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Our Reference: [REDACTED]

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Dear Sir/Madam

Weymouth Neighbourhood Plan Submission Version: Regulation 16 Consultation Response

On behalf of Bellway Homes Limited (Wessex), I write to provide comments on the Weymouth Neighbourhood Plan Submission Version. Bellway Homes has a specific interest in Land off Budmouth Avenue, Weymouth, which was previously identified under draft Policy Allocation WNP24 in the Regulation 14 consultation version of the Weymouth Neighbourhood Plan.

Steering Group's Approach to Plan-Making

First and foremost, Bellway wish to commend the Steering Group's approach to evidence gathering and consistent commitment to meaningful dialogue through the plan-making process. The Housing Needs Assessment stands as a particularly impressive example of robust evidence collection, especially regarding affordable housing provision, resulting in clear and compelling documentation of local requirements.

The Steering Group's willingness to maintain open and proactive conversation with stakeholders through the process demonstrates their determination to creating an evidence-led plan that responds to local needs and opportunities.

The challenging context within which the Neighbourhood Plan has been prepared should also be acknowledged. Weymouth faces significant constraints that impact development opportunities, with a complex interplay of topography, extensive flood risk zones, and numerous ecological designations creating a highly constrained environment for new development. The redevelopment of brownfield sites is also beset by viability constraints.

These inherent constraints significantly limit the availability of developable land, making it critical to optimize the use of those sites which technical assessments have already confirmed to be both suitable and deliverable.

The steering group has undertaken considerable work to identify these suitable and deliverable development sites, though we have specific concerns about whether identified and included sites are capable of meeting local housing need following the removal of previously identified sustainable development opportunities, especially in light of the rise in Dorset's housing requirement through the publication of the revised National Planning Policy Framework in December 2024.

Housing Needs Assessment and Affordable Housing Delivery

The 2024 Housing Needs Assessment provides distinct evidence of the scale of local housing need, identifying an annual requirement for 242 affordable homes, comprising 134 for rent and 108 for purchase. This represents a significant increase from previous assessments and emphasises the pressing need for deliverable sites that can provide meaningful quantities of affordable housing.

The current Local Plan requirement for 35% affordable housing on qualifying sites has demonstrably struggled to meet local needs, with monitoring data showing only 13% of completions in 2021-22 being affordable units.

This significant shortfall against both policy requirements and identified needs highlights the importance of maximising affordable housing delivery through the Neighbourhood Plan.

On behalf of Bellway Homes, we express concerns about site deliverability within the plan. The allocated Town Centre sites face particularly challenges, with flood risk constraints and viability issues presenting substantial barriers to the delivery of affordable housing.

The removal of the St Nicholas Street allocation due to the issues mentioned above exemplifies flooding and viability challenges and highlights the importance and difficulties of maintaining a sufficient supply of deliverable sites in sustainable locations.

The viability challenges facing brownfields sites in the Town Centre are well documented, and while regeneration of these sites is important, they cannot be relied upon as the primary source of affordable housing delivery.

Budmouth Avenue Omission Site and Technical Evidence

Against the above background of limited deliverable sites for development and pressing local housing needs, on behalf of Bellway we express disappointment at the removal of Land at Budmouth Avenue (previous draft Policy WNP24) from the submission version of the Neighbourhood Plan.

The site's credentials are strong – it was identified as a prospective housing allocation (WEY13) in the review of the West Dorset, Weymouth and Portland Local Plan, demonstrating its suitability in principle for residential development.

While that review was ultimately abandoned, the site's identification through that process should engender confidence in its fundamental suitability for development, given that it was included with the understanding of its suitability and deliverable credentials.

Bellway Homes has invested extensively in technical assessments that comprehensively confirm the Budmouth Avenue site's deliverability. Their detailed studies address all key planning considerations including highway capacity and access arrangements, ecological impacts and mitigation, surface water management, landscape and visual effects, and heritage considerations.

The technical work demonstrates conclusively that any identified constraints can be effectively mitigated through appropriate design and environmental enhancement measures.

Without prejudice, Bellway Homes committed to delivering 50% affordable housing on the Budmouth Avenue site through the Neighbourhood Plan process, accepting a lower return in exchange for assisting local affordable housing, alongside CIL payments and S106 contributions of £13,000 per unit. This level of affordable housing provision is a significant local opportunity to address the pressing need identified in the Housing Needs Assessment, which again demonstrates an annual requirement for 242

affordable homes, and that the Local Plan requirement for 35% affordable housing on qualifying sites has only resulted in monitoring data showing 13% of completions in 2021-22 being affordable units.

Bellway Homes are a partial owner of the Budmouth Avenue Site, ensuring that this site already has an established delivery partner with a clear track record as a national housebuilder. This stands in contrast to the nearby Wyke Oliver Farm allocation remaining in the Neighbourhood Plan, without yet having an attached delivery partner, and therefore a clear method of delivery.

The scheme would secure meaningful environmental enhancements through the transfer of 23 hectares of land to extend Lorton Valley Nature Park, helping maintain an appropriate settlement gap while improving public access to natural green space.

The level of affordable housing provision with the simultaneous delivery of substantial community benefits befits recognising a site like Budmouth Avenue as a sustainable development location and then assisting its delivery through a neighbourhood allocation.

Basic Conditions Assessment

It is essential to examine how the Weymouth Neighbourhood Plan addresses the basic conditions as set out in Paragraph 8(2) of Schedule 4B of the Town Country Planning Act. These conditions are fundamental requirements that must be met for a neighbourhood plan to proceed to referendum.

The Planning Practice Guidance clearly establishes that a neighbourhood plan must:

- a) Have appropriate regard to national policies and advice contained in guidance issued by the Secretary of State;
- b) Contribute to the achievement of sustainable development;
- c) Be in general conformity with the strategic policies contained in the development plan for the area; and
- d) Be compatible with EU obligations and human rights requirements

Taking each in turn:

National Policy Compliance: The removal of the Budmouth Avenue allocation conflicts with several key aspects of national policy. Paragraph 61 of the NPPF established the government's objective of "significantly boosting the supply of homes" while Paragraph 62 emphasises the importance of delivering a sufficient supply of homes informed by local housing needs assessments.

The site's removal directly contradicts these objectives, particularly given the documented local housing need and the site's proven ability to deliver a significant quantum of affordable housing.

Sustainable Development The Planning Practice Guidance states that "sufficient and proportionate evidence should be presented on how the draft neighbourhood plan guides development to sustainable solutions."

The removal of Budmouth Avenue – a site demonstrated through technical assessment to be sustainably located and capable of delivering both market and affordable housing alongside significant environmental enhancements – materially reduced the Plan's contribution to sustainable development.

This is particularly concerning given the site's potential to deliver substantial community benefits through the proposed transfer of land to extend Lorton Valley Nature Park.

Strategic Policy Conformity The Planning Practice Guidance advises that conformity with strategic policies requires consideration of “whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with.”

The current West Dorset, Weymouth and Portland Local Plan identifies the pressing need for housing delivery, particularly affordable housing, and the removal of a site capable of delivering 50% affordable housing appears to undermine rather than support these strategic objectives.

EU Obligations and Human Rights While the Plan has been subject to appropriate environmental assessment, the removal of demonstrably deliverable sites raises questions about whether it adequately addresses social sustainability requirements, particularly regarding the provision of affordable housing to meet identified local needs.

The Planning Practice Guidance emphasises that neighbourhood plans should be based on proportionate, robust evidence supporting the choices made and the approach taken. The technical evidence supporting Budmouth Avenue's deliverability meets this test, making its removal difficult to justify when assessed against the basic condition requirements.

Strategic Environmental Assessment

Building upon our analysis of basic conditions compliance, we must specifically address the Strategic Environmental Assessment's (SEA) conclusions regarding the Budmouth Avenue site, as these appear to have been given disproportionate weight in the decision to remove the allocation.

The SEA identified potential adverse impacts relating to Biodiversity and Geodiversity, Community Wellbeing, Landscape, and Transportation. In response, Bellway herein contend that the assessment and subsequent decision-making process has been weighted in regard to these potential adverse impacts without adequately considering the substantial mitigation measures detailed in Bellway's technical submissions.

Furthermore, the process has not recognised how these impacts (which are also described within the SEA as 'Likely adverse effect without mitigation measures') exist in balance with positive development effects, particularly regarding social sustainability and affordable housing provision.

Perhaps most critically, it has not fully recognised the environmental enhancement opportunities presented through the proposed 23-hectare extension to Lorton Valley Nature Park.

This approach to the SEA appears to have created internal inconsistency within the Neighbourhood Plan. While the Basic Conditions Statement emphasises the Plan's commitment to sustainable development, the removal of Budmouth Avenue – demonstrated through technical evidence to be capable of delivering social, economic and environmental benefits – undermines this position.

The Planning Practice Guidance is clear that sustainability considerations should be approached holistically. The current iteration of the Plan, by removing a site capable of delivering significant affordable housing provision alongside meaningful environmental enhancements contrasts this holistic objective.

This weakness is particularly acute given the documented difficulties in delivering affordable housing on brownfield sites within the Town Centre, the limited availability of alternative sites capable of delivering similar levels of affordable housing provision, and the opportunity to secure long-term environmental benefits through the Nature Park extension.

This implementation of the SEA compounds our earlier concerns regarding basic conditions compliance, particularly in relation to the achievement of sustainable development, conformity with strategic policies on housing delivery, and appropriate regard to national policy on meeting local housing needs.

Neighbourhood Plan Policies and Implementation

Bellway, separate from matters relating to the removal of Policy Allocation WNP24 and basic conditions, would like to express broad support for the Neighbourhood Plan's policy framework while suggesting several amendments to enhance its effectiveness and deliverability

The 20% Biodiversity Net Gain requirement specified in the supporting text for Policy W05 (paragraph 8.41) significantly exceeds national standards and risks undermining development viability. While we fully support the principle of biodiversity enhancement, Bellway Homes suggest aligning with the statutory 10% requirement while encouraging higher gains where feasible.

The approach to design quality through Policy W44 also raises some concerns for ensuring deliverable schemes can come forward. While high quality design is essential and the policy reflects NPPF Chapter 12's emphasis on good design, vague yet prescriptive requirements, such as material and detail harmonisation without greater specification, risk constraining innovation, and limiting the ability to respond to site-specific design.

Similar concerns apply to Policy W33 regarding infrastructure delivery, where greater detail would benefit logical phasing and trigger points to ensure viable delivery while maintaining appropriate infrastructure provision without confusion.

Conclusions

Bellway Homes wish to commend the extensive work undertaken by the Steering Group in preparing the Neighbourhood Plan, however also wish to raise concern that the Weymouth Neighbourhood Plan, in its current form, fails to deliver fully on its objectives, particularly regarding affordable housing delivery. This shortcoming is especially noteworthy given the robust evidence of need provided by the Housing Needs Assessment.

The removal of the Budmouth Avenue allocation – a demonstrably deliverable site capable of providing 50% affordable housing – undermines the Plan's ability to meet the basic conditions, particularly regarding sustainable development and general conformity with strategic policies.

The Planning Practice Guidance emphasises that Neighbourhood Plans should be based on robust evidence and should plan positively to support local development. The evidence supporting the Budmouth Avenue allocation, including detailed technical assessment and viability testing, demonstrates that the site would make a meaningful contribution to meeting local needs in a sustainable manner. Its reinstatement would strengthen the Plan's alignment with both national policy and local strategic objectives.

Collected evidence demonstrates that very few viable opportunities exist within Weymouth capable of meeting the identified affordable housing need. Given these constraints, it is crucial that those sites which can deliver significant affordable housing provision, such as Budmouth Avenue, are allocated and optimised through the Neighbourhood Plan.

We strongly urge reconsideration of the Budmouth Avenue allocation. Bellway Homes remains committed to delivering high-quality development that meets local needs.

The technical evidence supporting Budmouth Avenue's deliverability is compelling.

I trust these comments will assist the Examiner in their consideration of the Neighbourhood Plan. The appendices to this letter provide additional technical information regarding the Budmouth Avenue site, including our previous presentation to the Steering Group and our detailed Regulation 14 consultation responses.

Please do not hesitate to contact me should any clarification or additional information be beneficial.

Yours sincerely,

Jonathan Leigh Dual BA (Hons) MA

Senior Planner