is that since the emerging LP evidence base and testing was undertaken in 2022, land values have decreased, developments costs have gone up and sales prices have stagnated, all of which further impact the viability of development, and which influences realistic levels of affordable housing provision.

Paragraph 9.75 of the WNP in relation to Land at Redlands Farm (Policy W21) states that that the required proportion of affordable dwellings and the mix of tenure is based on a viability assessment that has been conducted on this site demonstrating that 50% Affordable Housing is viable, footnote 79 referencing the BVVR.

The BVVR is flawed in several ways. Most critically most key figures used in the report do not align with the supporting Annexes, which are supposed to be the detailed appraisals that justify the content of the report. The report, and its Annexes, are fundamental in that they should be the evidence that supports the assertion that 50% affordable housing is a justifiable requirement to adopt in the Neighbourhood Plan.

The basis of the whole report is, correctly, that for a scheme to be viable its Residual Land Value (RLV) should be higher than the Benchmark Land Value (BLV). *“What we are therefore saying is that a “viable” development is one which increases the value of the land. Conversely, one which decreases the value of the land will not come forward and is therefore unviable” (BVVR para 5.15).* The report seeks to run several appraisal scenarios (Annex 2 onwards) for each site to justify the application of the Neighbourhood Plan Policies. The methodology behind the appraisals is sound and whilst we do have some concerns about some of the inputs (set out in more detail below), the key issue is that the wording and figures in the report itself does not align at all with the figures in the detailed appraisals in the Annexes.

The section on Redlands Farm specifically (para 6.38 to 6.45) is supported by Annex 4. Para 6.39 sets the Benchmark Land Value at £3.52m (comments on the acceptability of this figure are discussed below), before stating (para 6.40) that the site would have a Residual Land Value of £3.52m, pointing readers to Annex 4, which is the appraisal run with 50% affordable housing. However, Annex 4 shows a Land Value (worded as “Residualised Price”) of £2.29m, which demonstrates that the RLV would be some £1.23m under the BLV, making it



very short of actually being viable. No explanation is offered, as to why the Annex provides such a different Land Value figure from that mentioned in the report.

Para 6.42 then explains a further appraisal scenario (Annex 4a) was run to improve viability, keeping 50% affordable, but increasing the proportion of four beds on site and “boosting coverage”. Ignoring the fact that the proposed mix in this scenario would probably be unacceptable to the Council as it would not be balanced mix as required by Policy W17 of the Neighbourhood Plan. The report confirms this improves the BLV to £4.03m (para 6.42), which cannot be correct as no change to the housing mix or coverage would improve the Benchmark Land Value. We can only assume that the report is supposed to reference the RLV being improved, which would make sense. However, whilst viability does improve, in the same way as base appraisal the figure in the report (£4.03m) does not match the background appraisal. Annex 4a actually shows a “Residualised Price” of £2.82m, which shows the site remains some £700k below the Benchmark Land Value, so would also be unviable.

Confusingly, the report goes on (paras 6.43-6.45) to suggest a sensitivity test was then undertaken, which reduced values by 5%. This made the scheme unviable until a tipping point was found at 41% affordable, when the scheme was viable again. This is supposed to be demonstrated within Annex 4b, but again the figures do not align. Not only does Annex 4b show a Residualised Price of £2.21m (£1.31m short of BLV), but it is also run at 44% affordable, not the 41% stated in the report.

Whilst the other sites assessed in the report have not been reviewed in detail, it is clear that similar problems with figures not aligning are prevalent. For example, Wyke Oliver Farm has a Residualised Price in Annex 3 of £4m, but the report states (para 6.32) that the site has a Residual Land Value of £5.63m. This shows a consistent problem whereby the Annexes do not align with the text within the report.

The conclusions of the report go on to say (paras 9.20-9.25) that the Greenfield sites identified in the Plan (including Redlands Farm) “*can therefore deliver 50% affordable housing and CIL and a level of S106 that exceeds current practice*” (BVVR para 9.23). However, as set out above, the detailed appraisals do not justify the findings within the report, but instead fundamentally undermine the conclusion that the Greenfield sites are viable when providing 50% affordable housing.



In addition to the overriding flaws in the BVVR set out above, we also have concerns with several other points and the Appraisal inputs:

- Benchmark Land Values are too low, as it assumes that the non-residential elements of the sites are to be valued at agricultural value which is unrealistic in practice. BLV should be based on gross acres as each acre of a development, irrespective of use, is equally as important as each other. This is reflected in most contractual arrangements with landowners, which will require a minimum price per gross acre, which is well above the £20,000-£25,000 per ha quoted in para 5.16 (£8,000-£10,000 per acre). This is because landowners need to be incentivised to release all land, whether it has residential development on it or not. At £8,000-£10,000 per acre, landowners are simply not going to release land, so a price per gross acre should be applied, regardless of the net/gross ratio. If a Benchmark Land Value of 10 times an agricultural value of £25k to the acre is used (lower end of the scale) it increases the Benchmark Land Value of all sites assessed considerably.
- Notwithstanding the above, £8,000-£10,000 per acre is also considered a low assessment for agricultural land values, especially on land close to residential areas. Values for smaller parcels are likely to be closer to £20,000 per acre (£49,000 per ha).
- Open Market Values have seemingly been assessed using a very small pool of new build sites across Weymouth, two of which are CG Fry sites that are not within Weymouth, but neighbouring Chickerell, where values will be different. No analysis has been done of the build quality of the different developers, which will influence values, nor the value attributable to the distinct locations. The Chesil View development by Domus, for example, is exceptionally located with views over the coast. It is clear from the values in Annex 1 that the values at Chesil View have skewed the overall figures upwards which is unfair, given most of the new sites in the Neighbourhood Plan will not benefit from the same locational uplift.
- The standard build costs applied are very low and not “conservative” as suggested in paragraph 5.4. In addition, it is impossible to confirm that all these sites are likely to be delivered by PLC and/or large regional builders as implied in paragraph 5.2.
- No allowance has been applied for potential abnormals, which would be expected on most of the sites included in the NP, given the sloped or brownfield nature of the sites which could mean retaining features, additional cut and fill, deep drainage, remediation etc. A 5% contingency (which does appear in the Annexes) is not sufficient in this regard.



- Decarbonising costs are too low. An Air Source Heat Pump alone will cost £7,500 per unit, this is without adding costs relating to underfloor heating and solar panels.
- Build Costs do not include any reference to or allowance for costs associated with the Building Safety Levy. Those additional costs, confirmed by Government in March 2025 as applying to new development from Autumn 2026 are £34.48/sqm for Dorset, equating to an average of £3,448 per 100sqm market dwelling – as such they represent a significant cost that must be accounted for.
- BNG Costs are supposed to be £2,000 per unit (according to para 2.24) but in all Annexes the figure is £998 per unit. Not only is this a mistake but it is a huge generalisation to assume that this would be sufficient on a site-by-site basis.

All of the above points would have a negative impact on viability for each of the site, reducing the residual valuation further. However, as stated earlier, the current Annexes already show most Greenfield sites (specifically Redlands Farm) as unviable when providing 50% affordable housing. As such, any adjustments to account for the above would only exacerbate this problem. Overall, the BVVR is fundamentally flawed and cannot be considered a robust piece of evidence to justify the increased affordable housing requirement.

It is noted that the Policy W18 has been amended from the Reg 14 version to allow for financial viability assessments at planning application stage to demonstrate a “robust justification for a different percentage”. However, this should not be seen as providing sufficient flexibility as the NP Policy should be fully justified in its own right. It is not right that the burden be put back on developers to prove that 50% affordable housing is unviable, especially as that is exactly what the Annexes in the BVVR already clearly demonstrate.

It is noted also that paragraph 3.14 of the DLPVA highlights that information provided by Dorset Council indicates that there has been limited success in achieving affordable housing targets in areas with targets of 40% and 50%. These requirements have generally been applied in the eastern part of Dorset where values are much higher but affordable housing of such a proportion has not been deemed viable, often resulting in significant delays to the planning process and associated delivery of much needed housing.

Given the government’s housing policy objectives (both in the December 2023 and December 2024 National Planning Policy Framework) to significantly boost housing supply



and delivery, even with the caveat wording related to submission of a viability assessment at planning application stage Policy W18 cannot be considered to be compliant with basic condition a) insofar as having regard to national policies and advice in relation to housing delivery.

### ***Suggested modifications***

For the reasons set out, to ensure that it is consistent with basic conditions a) and e), criterion 2. i. of Policy W18 should be deleted, leaving affordable housing requirements to be addressed through the Local Plan.

If retained, the policy wording should be amended as follows:

- i. the proposals meet the minimum target of ~~at least~~ 25% affordable housing on brownfield sites and ~~at least 50% on~~ greenfield sites unless a Financial Viability Assessment or other material considerations demonstrate a robust justification for a different percentage.

### **Policy W21: Land at Redlands Farm**

The identification of Land at Redlands Farm for the residential development of 150 dwellings is strongly supported. The location of the site and its proximity to existing and consented housing makes it ideal for new housing, whilst simultaneously offering extensive public open space as well as appropriate landscape, ecological and surface water mitigation initiatives.

The site is also a preferred option in the emerging Dorset Council Local Plan, support at both the LP and NP level reinforcing its suitability as an appropriate and sustainable location for residential development.

A number of modifications are however required to some of the criteria outlined in Policy W21 to ensure compliance with basic conditions a) and e), as outlined below.

### ***Suggested modifications***

Given that housing requirements are minimum figures, to be consistent with paragraph 61 of the NPPF (Dec 2023) criterion 1 should be amended to refer to **at least** or **about** 150 dwellings so as not to unduly limit the potential to deliver slightly more than 150 new homes on the site should this prove feasible.



Criterion 2 should also be amended as follows, for the reasons set out in our comments on policy W18 (Affordable Housing):

4. Affordable housing provision should form ~~50%~~ **25%** of every completed stage of the development **unless a Financial Viability Assessment or other material consideration demonstrate a robust justification for a different percentage** and comprise a mix of sizes, types and tenures as agreed with Dorset Council'.

Criterion 4i. refers to the provision of tree-lined roads and pathways, the principle of which are accepted in terms of the landscape and biodiversity benefits that they offer. This must however also be considered in the context of making the most efficient use of land for development (in accordance with paragraph 128 of the NPPF December 2023), as well as technical highway requirements that can make such provision impracticable. To ensure the policy is consistent with the NPPF flexibility should be incorporated into the wording of criterion 4i as outlined below:

- 4i. **where practicable and not in conflict with the need to make efficient use of land** the retention of hedgerows and provision of landscaping including tree-lined roads and pathways, to minimise any visual impact on the setting and local landscape character

As highlighted through comments submitted on the Reg 14 version of the plan, the reference in criterion 3iii to 'sufficiently lower than the western ridge line, so as not to be visible from the Wey Valley' should be reworded as set out below, to avoid potential contradiction within the policy. The wording related to the conservation area should also be amended as set out to ensure that it is consistent with chapter 16 of the NPPF (December 2023):

- 4iii. the height of dwellings should mostly be no more than two storeys in height, rising to a maximum scale of three storeys only occasionally, ~~and development should protect and enhance~~ **not cause substantial harm** to the setting of the nearby conservation area and **should be positioned on site to ensure it is appropriately screened from the Wey Valley**

Criterion 4vi should be amended to be consistent with criterion 2 of policy W07 (Rights of Way and Access to the Countryside) insofar as the acknowledgement that existing rights of way need to be diverted as part of a development proposal:

- 4vi. the retention of public rights of way across the site **either on their current alignment or following diversion in accordance with policy W07**



Criterion 4xiv refers to compliance with the environmental objectives and targets of the Neighbourhood Plan. As set out through these comments we have a number of concerns in relation to those objectives and targets. On the basis that if made, the NP as a whole will need to be adhered to, it is unclear why there needs to be a separate reference to this within policy W21. For this reason, it is suggested that criterion 4xiv should be deleted.

While not referred to in policy W21, the supporting text at paragraph 9.74 makes reference to a site-specific design code being agreed with the local planning authority as part of the master-planning of the site. While acknowledged that there can be merit in the production of design codes for large scale developments with multiple developers this is not the case with sites such as Land at Redlands Farm that are a) proposed for only around 150 homes and b) promoted by a single developer with a reputation for high quality design in the local area. Detailed parameters for the development, including demonstration of compliance with policy W44 (Design) can adequately be addressed through the planning application process and associated requirement for a Design & Access Statement without the need for a separate Design Code as suggested, which would provide an unnecessary burden for all parties, including the local planning authority.

#### **Policy W34: Sustainable Development**

While supportive of the principle of achieving high standards of sustainable construction and design we object to the specific requirements set out within policy W34 and the 'Supporting Environmental Targets' outlined in Appendix A insofar as they duplicate and / or exceed requirements already set out through other legislation, including Building Regulations.

The inclusion of such references in the WNP adds to the complexity of policy, regulations and standards that all housebuilders are already expected to comply with through Part L of the Building Regulations. The key to success in terms of the ambition to address climate change is standardisation and the avoidance of individual policy requirements or aspirations which lead to a patchwork of differing local policies that could inadvertently undermine the delivery of the wider objectives of the NP.

With respect to this matter, we draw attention to the Future Homes Hub publication "Future Homes, One Plan Building a generation of high quality, affordable and sustainable homes





and communities, together”<sup>2</sup> which highlights the key actions needed to support the delivery of sustainable homes. Specifically, section 9 states:

*‘Local planning requirements must align with the overall plan for improving performance standards at national level. For example, avoiding divergence of local energy standards that make it harder to accelerate improvement in standards at national level, and avoiding conflict between local planning conditions and new requirements of building regulations.’*

This position is further supported by government through the Written Ministerial Statement of 13<sup>th</sup> December 2023 which states:

*‘The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards that go beyond current or planned building regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current, or planned building regulations should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:*

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.*
- The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).*

As separately set out we have significant reservations in relation to the viability evidence that supports the WNP, which the requirements of Policy W34 and Targets outlined in Annex A only exacerbate in terms of potential impacts on scheme viability.

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<sup>2</sup> [https://irp.cdn-website.com/bdbb2d99/files/uploaded/Future%20Homes%20One%20Plan\\_Future%20Homes%20Hub%20Prospectus-%20FINAL%20WEB.pdf](https://irp.cdn-website.com/bdbb2d99/files/uploaded/Future%20Homes%20One%20Plan_Future%20Homes%20Hub%20Prospectus-%20FINAL%20WEB.pdf)



It is not considered that appropriate justification has been provided as to why the WNP requires a policy that sets standards above the requirements set out nationally through Building Regulations.

To ensure that policy W34 is compliant with basic condition a), unless deleted in its entirety, the wording should be amended to specifically refer to new development being required to comply only with Building Regulations with the objective and targets referenced in Appendix A deleted from the plan.

#### **Policy W45: Heritage Assets**

This policy merely duplicates requirements that are already set out within either national or local policy and is therefore unnecessary and should be deleted.

If retained the wording should be amended to be consistent with national planning policy in order to meet basic condition a), for example the NPPF does not require development proposals to cause no harm to heritage assets and their setting, harm is a matter that is considered as part of a weighting exercise, which takes into account benefits, as set out within chapter 16 of the NPPF.

#### **Policy W46: Transport and Travel**

This policy merely duplicates requirements that are already set out within either national or local policy and is therefore unnecessary and should be deleted.

If retained the wording should be amended to be consistent with national planning policy in order to meet basic condition a), for example criterion 2 should be updated to be consistent with paragraph 115 of the NPPF (December 2023), which states:

*‘Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.’*

#### **Appendix A: Weymouth Supporting Environmental Targets**

As outlined in our comments on policy W34 we have several concerns generally in relation to the imposition of / reference to objectives and targets within the NP which duplicate and /



or exceed requirements already set out through other legislation, including Building Regulations.

It is not considered appropriate for such details to be set out within the NP, particularly in the absence of robust evidence on viability. As such they should be deleted.