

# **Wedmore Neighbourhood Plan**

**Report by Independent Examiner to Sedgemoor  
District Council**

**Janet L Cheesley BA (Hons) DipTP MRTPI**

**CHEC Planning Ltd**

**26 February 2019**

<b>Contents</b>	<b>Page</b>
Summary and Conclusion	4
Introduction	4
Legislative Background	5
EU Obligations	6
Policy Background	8
The Neighbourhood Plan Preparation	9
The Wedmore Neighbourhood Plan	11
Policy WED1 – Location Of Housing	12
Policy WED2 – Housing Mix	13
Policy WED3 – Affordable Housing	13
Policy WED4 – Natural Environment	17
Policy WED5 – Design	18
Policy WED6 – Wedmore Conservation Area	18
Policy WED7 – Sustainability. Provision Of Well-Designed Energy Efficient Buildings And Places	19
Policy WED8 –Transport Strategy	22
Policy WED9 – Supporting The Local Economy	23
Policy WED10 – Small Scale Employment Space	24
Policy WED11 – Communications	24
Policy WED12 – Play, Sports, Recreation And Community Facilities	25

Policy WED13 – Health And Medical Care	26
Policy WED14 Westholme Farm	27
Policy WED15 East Of Wedmore First School	27
Policy WED16 Axe Valley Vets	27
Referendum & the Wedmore Neighbourhood Plan Area	28
Minor Modifications	28
Appendix 1 Background Documents	29

## Summary and Conclusion

1. The Wedmore Neighbourhood Plan has a clear vision with regard to retaining a strong sense of community in an historic and rural setting.
2. The Local Plan requires a minimum of 116 additional dwellings within the settlement boundary of Wedmore Village by 2032. Together with completions and commitments, the Plan provides for approximately 127 dwellings during the Plan period within the settlement boundary. I have recommended that this figure is increased slightly to approximately 127-132 dwellings, following the recent planning permission at Westholme Farm. In addition, a site for approximately 12 dwellings is allocated in Blackford.
3. I have recommended modification to some of the policies in the Plan, for the reasons set out in detail below. Even though I have recommended a number of modifications to the Plan, these do not significantly or substantially alter the intention or nature of the Plan.
4. The Parish Council has suggested the inclusion of a local lettings policy. This has subsequently been published for consultation. I see no reason why this policy cannot be included in the Plan if Sedgemoor District Council so wishes.
5. **Whilst I have set out my reasoning under individual policies, my overall conclusion is that, subject to my recommendations, the Plan meets the Basic Conditions. It is appropriate to make the Plan. Subject to my recommendations being accepted, I consider that the Wedmore Neighbourhood Plan will provide a strong practical framework against which decisions on development can be made. I am pleased to recommend that the Wedmore Neighbourhood Plan, as modified by my recommendations, should proceed to Referendum.**

## Introduction

6. On 9 September 2016 Sedgemoor District Council (SDC) approved that the Wedmore Neighbourhood Area be designated in accordance with the Neighbourhood Planning (General) Regulations 2012. The Area covers the whole of the Parish of Wedmore.
7. The qualifying body is Wedmore Parish Council. The Plan has been prepared by the Wedmore Neighbourhood Plan Steering Group on behalf of Wedmore Parish Council. The Plan covers the period 2017 to 2032.
8. I was appointed as an independent Examiner for the Wedmore Neighbourhood Plan in November 2018. I confirm that I am independent from the Parish Council and SDC. I have no interest in any of the land affected by the Plan and I have appropriate experience to undertake this examination. As part of my examination, I have visited the Plan area.

## Legislative Background

9. As an independent Examiner, I am required to determine, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, whether:
- the policies in the Plan relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
  - the Plan meets the requirements of Section 38B of the 2004 PCPA where the plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area; and
  - that the Plan has been prepared for an area that has been designated under the Localism Act 2011 and has been developed and submitted for examination by a qualifying body.
10. I am obliged to determine whether the Plan complies with the Basic Conditions. The Basic Conditions are:
- having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan;
  - the making of the neighbourhood plan contributes to the achievement of sustainable development;
  - the making of the neighbourhood plan is in general conformity with the strategic policies contained in the Development Plan for the area of the authority; and
  - the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations and human rights requirements.
11. *The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018* came into force on 28 December 2018. They state:
- Amendment to the Neighbourhood Planning (General) Regulations 2012.*
- 3.—(1) The Neighbourhood Planning (General) Regulations 2012(5) are amended as follows.*
- (2) In Schedule 2 (Habitats), for paragraph 1 substitute:*
- “Neighbourhood development plans*

1. *In relation to the examination of neighbourhood development plans the following basic condition is prescribed for the purpose of paragraph 8(2)(g) of Schedule 4B to the 1990 Act(6)—*

*The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(7).”*

12. Since 28 December 2018, a neighbourhood plan is required to be examined against this extra Basic Condition. I will make further reference to this matter under EU Obligations.
13. Subject to the modifications I have recommended in this report, I am content that these requirements have been satisfied.

## **EU Obligations**

14. A Wedmore Draft Neighbourhood Plan Habitats Regulations Assessment (HRA) dated May 2018 includes an Appropriate Assessment. The reason this was required is outlined in the report as follows: *For Natura 2000 sites where it is unlikely that the Neighbourhood Plan on its own will require a stage 2 Appropriate Assessment in relation to that site, it has been necessary to consider whether ‘in-combination’ effects are likely to result in an Appropriate Assessment being required. In this case it these plans and projects which are likely to affect the North Somerset and Mendip Bats SAC.*
15. The Appropriate Assessment concludes that the Plan is unlikely to have a significant effect on the conservation objectives of the Natura 2000 sites assessed.
16. Until *The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018* came into force on 28 December 2018, it was not possible for there to be an Appropriate Assessment of neighbourhood plans. Therefore, I asked for a new Appropriate Assessment of the Plan and for consultation with the statutory consultees during my examination of the Plan. Subsequently, a revised Habitat Regulations Assessment was undertaken in January 2019. This reaches the same conclusions as the previous assessment and Natural England has concurred with the conclusion.
17. On this basis and based on the screening determination and consultee response, I consider that the Plan does not require a full HRA under Articles 6 or 7 of the Habitats Directive.
18. Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) (EA Regulations) set out various legal requirements and stages in the production of a Strategic Environmental Assessment (SEA).

19. SDC prepared a *Final Screening Report for Strategic Environmental Assessment (SEA) of Wedmore Neighbourhood Development Plan* in October 2018. In this Screening Report, SDC concludes: *that the Wedmore NDP is not a “plan or programme” of a type described at Regulation 5(2) or 5(4) of The Environmental Assessment of Plans and Programmes Regulations 2004. The Plan is a “plan or programme” of the type described at Regulation 5(3), however, the ‘small area’ exemption applies and a determination made under Regulation 9(1) concludes that the Plan is not likely to have significant environmental effects. Therefore, the Plan does not require SEA.*
20. Historic England expressed concerns whether the proposed allocations had been properly assessed from a heritage perspective. Historic England suggested that a more robust Heritage Assessment evidence base was required. In view of this a Heritage Assessment was commissioned and the number of dwellings allocated on the site at Westholme Farm was reduced to approximately 11 dwellings. Historic England confirmed that the Heritage evidence base was satisfactory. I will refer to this matter under Policy WED14.
21. The allocated site at Westholme Farm was allocated for 16 dwellings in the Pre-Submission Regulation 14 Plan. The submission Plan reduced this number to approximately 11 dwellings following concerns raised by Heritage England to the SEA screening opinion and following the production of a Heritage Assessment Report (August 2018). Planning permission has subsequently been granted for 16 dwellings on the allocated site at Westholme Farm, Ref 50/18/00057. SDC has been obliged to consider the proposed development in accordance with heritage asset legislation and has found the proposed scheme for 16 dwellings to be acceptable. In the light of this planning permission, it is clear that the site has the capacity to accommodate these 16 dwellings without causing harm to identified heritage assets.
22. Based on the screening determination, consultee response and the subsequent planning permission at Westholme Farm, I consider that it was not necessary for the Plan to require a full SEA Assessment. The SEA screening accords with the provisions of the European Directive 2001/42/EC. I am satisfied that the Plan does not breach the requirements of Chapter 8 of Part 6 of *the Conservation of Habitats and Species Regulations 2017(7)*.
23. A Neighbourhood Plan must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant. I am satisfied that the Plan is compatible with EU obligations and does not breach the European Convention on Human Rights obligations.

## Policy Background

24. The revised *National Planning Policy Framework* has recently been published on 24 July 2018. Minor modifications to the revised *National Planning Policy Framework* have subsequently been published in February 2019. At paragraph 214 it states: *The policies in the previous Framework published in March 2012 will apply for the purpose of examining plans, where those plans were submitted on or before 24 January 2019.*
25. The revised *National Planning Policy Framework* incorporates policy proposals previously consulted on in the Housing White Paper and the Planning for the Right Homes in the Right Places consultation, as well as changes to planning policy implemented through Written Ministerial Statements since the *National Planning Policy Framework* was published in 2012.
26. In accordance with paragraph 214 in the revised *National Planning Policy Framework*, I have examined this Plan against the previous *National Planning Policy Framework* (2012) (NPPF). Where I refer to the NPPF, it is to the 2012 version. This sets out the Government's planning policies for England and how these are expected to be applied.
27. The *Planning Practice Guidance* (2014) (PPG) provides Government guidance on planning policy. Similarly, I have examined the Plan against PPG guidance and any Written Ministerial Statements that related to the 2012 Framework. The PPG provides advice on procedural and policy related matters related to neighbourhood plans. It provides clear explanation on what can or cannot be done in a neighbourhood plan and advice on the requirement for policies to be adequately justified and clearly expressed. The PPG is currently being revised in accordance with the revised NPPF. I have referred to paragraphs in the PPG that may be in the process of being archived as part of this revision, as it is necessary in this transition period to refer to PPG related to the 2012 NPPF.
28. Paragraph 7 in the NPPF identifies the three dimensions to sustainable development:

*There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:*

**• an economic role** – *contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*

**• a social role** – *supporting strong, vibrant and healthy communities, by*

*providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and*

**•an environmental role** – *contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

29. The development plan for the Wedmore Neighbourhood Plan Area comprises the recently adopted Sedgemoor Local Plan 2011 – 2032. The strategic policies in the Local Plan include policies regarding the scale of new development, infrastructure delivery, sustainable development principles and climate change. The Neighbourhood Plan has been prepared in accordance with this emerging, and now adopted, Local Plan.
30. Whilst consultation on the submitted Neighbourhood Plan at Regulation 16 stage was prior to the adoption of the Local Plan, it is clear throughout the Neighbourhood Plan that it has been prepared in line with the emerging Local Plan. At the time of the Regulation 16 consultation period, the Local Plan was in a late stage. The Inspector's main modifications had been published and subject to public consultation. Following the publication of the Inspector's report, I do not consider that there were further additional changes to strategic policy, beyond the main modifications, that have a direct implication for the policies in this Neighbourhood Plan. In these circumstances, I do not consider that anyone is prejudiced by the Neighbourhood Plan being examined against the recently adopted Local Plan. Therefore, I see no merit, in this instance, in requiring further consultation on the Neighbourhood Plan as a consequence of the Local Plan adoption.

## **The Neighbourhood Plan Preparation**

31. I am required under The Localism Act 2011 to check the consultation process that has led to the production of the Plan. The requirements are set out in Regulation 14 in The Neighbourhood Planning (General) Regulations 2012.
32. The initial consultation process started with a public meeting in October 2016 to check if there was broad support for a Plan. A community questionnaire was sent to every household in the Parish and there was a 'call for sites' in March 2017. The results of these were explained at a consultation event in June 2017. Three events in November 2017 considered vision and topic objectives, broad policy directions and potential site allocations. A working

draft was made available for consultation between 11 May 2018 and 1 June 2018.

33. The Consultation period on the pre-submission draft of the Plan ran from 14 July 2018 to 8 September 2018. SDC advertised the consultation on its website, notified all organisations on its Local Plan database and undertook consultation with statutory consultees.
34. A summary of the pre-submission draft of the Plan was distributed to each household in the Parish. Four events were advertised in the summary document and via posters and banners in the village.
35. The consultation and publicity went well beyond the requirements and it is clear that the qualifying body went to considerable lengths to ensure that local people were able to engage in the production of the Plan. I congratulate them on their enormous efforts.
36. A Consultation Statement has been submitted as part of the submission documents. Rather than in the main Consultation Statement, there is a separate document summarising the main issues and concerns of those consulted on the pre-submission draft of the Plan and how these have been considered. Whilst these are required as part of a Consultation Statement, I do not consider anyone has been prejudiced by this being a separate document.
37. The Consultation Statement does not include a list of people consulted on the pre-submission draft Plan. Regulation 15 (2) requires the Consultation Statement to contain details of the persons and bodies who were consulted about the proposed neighbourhood plan. At my request, SDC has subsequently published the list on the Council's web site for this Plan. I do not consider anyone has been prejudiced by this omission from the Consultation Statement. As such, I am satisfied that the pre-submission consultation and publicity has met the requirements in The Neighbourhood Planning (General) Regulations 2012.
38. SDC publicised the submission Plan for comment during the publicity period between 9 November 2018 and 21 December 2018 in line with Regulation 16 in The Neighbourhood Planning (General) Regulations 2012. A total of thirteen responses were received. I am satisfied that all these responses can be assessed without the need for a public hearing. I gave the Parish Council the opportunity to comment on the Regulation 16 representations and they have made comment on Policy WED3, with regard to a new local lettings policy. I have taken their comments into consideration under this policy below.
39. Some responses suggest additions and amendments to policies. My remit is to determine whether the Plan meets the Basic Conditions and other legal requirements. Where I find that policies do meet the Basic Conditions, it is not necessary for me to consider if further suggested additions or

amendments are required. Whilst I have not made reference to all the responses in my report, I have taken them into consideration.

## The Wedmore Neighbourhood Plan

40. It is necessary for Neighbourhood Plans to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency as stated in the core planning principles in paragraph 17 in the NPPF. I do refer to clarity and precision with regard to some recommendations to modifications to the Plan. Where I do so, I have in mind the need to provide a practical framework in accordance with the core principles in the NPPF, thus ensuring that the Plan has regard to national policy in this respect.
41. It is not for me to re-write the Plan. Where I have found editing errors, I have identified them as minor editing matters and highlighted these as such. These have no bearing on whether the Plan meets the Basic Conditions.
42. PPG states: A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared. (Paragraph: 041 Reference ID: 41-041-20140306).
43. A clear vision for the Parish has been established with regard to retaining a strong sense of community in an historic and rural setting. This has provided the starting point for the preparation of policy objectives for the individual topic chapters.
44. I have been provided with a detailed evidence base in background supporting documents on the Parish Council's web site. This has provided a useful and easily accessible source of background information.
45. Policies in a neighbourhood plan can only be for the development and use of land. Where there are community aspirations (identified as non land use policy aspirations in this Plan), these have to be clearly differentiated from policies for the development and use of land.
46. Somerset County Council has identified inaccuracies in paragraphs 2.5 and 2.7 with regard to education provision. The County Council states that it has not commissioned additional accommodation at the school in 2017 (paragraph 2.5) and is not aware of any capacity increase within the First School (paragraph 2.7). **I see these as minor editing matters.**

47. Footnote 1 in the introduction to the Plan states: *The R15 submission version Neighbourhood Plan includes cross-references to a number of policies in the Sedgemoor Local Plan. At the time of submission of the Neighbourhood Development Plan to the Local Planning Authority, the Sedgemoor Local Plan is currently at the main modifications stage of examination and policy numbering may therefore subsequently change when the Local Plan is formally adopted. Cross-references to policies in the Wedmore Neighbourhood Plan will therefore be updated as appropriate as factual corrections prior to the Neighbourhood Plan being made. I see such amendments as being minor modifications.*
48. I have not made reference to most of the required Local Plan policy number alterations in the text, apart from where I have suggested modification to policies for other reasons. In these instances, where I suggest re- wording, I have included the new Local Plan policy numbers.
49. For ease of reference, I have used the same policy titles as those in the Plan. I have briefly explained national policy and summarised main strategic policies where relevant to each neighbourhood plan policy. I have tried not to repeat myself. Where I have not specifically referred to other relevant strategic policy, I have considered all strategic policy in my examination of the Plan.

## Housing

### POLICY WED1 – LOCATION OF HOUSING

50. The Local Plan identifies a hierarchy of settlements based on a number of criteria including population, services and facilities. Wedmore Village is identified as a Tier 2 Settlement in Local Plan Strategic Policy S2. Policy T2a requires a minimum of 116 additional dwellings within the settlement boundary by 2032. Blackford is identified as a Tier 4 settlement in Local Plan Strategic Policy S2. Tier 4 settlements have rural locations with more limited services and facilities.
51. The NPPF in paragraph 185 is clear that outside the strategic elements *neighbourhood plans will be able to shape and direct sustainable development in their area*. National policy emphasises that development means growth. The Neighbourhood Plan has sought to provide for sustainable growth by allocating sites for housing development in Wedmore Village. Together with completions and commitments, the Plan provides for approximately 127 dwellings during the Plan period within the settlement boundary. In addition, a site for approximately 12 dwellings is allocated in Blackford.

52. Policy WED1 reflects the settlement hierarchy in the Local Plan and allows for growth in accordance with this hierarchy. As such, Policy WED1 has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Policy WED1 meets the Basic Conditions.

### **POLICY WED2 – HOUSING MIX**

53. The NPPF, at paragraph 50, emphasises the need to deliver a wide choice of high quality homes. Local planning authorities should, amongst other matters, plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.
54. Local Plan Strategic Policy S4 refers to the need to provide a wider choice of housing to meet the needs of local people, although in the context of improved house type designs that respond to climate change and population change.
55. Whilst not a strategic policy, District Wide Policy D5 in the Local Plan seeks to ensure that a suitable mix of different types and sizes of housing is provided to meet the needs of the community, based on the best available evidence.
56. Background evidence supporting Policy WED2 clearly indicates the need for small homes in Wedmore. This policy seeks to ensure that an appropriate range of houses is provided, based on up to date evidence, with particular support for small dwellings.
57. SDC has suggested modification to Policy WED2 to include reference to a minimum one-bed requirement as the recent Housing Needs Assessment highlights a desperate shortage of one-bed rented housing. I see no need to alter Policy WED2 in this respect, as it already refers to the mix of housing being required to have regard to relevant local housing needs assessments.
58. Policy WED2 has regard to national policy for the need to deliver a wide choice of homes. It contributes towards sustainable development, particularly the social role and is in general conformity with strategic policy. Policy WED2 meets the Basic Conditions.

### **POLICY WED3 – AFFORDABLE HOUSING.**

59. The NPPF requires local authorities to address the need for all types of housing, including affordable housing.
60. Local Plan Strategic Policy S2 outlines the spatial strategy for housing development in the District. The deliverability of affordable housing is reliant on the implementation of this spatial strategy.

61. Local Plan Policy D6 seeks appropriate affordable housing provision in accordance with defined thresholds on a site by site basis taking into account viability considerations.
62. Tables 7.2 and 7.3 in the Local Plan support Policy D6 and identify thresholds for seeking affordable housing and percentages for brownfield and green field sites. A change from the submission Local Plan to the final adopted Local Plan has moved Wedmore from the category where affordable housing would be sought for 11 units or more, to the 'rest of the District' where the threshold is 6 units or more and where the provision must be a commuted sum if between 6 and 10 units. This commuted sum requirement is in accordance with national policy on affordable housing threshold provision.
63. Local Plan Policy T2b sets the affordable housing requirement for sites outside the settlement boundary as normally a minimum of 40%, and unless provision of alternative local infrastructure priorities is agreed.
64. Local Plan Strategic Policy S3 requires new development to provide and contribute towards the provision of infrastructure to meet the needs and requirements that are expected to arise from the development.
65. Policy WED3 only refers to the requirement for 40% affordable housing, without reference to a minimum requirement or to local infrastructure priorities.
66. The Local Plan, as it has emerged, has altered the affordable housing threshold for Wedmore and Policy WED3 does not accord with either Local Plan Policy D6 or T2b and I have no robust evidence to justify departure from the Local Plan. Whilst these Local Plan policies are not strategic policies, such a conflict would not be in general conformity with the strategic objectives of Local Plan Strategic Policy S2.
67. Usually a neighbourhood plan policy should provide an additional level or layer of detail to the local planning authority's policies. I have suggested modification to Policy WED3 that ensures conformity with the affordable housing requirements in the Local Plan, rather than replicating the Local Plan policies. I recognise that off-site contributions are not generally supported by the local community and note the tenure split will reflect local up to date evidence. In addition, I recognise the value of the Site Assessment evidence base with regard to any potential sites outside the settlement boundary of Wedmore Village. These matters provide an additional level of detail justified by local evidence.
68. Subject to the modification I have suggested above, Policy WED3 has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Modified Policy WED3 meets the Basic Conditions.

69. Supporting paragraph 5.5 requires modification. It should refer to off site contributions in exceptional cases only being applicable for sites of 11 or more dwellings, to comply with national policy allowing off site contributions for sites of 6-10 dwellings. **I see this as a minor editing matter.**

70. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy WED3 to read as follows:**

**POLICY WED3 – AFFORDABLE HOUSING.**

**Affordable housing will be provided in accordance with the Local Plan.**

**Any sites that come forward under Local Plan Policy T2b should have appropriate regard to the Wedmore Neighbourhood Plan's 'Site Assessments' evidence base (November 2017), ensuring the constraints and planning considerations raised in relation to available sites are adequately addressed.**

**The tenure split will reflect the 2018 Wedmore Housing Needs Assessment, or subsequent updated evidence.**

**An off-site contribution for sites of 11 dwellings or more will only be supported in exceptional circumstances if it can be demonstrated that it will be invested in a specific affordable housing project elsewhere in Wedmore Parish.”**

71. During the Regulation 16 consultation period on the submission Plan, the Parish Council submitted a letter requesting the inclusion of a local lettings policy in the Plan. The wording of the suggested policy has been compiled in conjunction with the Housing Development Manager at SDC.

72. Justification for the policy is local concern that affordable housing is needed in the Parish and this should be available in the first instance to residents and workers in the Parish.

73. The wording of the proposed local lettings policy is as follows:

**For any new affordable housing unit in the Wedmore Neighbourhood Plan area, initial priority (and subsequent future allocation of the affordable home) will be given to eligible households who are in housing need (as defined in xxx of the Wedmore Neighbourhood Plan) and who have the following local connection with the Wedmore neighbourhood plan area:**

- Currently live in (and have done so for 5 years or more) the Wedmore neighbourhood plan area.**
- Previously lived for 5 years or more (within the previous 10 years) in the Wedmore neighbourhood plan area.**
- Work 16 hours or more a week in the Wedmore neighbourhood plan area.**

- **Have immediate family (who currently live in, and have done so for 5 years or more) the Wedmore neighbourhood plan area - means grandparent(s), parent(s), child(ren) or sibling(s)**
- **Provides or received care for immediate family in the parish (immediate family as defined above)**

**Should any affordable homes be left unallocated after exhausting the above list, the unallocated affordable homes will be allocated in accordance with the Homefindersomerset housing policy and rules (or any subsequent replacement).**

74. In addition, it is suggested that local housing need for the purposes of this new policy is defined in the Plan as:

**For the purposes of the Wedmore Neighbourhood Plan area, the household is considered to be in housing need if they are assessed as being an emergency, gold or silver band household in accordance with Homefindersomerset housing policy and rules (or any subsequent replacement), plus applicants with no dependent children and are lodging with friends or family or living in accommodation with shared living facilities.**

**[https://www.homefindersomerset.co.uk/content/Information/Prioritising applications](https://www.homefindersomerset.co.uk/content/Information/Prioritising_applications).**

75. The proposed local lettings policy is supported by SDC and would support the provision of affordable housing. The policy needs the addition of 'or' for each of the local connection criteria. Other than this, the policy meets the Basic Conditions. It has regard to national policy for affordable housing provision, contributes towards sustainable development and is in general conformity with strategic policy

76. The Regulations do not provide guidance on how to respond to late additions to a neighbourhood plan. As the Parish Council requested the inclusion of this policy at such a late stage, SDC, at my request, has published this policy for consultation as a possible addition to the Plan. Fourteen representations have been received. I have considered these representations and they do not alter my conclusion that the proposed policy meets the Basic Conditions.

77. My remit is to determine whether the Plan meets the Basic Conditions and other legal requirements. As such, I am unable to recommend the inclusion of this policy, as this policy is not required for the Plan to meet the Basic Conditions. My recommendations are not binding and SDC is required to decide what action to take in response to each of my recommendations. In these circumstances, particularly as the policy has been the subject of public consultation as a possible addition to the Plan, I see no reason why this policy cannot be included in the Plan if SDC so wishes.

## Design And Environment

### POLICY WED4 – NATURAL ENVIRONMENT

78. The NPPF, in Paragraph 109, requires the planning system to contribute to and enhance the natural and local environment. This includes protecting and enhancing valued landscapes and minimising impacts on biodiversity and providing net gains in biodiversity where possible.
79. Local Plan Strategic Policy S4 supports development proposals that protect and enhance the quality of the natural environment and create net gains for nature, ecology and bio-diversity.
80. Policy WED4 supports development that protects or enhances the natural environment. This is not in general conformity with strategic policy in Local Plan Strategic Policy S4, where it specifies the need to protect *and* enhance the quality of the natural environment. Therefore, I recommend such a modification to Policy WED4.
81. Sustainable Drainage Systems are proposed for all new development in Policy WED4. This approach is recognised by Somerset County Council which has confirmed that all new drainage systems for new and redeveloped sites must, as far as practicable, meet their non-statutory technical standards for Sustainable Drainage Systems. The definition of development in planning policy encompasses a wide range, including change of use and there may be many instances where small scale development has no need for any drainage system. In the interest of precision, I therefore recommend modified wording to Policy WED4 in this regard.
82. Subject to the modifications I have suggested above, Policy WED4 has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Modified Policy WED4 meets the Basic Conditions.
83. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy WED4 to read as follows:**

### POLICY WED4 – NATURAL ENVIRONMENT

**“Development will be supported where it can protect and enhance the natural environment of the Plan area. This includes the special character and biodiversity of the levels / moors and its rhynes, the network of historic lanes and their associated trees and hedgerows.**

**Sustainable Drainage Systems should be used in all new development, where relevant, to control the rate of surface water runoff to assist in the management of water in the Somerset levels.”**

## **POLICY WED5 – DESIGN**

84. The NPPF, at paragraph 58, requires neighbourhood plans to include policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.
85. Local Plan Strategic Policy S4 supports new development that creates locally distinctive, well designed, healthy, safe and accessible neighbourhoods and that protects and enhances the quality of the built and historic environment.
86. Policy WED5 seeks high quality design that is sympathetic to the traditional built character of the villages and takes into consideration recommendations in the Wedmore Village Design Statement. That statement provides robust background evidence supporting Policy WED5, providing an understanding and evaluation defining characteristics of the village.
87. The Wedmore Neighbourhood Plan Heritage Assessment (2018) was produced to support the Plan and recommended the wording of WED5 in the submission Plan.
88. I have visited the Parish and seen for myself the traditional character of the villages and in particular, the traditional features in the Conservation Area. In addition, I have seen the importance of ensuring that the design of new development recognises the relationship with heritage assets and with the open nature of surrounding land.
89. Policy WED5 has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Policy WED5 meets the Basic Conditions.

## **POLICY WED6 – WEDMORE CONSERVATION AREA**

90. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes duties requiring special regard to be had to the desirability of preserving or enhancing the character or appearance of a Conservation Area.
91. The NPPF advises that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.
92. Local Plan Strategic Policy S4 supports new development that protects and enhances the quality of the historic environment.
93. Policy WED6 seeks to ensure that new development in the Conservation Area respects existing traditional design and layout. My only concern is the list of design principles in the supporting Paragraph 6.19. Whilst, some of these design principles replicate those in Policy WED6, this list is not a

policy requirement and, where it differs from Policy WED6, does not provide a practical framework for decision making. Therefore, in the interest of clarity, I recommend the deletion of this list in Paragraph 6.19. The remaining part of the first sentence of Paragraph 6.19 can be amalgamated with Paragraph 6.12, but for ease of reference I have left it as Paragraph 6.19. Where in the text this sentence ends up is **a minor editing matter**.

94. Policy WED6 has regard to national policy, contributes towards sustainable development, particularly the environmental role and is in general conformity with strategic policy. Policy WED6 meets the Basic Conditions.

95. **Recommendation: to meet the Basic Conditions, I recommend modification to Paragraph 6.19 to read as follows:**

**The protection of the conservation area is one of the prime concerns of its residents.**

#### **POLICY WED7 – SUSTAINABILITY. PROVISION OF WELL-DESIGNED ENERGY EFFICIENT BUILDINGS AND PLACES.**

96. A core principle in the NPPF is to: *support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy).*

97. Local Plan Strategic Policy S5 requires development to contribute to both mitigating and adapting to climate change and to meet targets to reduce carbon dioxide emissions. Proposals for zero carbon development will be strongly supported. Explanatory Paragraph 4.53 explains that delivery of these strategic objectives will be primarily through development management, taking into consideration this policy and related district wide policies. District Wide Policy D3 supports this strategic aim, relating to sustainability and energy in development. In particular it refers to encouraging sustainable construction techniques and relevant non - domestic development will be expected to achieve a BREEAM rating of 'Very Good' or equivalent standard, unless it can be demonstrated that this is not viable.

98. Policy WED7 seeks energy efficient buildings and places. In particular, in criterion 4 it refers to a requirement for non-residential developments to aim to meet the Buildings Research Establishment BREEAM building standard 'excellent'. This is a higher level than that required in the Local Plan and I have not been provided with any robust evidence to justify this approach. Therefore, I recommend modification to this criterion to accord with the Local Plan, to ensure that new development contributes towards sustainable development.

99. Criterion 7 in Policy WED7 refers to alterations to existing buildings being required to comply with sustainable design and construction standards, but does not state what these standards are. I assume they are BREEAM standards, which are already mentioned in criterion 4. Therefore, I recommend deletion of the reference to sustainable design and construction standards at the end of criterion 7.
100. Criterion 5 in Policy WED7 requires any new development to incorporate on-site energy generation. As I have previously mentioned, the definition of development in planning policy encompasses a wide range, including change of use and there may be many instances, particularly for small scale development, where such on-site energy generation is not appropriate. Therefore, in the interest of precision. I have suggested revised wording for this criterion.
101. Criterion 6 in Policy WED7 is concerned with retrofitting heritage properties in accordance with engagement and permissions of relevant organisations. It goes without saying that planning consent and/or listed building consent must be obtained for development requiring such consent. In the interest of clarity, I recommend the deletion of this reference.
102. In a Written Ministerial Statement of 25 March 2015 the Government announced that it is not now appropriate to refer to any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings in neighbourhood plans. Therefore, it is not appropriate for the first seven criteria in Policy WED7 to apply to residential properties. To have regard to national policy, I recommend modification to Policy WED7 accordingly. This includes the deletion of criterion 8 with regard to Lifetime Homes Standards. I have suggested revised wording to the policy. In addition, I have suggested revised wording to Paragraph 6.21, so that it only relates to non-residential developments.
103. This leaves criterion 9, regarding electric vehicle charging points for each new dwelling. The NPPF at paragraph 35 states that developments should be designed where practical to incorporate facilities for charging plug-in and other ultra low emission vehicles. I have no reason to suppose that it is the government's intention that the provision of electric vehicle charging points should be more onerous where neighbourhood plans are in existence than elsewhere. There would therefore need to be a special justification for a policy imposing these requirements to relate to all new dwellings and none has been presented to me. Therefore, I have suggested modified wording to criterion 9 to have regard to national policy. As I have recommended above that Policy WED7 should only apply to non-residential buildings, I recommend, in the interest of providing a practical framework for decision making, that electric vehicle charging points are in a separate new policy.
104. Subject to the modifications I have recommended above, Policy WED7 has regard to national policy, contributes towards sustainable development,

particularly the environmental role and is in general conformity with strategic policy. Modified Policy WED7 meets the Basic Conditions.

105. **Recommendation: to meet the Basic Conditions, I recommend**

**1) modification to Policy WED7 to read as follows**

**POLICY WED7 – SUSTAINABILITY. PROVISION OF WELL-DESIGNED ENERGY EFFICIENT BUILDINGS AND PLACES.**

**“The design and standard of any new non-residential development should aim to meet a high level of sustainable design and construction and be optimised for energy efficiency, targeting zero carbon emissions. This includes:**

- 1. Siting and orientation to optimise passive solar gain**
- 2. The use of high quality, thermally efficient building materials**
- 3. Installation of energy efficient measures such as loft and wall insulation and double glazing**
- 4. Developments should aim to meet the Buildings Research Establishment BREEAM building standard 'Very Good' or equivalent standard, unless it can be demonstrated that this is not viable**
- 5. Any new development to be encouraged to incorporate on-site energy generation from renewable sources such as solar panels or heat pumps where appropriate**
- 6. The retrofit of heritage properties / assets is encouraged to reduce energy demand and to generate renewable energy where appropriate, providing it safeguards historic characteristics**
- 7. Alterations to existing buildings should be designed with energy reduction in mind.**

**2) the inclusion of a new policy to read as follows:**

**New dwellings should be designed where practical to incorporate facilities for charging plug-in and other ultra low emission vehicles.**

**3) modification to paragraph 6.21 to read as follows:**

**6.21 The Neighbourhood Plan can play its part in moving the community towards zero carbon emissions by encouraging all new non-residential buildings to achieve greater energy efficiency through building design, improved energy conservation and the use of renewable energy sources. A neighbourhood plan cannot refer to any**

**additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. Therefore, Policy WED7 only applies to non-residential development. Policy WED7 sets out in a series of measures which clearly signpost the aspirations of the Wedmore community to achieve a low energy, low carbon future.**

## Transport

### **POLICY WED8 –TRANSPORT STRATEGY**

106. Paragraph 173 in the NPPF states: *Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be delivered viably is threatened.*
107. Local Plan Strategic Policy S3 requires new development to *provide and contribute towards the provision of services, facilities and infrastructure at a rate, scale and pace to meet the needs and requirements that are expected to arise from that development.*
108. Developer contributions can only be sought where they meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. These tests are set out as statutory tests in the *Community Infrastructure Levy Regulations 2010.*
109. Policy WED8 is a Transport Strategy, identifying accessibility and safety improvements. I have suggested revised wording for Policy WED8, to require new development to provide or contribute towards the proposals in the Transport Strategy in accordance with the statutory tests.
110. Whilst I recognise the importance to the local community of the detailed requirements in the Transport Strategy, many of the proposed improvements are traffic management matters rather than land use and development matters for inclusion in a planning policy.
111. Due to the concerns I have raised above, I recommend that the details of the Transport Strategy are deleted from Policy WED8 and incorporated into Paragraph 7.3, so that only development and land use matters are retained in the policy itself. It is not for me to re-write the Plan. I suggest that Paragraph 7.3 becomes the Wedmore Transport Strategy and is edited accordingly. The Transport Proposals can remain on the Proposals Maps, but should be annotated to cross refer to the Wedmore Transport Strategy in paragraph 7.3.

112. Subject to the modifications I have recommended above, Policy WED8 has regard to national policy, contributes towards sustainable development, particularly the environmental role and is in general conformity with strategic policy. Modified Policy WED8 meets the Basic Conditions.
113. Criterion 1 in Policy WED8 refers to a 20MPH speed limit by Hugh Sexey's Middle School in Blackford. However, there is no corresponding annotation on the Blackford Village Proposal Map. **I see the inclusion of the annotation as a minor editing matter.**
114. **Recommendation: to meet the Basic Conditions I recommend:**
- 1) modification to Policy WED8 to read as follows:**
- POLICY WED8 –TRANSPORT STRATEGY**
- Development proposals will be supported where they provide, or contribute to, the accessibility and safety improvements in the Wedmore Transport Strategy in accordance with the statutory tests as set out in the Community Infrastructure Levy Regulations 2010.**
- 2) the incorporation of criterion 1-11 in Policy WED8 into Paragraph 7.3 and for this paragraph to be titled 'Wedmore Transport Strategy'.**
- 3) modification to the Keys on both Proposals Maps for the Transport Proposals to cross refer to the Wedmore Transport Strategy in paragraph 7.3, rather than to Policy WED8.**

## **Economy**

### **POLICY WED9 – SUPPORTING THE LOCAL ECONOMY**

115. Paragraph 28 in the NPPF states: *Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. One criterion to promote a strong rural economy is that neighbourhood plans should: promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.*
116. Local Plan Strategic Policy S4 supports a vibrant, diverse and responsive local economy. Local Plan Policy D18 identifies The Borough/Church Road in Wedmore village as a District Centre.
117. Policy WED9 seeks to encourage and retain A1 and A2-A5 uses in the District Centre. As such, it has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy,

supporting a vibrant local economy. Policy WED9 meets the Basic Conditions.

### **POLICY WED10 – SMALL SCALE EMPLOYMENT SPACE**

118. One criterion in paragraph 28 in the NPPF to promote a strong rural economy is that neighbourhood plans should: *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings.*
119. Local Plan Strategic Policy S2 sets out the spatial strategy for the District. Both Wedmore village and Blackford are expected to focus on employment growth appropriate to the scale and character of the settlements.
120. Policy WED10 supports the provision of small scale B1 employment space. As such, it has regard to national policy to promote economic growth in rural areas, contributes towards the economic role of sustainable and is in general conformity with strategic policy, supporting appropriate employment growth. Policy WED10 contributes towards the economic role of sustainable development. Policy WED10 meets the Basic Conditions.

### **POLICY WED11 – COMMUNICATIONS**

121. The NPPF emphasises that advanced high quality communications infrastructure is essential for sustainable economic growth and plays a vital role in enhancing the provision of local community facilities and services.
122. I note from responses to the residents questionnaire undertaken in March – April 2017 that less than a quarter of respondent households had access to superfast or ultra fast broadband.
123. A developer cannot be held to providing superfast broadband as connection speeds are dictated by the internet provider. However, I do see the importance of new buildings being provided with the necessary ducting capable of accepting fibre cables, to assist the local economy and community. Therefore, In the interest of precision, I recommend modification to Policy WED11 to specify a requirement for the provision of suitable ducting capable of accepting fibre cables to enable superfast broadband. This has regard to national policy and contributes towards the economic role of sustainable development. Modified Policy WED11 meets the Basic Conditions.
124. **Recommendation: to meet the Basic Conditions I recommend modification to Policy WED11 to read as follows:**

### **POLICY WED11 – COMMUNICATIONS**

**“Ducting capable of accepting fibre cables should be installed in all new residential, retail and commercial premises to enable a superfast broadband connection.”**

## **Community And Wellbeing**

### **Policy WED12 – PLAY, SPORTS, RECREATION AND COMMUNITY FACILITIES**

125. As previously mentioned, paragraph 28 in the NPPF promotes a strong rural economy. Paragraph 70 in the NPPF requires planning policies to *plan positively for the provision and use of community facilities and guard against the unnecessary loss of valued facilities*.
126. Local Plan Strategic Policy S4 supports development proposals that promote greater self-containment of settlements that are supported by adequate services, cultural, sporting and leisure facilities.
127. Policy WED12 seeks to protect existing locally valued community facilities and supports appropriate new facilities. In the interest of precision, I recommend cross reference to Appendix 3, which lists these facilities. I see some internal conflict in the Plan with regard to the redevelopment of the Axe Valley Veterinary Centre site. I am not sure from the evidence before me if the loss of that facility would satisfy criterion 1.i. Therefore, I recommend the inclusion of a specific criterion for these premises. I have suggested revised wording.
128. Policy WED12 refers to locally valued community assets. SDC is obliged to hold a Register of Assets of Community Value, where buildings are nominated for inclusion and where SDC accepts the inclusions. The buildings listed in Appendix 3 are not, to my knowledge, on the SDC list. Therefore, in the interest of clarity, I recommend that Policy WED12 only refers to locally valued community facilities, to distinguish the buildings from Assets of Community Value.
129. Section 3 is written as a statement rather than a policy. In the interest of clarity, I have suggested revised wording.
130. Subject to the modifications I have recommended above, Policy WED12 has regard to national policy, contributes towards sustainable development, particularly the social role and is in general conformity with strategic policy. Modifies Policy WED 12 meets the Basic Conditions.
131. **To meet the Basic Conditions, I recommend modification to Policy WED12 to read as follows:**

### **POLICY WED12 – PLAY, SPORTS, RECREATION AND COMMUNITY FACILITIES**

1. **“Locally valued community facilities listed in Appendix 3 will be protected from loss. Proposals for the redevelopment or change of use of locally valued community facilities will only be supported where:**
  - i. **there is no reasonable prospect of viable continued use of the existing building or facility and a need is demonstrated for the proposed change; and,**
  - ii. **there is no adverse impact on the natural and built environment of the adjoining area.**
  - iii **an exception is the redevelopment of the Axe Valley Veterinary Centre on Redmans Hill, Blackford, subject to the requirements of Policy WED16.**
  
2. **Development proposals for new, replacement, extended and/or improved community facilities and open space will be supported where:**
  - i. **the proposal would not have significant adverse impact on the amenity of nearby residents;**
  - ii. **the proposal would not have significant adverse impacts on the surrounding local environment (with regard to biodiversity, wildlife habitat and landscape character);**
  - iii. **the proposal would not have unacceptable impacts on the local road network (with regard to additional traffic volume / congestion, demand for parking, and pollution levels);**
  - iv. **it is easily accessible to residents.**
  
3. **Land to the north and east of Worthington Close is currently proposed to be the location of a children’s play area funded by the Cross Farm development. If this play area is constructed elsewhere, an extension to the Worthington Road car park, is supported.”**

## **POLICY WED13 – HEALTH AND MEDICAL CARE**

132. A core planning principle in the NPPF is to *take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.*
  
133. Local Plan Strategic Policy S4 supports development proposals that create healthy communities. District wide policies relevant to the delivery of this strategic objective are Local Plan Policies D7 and D28.
  
134. Policy WED13 supports the provision of additional health and medical care facilities. Whilst the location and design of such provision is not specified in Policy WED13, the Plan has to be read as a whole and other policies cover these matters with regard to development in general. In these circumstances, I am satisfied that Policy WED13 has regard to national policy, contributes towards sustainable development, particularly the social

role, and is in general conformity with strategic policy. Policy WED13 meets the Basic Conditions.

135. The last sentence in Paragraph 9.7 should be deleted where it refers to Lifetime Homes Standards and 'however' at the beginning of Paragraph 9.8. **I see these as minor editing matters.**

## **Housing Allocations**

### **POLICY WED14 WESTHOLME FARM**

### **POLICY WED15 EAST OF WEDMORE FIRST SCHOOL**

### **POLICY WED16 AXE VALLEY VETS**

136. I have referred to relevant national and strategic policy regarding housing provision under Policy WED1.
137. As referred to under Policy WED1, Local Plan Policy T2a requires a minimum of 116 additional dwellings within the settlement boundary of Wedmore by 2032. This Neighbourhood Plan allocates two sites within a revised settlement boundary that will exceed this requirement. In addition the Plan allocates a site at Blackford.
138. A call for sites was undertaken in 2017. The sites were evaluated in a Site Assessment Matrix. The chosen sites have been the subject of extensive public consultation and have received local support during a transparent and robust consultation process. Any assessment of land availability in the production of neighbourhood plans needs to be proportionate. I am satisfied that the chosen sites are deliverable as far as I can reasonably be expected to be, and together with the overall housing strategy in the Plan will contribute towards the achievement of sustainable development by the provision of sustainable growth.
139. I sought clarification from the Parish Council as to whether it wished to retain the number of dwellings allocated for the Westholme Farm site as approximately 11 dwellings and the Parish Council confirmed that it wished to retain this figure. My concern is that a scheme for 16 dwellings has been granted planning permission. If a similar proposal for 16 dwellings were to be submitted to SDC, the restriction on numbers to approximately 11 in the Plan would not create a practical framework for decision making. In these circumstances, I recommend that the site is allocated for approximately 11 - 16 dwellings.
140. Planning permission has been granted for 35 dwellings on the allocated site at land East of Wedmore Primary School, Ref 50/18/00056.
141. As regards the detailed policy requirements in Policies WED14, WED15 and WED16, I am satisfied, as far as I can reasonably be expected to be from

the evidence provided, that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.

142. Modified Policy WED14 and Policies WED15 and WED16 have regard to national policy, contribute towards sustainable development and are in general conformity with strategic policy. Modified Policy WED14 and Policies WED15 and WED16 meet the Basic Conditions.
143. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy WED14 to allocate Land at Westholme Farm for approximately 11 - 16 dwellings.**

## **Referendum and the Wedmore Neighbourhood Plan Area**

144. I am required to make one of the following recommendations:
- the Plan should proceed to Referendum, on the basis that it meets all legal requirements; or
  - the Plan as modified by my recommendations should proceed to Referendum; or
  - the Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.
145. **I am pleased to recommend that the Wedmore Neighbourhood Plan as modified by my recommendations should proceed to Referendum.**
146. I am required to consider whether or not the Referendum Area should extend beyond the Wedmore Neighbourhood Plan Area. I see no reason to alter or extend the Neighbourhood Development Plan Area for the purpose of holding a referendum.

## **Minor Modifications**

147. The Plan is a well-written document, which is easy to read. Where I have found errors, I have identified them above. It is not for me to re-write the Plan. If other minor amendments are required as a result of my proposed modifications, I see these as minor editing matters which can be dealt with as minor modifications to the Plan. In particular, I note that paragraphs 1.10 and 1.11 in the introduction to the Plan will need updating.

**Janet Cheesley**

**Date 26 February 2019**

## Appendix 1 Background Documents

The background documents include

The National Planning Policy Framework (The Framework) (2012)  
The Revised National Planning Framework (2018) and minor modifications  
(February 2019)  
The Planning and Compulsory Purchase Act 2004  
The Localism Act (2011)  
The Neighbourhood Planning Regulations (2012)  
The Neighbourhood Planning (General) (Amendment) Regulations (2015)  
The Planning Practice Guidance (2014)  
The Conservation of Habitats and Species and Planning (Various  
Amendments) (England and Wales) Regulations 2018  
Sedgemoor Local Plan (February 2019)  
All supporting documents submitted with the Neighbourhood Plan  
Wedmore Neighbourhood Plan Heritage Assessment (August 2018).  
Regulation 16 Representations  
Habitats Regulations Assessment (January 2019)  
Wedmore additional consultation amendment to policy WED3