

# Bentley Parish Submission Modified Neighbourhood Plan 2021-2040

# **Consultation Statement**

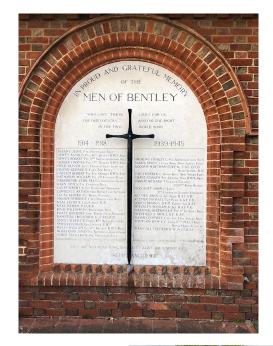


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**Updated May 2024** 

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### 1. CONSULTATION STATEMENT

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Modified Bentley Parish Neighbourhood Plan (BPNP). The legal basis of the Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations, which require that a Consultation Statement should:

- (a) contain details of the persons and bodies who were consulted about the Neighbourhood Development Plan as proposed to be modified.
- (b) explain how they were consulted;
- (c) summarise the main issues and concerns raised by the persons consulted; and
- (d) describe how those issues and concerns have been considered and, where relevant, addressed in the neighbourhood development plan as proposed to be modified.

This document is intended to fulfil the above legal requirement.

This Consultation Statement summarises all consultation and engagement undertaken with the community and other relevant statutory bodies and stakeholders in developing modifed Bentley Parish Neighbourhood Plan (BPNP). The statement includes specific detail on how issues that were raised during the pre submission consultation have been addressed and evidence of the feedback received is incorporated into this statement.

## 2. BACKGROUND

### 2.1. The BPNP Steering Group

Bentley Parish Council set up a sub-committee Steering Group to oversee the preparation of the Made Neighbourhood Plan. The group comprised of a Parish councillor and a number of local residents with interest in the community and in helping to deliver this project.

During the development of the Made BPNP, the Steering Group and Working Groups met frequently during 2014 to early 2016.

During the development of the modified BPNP, the groups were reconvened and met regularly in 2018 and 2019. Work was then paused during most of 2020 and 2021 due to the outbreak of Covid-19 and delays to the emerging Local Plan. The groups then resumed during 2022 onwards.

Members of the Steering/Working Group were sub-divided into a number of topic specific working groups, utilising their specific skills and knowledge of the Parish.

The Steering Group established links with planning officers at EHDC and took advantage of the various neighbourhood planning events arranged by the Authority and others for Parish councils in the District.

The Steering Group appointed an external Planning Consultants O'Neill Homer, (ONH) to provide advice and guidance throughout the process.

The Steering Group has worked throughout the process to gather together an evidence base to support the Neighbourhood Plan. This includes both published and online sources, such as the Census, local authority and EHDC documents, and information gathered through community surveys and other local sources.

## 2.2 Communication of the proposed modified BPNP

The proposed modified BPNP has been prepared following detailed early engagement with the local community and builds upon the extensive previous consultation work used to prepare both the "Bentley Plan" (2014) and the Made Bentley Parish Neighbourhood Plan (2016) A full copy of the Bentley Plan is included in Appendix A.

In preparing the modified BPNP the outputs of the early engagement were used alongside the updated evidence bases to prepare for the Regulation 14 consultation. Updates and information have been made available to the community using all of Bentley Parish Council's methods of communication. In particular the following background work and methods of communication have been used:

- A community questionnaire to records community views and comments;
- Monthly full council meetings attended by the public where they could attend and receive updates and ask questions;
- Letters to property owners of candidate Local List properties, in advance of the Regulation 14 consultation
- A flyer in the Parish Magazine promoting the Regulation 14 consultation
- Notices placed on noticeboards throughout Bentley to advertise the modified BPNP, Regulation 14 and the agendas for Bentley Parish Council meetings updating on the process
- Locally distributed posters to promote the regulation 14 consulation.
- Updates on Bentley Parish Council website (bentleyparishcouncil.co.uk)
- Updates on the Bentley Neighbourhood Plan Facebook page
- Individual letters sent to 130 statutory consultees, local groups and organisations inviting responses to the Regulation 14 consulation.

# 3. DECIDING TO MODIFY THE BENTLEY PARISH NEIGHBOURHOOD PLAN

#### 3.1 Introduction

Bentley Parish Council (BPC) and the Bentley Parish Neighbourhood Plan (BPNP) Steering Group decided in 2018 to modify and update our Made Bentley Neighbourhood Plan.

### 3.2 Reasons for modifying the Plan

- 3.2.1 EHDC Local Plan being updated EHDC decided to update their Local Plan and when the timetable for this was published, the plan was to modify the BPNP alongside the adoption of the new Local Plan;
- 3.2.2 To respond to speculative applications The Parish Council is keen for the plan-led system to maintain its currency in managing a recent trend in speculative planning applications for housing development surrounding the main village., to ensure any further development is the right development for the village. It was therefore felt that changes could be made to the current BPNP to provide further clarity for applicants and decision makers when considering such applications.
- 3.2.3 BPNP policy update In monitoring the Made Plan between 2016 and 2018, BPC recognised that there is a need to have a number of additional policies in the Bentley Neighbourhood Plan to help strengthen its effectiveness.

# 4. THE CONSULTATION PROCESS 2018-2023

Having made the decision to review the Made BPNP, the first action was to undertake a community engagement exercise to establish the scope of the proposed modification. The outputs of this were then used alongside updated evidence bases, anecdotal evidence from recent planning experiences and engagement with planning officers at EHDC to shape the proposed modification. The pre-sumission draft was then formally consulted upon in 2023. A summary of this activity, with dates, is detailed in the table below.

# 4.1 Summary of consultation activity for the Modified BPNP

Date	Audience	Activity	
11/2018	Residents	Drop-in community briefing about the	
		Neighbourhood Plan at the village Memorial Hall – to	
		engage with residents on the proposed modification	
		to our BPNP (2016)	
		The notification is detailed below this table.	
		Residents were able to take part in a SWOT analysis.	
		(See Appendix H) and encouraged to answer the	
		questionnaire (see Appendix F)	
11/2018	Residents	Questionnaire – to ascertain what issues that	
		residents think we should focus on	
		(Appendix G)	
11/2018	Residents	SWOT analysis – to understand where there are	
		opportunities for improvement and if the BPNP can	
		address these	
		(Appendix H)	
04/2019	Residents	Presentation to the village Annual Meeting on the	
		outputs of the questionnaire and shaping the	
		modification.	
10/2021	Residents	An update on where we are with our modification	
		sent to residents	
02/2022	Residents	An update on where we are with our modification	
		sent to residents	
		Cool do la dala a di a la Co 1 di 40	
00/2022	FUDC	Sent due to delays due to Covid-19.	
09/2022	EHDC	Meeting with EHDC Planning Team – to get advice on	
05 (2022	Challan	the proposed policy modifications	
05/2023	Statutory	Letter and SEA Screening form sent to four consultees	
	consultees	– Environment Agency, Historic England, Natural	
		England and EHDC	
		Strategic Environmental Assessment (SEA) -	
1		Julategic Liivii Ollillelitai Assessillelit (JEA) -	

		Screening Statement - Determination under Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.	
		(See Appendix M)	
07/2023	EHDC	Meeting with EHDC Planning Team – to get	
		agreement to proceed with Reg. 14. Agreement	
		given, together with advice on how to improve the	
		plan and supporting process	
08/2023	Residents and	Letter to c.130 consultees to give them an	
	statutory	opportunity to let us have feedback on the draft	
	consultees	Modified BPNP	
09/2023	Binsted PC	Meeting to discuss common issues	
	(Neighbouring		
	Parish)		
2022-2024	Bentley Parish	These are held on the second Monday of each month	
	Council	in public. A discussion on the Neighbourhood Plan	
		progress has been a regular item on the agenda at	
		these meetings since 2018. The Neighbourhood	
		Planning Steering Group has sent all key decisions to	
		the Parish Council for discussion and decisions. For	
		example, the Parish Council has:	
		Made appropriate decisions	
		Signed off on proposed policies	
		Asked any questions	

### 4.2 Further details about the consultation events

# 4.2.1 Neighbourhood Plan Information Evening held at Bentley Memorial Hall, November 2018

The Steering Group decided to hold 2 events to ensure that as many people as possible could attend. Members of the Parish Council, Steering Group and Working Party were in attendance to help residents understand the materials on display and to answer any questions.

The event was advertised in the Bentley Parish Magazine on 11/10/2018.

# Bentley Neighbourhood Plan – Drop in Public Meetings at the Memorial Hall

Saturday 17th November between 10am and 12.30pm or

Monday 19th November between 7.30pm and 9.30pm

Earlier this year the government revised the National Planning Policy Framework which will last until 2036. As a consequence, our 2016 Neighbourhood Plan has to be revised to remain consistent with government and local council plans.

During the life time of our neighbourhood plan it was always the intention that it would be updated every 5 years, so although this is a little earlier than expected, it is an opportunity to update and make our current plan stronger. The Bentley Parish Neighbourhood Plan Group is working to revise the plan for our parish and to ensure it represents our community as a whole.

We would all agree that we live in a very beautiful area, blessed with a rich natural environment offering access to the countryside with expansive views. But there are challenges too, in particular traffic, public transport, parking and increased pressure for developments on green field sites. Change and growth is inevitable and Bentley has changed and will continue to do so. The Neighbourhood Plan is not about stopping development but ensuring the type, location, style and size of development meets the needs and aspirations of our community. Having a Neighbourhood Plan provides opportunities for us to ensure future housing and any other development is sustainable for the parish and meets the needs of our area.

To explain more about the Neighbourhood Plan and answer questions you have, we will be holding drop in public meetings in the Memorial Hall to which you are invited on Saturday the 17<sup>th</sup> November or on Monday the 19<sup>th</sup> November.

We do hope you will be able to attend one of these meetings, and in due course complete a questionnaire, because your participation, thoughts, feelings and feedback will be essential to enable Bentley to have a robust and well supported Neighbourhood Plan.

Bentley Neighbourhood Plan Group

This was the flyer circulated to all households:



# The Bentley Neighbourhood Plan, again?

- · We've already got a plan, why do we need to do it again?
- What was the point of the first plan if our village has to repeat the exercise so soon?
- Can we have more of a say over future development in Bentley?

All good and appropriate questions which need to be aired and answered.

Find out more at a drop in meeting between 10am to 12.30pm at the Memorial Hall on Saturday, 17th November or on the Monday 19 th November from 7.30pm in the Memorial Hall:-

- · to ask these questions and others you may have,
- to find out why it is important for as many residents as possible to have a general awareness of the importance of the Plan which then can be filtered through our village and
- to capture your thoughts, feelings and feedback, which will be central to determining the views of the village on future building in your village.

So please attend the meeting and play a part in the future of our village and if you wish to be further involved please contact Mike Ewin on 01420.22440

Bentley Neighbourhood Plan Steering Group

A welcome and introduction was given by the chairman of the BPNP Steering/Working Group and questions welcomed. The slides shown:

# **Bentley Neighbourhood Plan**



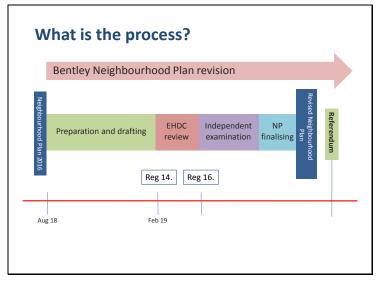
# Bentley Neighbourhood Plan, again!

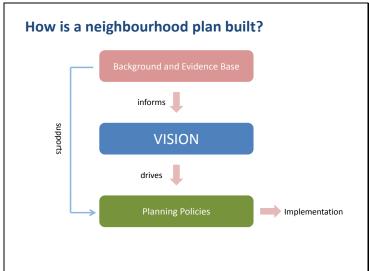
- We've got a plan already, why do we need to do it again?
- What was the point of the first plan if the village has to repeat the exercise so soon?
- Can we have more of a say over future development in Bentley?

# What are neighbourhood plans?

- Plan for communities to shape the future of where they live
- Introduced through the Localism Act 2011
- Land use policies specific to the neighbourhood
- Guide development and provide a framework for decisions on local planning applications

# 





#### Where have we got to?

#### Background and Evidence Base

- Bring the Background and Evidence Base up to date
- Traffic survey changes in the past 6 years
- Our comments and thoughts on Key Themes
- What do we all think about Bentley Parish Survey

# **Bentley Neighbourhood Plan**

Our neighbourhood plan will be developed by the community for the community

## 4.2.2 Resident questionnaire

The BPNP Steering/Working Group prepared a questionnaire in 2018 prior to drafting the modified BPNP. The questionnaire had 31 questions and covered the following areas:

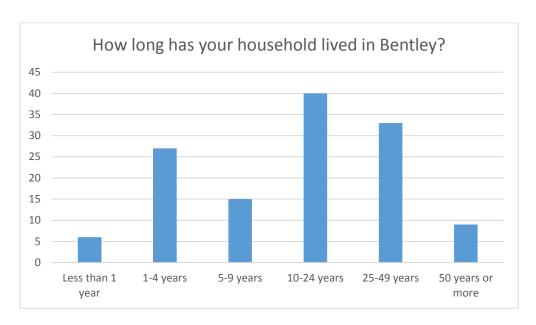
- Housing & Development
- Employment, Business & Transport
- Amenities, Population & Community

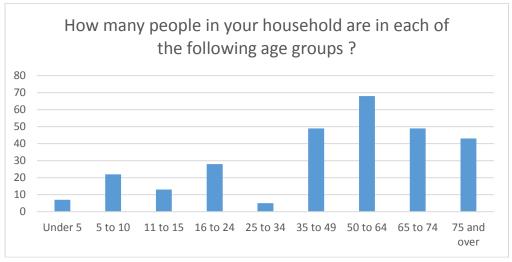
The full questionnaire can be found in Appendix F, and the results can be found in Appendix G.

Findings from the resident questionnaire. Answered by 130 residents.

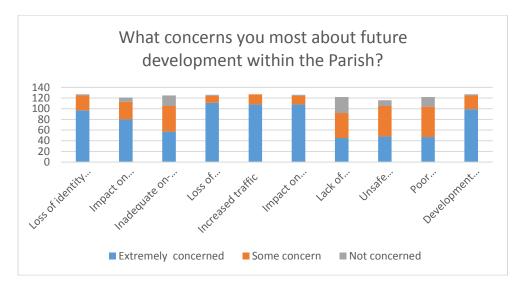
A summary of findings and implications for the modified BPNP is provided at the end of this section.

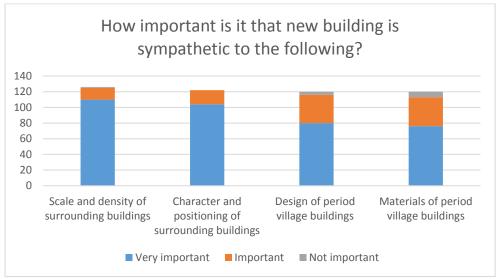
Section 1: Resident information:

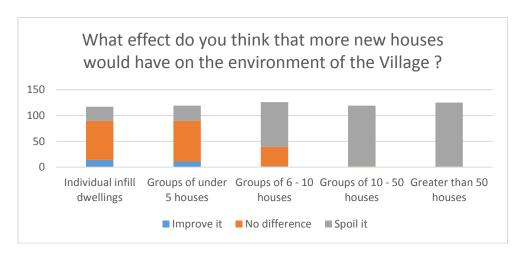


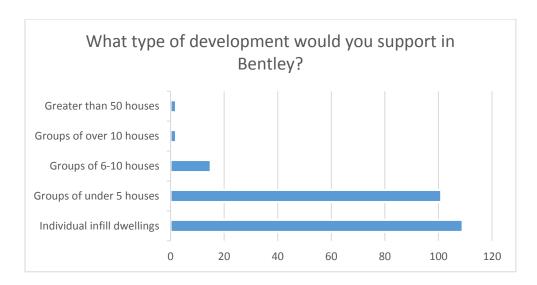


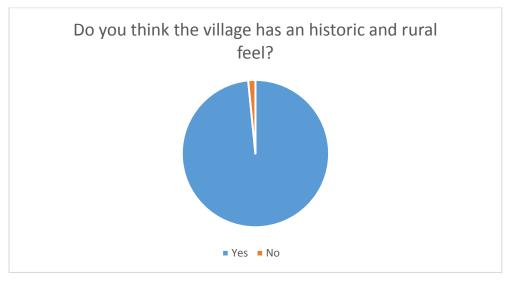
Section 2: Housing & Development:

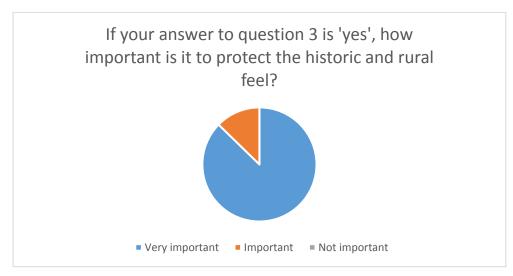


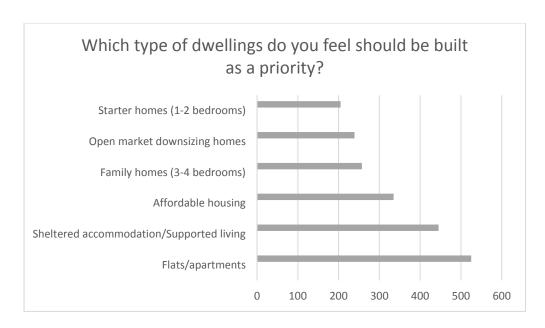


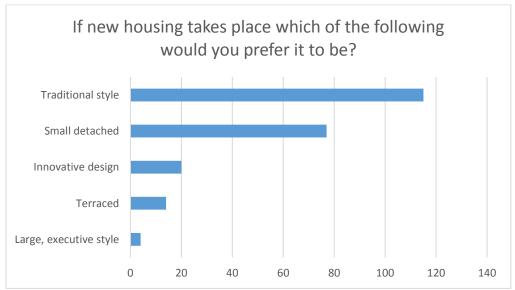


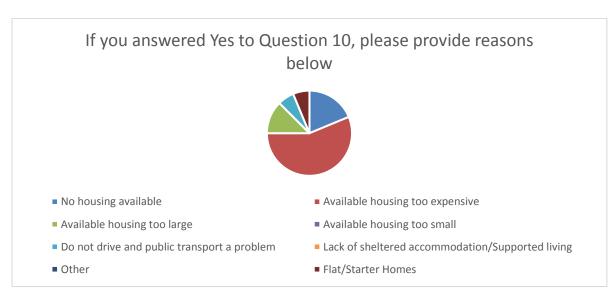




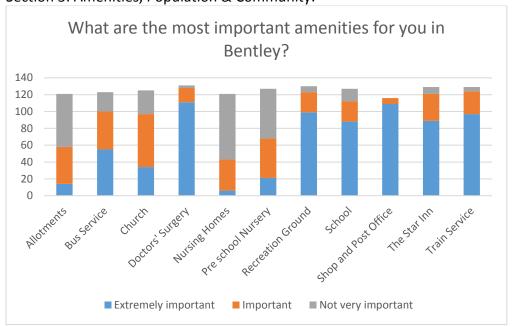




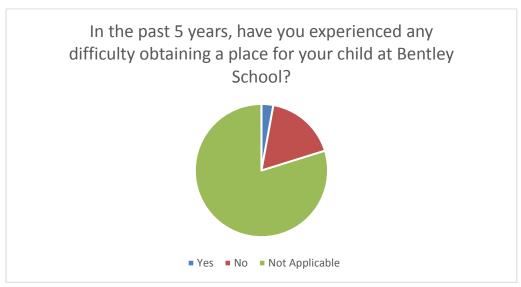


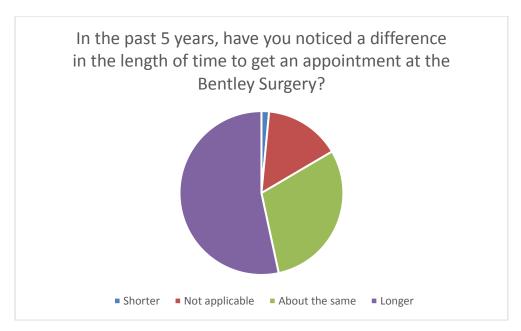


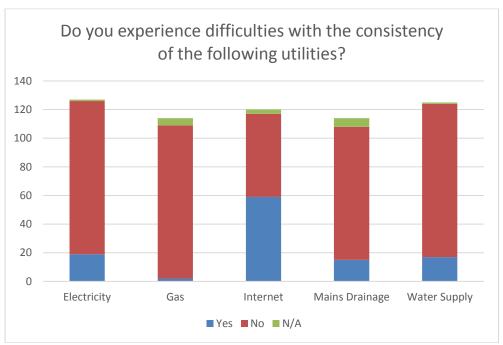
Section 3: Amenities, Population & Community:

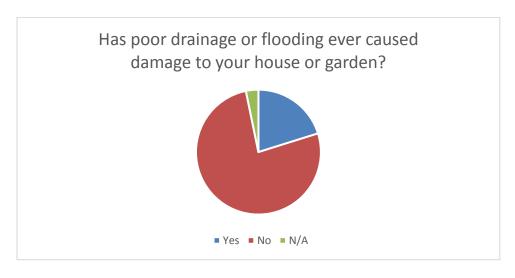


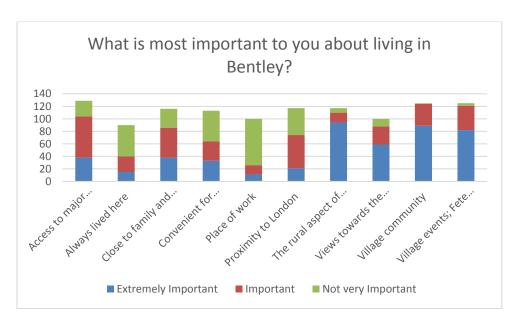


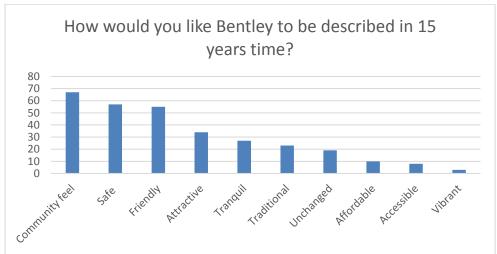




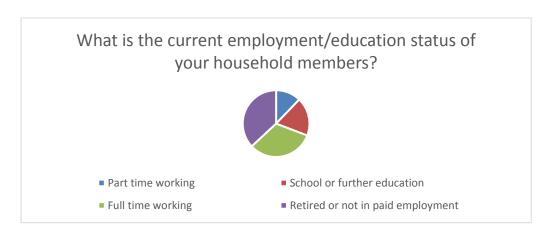


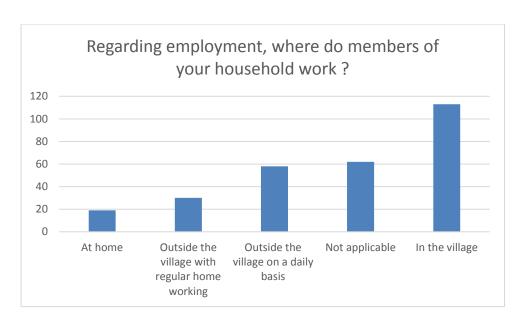


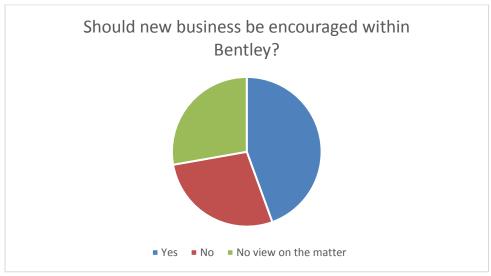




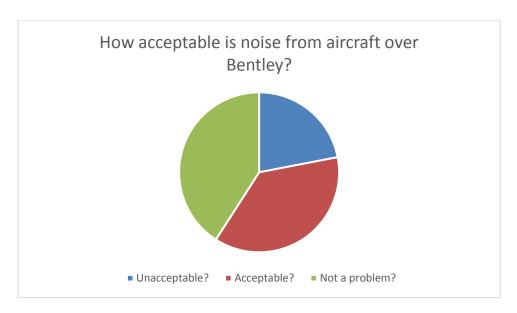
Section 4: Employment, business & transport:

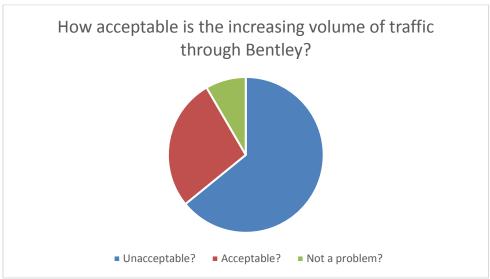


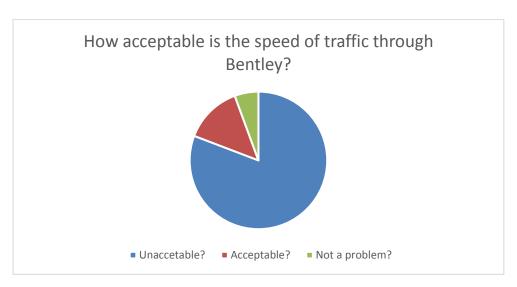


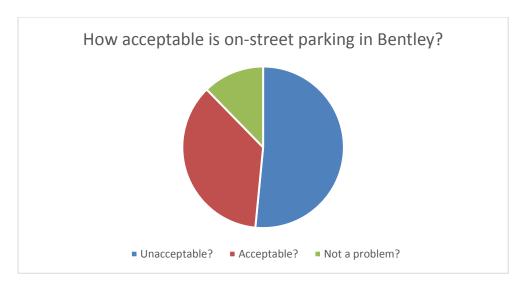


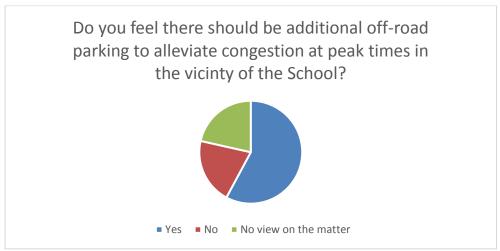


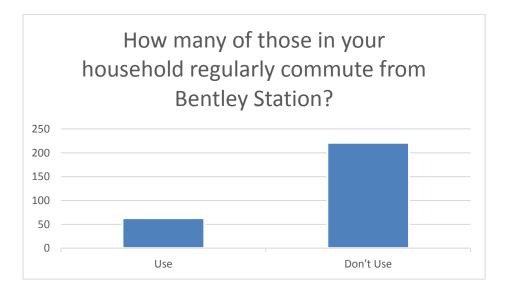




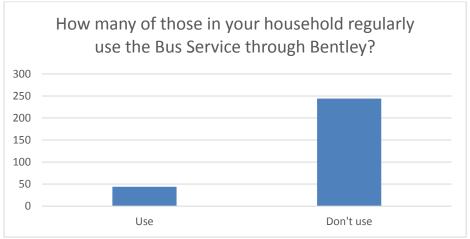


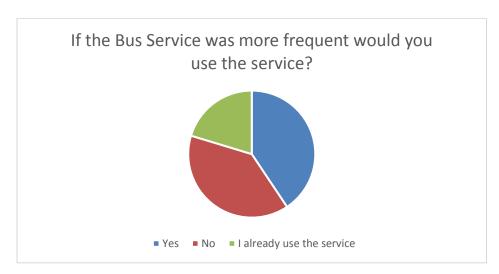












Section	Summary of respondent comments	Action for Modified BPNP
Resident information	<ul> <li>64% of the respondents have lived in the village for more than 10 years</li> <li>The majority of residents in the respondent households are aged 50+</li> </ul>	To check the 2021     Census data for     Bentley
Housing & development	<ul> <li>98% of respondents think that Bentley has a historic and rural feel</li> <li>87% think that the historic &amp; rural feel should be protected</li> <li>The top 3 concerns of respondents are – loss of countryside, increase in traffic and impact on medical facilities</li> <li>87% of respondents think it is very important for new building to be sympathetic to the scale &amp; density of existing buildings</li> <li>The vast majority of respondents feel that anything more that groups of 6 houses will spoil the village (a marked preference for infill and up to 5 houses)</li> <li>The top 3 types of accommodation preferred are flats/apartments, sheltered accommodation/supported living and affordable housing</li> <li>Small detached and a traditional style are the most preferred new housing types</li> <li>Only 7% of respondents report that someone has had to move out of Bentley due to lack of housing</li> </ul>	<ul> <li>To reference appropriate findings in the BPNP Background &amp; Evidence section</li> <li>To reference this data in Policy BEN3: Design</li> <li>To correlate the 5 house limit with point made in Policy BEN10: Green Infrastructure</li> </ul>
Amenities & community	<ul> <li>Most valued 3 amenities are doctors surgery, shop &amp; post office and the recreation ground</li> <li>Most people rely on the Parish Magazine and word of mouth for village information</li> </ul>	To reference     appropriate findings     in the BPNP     Background &     Evidence section

	<ul> <li>7% of respondents have had difficulty in getting a place at Bentley school</li> <li>54% of respondents report that over the last 5 years it takes longer to get an appointment at the village surgery</li> </ul>	<ul> <li>To reference this data in Policy BEN7:         Community Facilities     </li> <li>To reference this data in Policy BEN6:         Education     </li> </ul>
	<ul> <li>The internet is the utility that respondents most have difficulty with</li> <li>20% of respondents have experienced damage due to poor drainage/flooding</li> <li>The top 3 important reasons for living in Bentley are – the rural aspect, village community and the village events e.g. the fete</li> <li>In 15 years time, respondents would most like the village described as – community feel, safe, friendly, attractive, tranquil</li> </ul>	
Employment, business & transport	<ul> <li>Respondent households – 36% retired and 32% in employment</li> <li>40% of those working do so in the village</li> <li>44% of respondents think that the village should encourage new businesses and that starter units should be provided to encourage this</li> <li>22% think that aircraft noise is unacceptable</li> <li>64% of respondents say that the increase in traffic in the village is unacceptable</li> <li>81% of respondents think that the speed of traffic through Bentley is unacceptable</li> <li>51% think that the level of onstreet parking is unacceptable and that more should be done at school drop-off and pick-up times</li> </ul>	<ul> <li>To reference appropriate findings in the BPNP Background &amp; Evidence section</li> <li>To check the 2021 Census data for Bentley for employment numbers</li> <li>To reference this data in Policy BEN9: Traffic Impacts</li> </ul>

•	More respondents would use
	the station if the parking
	provision was improved
•	Only 15% of respondent
	households currently use the
	bus service, however more
	would use it if there was a
	more frequent service

# 4.2.3 SWOT analysis

Residents were asked to take some time and provide their thoughts on six aspects of living in Bentley Village. The six areas were:

- Community
- Amenities
- Employment & Business
- Transport
- Landscape & Location
- Housing

The SWOT comments can be seen in full in Appendix H.

The following tables summarise the feedback received and any action noted for the modified BPNP:

Community	Summary of Resident comments	Action for Modified BPNP
Strengths	<ul> <li>Strong sense of community and spirit</li> <li>Excellent community in the B committees and events</li> </ul>	
Weaknesses	<ul> <li>Potential development at Northbrook</li> </ul>	Evidence section
Opportunities	<ul> <li>More co-ordinated communication channels</li> <li>Encouraging more residents to get involved in community activities</li> </ul>	

Threats	•	Increased development putting	
		pressure on village	
		infrastructure	

Amenities	Summary of Resident comments	Action for Modified BPNP
Strengths	<ul> <li>Excellent village amenities e.g.</li> <li>School and pub</li> <li>Access to North Downs</li> </ul>	<ul> <li>To reference appropriate findings in the BPNP</li> </ul>
Weaknesses	<ul> <li>Investment required in aging assets</li> <li>Poor broadband speeds</li> <li>Inadequate parking for school</li> <li>Surgery under pressure</li> </ul>	Background & Evidence section  To reflect sentiments in BEN 7 and BEN 11
Opportunities	<ul> <li>Cycle path to station</li> <li>Better footpaths in lanes</li> <li>Promote bio-diversity habitats</li> <li>Invest in new village hall</li> </ul>	
Threats	<ul> <li>Amenities could mean unwanted development forced on Bentley village</li> <li>Overpopulation will put pressure on school and facilities</li> </ul>	

Employment & Business	Summary of Resident comments	Action for Modified BPNP
Strengths	<ul> <li>Services and business parks provide local employment opportunities</li> </ul>	<ul> <li>To reference appropriate findings in the BPNP</li> </ul>
Weaknesses	<ul><li>Poor internet speed</li><li>Limited space to expand businesses</li></ul>	<ul> <li>Background &amp;</li> <li>Evidence section</li> <li>To consider possible policy on the internet</li> <li>To support this</li> </ul>
Opportunities	<ul> <li>Internet café/hub/studio facility with better broadband</li> <li>Regular market in the village</li> </ul>	
Threats	<ul> <li>External competition putting pressure on businesses</li> <li>Increased commercial traffic in the village</li> </ul>	sentiment in Policy BEN8

Transport	Summary of Resident comments	Action for Modified BPNP
Strengths	<ul> <li>Train station with regular</li> </ul>	To reference
	services to London	appropriate findings
	<ul> <li>Good road links</li> </ul>	in the BPNP
	<ul> <li>Presence of a bus service</li> </ul>	

Weaknesses	<ul> <li>Parking capacity at the station is at saturation</li> <li>School parking a nightmare</li> <li>Traffic at the crossroads</li> <li>Limited bus services outside core hours</li> <li>Number of cars parked in the road near crossroads and the</li> </ul>	Background & Evidence section
	shop	
Opportunities	<ul> <li>Cycle path between the village and station</li> <li>Shuttle service from the village to the station</li> <li>Provision of more parking at the station</li> <li>Build slip road onto A31 at the bridge</li> <li>Regular speed checks</li> </ul>	
Threats	<ul> <li>Increase in traffic at crossroads and through the village due to "rat runs"</li> <li>Increased development in nearby towns e.g. Bordon leading to more traffic through the village</li> <li>Increasing in speeding cars through the village</li> </ul>	

Landscape & Location	Summary of Resident comments	Action for Modified BPNP	
Strengths	<ul> <li>Rural setting, surrounded by countryside</li> <li>Beautiful landscape which is important to protect for all</li> <li>Proximity to Farnham and Alton</li> <li>Characterful village</li> <li>Good network of footpaths</li> </ul>	To reference appropriate findings in the BPNP Background & Evidence section	
Weaknesses	<ul> <li>Village harmed by poorly designed and large scale housing development</li> </ul>		
Opportunities	<ul> <li>Improve footpaths</li> <li>Protect views of the village e.g. from the south</li> <li>To have sympathetically designed small development</li> </ul>		

Threats	•	Erosion of views	
	•	Overbuilding in the village	
		destroying the landscape	
	•	Building outside the settlement	
		boundary	

Housing	Summary of Resident comments	Action for Modified BPNP	
Strengths	<ul> <li>Have had more housing over the last few years</li> <li>Reaching optimum for our village size</li> </ul>	<ul> <li>To reference appropriate findings in the BPNP Background &amp;</li> </ul>	
Weaknesses	<ul> <li>Inability to influence the style of new building</li> <li>Too many executive type houses and not enough that is affordable to many people or for those wishing to downsize</li> <li>Poor drainage leading to flooding</li> </ul>	Evidence section  To reflect points on style in BEN3	
Opportunities	<ul> <li>Maintain linear development only</li> <li>Encourage more affordable development</li> <li>New housing must blend with the older houses in the village</li> <li>To use brownfield sites</li> </ul>		
Threats	<ul> <li>Building on Bentley greenbelt</li> <li>Lack of house design criteria</li> <li>Erosion of historic design &amp; feel of village by building poorly designed houses</li> </ul>		

# 4.2.4 Updates to residents

A progress update was presented to residents at the Annual Parish Meeting in April 2019





Electors of the Parish of Bentley Parish Council are invited to attend the

ANNUAL PARISH ASSEMBLY

This meeting will be held at Bentley Memorial Hall, Alton Road, Bentley GU10 5NB On: Monday 29th April 2019 at: 7:30pm

> Under the Chairmanship of: ......Mr Patric Curwen......

(Chairman of the Parish Council)

The Parish Meeting may by law discuss all parish affairs and pass resolutions about them although the resolutions may not be binding upon the council.

### AGENDA

- 1. Apologies
- 2. Approval of minutes from the Annual Parish Assembly held on 16th April 2018.
- 3. Annual Report of the Parish Council 2018/19.

Report from the Chairman covering the activities of the Parish Council.

Annual Report of the Parish 2018/19.

Report from Hampshire County Councillor - Cllr Mark Kemp-Gee

Annual Report of the Parish 2018/19.

Report from East Hampshire District Councillor - Cllr Ken Carter

- 6. Guest Speakers:
  - Pamela Elkington Liability Negotiations Adviser at Network Rail Improvements made at Bentley Train Station
  - Robert Simpson Bentley Wildlife Group Introduction of the Bentley wildlife Group
  - Carmella Reece Bentley Scouts Project work at Gambia
  - Hampshire Police Crime Report
  - Cllr John Fuller Current Status of the Bentley Neighbourhood Plan

Light refreshments of wine, tea, coffee and nibbles will be made available after the meeting.

The Annual Parish Assembly is also known as the Annual Parish Meeting Permission to record, film or take photos must be granted by the Chairman of PC.

Signature:

MENE SALE

Date of Issue: 02/04/2019

The further update was shared with residents in the Bentley Parish Magazine on 01/10/2022:

#### Bentley's Neighbourhood Plan

In the last few months there has been little to update the village on in respect of the Neighbourhood Plan but that is about to change. Recently, the EHDC Planning Department signalled that its "Local Plan" should be in place by April 2022 and, therefore, it is now time for the Bentley Parish Council's Neighbourhood Plan Steering Group to resume its work after a period of enforced hibernation.

Just to recap, where and how many new houses are to be built in Bentley, as in all other parishes in East Hampshire, is determined and approved by the District Council, in accordance with the EHDC Local Plan. Following instructions from the UK Government to increase the number of new houses to be built across the UK in 2019 EHDC started to update its Local Plan, which in turn requires Parish Councils to update their Neighbourhood Plans.

With the direction we now have from EHDC the Neighbourhood Plan Steering Group, along with the Working Group, will now work towards putting together Bentley's Neighbourhood Plan. When this is approved it will sit alongside the EHDC Local Plan and provide direction on the future of our village, which may include direction on the type and number of houses that can be built.

An opportunity to comment on our Neighbourhood Plan will be part of the process and further updates will be provided as the work progresses.

#### What's happening to Bentley's Neighbourhood Plan

It would be true to say that our attempts to organise the Neighbourhood Plan for Bentley could be likened to one of the celebrities on Strictly Come Dancing. All along the process we have tried to keep in step with the EHDC Local Plan but while we have made some progress, irritatingly, we have now been given a new set of guidelines to follow.

Just to recap, where and how many new houses are to be built in Bentley, as in all other parishes in East Hampshire, is determined and approved by the District Council, in accordance with the EHDC Local Plan. Following instructions from the UK Government to increase the number of new houses to be built across the UK in 2019 EHDC started to update its Local Plan, which in turn required Parish Councils to update their Neighbourhood Plans.

To the frustration of many in EHDC the Government has once again changed the goalposts which has caused EHDC to largely restart its Local Plan again. Regrettably this could leave local parishes exposed to unwanted proposals for development and the Bentley Neighbourhood team therefore decided at a recent meeting that it will be best for Bentley if, regardless of the position of the EHDC Local Plan, it continues with our Neighbourhood Plan with the intention of completing it early in the New Year.

We will provide an update on progress before the end of this year via the Bentley Parish Council website and the Bentley Village Events Facebook page.

## 4.2.5 Strategic Environmental Assessment (SEA)

A letter and SEA\* Screening form was sent to three consultees on 31/05/2023:

- a) Environment Agency
- b) Historic England
- c) Natural England

An additional copy was sent to EHDC.

\*Strategic Environmental Assessment (SEA) - Screening Statement - Determination under Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.

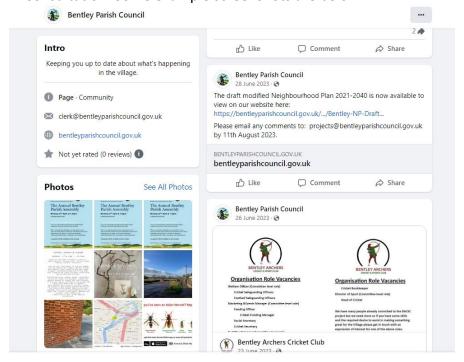
The full SEA document can be found in Appendix M.

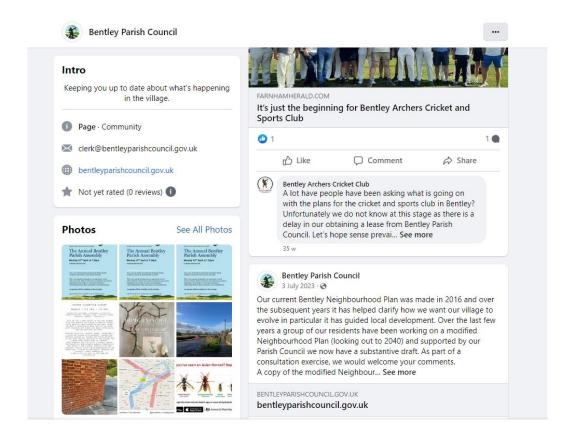
#### 4.2.5 Regulation 14 consultation

A standard letter was sent via email on the 29<sup>th</sup> and 30<sup>th</sup> June 2023 to a wide range of statutory consultees, including organisations, providers of services, local Parish and Town Councils and representatives of local organisations to invite them to comment on the draft BPNP. (A copy is provided below)

A number of hard copies of the draft BPNP were left at the village shop in case residents and others wished to view the print copy.

The parish website, notice boards and social media pages notified the community of the Regulation 14 Consultation. Some example screenshots are below.





## **Latest News Items**



Tuesday 13th February, 2024 / in News / by Clerk

Helpful information to respond to the Local Plan can be found here. Comments to be received to EHDC by Monday 4th March 2024.



#### Neighbourhood Plan

Tuesday 18th July, 2023 / in News / by Clerk

The Neighbourhood Plan 2021-40 is now available to view here. The consultation period is open from 30th June-11th August 2023. Please email comments to: projects@bentleyparishcouncil.gov.uk



Bentley Parish Council website news page and Facebook page



Regualtion 14 Statutory Consultee letter (also added to the village notice boards and Shop)

Dear Sir or Madam,

### The Neighbourhood Planning (General) Regulations (2012) - Regulation 14 Public Consultation

Our current Bentley Neighbourhood Plan was made in 2016 and over the last few years a group of residents have been working on a modified Neighbourhood Plan. Bentley Parish Council has now reached the pre-submission stage and we are pleased the make the modified document available for your consultation from Friday 30<sup>th</sup> June until Friday 11<sup>th</sup> August 2023.

Details of the modified Neighbourhood Plan, 2023 can be seen on our Parish Council web site:

## Neighbourhood Plan – Bentley Parish Council

In addition, a printed copy will be available for viewing at the Bentley Village Stores, Main Road, Bentley, GU10 5HY.

If you wish to raise any queries or make a comment on the modified Neighbourhood Plan, please do so by email to <a href="mailto:projects@bentleyparishcouncil.gov.uk">projects@bentleyparishcouncil.gov.uk</a> by the deadline of **Friday 11<sup>th</sup> August**. If you wish to communicate in writing, please do so to Bentley Parish Council Projects, Bentley Memorial Hall, Hole Lane, Bentley, GU10 5NB.

Yours faithfully,

Chris

# **Christopher Mace**

Councillor, Bentley Parish Council Chairman, Bentley Neighbourhood Plan Working Group



Bentley Memorial Hall Hole Lane Bentley GU10 5NB Tel: 07501 963420

# 5. REGULATION 14

### 5.1 LOCAL COMMUNITY REPRESENTATIONS

This note summarises the representations made by the local community on the Pre-Submission version of the modified Bentley Parish Neighbourhood Plan (BPNP) during its recent 'Regulation 14' consultation period.

Representations have been received from 4 local residents

All other local residents were consulted as detailed above but none have made representations. A full analysis of local resident comments is in Appendix I along with

resulting changes to the proposed modified BPNP. A copy of this Appendix I has been added to the end of this document.

## **5.2 STATUTORY CONSULTEES**

A list of the statutory consultees who were notified of the Regulation 14 is as follows:

Contacted	EHDC Councillors & Parish
Contacted	Clerks
	LPWG
	Bentley Ward Cllrs
29-Jun	Cllr Davies
29-Jun	Cllr Ashcroft
	<b>Neighbouring Parishes</b>
29-Jun	Binsted CP
29-Jun	Froyle CP
29-Jun	Farnham (Waverley) TC
29-Jun	Crondall (Hart)
	<b>Neighbouring Councils</b>
29-Jun	Basingstoke and Deane
	Borough Council
29-Jun	Hart District Council
29-Jun	Waverley Borough Council
29-Jun	Chichester District Council
29-Jun	Havant Borough Council
29-Jun	Winchester City Council
29-Jun	South Downs National Park
29-Jun	Hampshire County Council
29-Jun	Surrey County Council
29-Jun	West Sussex County Council
	Specifies / Drescribed bodies
	Specifics / Prescribed bodies
31-May	Environment Agency
31-May	Historic England
31-May	Natural England
29-Jun	Network Rail
29-Jun	EE Mobile Phone
29-Jun	EMF Enquiries
29-Jun	National Highways
29-Jun	Homes England

30-Jun	RSPB
30-Jun	National Trust
33 3411	Federation
30-Jun	National Gypsy Traveller
30-Jun	Mr Damian Hinds (MP)
30-Jun	Mobile UK
30-Jun	House Builders Federation
JO-Juli	Commissioner
30-Jun	Hampshire Police and Crime
30-Jun	Hampshire Fire Service
30-Jun	Hampshire Chamber
30-Juli	Trust
30-Jun	Gosport Borough Council Hampshire and IOW Wildlife
30-Jun	
30-Jun	General Consultee
30-Jun	Friends Family and Travellers
30-Jun	Forestry England
∠ <i>3-</i> Ju∏	Consultations
29-Jun 29-Jun	Forestry Commission
29-Jun 29-Jun	Flick Drummond
29-Jun 29-Jun	CPRE Hampshire
29-Jun	Community First
29-Jun	Citizens Advice
29-Jun	Campaign for Real Ale
29-Jun	Action Hampshire
	General
23°JUH	Active Haver Lingianu
29-Jun	Active Travel England
29-Jun	LEP
∠J-Juli	Authority
29-Jun	Integrated Transport
29-Jun 29-Jun	SGN
29-Jun	southern) SSE
29-Jun	Southern Water (treatment,
20 1	Service
29-Jun	Portsmouth Water Developer
20 lun	Catchment Management
29-Jun	Portsmouth Water
29-Jun	National Grid
20 Jun	(Formerly CCG)
29-Jun	Intergrated Care Network
	(Formerly CCG)
29-Jun	Intergrated Care Network
	(Formerly CCG)
29-Jun	Intergrated Care Network

30-Jun	Showmens Guild
30-Jun	Solent LEP Consultations
30-Jun	South Downs Society
30-Jun	Sport England
30-Jun	Sport England
30-Jun	Stagecoach
30-Jun	SW Railway
30-Jun	Test Valley
30-Jun	The Crown Estates
30-Jun	Woodland Trust
30-Jun	Esso pipeline (existing)
	Bentley Local contacts
30-Jun	PTFA
30-Jun	PCC
30-Jun	
30-Jun	Scouts

Of these consultees the following responded:

- a. East Hampshire District Council
- b. Active Travel England
- c. The Forestry Commission
- d. National Gas
- e. National Grid
- f. National Highways
- g. Sport England
- h. Surrey County Council
- i. West Sussex County Council

Other statutory bodies were consulted but none have made representations. The representations from Active Travel England (b), The Forestry Commission (c), National Gas (d) National Grid (e), National Highways(f), Sport England (g), Surrey County Council (h), and West Sussex County Council (i) raised no specific issues on the BPNP modifications and directed the Parish Council to its standard advice for neighbourhood plans.

A full analysis of respondent comments is in Appendix J – this has been added to this document below.

Appendix I - Consultation comments received from consultees and appropriate amendments made, May 2024

Policy Reference Number	Comment From	Comment Made (Copy)	Proposed Amendment
Background & Evidence Base	Emma Brook, Resident	I note that this data is from the 2011 census. Would it be possible to update this to the 2021 census data to give the most accurate picture of the area that this most welcome plan covers.	Tables including Census information have been updated to 2021 Census data
Background & Evidence Base	Jessica Pawley, Resident	Page 15 - Housing stock is often detailed as 'private' - would it be worth breaking this down e.g. Somerset Fields is a mixture of privately bought, shared ownership and housing association. It shows a varied mix of housing stock taking into consideration a wide range of housing needs.	Table D amended to show differentiations where possible
Background & Evidence Base	Brigid Fice, Resident	Further to your request for comments on the draft modified Neighbourhood plan for Bentley, I noticed that there were a number of inaccuracies in the historical references regarding Bentley.  I have detailed them in the attached and suggested some corrections.	Bentley History: accepted corrections to paragraph 2.4.  The Human Character of Bentley: accepted correction and included a new paragraph 2.9 to the effect that although the identity of our Bentley archer is unknown it remains an important icon for the parish. However, made clear that it is not William the Archer.  Brigit's suggested correction was included as paragraph 2.10

Appendix J - Consultation comments received from consultees and appropriate amendments made, May 2024

Policy	Comment	Comment Made (Copy)	Proposed Amendment
Reference Number	From		
General point	EHDC	Refs in the document to the plan period running to 2028, but the front cover refers to 2040? Compliance with JCS.	references to 2028 amended to 2040 to reflect emerging Local Plan. Basic conditions compliant with JCS (current Local Plan)
General point	EHDC	Various incidents of XX and (summary to be inserted) – so document needs to be updated with all amendments proposed.  Also various typos and para numbers missing	Edits completed
General point	EHDC	No supporting evidence or reference to evidence base work to be done. ALL evidence should be available to support this Reg 14 consultation	All supporting evidence now available on BPC website.
General point	EHDC	Several references to paragraphs in the 2012 NPPF – need to refer to 2021 version	Edits completed
General point	EHDC	Many of the policies lack clarity and preciseness a requirement of government guidance	Changes made to wording, as required to improve clarity and preciseness.
Foreword	EHDC	The original plan was made on 12 May 2016 not 2015.  Statement "A condition of the Government's National Planning Policy Framework is that neighbourhood plans are reviewed and revised every 5 years."  This is incorrect there is no specified period in which to review an NP.	Date changed to 12 May 2016 and wording changed
List of policies (page 4)	EHDC	The preamble to this list refers to a summary of the proposed material modifications to the plan – the justification expressed as required	Section 3 of the Proposed Modification statement, set out in Appendix D, which forms part of the plan itself, clearly sets out the changes.

Para 1.1	EHDC	by NP legislation and guidance, only an indication that 3 policies are to be modified and that there are 5 new policies and this is set out in Appendix D but not referred to in the plan itself.  See Planning practise guidance:  https://www.gov.uk/guidance/neighbourhood-planning2#updating-neighbourhood-plan refers to modifications to the NP – See	Edit completed
		Planning practise guidance	
Para 1.3	EHDC	This para refers to the modification statement published alongside the draft plan – there is no evidence of this document on the PC's website. The statement is set out at Appendix D but there's no reference to Appendix D in the NP.  It is not the decision of the PC to determine if a referendum will be required or not – this is the role of the independent examiner	1.3 updated to reference the modification statement in Appendix.
Para 1.4 and 1.6 (no para 1.5?)	EHDC	If the statutory bodies were consulted then their responses along with the SEA/HRA screening documentation should be on the website	Now added to website  Have created para 1.5
Para 1.7	EHDC	Typo 'farther' should be 'further'	This has been changed
Background & Evidence Base	EHDC	Para 2.2 'Boundaries of the village' should be amended to the 'boundaries of the parish' to avoid confusion with SPBs	2.2 amended to; "although outside the SPB, are recognisably part of the village; properties east of the Recreation Ground for example"
Background & Evidence Base	EHDC	Para 2.19 (2.20) Avoid mixing up the conservation area appraisal and design policies – see comments below on design policies.	2.20 amended to; "The BPNP incorporates the Bentley Conservation Area, Character Appraisal and Management Plan, EHDC, Aug 2014, in its Design policy, BEN003, to support

			recommendations for the design of the new development in the parish"
Background & Evidence Base	EHDC	Para 2.22 (2.23) Census 2021 data is available, use this website to access local census data at the parish level https://www.ons.gov.uk/visualisations/custom profiles/draw/	Included 2021 Census data
Background & Evidence Base	EHDC	Para 2.24 (2.25) Check NOMIS website for up to date employment data	Updated
Background & Evidence Base	EHDC	Para 2.25 (2.26) Has working from home data changed as a result of working habits post covid?	Working from home change noted in text
Background & Evidence Base	EHDC	Para 2.26 (2.27) Traffic data – has this been updated since 2018 given your plan runs from 2021? Again post covid the results could be very different.	Discussion held about with our consultants at ONH and advised that 2018 data is still relevant and that it is not necessary to update further
Background & Evidence Base	EHDC	Para 2.27 (2.28) How do you know the fault is with the layout, where's the evidence to back up this statement?. This probably needs to be rephrased – what evidence do you have that the solution proposed would work – who will fund it etc?	Paragraph rephrased
Background & Evidence Base	EHDC	Para 2.32 Data in this para would benefit being in table format. What evidence is there to justify	Data are tabulated
Background & Evidence Base	EHDC	Para 2.33 Since what date have the 82 dwellings been added? The JCS noted a minimum of 150 dwellings should be	Figures adjusted to April 2013: 72 dwellings

		provided to smaller settlements across the rural area on top of the existing supply, which has an April 2013 base date.	
Background & Evidence Base	EHDC	2.33 Reference to traveller site – we assume this is The Paddocks, Vickery Lane, Station Road which has 8 pitches permitted.	Text amended to; "a Gypsy and Traveller site located near the water treatment plant, The Paddocks, Vickery Lane, which is now 8 pitches and associated buildings"
Background & Evidence Base	EHDC	Para 2.39/2.40 (2.40/41) See HCC website for more details on traffic schemes in and around Whitehill Bordon	No change
Background & Evidence Base	EHDC	Para 2.44 Community views should have been sought to inform this review and this Reg 14 version – something undertaken in 2018 is potentially out of date	No change. Community views were sought in 2018 as part of this review. Due to covid and delays with the emerging Local Plan led to the Reg14 being postponed until 2023. BPC comfortable that the views expressed at that time are still up to date and this is reflected in the minimal number of community responses to the Reg14.
BEN1	EHDC	It is noted that this policy has been reworded. The following wording has been removed: "The inappropriate development of residential gardens, for example, where such development would harm local character, will be refused". However, para 4.18 under BEN2 refers to resisting development in residential gardens, which is not identified in the policy wording.	Modification made to policy and paragraph 4.18 under BEN2
BEN1	EHDC	The last sentence in policy BEN1 has been made more restrictive and does not conform with the strategic policies within the JCS namely CP10. The Policy lacks clarity."	Part B of policy amended to conform with CP10: "B. Development outside of the BSB will only be supported if it demonstrates that it will fill a genuine and proven community need or local community aspiration for a countryside location,

			which cannot be accommodated within the built up area, and reinforces the settlement's role, character and function"
BEN1	EHDC	EHDC 'Housing Outside Settlement Boundaries' applies to all East Hants outside of SDNP – Bentley is not exempt from the application of this SPD. The SPD is based on Policy CP10, which is considered strategic and noted in the modified NP para 3.6. The application of the SPD is a planning judgement made at the time of the application. Likewise, Policy CP14 for rural affordable is another strategic policy which applies to Bentley. Policy CP14 is clear that it applies to both settlements with a SPB as well as those without one, by virtue, Bentley is likely to be one of the largest settlements the policy applies to. It would be down to individual applicants to submit evidence to justify whether a site meets the criterion related to the policy.	Paragraph 4.13 has been amended to include the following sentence: "It is for an applicant to submit evidence to justify whether a site meets the criterion related to the policy. [CP10]"
BEN2	EHDC	4.18 The supporting text (para 4.18) states new development should be confined to previously developed land, which contradicts Policy BEN1 which advocates development proposals within the SPB will be permitted. There is no wording in Policy BEN2 about previously developed land. Para 4.18 also notes that development in gardens will not be allowed, but this is not mentioned in the policy and the original wording in BEN1 has been omitted.	Policy iii amended to; "consolidating the existing linear layout by avoiding residential garden, backland or tandem development unless there is precedent in that specific part of the village" 4.18 amended to; "New residential development within the settlement policy boundary should be confined to infilling, redevelopment of previously developed land and buildings, conversion, subdivision or change of use of buildings. The density of housing should always respect the surrounding properties to preserve the rural character of the parish"

BEN2	EHDC	Lack of clarity and preciseness as required by Planning Practice Guidance Policy mixes up design matters and title does not reflect the contents	retitled policy "Development Principles"  Tidied up numbering for clarity.
BEN3	EHDC	Where's the evidence for this – have AECOM been commissioned to undertake preparation of a Design Code and Design Guidelines?	Amended policy title to "Design
BEN3	EHDC	It would also be helpful to disambiguate the implied distinction between 'reflect' and 'respect'.	Substituted "respect" for "reflect" throughout policy
BEN3	EHDC	Consider taking out the conservation area parts and having these as a separate policy.	No change; decided to keep as one policy
BEN3	EHDC	4.24 There is a tension between the proposal to constrain building articulation to 'inherent architectural attributes' (thus avoiding the perception of a new building's "evolution over time") and part iv of BEN 3, which suggests that new dwellings should harmonise with neighbouring properties, the design of which may, indeed, have evolved over time.	Amended wording in 4.24 final sentence to; "(to avoid inauthentic reproductions or replicating later additions where they are not sympathetic to the original building)"
BEN3	EHDC	4.26 The phrase 'larger properties should present a more open aspect' is vague. EHDC comment Which properties/where in the parish are good examples to follow? Conversely, can you identify bad examples that should not be followed?	Added example to follow as suggested: "Further, new, larger properties should be spaced such that they conform to the layout of similar sized, older properties in the parish, for example, the spacious appearance of older, larger properties along the Main Road between Cedar Cottage and Staceys, and avoid the closely packed style of executive housing, characteristic of recent suburban planning."

		It is important to clarify what 'open aspect' means (whether from street scenes, public viewpoints; or whether you intend more of morphological rather than an experiential interpretation, where properties are set back from plot boundaries)	
BEN3	EHDC	4.30 Clay with flint deposits form part of the geology of the parish (albeit a minor part, in northern areas of the designated area) according to the Council's Landscape Character Study. It is therefore a contextually appropriate building material even if it has not been used in past architecture. It is more appropriate to discourage its use in Bentley village and advise that it should be used sparingly elsewhere within the parish.	Final sentence of 4.30 amended to; "However, the use of flint in local building should be discouraged in the village and used sparingly elsewhere in the parish"
BEN4	EHDC	Where's the evidence base? There are no photos or detailed description as to why these buildings are important, only limited commentary in Annex C, with limited emphasis on why these assets warrant protection.  Para 4.36 refers to evidence work to be done – evidence should inform the NP, not be written retrospectively.  Policy refers to heritage assets on a proposal map – where is the accompanying mapping?	Rationale and justification had been prepared prior to Reg 14 but not finalised. Now published.
Para 4.36	EHDC	Para seems unfinished and includes notes to author	
BEN6	EHDC	Our understanding from general conversations with HCC is that there are no	That is correct, however, the safeguarding of land for education is unchanged from the previous version of the plan and supporting

		specific plans to extend this school at present. The land proposed for extension is owned by HCC, and as landowner, they would need to be consulted on this as to the availability and deliverability of this proposal. Suggest direct conversations with HCC education regarding this proposal, and their intentions for the future use of this land. We can supply the contact.	text notes that there are no plans at present for expansion but HCC school places plan only covers period to 2028  https://documents.hants.gov.uk/education/HampshireSchoolPlacePlan.pdf  Bentley admissions 2025/26 PAN 30  https://documents.hants.gov.uk/education/admissions/schoolpolicies/2025/30232025.pdf  It is also noted that when the original BNP was written there were no plans to extend the school, an application to extend it was received in 2016 and granted so this ensures the ability to do this again. The school has previously been subject to 5 other extensions in the last 30 years.
BEN7	EHDC	Where is mapping relating to community facilities?	These are now listed individually on the policies Map
BEN8	EHDC	The use classes order changed in 2020/21 and has introduced Class E which includes a range of activities and planning permission is not required to change activities within the Class – see Appendix A attached.	No change needed to the policy but additional supporting text added in respect of use class order changes and prior approval.
Para 4.53/54	EHDC	Use class A1 no longer exists – see above comments Duplication with BEN 7 – shop is listed under community facilities	Edit completed
BEN09	EHDC	This policy relies on data that is five years old, is there any updated information?	Added 2018 data. Will probably do another survey when the NP is modified again
BEN10	EHDC	Query reference to 6 dwellings and reference to Policy CP21 – where is the justification for that quantum and there's no need to repeat	Amendment made in line with comments. Moved the surface water clause to BEN12 and amended to demonstrate purpose is to make best use of surface and wastewater.

local plan policies within a neighbourhood plan policy.

Given the Environment Act and the introduction of mandatory Biodiversity Net Gain later this year – consider focussing this policy on achieving BNG and linking to the forthcoming Local Nature Recovery Strategy.

The policy mixes up different matters – sustainable construction; biodiversity; public rights of way; flooding and GI. Although GI has many benefits, the GI policy should be more specific to GI.

Some of the contents in the policy is confusing, for example, it refers to grey and rainwater harvesting to manage surface water flood risk. But rainwater harvesting and grey water are different processes; rainwater harvesting is a form of SuDs which does help manage surface water flooding and is the process of collecting and filtering rainfall from the roof of a building. However, greywater recycling, on the other hand, recycles wastewater from domestic appliances such as washing machines, baths, showers and sinks so is a form of water efficiency.

Plan E and F source of these – ambitious plans how will these be implemented and funding are these reliant on delivery of new

		development for funding, if so the NP does not allocate sites for development.	
BEN11	EHDC	Where is the associated mapping? This needs to be accompanied by a detailed evidence base to demonstrate why the sites chosen comply with the requirements of Para 102 of NPPF Para 4.64 refers to the evidence base – but this is not published? Doubtful whether the proposed LGS to the south of the village would satisfy the requirements of para 102. As part of this consultation it is crucial the owners of these parcels of land are made aware of the pending designation	Sites 1, 2 and 3 are existing LGS so no evidence base required.  Policy edited in line with evidence obtained
BEN12	EHDC	Repetition of some elements of BEN 10.	Duplication removed from BEN10
BEN12	EHDC	I would also suggest adding to the policy that by maximising of the use of 'natural' SUDS features "it not only manages flood risk but has other multiple benefits, such as improving water quality, increasing biodiversity and providing amenity benefits, such as additional public open space integrating with cycling and walking routes, providing additional habitat, etc.	Amended paragraph A of policy to include; "able to demonstrate that they maximise natural sustainable drainage where appropriate"  Included in paragraph 4.65; "A specific objective is to by maximise the use of natural sustainable drainage, since it not only manages flood risk but has other, multiple benefits such as improving water quality, increasing biodiversity and providing amenity benefits, including additional public open space integrating with cycling and walking routes and providing additional habitat"