

# **Bentley Neighbourhood Plan Regulation 16**

## **External Consultation Responses**

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**From:** [REDACTED]  
**Sent:** 23 December 2024 16:09  
**To:** [EHDC - Neighbourhood Plans Shared](#)  
**Cc:** [REDACTED]  
**Subject:** Bentley Neighbourhood Plan Reps  
**Attachments:** L020 - Reps to Bentley NP submission modified 2024 incl encl.pdf

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**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

On behalf of our clients Manor Oak Homes please find attached representations to the Reg 16 Bentley Neighbourhood Plan consultation.

Regards

[REDACTED]  
**Associate**  
[REDACTED]



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Ref: GA/RW/03520/L020

23 December 2024

East Hampshire District Council  
Planning Policy  
PO Box 310  
Petersfield  
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**By E-mail:** [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)

Dear Sir/Madam

**Bentley Parish Submission Modified Neighbourhood Plan 2021-2040, August 2024**

I write on behalf of our clients Manor Oak Homes (MOH) to provide our representations to the above Neighbourhood Plan (NP).

**Background**

MOH act as promoters of land alongside the owners to secure viable planning permissions and have a successful track record in achieving planning permission for high quality and sustainable residential schemes. In the context of their interest in the Bentley NP their land interests extend to approximately 2.5ha of land immediately to the west of Somerset Fields in Bentley.

The eastern part of the site (c. 1ha) benefits from planning permission (**Enclosure 1**) secured earlier this year at appeal (EHDC Ref. 55417/009 and PINS Ref. 3328579). It was for a rural exception scheme of 12 dwellings of which 9no are affordable homes and 3no. market homes. The site showing the appeal site edged in red and the remainder of the land edged blue is shown below:



The entire site (red and blue line) was also included in the latest Regulation 18 Version of the East Hampshire Local Plan as an allocation for 20no. homes under policy BEN1 and site reference BEN-017. A copy of that policy which was consulted on during the early part of 2024, is at **Enclosure 2**.

I trust this provides useful context for explaining MOH’s interest in the Bentley Neighbourhood Plan and the comments which follow.

**Representations**

These representations have been prepared with regard to the parts and policies of the Neighbourhood Plan which MOH consider require particular attention. They have been structured under relevant sub-headings to make it clear which part of the Neighbourhood Plan or policies the comments relate to. In recommending amendments to specific policies, these are shown in *italics* below, with additions shown in **bold** and deletions ~~struck through~~.

**2. Background Information and Evidence Base**

As a general point it is noted that the modified Neighbourhood Plan, refers to a minimum housing no. of 150no. dwellings from policy CP10 of the adopted Joint Core Strategy.

This is a policy adopted more than 10years ago (June 2014) to the cover the period 2011-2028, in a Local Plan which made provision for a target of 10,060no. new dwellings equating to 592dwellings per annum (dpa).

The new standard method introduced by the Labour Government sets a local housing need figure of 1,142dpa for East Hampshire District Council, which will need to be met through the new Local Plan.

This is only a very recent change but an important one. The change in circumstances should be made clear in the final version of the NP. If this is not done the scale of housing needs facing all parts of East Hampshire, including Bentley, would be concealed.

To acknowledge and include reference to this important change aligns with guidance in the NPPG. The NPPG advocates that communities preparing a neighbourhood plan should take account of the latest and up-to-date evidence of housing need (NPPG Ref ID: 41-084). This is important because paragraph 30 of the NPPF indicates that NP’s should not promote less development than set out in the strategic policies for the area. These strategic policies will need to be updated very soon.



The same page of the Neighbourhood Plan (page 18, paragraph 2.33), does reference the EHDC Local Plan (2024), indicating it has made a single site allocation for a maximum of 20 homes in Bentley (emphasis added). The policy extract is at **enclosure 2**. The figure 20no. dwellings is not expressed as a maximum or 'up to' figure. This wording is misleading and should be omitted.

Paragraph 3.2 references a superseded version of the NPPF. This should be updated.

At 3.19 and 3.20 the NP, confirms that it can reflect the reasoning and evidence of the emerging East Hampshire Local Plan, parts of which have been drawn from to inform the modified plan (paragraph 3.19).

The NP then goes onto refer housing numbers in the emerging Regulation 18 LP, which identified a need for a minimum number of 9,082 dwellings over the plan period (2021-2040), equating to 478dpa over the plan period. It further comments at paragraph 3.20 that the emerging Plan seeks to allocate 3,500 homes and makes a single allocation for 20 homes in Bentley as a lower tier settlement (emphasis added). The Regulation 18 LP identifies Bentley as a 'Tier 3' settlement, under policy S2 Settlement Hierarchy. Five tiers of settlement are identified in the policy.

The term 'lower' should be replaced by 'Tier 3', to avoid it being potentially misleading and improve accuracy.

It should be noted and acknowledged that the housing need figures included in paragraph 3.20 have been superseded following the introduction of the new standard method for calculating housing needs and the new National Planning Policy Framework (NPPF) on 12 December 2024. This now sets the minimum number of homes to be planned for, plus any needs that cannot be met within neighbouring authorities should also be taken into account.<sup>1</sup>

As mentioned above this housing needs figure for East Hampshire is now calculated as 1,142dpa or 21,698 over the 19year plan period. While a small proportion of these will be met in South Downs National Park, the majority will need to be accommodated in East Hampshire in what represents an effective doubling of the housing needs target for the District.

Given the scale of increase, it may well be necessary to consider how suitable housing sites, such as our clients, can do more to help meet these needs.

At paragraph 4.14 the NP states that there is no over-riding community need or aspiration for housing growth over the plan period to 2040 that would reinforce the village's role. It also states as part of the same paragraph that the Regulation 18 LP allocates a development site for up to 20 new homes to the west of Somerset Fields and that part of this site is currently subject to a planning appeal for 12 homes.

Taking the items in reverse order the paragraph could be updated to reflect matters as they currently stand:

The appeal for 12 homes has been determined and was allowed, see **enclosure 1**.

The Reg18 LP allocation does not include 'up to' (see **enclosure 2**). This can be omitted.

It is difficult to reconcile the statement which maintains there is no community need for housing growth over the plan period with the situation on the ground. The Planning Inspector accepted in his decision to allow the appeal (**enclosure 1**) that:

- Need for affordable housing in the District is significant;
- 22 people seeking such housing identified a local connection to Bentley;
- A further 14 households had a preference to live in Bentley in shared ownership, shared equity or rent to buy accommodation and identified a lack of sites in Bentley to meet these needs.<sup>2</sup>

<sup>1</sup> NPPF, 2024, paragraph 62

<sup>2</sup> Appeal decision, paragraphs 20 & 21.

The effective doubling of housing needs across the District as a whole means that all settlements in East Hampshire, including Bentley will inevitably have an important role to play in meeting these identified needs.

Turning to the policies of the NP, our comments below have been informed by guidance taken from the NPPG, (Ref ID: 41-041), which confirms that:

*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.*

Consistent with satisfying the Basic Conditions, the policies must also have regard to national policy and advice and be in conformity with strategic policies of the development plan. In that context they should plan to positively support local development, as reflected in paragraphs 13 and 30 of the NPPF. We have suggested some amendments below, where we consider these tests have not been met.

### **Policy BEN2: Development Principles**

*New development should ~~protect~~ **demonstrate how it has considered its impact on** the character of the established settlement pattern of the village by having full regard to the following principles where relevant to its location, nature and scale:*

- i. ~~preserving open views across and along the valley, and towards the higher ground to the north;~~*
- ii. ~~preserving the rural edge to the northern side of the main settlement;~~*
- iii. ~~consolidating the existing linear layout by avoiding residential garden, backland or tandem development unless there is precedent in that specific part of the village;~~*
- iv. ~~to ensure only incremental schemes are proposed to maintain the settlement pattern, a development proposal which may otherwise form part of a more substantial potential development on the same land and adjoining land, will be treated as proposal for the more substantial development;~~*
- Proposals affecting designated heritage assets should be supported by proportionate evidence to understand the potential impact on their significance.**~~avoiding an adverse effect on the character and appearance of the locality, particularly if in or adjacent to the Conservation Area;~~*
- v. ~~ensuring the development is not harmful to the significance of designated Grade II listed buildings through the impact on their setting;~~*
- vi. ensuring the development **is designed to make appropriate use of** ~~located to enable~~ connections to the existing network of rural lanes, bridleways and footpaths to improve and extend safe pedestrian and cycling routes and to **limit unnecessary** ~~minimise~~ traffic generation;*
- vii. ensuring the precise location, height and massing of the development avoids the potential for visual coalescence between the village and adjacent settlements such that the village does not lose its identity; and*
- viii. ensuring the size and orientation of each building plot, and its coverage, reflects the established pattern of plots within the immediate area, and where this allows for larger properties then ensuring they are arranged to provide an open, rural aspect.*

Paragraph 4.17 and 4.18 of the NP purport to prevent development which would change the shape of the village or result in any form of tandem or backland development. The same theme is continued at paragraph 4.20.

These parts of the NP are considered inconsistent with the NPPF and the emphasis it places on policy makers and NP's to positively support and shape future development needs. As reflected in paragraph 135 of the NPPF the emphasis should not be on preventing change but should help shape how such change can be sympathetic to local character, built environment and the landscaping setting of an area, whilst not preventing appropriate innovation or change.

**Policy BEN3: Design**

Parts of criteria iv and v are considered to be unduly prescriptive and restrictive and inconsistent with national policy (NPPF, paragraph 135). Amendments are shown below:

- iv) Ensuring all new dwellings **are sympathetic to local character and the local built environment.** ~~harmonise with neighbouring properties such that the scale, fenestration, roof geometries and design elements are echoed, but not necessarily copied, in new design;~~*
- v) Ensuring new dwellings are of **an appropriate height in their local context** ~~no more than two storeys below the eaves level,~~ with any habitable rooms in the roof space being lit by dormer windows or roof lights that complement but not dominate the roof.*

**Summary and Conclusions**

I trust that the content of this letter is clear, intended to be constructive in ensuring the NP achieves its stated aims while also ensuring that it aligns with national policy, the basic conditions and the achievement of sustainable development.

As reflected in our comments we identify a general concern that some of language used in the Neighbourhood Plan appears intent on preserving the status quo rather than positively looking to support and shape sustainable development. Clearly if this were the case it would be contrary to national policy and limit the longer-term relevance of the NP in the context of the scale of development needs now facing East Hampshire and in turn Bentley.

In the event you should have any queries or require any additional information please do not hesitate to contact either myself or my colleague [REDACTED].

Yours faithfully

[REDACTED]

[REDACTED]

**Armstrong Rigg Planning**

[REDACTED]

**Enclosures**

- Enclosure 1**                      **Appeal decision PINS Ref. 3328579**
- Enclosure 2**                      **East Hampshire Reg 18 LP Policy BEN1**

**Enclosure 1**

**Appeal decision PINS Ref. 3328579**



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# Appeal Decision

Site visit made on 4 March 2024

**by Robin Buchanan BA (Hons) MRTPI**

**an Inspector appointed by the Secretary of State**

**Decision date: 30 April 2024**

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**Appeal Ref: APP/M1710/W/23/3328579**

**Land west of Somerset Fields, Hole Lane, Bentley, Hampshire GU10 5LP**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant outline planning permission.
  - The appeal is made by Manor Oak Homes against the decision of East Hampshire District Council.
  - The application Ref is 55417/009.
  - The development proposed was described as 'a rural exception site comprising 9 no. affordable homes and 3 no. market homes with all matters apart from access and layout reserved'.
- 

## Decision

1. The appeal is allowed and planning permission is granted for a rural exception site comprising 9 no. affordable homes and 3 no. market homes with all matters apart from access and layout reserved at land west of Somerset Fields, Hole Lane, Bentley, Hampshire GU10 5LP, in accordance with the terms of the application, Ref 55417/009, and the plans submitted with it, subject to the conditions set out in the attached schedule.

## Preliminary Matters

2. The application is in outline with the principle of the proposal and details of access and layout for 12 dwellings to be considered now. These details are shown in a site layout plan<sup>1</sup>, including means of access to the site which the Council did not object to. I have determined the appeal on this same basis.
3. Details of scale, appearance and landscaping were reserved for future determination; so while the application includes some of these details they are not part of the formal proposal, just one possible way the site could be developed in these respects.
4. On 19 December 2023 the Government published a revised National Planning Policy Framework (NPPF). I refer to relevant new paragraph or footnote numbers as necessary. The Council updated what it considers to be its housing land supply position and the appellant made comments in these respects. I have taken these submissions into account in determining the appeal.
5. During the appeal the appellant submitted an executed Section 106 legal agreement dated 6 December 2023 (S106). It relates to the provision of affordable housing on the site and to a transport contribution for highway improvements. The main parties intend the S106 to overcome reason for refusal (RfR) 5 cited in the Council's decision notice.

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<sup>1</sup> Drawing number SL.01 Rev P4

6. Though not cited in RfR1, the Council considers that the proposal is contrary to other policies of East Hampshire District Local Plan: Joint Core Strategy, June 2014 (CS) and Bentley Neighbourhood Plan, February 2016 (NP). The appellant has addressed these other policies so I have taken them into account.

### **Main Issues**

7. The main issues in this appeal are:
- the effect of the proposal on the character and appearance of the area;
  - its effect on the character or appearance of Bentley Conservation Area by development in its setting and on the setting of listed buildings;
  - whether there is a need for affordable housing at Bentley;
  - whether the site would be a suitable location for the proposal having regard to the development plan spatial strategy, including provision of rural exception affordable housing; and
  - its effect on the living conditions of the occupiers of dwellings in Somerset Fields with respect to rear gardens and privacy.

### **Reasons**

#### *Character and appearance of the area*

8. The site is about half of a large, almost square field managed as rough grassland. This currently homogenous parcel of rural land is intrinsically part of the countryside around Bentley village and locally distinctive as such. It is, though, bordered by residential development on two sides. The northern and southern parts of the site would be less intensely developed to reflect the equivalent parts of housing in Somerset Fields to the east, and the single dwelling on the southern part would also match the looser knit arrangement of more dwellings south of the site fronting Main Road. Dwellings and plots in the centre of the site would be smaller and closer spaced, in keeping with this equivalent part and majority of Somerset Fields.
9. Most dwellings would be inset from the north site boundary and the mainly curved west boundary to give a landscaped margin of undeveloped land on these outer edges of the site with an aspect towards the wider countryside. As well, a less intense and abrupt transition with the countryside than the more regimented border of housing and plots in Somerset Fields. An open vista through Somerset Fields cul-de-sac would be maintained and views of the site from Public Footpath No.2, St Swithun's Way, on higher ground to the north west, are distant and would remain largely of a landscaped or village backdrop.
10. I am, therefore, satisfied that the layout would be compatible in this immediate developed context and with similar housing in nearby cul-de-sacs east of Hole Lane, north of Main Road. Furthermore, that suitable details of the scale and appearance of the dwellings could be resolved at a reserved matters stage, as well as landscaping of the site, including a condition to ensure trees next to the south boundary of the site which have significant visual amenity value are protected from ground excavations.
11. Existing features of the site would, though, be permanently lost with the rural integrity and presence of the field reduced in substance by the development. This would have a moderate adverse effect on the character and appearance of

the area, so there is some conflict with CS Policies CP2, CP20 and CP29 and NP Policy 2. These policies include that layout of development should protect the natural environment, local distinctiveness, sense of place and openness at the urban edge of settlements in the wider landscape and respect the character and identity of villages.

*Bentley Conservation Area (CA) and listed buildings*

12. The significance of the CA includes mainly older dwellings and plot layouts forming a long, narrow linear frontage along the north side of Main Road<sup>2</sup>. The two most relevant in this appeal are Ganwells and Cedar Cottage grade II listed buildings, south of part of the field and the site respectively. They have innate architectural and historic interest and as part of this frontage make a positive contribution to the character and appearance of the CA.
13. Positioned close to Main Road, facing it, these buildings have a main southerly aspect largely not constrained by opposing buildings and towards an open panorama of lower lying fields on the south side of Main Road in the CA. This mostly undeveloped foreground to these buildings is locally distinctive and also the most important part of the setting of Ganwells and Cedar Cottage, including because these features can be appreciated in significant views from Main Road and give a clear impression and understanding of the historic settlement pattern.
14. Part of the site and the rest of the field are next to the north boundary of the CA. This land is not in the CA and is distant from Main Road as well as Ganwells and Cedar Cottage. It has a more discrete background presence and secondary feel in relation to the rear elevations of the buildings fronting Main Road in the CA, including the gardens, upper storeys and rear facing windows of Ganwells and Cedar Cottage. It is, though, part of the rural edge of Bentley so makes a modest intrinsic positive contribution to the setting of the CA and the rearward setting of Ganwells and Cedar Cottage.
15. However, even the closest part of the site is separated from Main Road and Ganwells and Cedar Cottage by a deep, wide swathe of garden land, with intervening hedgerow and some trees along the common boundary with the CA. This part of the site would be least intensely developed by a single dwelling set well back from the boundary with the CA and well behind Ganwells and Cedar Cottage. Though most of the dwellings would be on the more gently elevated northern part of the site, they would be even more distant. Subject to suitable details of scale and appearance no dwelling would be experienced in any meaningful public view from Main Road or elsewhere in the CA due to intervening buildings, walls, fences, hedgerow or trees. A significant view north from Main Road in a wider gap between buildings is too far to the west so not towards the site.
16. The layout of the dwellings would have more in common with the housing development in Somerset Fields (which is not in the CA) than Main Road or Ganwells and Cedar Cottage. Previous expansion of the village with similar backland residential development north of Main Road, next to but beyond the north boundary of the CA and behind other listed buildings, has maintained the integrity of the historic Main Road corridor settlement pattern. It has also left

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<sup>2</sup> Bentley Conservation Area Character Appraisal and Management Plan, August 2014



the primary front facing aspect of listed buildings in this part of the CA intact, as would still be the case at Ganwells and Cedar Cottage.

17. Taking all the above into account, I am satisfied that the proposed layout would be compatible with this heritage context. Also, that suitable details of the scale and appearance of dwellings and landscaping of the site could be resolved at a reserved matters stage, including so that there was no appreciation of any significant built form or roofs in the Main Road streetscene.
18. Nonetheless, existing features of the site would be permanently lost. These outcomes would have a limited negative effect on this part of the setting of the CA and this part of the setting of Cedar Cottage and Ganwells listed buildings. This would not preserve or enhance the character or appearance of the CA overall<sup>3</sup> or preserve the setting of Cedar Cottage and Ganwells listed buildings overall<sup>4</sup>. Consequently, there is some conflict with CS Policies CP2, CP20 and CP29 and NP Policy 2. These policies include that layout of development should protect historic features or natural and built environment heritage, such as rural buildings and open areas or spaces around buildings.

#### *Need for affordable housing at Bentley*

19. The CS acknowledges a housing affordability problem for local people in the district, especially in rural areas. Also, a significant deficit in affordable housing supply. It was a pressing need and priority in 2014 when this plan was adopted, with the examination Inspector finding an acute and urgent need for affordable housing in the district; as did an Inspector in a 2015 dismissed appeal for housing development near the current appeal site<sup>5</sup>. The Council's officer report for the current appeal application suggested that local need for affordable housing was 'low' and that 'a number of applications with better connection would meet the need' but it has not substantiated either claim.
20. Even if affordable housing (as opposed to more affordable market housing) already exists locally, as some interested parties suggest, there is no evidence that any identified local affordable housing need has already been met. Nor would be met (in whole or in part) by the proposal or by any extant planning permissions in or at Bentley. The Council's latest published need for affordable housing in the district is a significant 613 dwellings per annum<sup>6</sup> and in 2021 housing affordability remained a notable barrier to home ownership<sup>7</sup>. The CS and the NP do not allocate sites for any housing in the settlement boundary or next to it at Bentley. I have not been informed about any other sites within the village that are promoted for housing, including affordable housing.
21. Subject to a suitable planning obligation the Council's Housing Enabling Officer supported the proposal (albeit after the Council had made its decision) – confirming that 22 people seeking housing on requisite registers expressed a local connection to Bentley (in terms of residence, close family or work) and a further 14 households had a preference to live in Bentley in shared ownership, shared equity and rent to buy housing<sup>8</sup>. I have not been informed of any change in these regards.

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<sup>3</sup> Section 72(1) - Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)

<sup>4</sup> Section 66(1) - Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)

<sup>5</sup> APP/M1710/W/15/3008871

<sup>6</sup> Housing and Economic Development Needs Assessment 2022

<sup>7</sup> Housing Needs and Requirement Background Paper

<sup>8</sup> Consultation memorandum, 19 May 2022

22. These are the sort of circumstances that CS Policy CP14 is designed to help address and these housing tenures (as well as appropriate dwelling sizes) are reflected in the S106. It also requires a qualifying local connection and transfer of the affordable housing<sup>9</sup> units to an appropriate provider (ie in perpetuity, unless in certain exceptional circumstances which the Council has agreed to as a party to the S106). On this basis, the S106 is necessary, related directly to the development and fairly related in scale and kind. As such it accords with the provisions of Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010 and the NPPF tests for planning obligations.
23. I therefore find that 9 affordable homes (75%) of the proposed 12 dwellings would make a significant contribution towards meeting local unmet affordable housing need at Bentley. Consequently, the proposal complies with CS Policy CP14 a), b), c) and f). The Council did not object to the market dwellings (25%) or related provisions in the S106. This level is within the scope of CS Policy CP14 which requires a respective minimum 70% and 30% split in dwelling type, so in this case biased more towards affordable housing.

*Whether a suitable site for the proposal*

24. In CS Policy CP2 Bentley is a lower Level 4 settlement with a settlement boundary defined by NP Policy 1. Some small-scale development may be appropriate within such settlements and most have access to local facilities and workplaces. Such development can be beneficial where it would support them. These settlements also have reasonable access to higher order centres to meet at least daily needs and where appropriate will accommodate development to meet local needs.
25. The site is not in the settlement boundary so in the countryside where CS Policy CP19 restrains development unless it needs to be there. CS Policy CP14 permits small-scale affordable housing for rural communities outside settlement boundaries in the countryside as an exception to CS Policy CP19, including subject to criteria d) and e). Even if there has already been modest housing growth at Bentley the development plan sets out a minimum number of new homes, so the housing requirement is not a cap to further suitable and justified housing.

Small-scale

26. There is no apparent definition of 'small-scale' for CS Policies CP2 and CP14 or in the NPPF. The NP supports smaller scale housing development of between 8-12 dwellings to meet local needs. Some 230 dwellings in the village in 2014 were increased to almost 270 by Somerset Fields. The proposed 12 dwellings, including 9 affordable homes is a small-scale scheme by definition under the NP and by this relative absolute and percentage change in dwellings.

Criterion d) - services and facilities

27. Albeit under a previous interim housing policy to address a housing land supply deficit, the Council granted planning permission for Somerset Fields considering it to be well located for village facilities within a relatively short walking distance. The site is next to Somerset Fields. In addition, though a rural village the Council considered Bentley to be one of the larger and more sustainable

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<sup>9</sup> As defined by NPPF Annex 2: Glossary

Level 4 settlements with a number of local facilities, so comparatively one of the most appropriate villages to absorb additional residential development.

28. There is no longer a doctors surgery in Bentley. This is a significant change, including since the 2015 appeal decision referred to earlier. But that decision does not elaborate on the nature or extent of apparently 'limited' services or facilities then, now some 9 years ago. In any event, in my view, CS Policy CP2 (and relevant supporting text to this policy) does not anticipate or insist that services and facilities in Bentley must provide for 'all the day-to-day living requirements' of occupiers of new dwellings, as that Inspector observed.
29. Albeit a snapshot, Bentley has a primary school, children's nursery, public recreation and sports ground with equipped playground, village hall, pub, large 'village stores' convenience shop with Post Office and a coffee shop/cafe selling hot and cold food to eat-in or takeaway. There are also employment units in the Bentley Industrial Centre and some allotments. Although some minor roads would need to be crossed, these are all roughly within a most conducive 10 minute or 800m walk<sup>10</sup> from the site by suitable, safe shared surfaces or pavement which include street lighting. Despite no dedicated cycle lanes, including in the busier Main Road, all are within a short cycle ride.
30. Bus services from Bentley include to Alton (with the nearest doctors surgery), Farnham and Guildford. Bus stops are within the same conducive walking distance of the site. Though not on Sundays, the level of service Monday to Friday and Saturday is roughly between 60 to 90 minutes from early morning to late afternoon/early evening. Alton and Farnham are only about 6km away so these journey times are quite short. Bentley railway station includes hourly services to Alton and Farnham, with journey times below 10 minutes, and to London. The station is about a 2km walking distance, usually with the greatest potential to replace short car trips<sup>11</sup> but there is no continuous pavement or street lighting. This would reduce the attractiveness of walking but it could be cycled to. Many additional living needs could therefore be conveniently met at these towns by bus or train and some by cycling, as well as by rail to London.
31. I accept that some needs would still likely be met by car, such as weekly family food shopping or some commuting to work. However, Bentley has a useful range of local services and facilities to meet a number of day-to-day living requirements. These could be accessed by walking or cycling and occupiers of the proposed dwellings would likely support some or all of them in a meaningful way, in-line with aspirations of the NP. There is also useable access by other modes to larger settlements with a wider range of services and facilities. Even if modestly, these travel options would reduce dependence on cars so future occupiers of the dwellings would not be heavily or overly reliant on them.

Criterion e) - scale, location and size of the site

32. Much of the low-density layout would contain no buildings or other built form, including gardens, public open space, drainage swale and wildlife habitat. The area of site to be developed with 12 dwellings would be limited in extent in relation to the relatively small 1.2h site area. The southern edge of the site is next to the settlement boundary, with houses beyond in the village, and houses

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<sup>10</sup> Manual for Streets – paragraph 4.4

<sup>11</sup> Manual for Streets – paragraph 4.4

in Somerset Fields next to the settlement boundary are now part of the village. The proposed dwellings would not be isolated or detached from the village and be near most of the services and facilities along Main Road. This development would also counterbalance the similar cul-de-sac housing on the east side of Hole Lane, north of Main Road up to the edge of the built-up area of the village, so maintain a compact settlement envelope and form. In scale, location and size the site therefore relates well to the existing settlement, consistent with objectives of the NP for housing development in small clusters or separate pockets connected to the village.

33. On plain reading, the four criteria set out towards the end of CS Policy CP10 apply to small-scale housing development that is 'in addition to' that which accords with CS Policies CP14 and CP19, so do not apply in this case. Even if they did, the proposal would meet a community need with no evidence it could otherwise be met within the built-up area, would reinforce the role and function of Bentley and is a form of development identified in the NP by reference to a framework of relevant CS policies, including CS Policy CP14<sup>12</sup>.
34. Taking all the above into account, I find that the site would be a suitable location for the proposal having regard to the development plan spatial strategy, including for the provision of rural exception affordable housing. Consequently, it complies with CS Policies CP14 d) and e) and CP31 and with NP Policy 1. As such there is no conflict with CS Policies CP2 or CP19, nor does it undermine the sustainable development objectives of CS Policy CP1.

*Living conditions of the occupiers of dwellings in Somerset Fields*

35. The first part of RfR6 and the Council's appeal statement refer to rear gardens in Somerset Fields, which is not to the south of the site as later cited in RfR6. The position (ie layout) of the dwellings is not 'indicative' as RfR6 otherwise states but details of scale and appearance (thus including dwelling storeys and window placement) is not being considered now. Five rear gardens border the site so have the most potential to be adversely affected by overlooking from first floor windows of the dwellings (other rear gardens would be further away or not in direct line of sight). The six dwellings on plots 1 and 5 to 9 would be the closest to these rear gardens.
36. The layout of plots 1, 5 and 9 indicate front and rear dwelling elevations orientated roughly north-south, so views from first floor windows would be at an oblique angle to Somerset Fields. Perpendicular first floor rear elevation windows at plots 6 and 7 would be inset a significant distance from the east site boundary, comparable to usual separation distances between dwellings and gardens. The dwelling at plot 8 would be closest to the east boundary but even if a flat above garage three first floor elevations would face in other directions, including scope for rooflights with upward views. Floorplans could locate rooms such as kitchens or bathrooms (with obscured glazing) to mitigate overlooking.
37. There is no objective evidence to suggest that the proposed layout would result in first floor windows in dwellings at plot 1 and plots 5 to 9 having direct, unduly proximate or intrusive downward views towards the adjoining rear gardens. As a result, I am satisfied that suitable details of the scale and appearance of the dwellings could be resolved at a reserved matters stage to avoid undue adverse effect on the living conditions of the occupiers of dwellings

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<sup>12</sup> NP paragraph 4.9

in Somerset Fields with respect to rear gardens and privacy. Consequently, the proposal complies with CS Policy CP27 which includes that development should not have an unacceptable effect on the amenity of occupiers of neighbouring properties through loss of privacy.

## **Other Matters**

### *Emerging draft Local Plan (draft LP)*

38. In the draft LP the whole field, including the site, is allocated for 20 homes not limited to rural exceptions housing and Bentley is elevated to a higher Tier 3 settlement<sup>13</sup>. This plan is at an early stage of preparation and subject to consultation, so may change. Accordingly, it is not yet an agreed strategy for meeting development needs across the district, whereas the current task in hand is the individual planning merits of the proposal before me. While a potential direction of travel, these provisions of the draft LP therefore have no weight in my decision.

### *Housing land supply*

39. The draft LP is a Regulation 18 stage plan which contains a policies map and proposed housing allocations towards meeting housing need. The Council therefore has to demonstrate a 4 year supply of its 5 year housing requirement<sup>14</sup>. The Council did not fail the 2022 Housing Delivery Test and in February 2024 considered it had a 4.74 year supply of deliverable housing sites without any buffer<sup>15</sup>. This position was considered in a recent appeal decision, provided by the appellant, for housing development elsewhere in the district<sup>16</sup>. The Inspector found a 3.59 year housing supply, though that detailed evidence is not before me. Although I have not been informed of a challenge, the period for high court challenge has not expired. In these circumstances, the housing land supply position outlined in that decision is not yet settled. Accordingly, while I have had regard to it, I give it no weight in my decision.

### *Thames Basin Heaths Special Protection Area (SPA)*

40. The SPA is designated a European Site and is also internationally important because of habitat for certain ground nesting and breeding birds susceptible to harmful impacts due to recreational use of this land. The site is beyond a 5km zone of influence of the SPA but within 7km of an edge of it. The main parties agree that in this location proposals for less than 50 dwellings do not require SPA assessment or mitigation, as set out in a delivery framework adopted by the Council and prepared with advice from Natural England<sup>17</sup>. I therefore have no reason to find otherwise or that there would therefore be a likely significant adverse effect on the nature conservation interest of the SPA and adverse effect on its integrity.

### *Transport contribution*

41. A transport contribution in the S106 is agreed by the main parties. I have been provided with some explanation of why it was sought and how the sum was

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<sup>13</sup> BEN1 – Land west of Hole Lane, Bentley

<sup>14</sup> NPPF paragraph 226 and Planning Practice Guidance paragraph 68-056-20240205

<sup>15</sup> Addendum to October 2023 East Hampshire Five-Year Housing Land Supply Position Statement

<sup>16</sup> APP/M1710/W/23/3329928, 10 April 2024

<sup>17</sup> Thames Basin Heaths Special Protection Area Delivery Framework – Thames Basin Heaths Joint Strategic Partnership Board February 2009



calculated. But I have not been informed about what transport infrastructure it would be used for 'to support the development' or to 'provide improvements that link the site to the wider transport network'. Nor is there any programme for delivery, including relative to potential commencement or completion of the development in the event that the appeal was allowed. Nor do I know if the contribution would be sufficient by itself or need to be pooled, but if so the mechanism and timing is unclear. I therefore cannot be certain that this obligation in the S106 accords with CIL Regulation 122 or the relevant NPPF tests. In these circumstances, and albeit not a determinative factor in my decision, there is no transport contribution benefit in this appeal.

#### *Other interested party comments*

42. Bentley Parish Council (BPC) and many local residents also objected for other reasons. Details of external lighting and a surface water drainage scheme for this greenfield site, which might also have off-site flood risk benefits, could be secured by a condition(s). There is no objective evidence that the site is best and most versatile agricultural land or that other infrastructure to support the proposal would not be provided in a timely manner. The Highway Authority did not object to the modest increase in traffic generation or its effect on the surrounding road network and it was not a Council reason for refusal. The percentage increases in traffic along Hole Lane referred to by BPC are given without any context about overall traffic numbers, so have limited meaning.
43. Whether or not the proposal is a precursor to a further phase of housing development on the residual part of the field is not material to my decision because a planning application would need to be considered on its individual planning merits. There is no objective evidence before me that the Council gave undertakings that land west of Somerset Fields would not be developed.

#### **Heritage Balance**

44. The NPPF aims to conserve the historic environment. Designated heritage assets are an irreplaceable resource to be conserved in a manner appropriate to their significance. In a limited way the proposal would undermine the significance of the CA and the significance of Ganwells and Cedar Cottage listed buildings by virtue of development in the respective settings, so in each case the harm would be less than substantial. The NPPF requires that great weight should be given to the conservation of a designated heritage asset irrespective of the level of harm. The proposal would undermine the Council's relevant development plan objectives in these regards, which are broadly consistent with these aspects of the NPPF. Where a proposal will lead to less than substantial harm to significance this harm should be weighed against the public benefits of the proposal.
45. By virtue of the housing land supply position in this appeal, NPPF footnote 8, paragraph 11 d) is not engaged. Consequently, the presumption in favour of sustainable development (the 'tilted balance') does not apply in this case. However, the Council agrees this in itself 'is not a barrier to supporting an affordable housing rural exception site such as this'. There is an identified need for affordable housing at Bentley and the site is a suitable location in principle to meet some of it in the scale and manner proposed, including an acceptable level of market housing to facilitate this and help meet the Council's overall housing requirement. Employment would be sustained during construction works and the dwellings would generate CIL receipts with 25%

directed to BPC to invest locally due to the made NP. Future occupiers of the dwellings would likely support services and facilities in Bentley. There would be no undue impact on the most important wildlife habitat or on protected species. Subject to a condition there would be adequate ecology mitigation and compensation at the site with an overall biodiversity net gain exceeding 10%.

46. These outcomes would accord with relevant development plan policy aims. They are consistent with objectives of the NPPF to significantly boost the supply of new homes and meet the needs of people with specific local affordable housing requirements in rural areas on exception sites. In these respects, an effective use of this rural land with an appropriate density of housing and new residents to help enhance or maintain the vitality of Bentley, including the rural economy by supporting the retention or new accessible local services and community facilities. This pattern growth would offer a genuine choice of transport modes, recognising the rural location of the site. It would also enhance habitats and ecology.
47. In my view, these 12 dwellings would make an appreciable contribution in these regards, so each consideration has significant weight in favour of the appeal. The public benefits of granting planning permission would, therefore, outweigh the loss of significance and level of heritage harm in this case. In these terms there is a clear and convincing justification for the proposal.

### **Conditions**

48. The Council suggested some planning conditions if the appeal was allowed. The appellant has given written agreement to pre-commencement of development conditions. I am satisfied that those details must be established at the outset so they can be incorporated in the development at the appropriate time to achieve the desired outcomes. Where required, I have considered modified wording in the interests of clarity or precision, including consultee responses and some wording suggested by the appellant. I have also had regard to the relevant tests in the NPPF and Planning Practice Guidance, including to keep conditions to the minimum required.
49. In addition to standard conditions for securing details of the reserved matters and time limit for commencing development, a condition to specify the approved plans would give certainty about the details of access and layout that would be built. The site is agricultural land so a condition would be justified to ensure it is not contaminated by this use and could ensure any necessary mitigation for future residential use of it. It is also in an area of known undisturbed archaeological potential so a condition for on-site investigation and, if necessary, mitigation and recording of artefacts would be justified.
50. The development would be near existing residential properties and accessed along residential roads. Although for a temporary period, some noise or disturbance is an inevitable consequence of new development but a condition could secure a construction management plan to help ensure safe and free flow for all users of the highway. Also, to avoid intrusion to residential amenity at antisocial times of the day or certain times of the weekend and on public holidays. Additionally, to ensure that proposed off-street car parking was provided to reduce the scope for congestion in the cul-de-sac or parking elsewhere, and suitable cycle storage to encourage this mode of travel. A condition could secure suitable storage for domestic waste at each property.



## **Planning Balance and Conclusion**

51. There would be no harm to the living conditions of the occupiers of dwellings in Somerset Fields with respect to rear gardens and privacy. This is a neutral factor in my decision. Some countryside would be permanently lost as a result of the proposal and undermine relevant development plan policy aims. These are consistent with objectives of the NPPF to recognise the intrinsic character and beauty of the countryside. The loss would be relatively small but this harm adds further modest weight against the proposal.
52. However, there is otherwise no apparent reason why future approval of details of scale, appearance and landscaping would not (with the details of access and layout) result in well-designed development that was visually attractive and sympathetic to local character and history, including surrounding built environment and landscape setting. This would maintain a strong sense of place and Bentley as a distinctive place to live or visit.
53. The benefits of granting planning permission therefore outweigh the totality of the harm. Since I intend to allow the appeal on this basis, even if the Council does not have a 4 year supply of deliverable housing sites this would not affect my decision or, therefore, alter the outcome of the appeal.
54. The proposal does not comply with certain policies of the development plan and conflicts with some provisions of the NPPF. However, there are other important material considerations that indicate the decision should be made in accordance with the development plan taken as a whole<sup>18</sup>, consistent with other relevant provisions of the NPPF and planning permission granted subject to conditions and the S106.
55. Consequently, for the reasons given above the proposal is acceptable, so the appeal succeeds.

*Robin Buchanan*

INSPECTOR

## **Schedule of Conditions (12)**

- 1) Details of scale, appearance and landscaping (hereinafter called 'the reserved matters') shall be submitted to and approved in writing by the local planning authority before any development takes place and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than 3 years from the date of this permission.
- 3) The development hereby permitted shall take place not later than 2 years from the date of approval of the last of the reserved matters to be approved.

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<sup>18</sup> Section 38(6) Planning and Compulsory Purchase Act 2004 (as amended) and NPPF paragraph 12

- 4) The development hereby permitted shall be carried out in accordance with the following approved plans:
- |        |        |                    |
|--------|--------|--------------------|
| SLP-01 | Rev A  | site location plan |
| SL.01  | Rev P4 | site layout plan   |
- 5) No development shall commence on site until details of a scheme for foul and surface water drainage shall have been submitted to and approved in writing by the local planning authority, based on principles within the submitted Flood Risk Assessment (FRA)<sup>19</sup>. Such details shall include:
- (a) provision for all surface water drainage from parking areas and areas of hardstanding to prevent surface water from discharging onto the highway;
  - (b) a detailed drainage layout and construction details based on site investigation and percolation tests with run-off calculations for the peak event;
  - (c) a technical summary with any changes to the design in the FRA;
  - (d) infiltration tests undertaken in accordance with BRE365 and providing a representative assessment of those locations where infiltration features are proposed;
  - (e) detailed drainage plans to include type, layout and dimensions of drainage features and cross reference to drainage calculations;
  - (f) detailed drainage calculations to demonstrate existing runoff rates are not exceeded and there is sufficient attenuation for storm events up to and including 1:100 years plus climate change;
  - (g) evidence that urban creep has been included in the calculations;
  - (h) confirmation that sufficient water quality measures have been included to satisfy the methodology in the CIRIA SuDS Manual C753; and
  - (i) exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.

The proposed hard surface(s) shall either be made of porous materials or provision shall be made to direct run-off water from the hard surface(s) to a permeable or porous surface within the site. The development shall be carried out in accordance with the approved details before any part of the development is first occupied and shall be retained and maintained thereafter.

- 6) No development shall commence on site, or excavations or groundworks take place, until the following details shall have been submitted to and approved in writing by the local planning authority:
- (a) a scheme outlining a site investigation and risk assessments (including desktop study) designed to assess the nature and extent of any contamination on the site;
  - (b) a written report of the findings including a description of the extent, scale and nature of any contamination, an assessment of

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<sup>19</sup> Ref 406-FRA-01-B, prepared by Martin Andrews Consulting (MAC) Limited June 2022.

all potential risks to known receptors, an update of the conceptual site model (devised in the desktop study) and identification of all pollutant linkages; and, unless identified as unnecessary in the written report, an appraisal of remediation options and a proposed preferred option(s) identified as appropriate for the type of contamination found on the site; and

- (c) a detailed remediation scheme designed to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historic environment. The scheme shall include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works, site management procedures and a verification plan outlining details of the data to be collected in order to demonstrate the completion of the remediation works and any arrangements for the continued monitoring of identified pollutant linkages.

The above schemes and reports shall be completed by a competent person<sup>20</sup>. The site works shall be undertaken in accordance with DEFRA and the Environment Agency 'Model Procedures for the Management of Land Contamination, CLR 11' and BS10175:2011 Investigation of potentially contaminated sites – Code of practice.

- 7) No development shall commence on the site, or excavations or groundworks take place, until an Arboricultural Method Statement and Tree Protection Plan, based on principles within the submitted arboricultural impact assessment<sup>21</sup>, shall have been submitted to and approved in writing by the local planning authority. The development, including excavations and groundworks, shall be carried out in accordance with the approved details.
- 8) No development shall commence on the site until a programme of archaeological evaluation, and as necessary a programme of archaeological mitigation of impact, has been implemented in accordance with a Written Scheme of Investigation (WSI) that shall have been submitted to and approved in writing by the local planning authority. The WSI shall also include arrangements for submitting a post-completion of archaeological fieldwork report setting out and securing appropriate post-excavation assessment, specialist analysis and reports, publication and public engagement.
- 9) No development shall commence on the site until a Construction Method Statement (CMS) shall have been submitted to and approved in writing by the local planning authority. The CMS shall include the following details for the operation of the site during the construction phases:
- (a) a programme and phasing of construction work;
  - (b) vehicle parking arrangements for site operatives and visitors;
  - (c) hours of working at the site, including arrangements and timings for deliveries;
  - (d) means of access and egress for plant and machinery;

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<sup>20</sup> NPPF Annex 2: Glossary

<sup>21</sup> Ref 220128 1078 AIA V1, prepared by Wharton Natural Infrastructure Consultants, 4 February 2022

- (e) protection of pedestrian routes within and adjoining the site; and
- (f) location of temporary site buildings, compounds, construction material, spoil heaps and plant storage areas.

The approved CMS shall be adhered to throughout the construction phases of the development.

- 10) No development shall commence on the site, or excavations or groundworks take place, until a Biodiversity Mitigation and Enhancement Plan (BMEP), including a sensitive lighting design strategy and construction environmental management plan, based on principles within the submitted ecological impact assessment<sup>22</sup>, addendum and technical note<sup>23</sup>, shall have been submitted to and approved in writing by the local planning authority. These details shall include:

- (a) risk assessment of potentially damaging construction activities;
- (b) identification of biodiversity protection zones;
- (c) practical physical measures and sensitive working practices or method statement to avoid or reduce impacts during construction;
- (d) the location and timing of sensitive works to avoid harm to biodiversity features;
- (e) the times during construction when specialist ecologists, an ecological clerk of works or similar competent person need to be present on site to oversee works, including responsibilities and lines of communication; and
- (f) use of protective fences, exclusion barriers and warning signs.

The development, including excavations and groundworks, shall be carried out in accordance with the approved BMEP and as relevant thereafter retained and maintained in accordance with the BMEP.

- 11) No part of the development hereby permitted shall be occupied until details for the on-site provision of refuse and recycling bin and cycle storage facilities shall have been submitted to and approved in writing by the local planning authority and the approved details have been implemented on the site. The approved details shall be retained thereafter for these purposes.
- 12) No part of the development hereby permitted shall be occupied until the approved layout and provision of car parking has been implemented on the site. The approved details shall be retained thereafter for these purposes.

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<sup>22</sup> Ref 220929 1078 ECIA V2 ISSUE, prepared by Wharton Natural Infrastructure Consultants, 29 September 2022

<sup>23</sup> Both undated, prepared by Wharton Natural Infrastructure Consultants

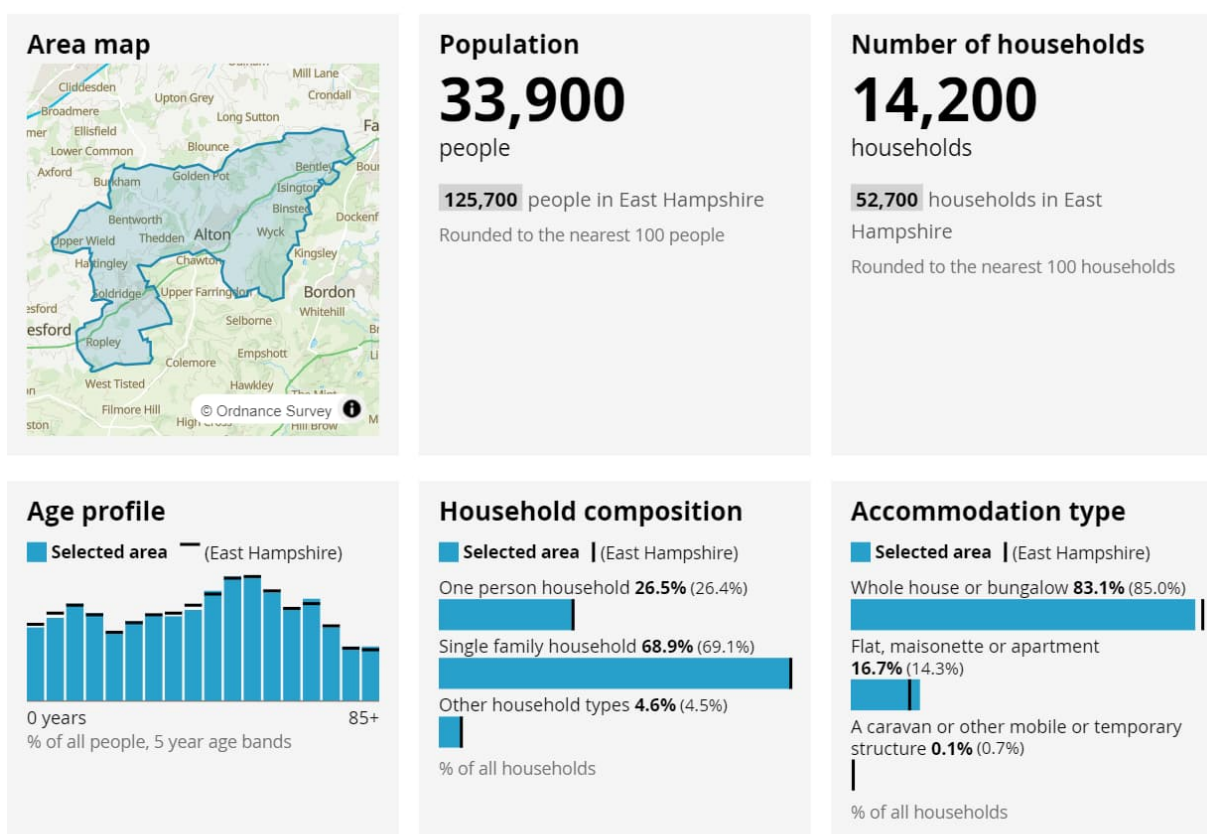
**Enclosure 2**

**East Hampshire Reg 18 LP Policy BEN1**

## NORTH AREA: REMAINING SETTLEMENTS & SITE PROPOSALS

This part of the Local Plan Area is predominantly part of the Hampshire Downs Countryside Character Area that characterises the northern and western parts of East Hampshire. The valley of the northern River Wey is a distinctive landscape feature, along with undulating chalk downland. The geology is largely chalk, with some overlying clay-with-flint deposits. The landscape is predominantly agricultural, often arable farmland, with small areas of ancient and replanted woodland and chalk grassland. Outside of Alton, settlements are often small and dispersed in character – Ropley is a notable example of this in the east, whilst Upper and Lower Wield, along with Upper and Lower Froyle are notable examples elsewhere. Transport connections are focused in Alton as the largest settlement, but there is also a train station near Bentley and there are main road connections (the A339 and A31) dissecting the area, connecting it to the larger population centres of Basingstoke, Farnham, Guildford and Winchester.

Population and household statistics that are available for a ‘best fit’ area from the 2021 Census provide the following overview of existing communities:

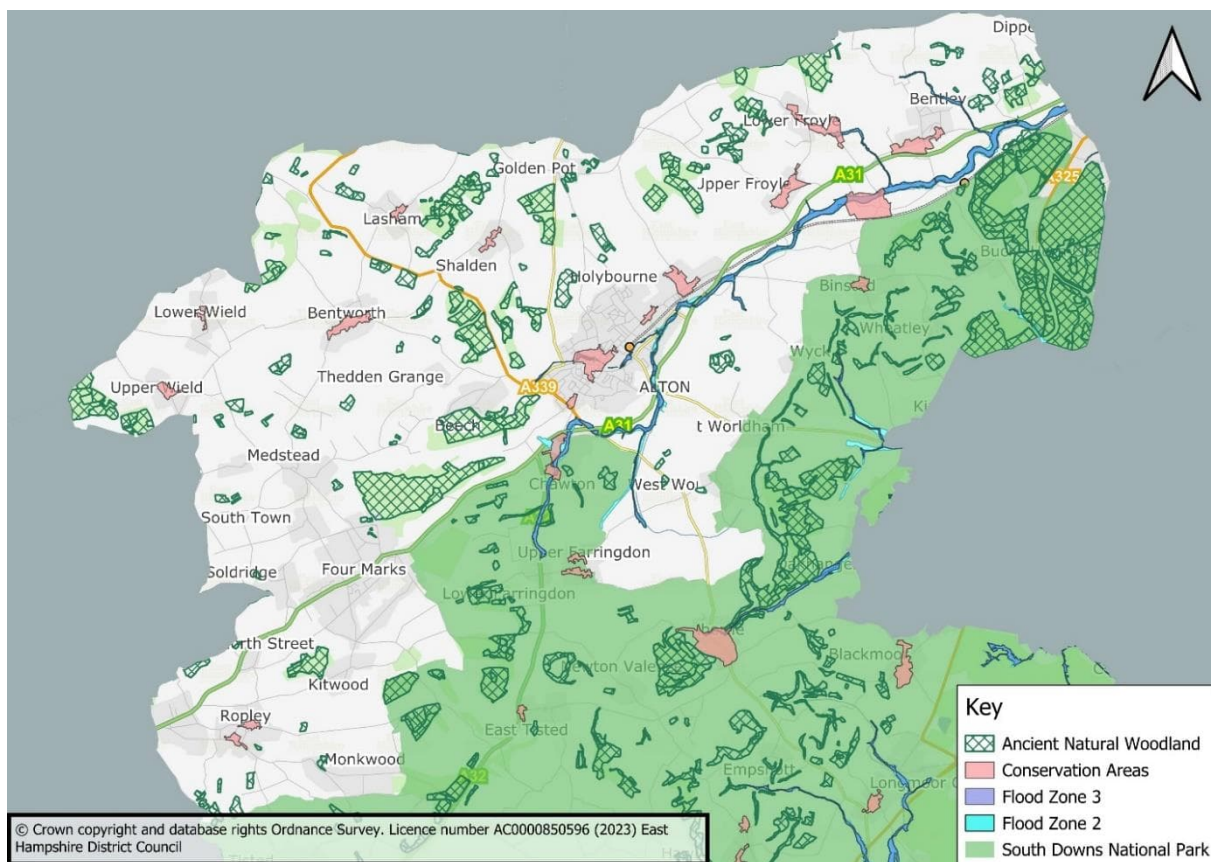


Source: Office for National Statistics - Census 2021

Sites within or close to the settlements of Bentley, Bentworth and Medstead have been identified as those preferred for development in this Draft Local Plan. Figure 12.26 identifies many of the principal environmental constraints for new development in the North Area.



FIGURE 12.26: STRATEGIC ENVIRONMENTAL CONSTRAINTS FOR THE NORTH



In the revised settlement hierarchy of this Draft Local Plan, Bentley is in Tier 3, Medstead is in Tier 4 and Bentworth is in Tier 5. This indicates that Bentley has some potential for enabling residents to access services or facilities within a reasonable walking or cycling distance, but that there is generally less potential for this in Medstead and Bentworth. New development should be of a small scale within these settlements, so that the Local Planning Authority remains true to its principle of helping new residents to live more locally, using walking and cycling as modes of transport on a more frequent basis.

Figures 12.27-12.29 highlight where current planning applications are located within the Bentley, Bentworth and Medstead areas in relation to the proposed allocations. Details on potential new sites in Bentley, Bentworth and Medstead are identified after Figure 12.29.



FIGURE 12.27:  
**CURRENT PLANNING APPLICATIONS AND PROPOSED ALLOCATIONS – BENTLEY**

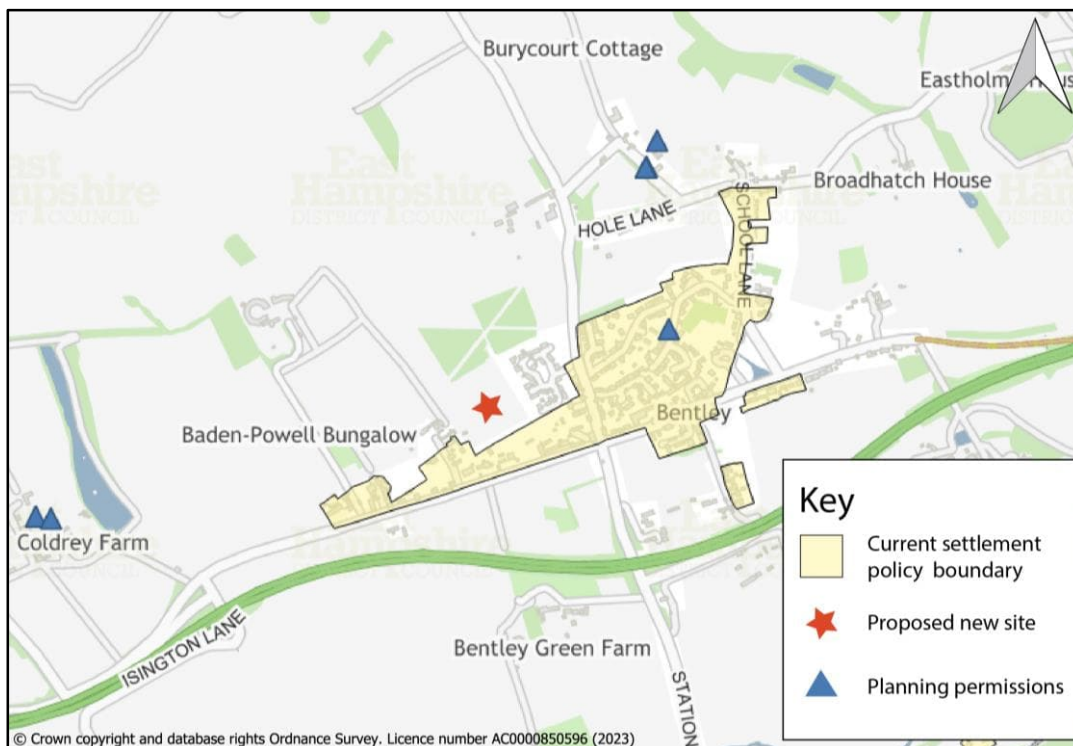


FIGURE 12.28: **CURRENT PLANNING APPLICATIONS AND PROPOSED ALLOCATIONS – BENTWORTH**

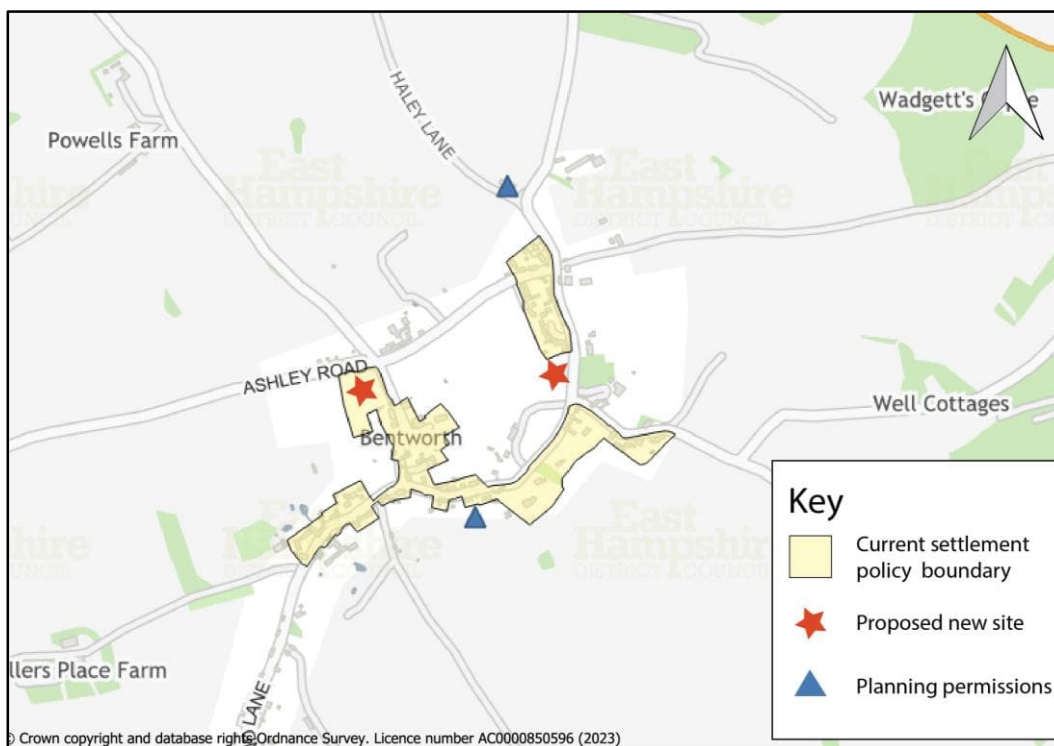
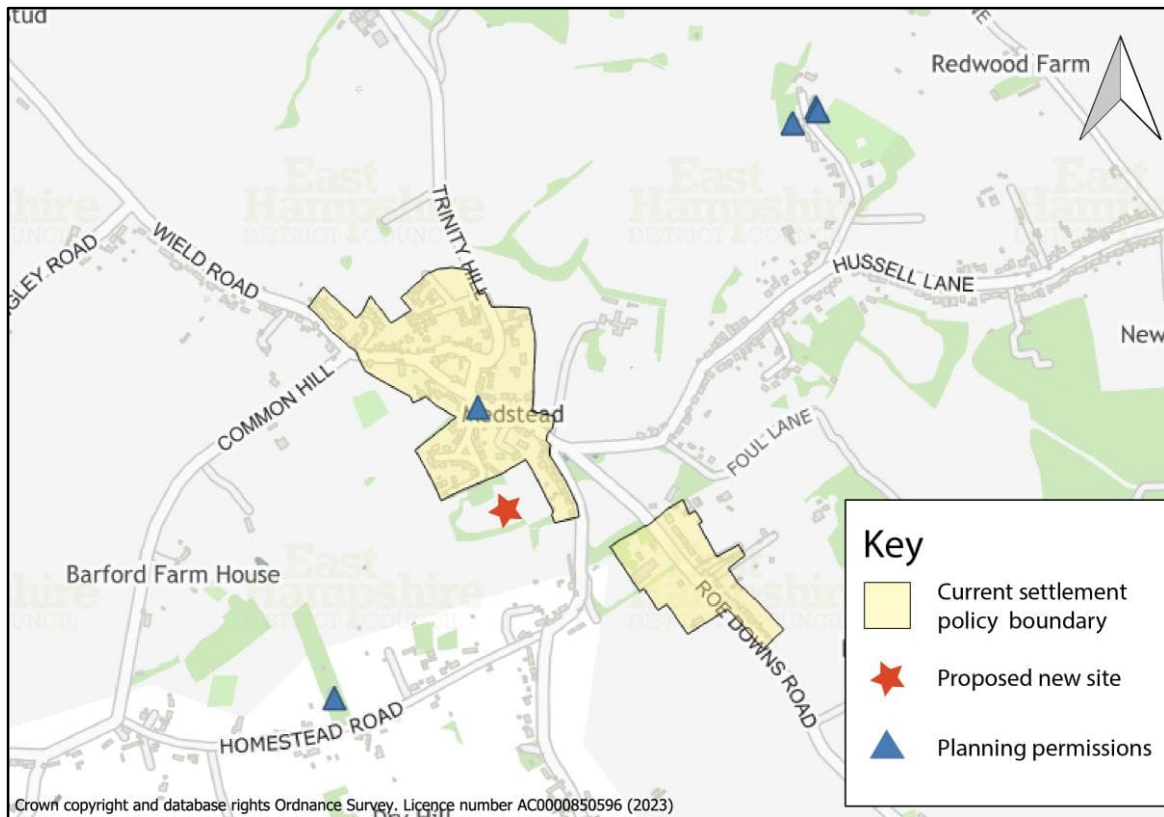
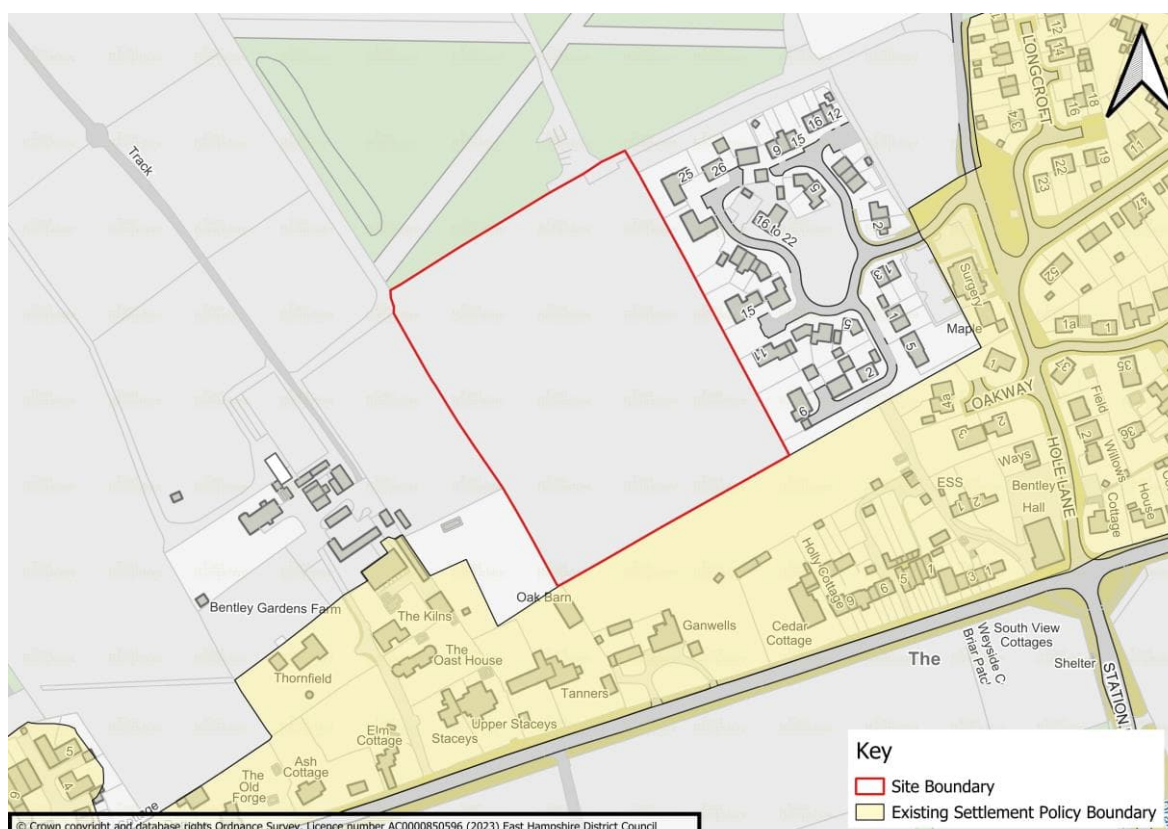


FIGURE 12.29:  
**CURRENT PLANNING APPLICATIONS AND PROPOSED ALLOCATIONS – MEDSTEAD**



## BEN1 – Land west of Hole Lane, Bentley

LAA Reference	BEN-017
Site Size (Ha)	2.5 ha
Existing Use	Agriculture
Proposed Future Use	Residential
Proposed Number of Homes	20



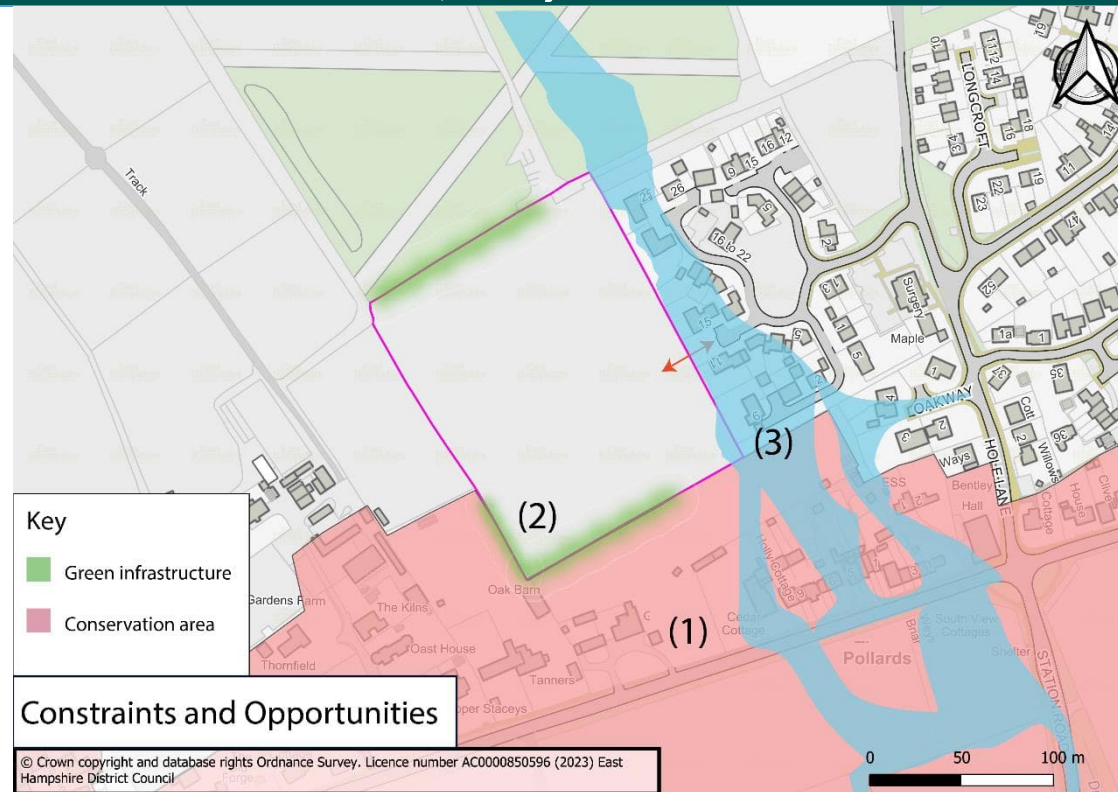
### Site Description

The site lies adjacent and to the west of recent housing development in Bentley, off Hole Lane. Historic areas of Bentley adjoin the southern boundary, whilst undeveloped land and garden ground lies to the west. A designed landscape adjoins the northern boundary. Central areas of Bentley is within a short walking distance from the site, accessible via Hole Lane.

The site is greenfield pasture with some mature trees and hedgerows on southern boundaries and a substantial hedge to the north. Boundaries with housing to the east are domestic in character. There is an access track that connects the north of the site with nearby allotments and Hole Lane. The land is relatively flat, but slopes gently, rising from south to north. Housing in the site's environs is predominantly of detached houses, but with some semi-detached and terraced house types. Plot design (size, shape, configuration) is highly varied to the south, in historic parts of Bentley. It is more conventional and suburban in size, shape and layout in the recent housing development to the east.



## BEN1 – Land west of Hole Lane, Bentley



## List of constraints &amp; opportunities

- **Built heritage (1):** the site adjoins the Bentley Conservation Area, which is located to the south and south-west and is in close proximity to four Grade II listed buildings (Greystones, Tanners, Ganwells, Cedar Cottage) that are within the conservation area.
- **Green infrastructure (2):** mature field boundaries and trees are important characteristics of the site, providing a context for the conservation area to the south and helping to integrate the site with its surroundings.
- **Landscape:** there is potential for adverse landscape and visual impacts on the setting of the conservation area.
- **Residential amenity:** due to the proximity of adjoining dwellings to the east, there is the potential for adverse impacts on the amenity of existing housing.
- **Flood risks (3):** very small areas of the site are susceptible to surface water flooding. These areas of flood risk are located in the south-east corner of the site and form part of a more extensive area of surface water flood risk that runs along the eastern boundary of the site (NB: contiguous surface water flood risks on Hole Lane and Station Road are not shown on the constraints and opportunities plan).
- **Access:** connection to the local road network could be achieved through recent housing development to the east.
- **Access:** potential to connect the site to Hole Lane and allotments in Bentley by walking and cycling modes via the northern access track.
- **Agricultural land quality:** the site and adjoining areas could be Grade 3 agricultural land, which is a finite resource.

## **BEN1 – Land west of Hole Lane, Bentley**

### **Summary of Reasons for Inclusion**

The site is relatively well-located close to facilities and services in the centre of Bentley. The site scores above average in the Local Planning Authority's Accessibility Study. Impacts on environmental constraints (green infrastructure, flood risks) could be avoided or mitigated by appropriate design and layout, whilst the sensitive design and arrangement of new buildings could reduce built heritage and landscape concerns. Maintaining and augmenting green infrastructure on the site boundaries could enhance the site's sense of containment, helping to avoid adverse impacts on residential amenity to the east. New vehicular access could be provided by extending roads that were built to serve the housing development to the east. The dimensions of the site facilitate a predominantly east-west layout for development, which would support passive design principles and the installation of solar panels for meeting the design requirements associated with the climate emergency.

### **Infrastructure Requirements**

- **Education:** No specific requirements identified at this stage.
- **Health:** No specific requirements identified at this stage.
- **Access:** A vehicular connection to Somerset Fields and new walking and cycling infrastructure and connections would be necessary to support development. Developer contributions may be required for off-site transport improvements within Bentley.
- **On-site drainage:** there are likely to be opportunities for bespoke infiltration sustainable drainage systems. Appropriate infrastructure will be required to mitigate flood risks.
- Cumulative pressures of development on local infrastructure will be dealt with via CIL.

**From:** [REDACTED]  
**Sent:** 10 December 2024 15:19  
**To:** EHDC - Neighbourhood Plans Shared  
**Subject:** Bentley Neighbourhood Plan Regulation 16 consultation

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Dear Planning Policy team,

Thank you for consulting the Environment Agency on the Bentley Parish Submission Modified Neighbourhood Plan (NP).

We are a statutory consultee in the planning process providing advice to Local Planning Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans. We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.

The NP confirms that there will be no allocated sites included as part of this plan. Therefore, based on the information currently available, the proposed NP raises no environmental concerns for us.

We do have some comments on two of the policies which are set out below:

- **Policy BEN10: Green infrastructure**

Ideally, the policy would reference 'green **and blue** infrastructure' to make it clear that the water environment is to be considered alongside the terrestrial environment. It would be helpful to directly list rivers and watercourses as green and blue infrastructure assets within the list in section A.

Paragraph 4.61 of the accompanying text references plans which identify opportunities for delivering Biodiversity Net Gain. The Hampshire Local Nature Recovery Strategy (when published) is also likely to be helpful in this regard and should be referenced within this paragraph.

- **Policy BEN12: Sustainable drainage & water**

Paragraph 4.69 says "...Hence the policy requirement for evidence to demonstrate that the timing of new development will fit with the phasing of improvements to the STW." However, there is no wording in the policy which specifies this directly. We would recommend that a sentence is added to section D which says, "Phasing of development may be required to ensure adequate wastewater treatment capacity is available to accommodate the requirements resulting from the development."

We trust that the above information is of assistance.

*Please note: this response is based on the information you have made available at this time. It is based on current national planning policy, associated legislation and environmental data / information. If any of these elements change in the future, then we may need to reconsider our position.*

Kind regards,  
[REDACTED]

[REDACTED]  
Sustainable Places Technical Specialist | Environmental Planning | Solent and South Downs  
Oving Road, Chichester, West Sussex, PO20 2AG

████████████████████  
████████████████████

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Good morning,

Please find Hampshire County Council's response to the reg16 consultation of the Bentley Neighbourhood Plan.

If you have any queries or questions, just let me know.

Kind regards,

[REDACTED]  
**Spatial Policy Officer**  
[REDACTED]

[REDACTED]  
**Hampshire 2050**  
EII Court West, The Castle, Winchester  
Hampshire, SO23 8UD

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**From:** EHDC - Neighbourhood Plans Shared  
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**Subject:** Bentley Neighbourhood Plan Regulation 16 consultation

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Dear Sir/Madam,

**PUBLICATION OF THE BENTLEY NEIGHBOURHOOD DEVELOPMENT PLAN  
UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL)  
REGULATIONS 2012**

Bentley Parish Council as the qualifying body has reviewed and prepared a modified Neighbourhood Development Plan, entitled Bentley Parish Submission Modified Neighbourhood Plan 2021-2040, for their parish with the help of the local community.

The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

There is now a six week consultation period on the Neighbourhood Plan in advance of the independent examination.

The consultation period commences on **Monday 11 November 2024 and closes at 5pm on Monday 23 December 2024.**

Details of the Neighbourhood Plan and accompanying submission documentation can be found on our website at:

[Bentley modified neighbourhood plan | East Hampshire District Council](#)

Documents available for inspection include:

- The proposed modified Neighbourhood Plan including a map identifying the area to which the proposed modified Neighbourhood Plan relates;
- A Strategic Environmental Assessment (SEA) screening statement;
- A Basic Conditions Statement explaining how the proposed neighbourhood plan meets the requirements of paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990.
- A modification statement to state how substantial and significant the modifications in the proposed plan are; and
- A consultation statement.

These can be inspected at:

- The Star Inn, Main Road, Bentley GU10 5LW  
(Opening Hours: Monday 12:00pm to 10:00pm, Tuesday 10:30am to 10:00pm, Wednesday 10:30am to 11:00pm, Thursday 12:00pm to 11:00pm and Friday to Saturday 12:00 to 11:30pm)
- Bentley Village Stores, London Road, Bentley GU10 5HY  
(Opening Hours: Monday to Saturday 7:00am to 9:00pm and Sunday 7:00am to 8:00pm)
- East Hampshire District Council, Monterey House, Bedford Road, Petersfield, Hampshire GU32 3LJ  
(Monday to Friday 9:00am – 5:00pm) **BY APPOINTMENT ONLY** please email [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk) or call 01730 234339

Representations can be sent via email to [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk) or by hard copy to:

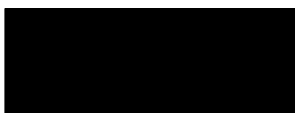
EHDC, Planning Policy, PO Box 310, Petersfield, GU32 9HN

After the close of the consultation, all responses will then be forwarded to the plan's examiner once they are appointed. Your details will be retained in accordance with the [Planning Policy Privacy Notice](#) and will be shared with the appointed examiner, and published on our website showing your name and (where applicable) organisation. Please state in your representation which section of the plan and any specific policy you are commenting on.

In addition, when making your representation, please can you indicate whether you wish to be informed of any decision EHDC make under Regulation 19 in relation to the adoption of the Neighbourhood Plan in the future.

In the meantime, if you have any questions regarding the process at this stage or in future, or have any problems accessing any of the links set out above please do not hesitate in contacting the Planning Policy Team via [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk).

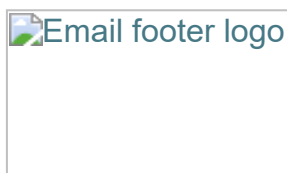
Regards



**Adam Harvey**

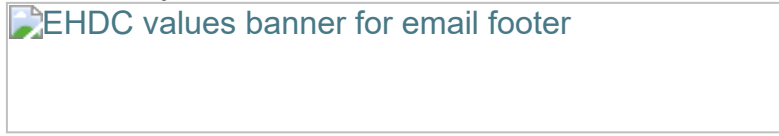
Planning Policy Manager  
**Planning Policy**

**Please note the council offices will be closed between Christmas and New Year from 25<sup>th</sup> December to 1<sup>st</sup> January (inclusive)**



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Hampshire 2050  
The Castle  
Winchester, Hampshire SO23 8UL  
Telephone 0300 555 1375  
Fax 01962 847055  
www.hants.gov.uk

Enquiries to

[REDACTED]

My reference

Bentley\_NP\_Reg16

Direct Line

[REDACTED]

Your reference

Date

17/12/2024

E-mail

planningconsultations@hants.gov.uk

Dear Sir/Madam,

### **Bentley Neighbourhood Plan Regulation 16 consultation**

Thank you for consulting Hampshire County Council on the emerging Bentley Neighbourhood Plan as part of the Regulation 16 consultation. At this stage the County Council has no comments to make but would like to be kept informed on the progress of the Plan.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** 25 November 2024 09:10  
**To:** [EHDC - Neighbourhood Plans Shared](#)  
**Subject:** Historic England advice on case PL00797421  
**Attachments:** [\\_HERef\\_PL00797421\\_L460975.doc](#)

---

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Dear Mr Harvey

I am writing in relation to the following:

NDP: Neighbourhood Development Plan  
Bentley Neighbourhood Development Plan 2021 - 2040  
[Case Ref. PL00797421; HE File Ref. ; Your Reference. ]

Please see our response attached.

Yours Sincerely

[REDACTED]  
Business Officer  
[REDACTED]  
[REDACTED]

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Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at [historicengland.org.uk/strategy](https://historicengland.org.uk/strategy).

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Historic England

Mr Adam Harvey  
East Hampshire District Council  
Penns Place  
Petersfield  
HANTS  
GU31 4EX

Direct Dial: -

Our ref: PL00797421

25 November 2024

Dear Mr Harvey

Thank you for consulting Historic England about your Regulation 16 draft Neighbourhood Plan. This is the first opportunity Historic England has had to review your neighbourhood plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.

Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers - be they interested members of the public, planners or developers - regarding how the place should develop over the course of the plan period.

We welcome the production of this neighbourhood plan and are pleased to see that the historic environment of your parish features throughout this draft.

Although your neighbourhood area does contain a number of designated heritage assets, at this point we don't consider there is a need for Historic England to be involved in the detailed development of the strategy for your area, but we offer some general advice and guidance below, which may be of assistance. The conservation officer at your local Council will be the best placed person to assist you in the development of the Plan with respect to the historic environment and can help you to consider and clearly articulate how a strategy can address the area's heritage assets.

Paragraph 190 of the National Planning Policy Framework (2021) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive



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contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.

The government's National Planning Practice Guidance <https://www.gov.uk/guidance/neighbourhood-planning--2> on neighbourhood planning is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a *neighbourhood* scale. Your Neighbourhood Plan is therefore an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character. Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, views or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>

The plan could also include consideration of any Grade II listed buildings or locally designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement. We would refer you to our guidance on writing effective neighbourhood plan policies, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/>

If you have not already done so, we would recommend that you speak to the staff at local authority archaeological advisory service who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also non designated locally important buildings, archaeological remains and landscapes. Some Historic Environment Records may be available to view on-line via the Heritage Gateway



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([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk) <<http://www.heritagegateway.org.uk>>). It may also be useful to involve local voluntary groups such as a local Civic Society, local history groups, building preservation trusts, etc. in the production of your Neighbourhood Plan, particularly in the early evidence gathering stages.

Your local authority might also be able to provide you with more general support in the production of your Neighbourhood Plan, including the provision of appropriate maps, data, and supporting documentation. There are also funding opportunities available from Locality that could allow the community to hire appropriate expertise to assist in such an undertaking. This could involve hiring a consultant to help in the production of the plan itself, or to undertake work that could form the evidence base for the plan. More information on this can be found on the My Community website here: <<http://mycommunity.org.uk/funding-options/neighbourhood-planning/>>.

The Conservation Area may have an appraisal document that would ordinarily set out what the character and appearance of the area is that should be preserved or enhanced. The neighbourhood plan is an opportunity for the community to clearly set out which elements of the character and appearance of the neighbourhood area as a whole are considered important, as well as provide specific policies that protect the positive elements, and address any areas that negatively affect that character and appearance. An historic environment section of your plan could include policies to achieve this and, if your Conservation Area does not have an up to date appraisal, these policies could be underpinned by a local character study or historic area assessment. This could be included as an appendix to your plan. Historic England's guidance notes for this process can be found here: [HE Advice Note 1 - conservation area designation, appraisal and management](https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/) <<https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>>, and here: <<https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/>>. The funding opportunities available from Locality discussed above could also assist with having this work undertaken.

The NPPF (paragraphs 124 - 127) emphasises the importance placed by the government on good design, and this section sets out that planning (including Neighbourhood Plans) should, amongst other things, be based on clear objectives and a robust evidence base that shows an understanding and evaluation of an area, in this case the Parish of Capel. The policies of neighbourhood plans should also ensure that developments in the area establish a strong sense of place and respond to local character and history by reflecting the local identity of the place - for instance through the use of appropriate materials, and attractive design.

Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces, as encouraged by national planning policy. Green spaces are often



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integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them or aimed at managing development around them. Locality has produced helpful guidance on this, which is available here:

<https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces.>

You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: <http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/> .

Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can either have access to this money or influence how it is spent through the neighbourhood plan process, setting out a schedule of appropriate works for the money to be spent on. Historic England strongly recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. More information and guidance on this is available from Locality, here: <https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/>

If you are concerned about the impact of high levels of traffic through your area, particularly in rural areas, the "Traffic in Villages" toolkit developed by Hamilton-Baillie Associates in conjunction with Dorset AONB Partnership may be a useful resource to you.

Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing. Our webpage contains links to a number of other documents which your forum might find useful. These can help you to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is protected or improved through appropriate policy wording and a robust evidence base. This can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your->



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[neighbourhood/](#).

Historic England Advice Note 11- Neighbourhood Planning and the Historic Environment, which is freely available to download, also provides useful links to exemplar neighbourhood plans that may provide you with inspiration and assistance for your own. This can be found here: <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>  
The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:

HE Advice Note 2 - making changes to heritage assets:

<https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>

HE Good Practice Advice in Planning 3 - the setting of heritage assets:

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

If you are considering including Site Allocations for housing or other land use purposes in your neighbourhood plan, we would recommend you review the following two guidance documents, which may be of use:

HE Advice Note 3 - site allocations in local plans:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment :

<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.

Finally, we should like to stress that this advice is based on the information provided by your Local Authority. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

If you have any queries about this matter or would like to discuss anything further,



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Historic England

please do not hesitate to contact me.

Yours sincerely,

[Redacted signature]

[Redacted contact information]



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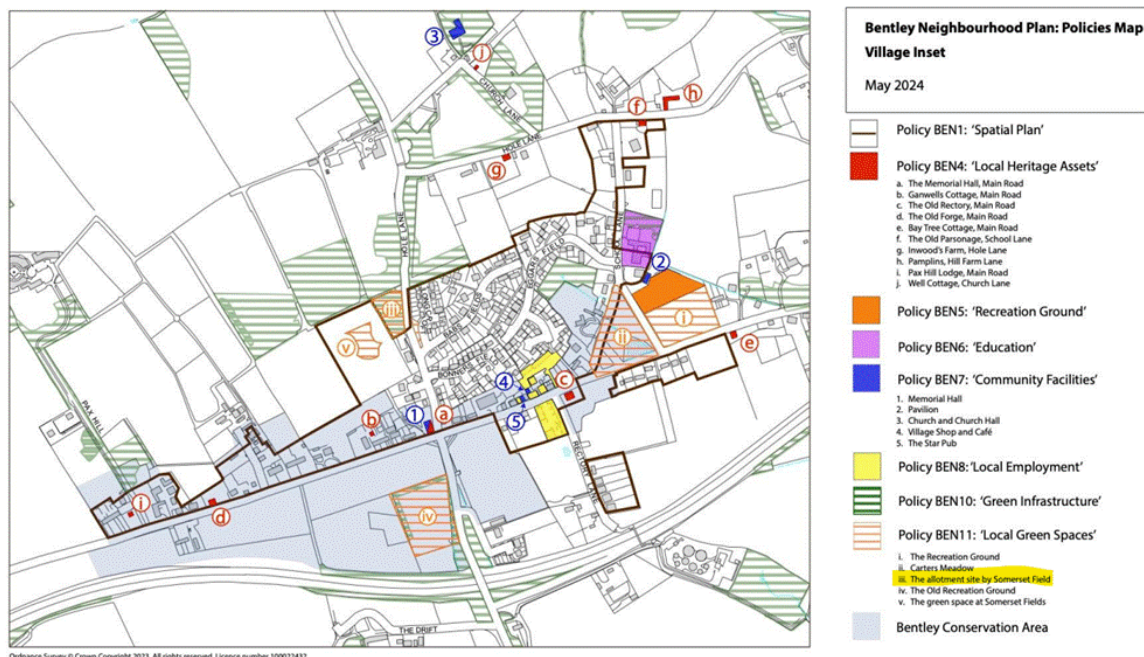
**From:** [REDACTED]  
**Sent:** 20 December 2024 17:25  
**To:** [EHDC - Neighbourhood Plans Shared](#)  
**Cc:** [REDACTED]  
**Subject:** Bentley Neighbourhood plan.  
**Attachments:** [XXX\\_R2A\\_Bentley Drawings.pdf](#)

**Follow Up Flag:** Follow up  
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Dear Sirs,

I would like to make a suggestion for the new neighbourhood plan.

As can be seen from the village plan below, there is a sort of straight line on the northern edge of the village boundary, stretching from the north western corner of Somerset Fields almost all the way to School Lane. The one break in this line is the fact that the boundary goes round the southern side of the Allotments. The Allotments cannot currently be developed and included in the village because the current neighbourhood plan designates the allotments as "Local Green Space",



There is growing pressure for more housing development in the village, and this force will soon be too great to resist, so maybe the village ought to consider whether they would like to encourage development on a less harmful site, if this were the trade off for preventing development on a more harmful site.

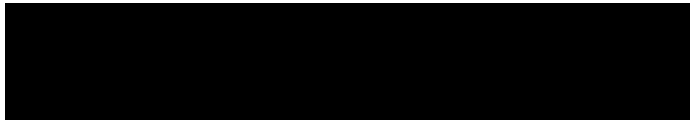
I would suggest that the green space designation be removed from the allotments, allowing them to be potentially developed for up to say 10 houses. The allotments are currently surrounded on west, south and east by houses, [REDACTED]. In my opinion, development of the allotments would not exactly enhance the setting [REDACTED] but, given that Longcroft and Somersets Field are already in situ, it cannot cause any significant further detriment. Would a housing development on the allotment site be of an advantage to the village, if it helped prevent a development in a less suitable location?

So, what about the allotments. They could move onto part of the field, [REDACTED], north of Longcroft, and immediately East Hole Lane. At present, the Allotments only have pedestrian access [REDACTED]. A new Allotments could have vehicular access through the existing gateway to that field next to Jenkyn Place Cottage, there is already water there, there could be parking, a communal allotment holders shed/building, but almost most importantly, the north part of that field is on the Bentley Greensand, which has enabled the Vineyard to be so successful, and the current allotments are not on the greensand. Furthermore, for those allotment holders who live in the village and would like to walk to their allotment, a pedestrian access could be created into the new allotment site from immediately opposite the vineyard entrance. The Local Green Space designation could then be moved to the new allotments.

So, what about the existing allotment site. This could accommodate probably up to 10 new dwellings. There is potential access either off the Vineyard Entrance track or off the entrance road into Somersets Field, so no new junction with Hole Lane would be needed.

All this is deliverable, provided the Local Green Space/Allotment designation is moved to the other side of Hole Lane.

The attached plan demonstrates my idea, except that the allotments want to be at the north end of the field (less wet and on the greensand)







- PROPOSED HOUSING**
- A Development redline
  - Proposed development area
  - └─┘ Proposed frontage
  - Existing trees
  - Proposed landscape and trees
  - Proposed access
  - ↔ Access points

- REPLACEMENT / ENLARGED ALLOTMENTS**
- B Development redline
  - Allotments
  - Hard standing / Parking Area
  - Communal building
  - Existing trees
  - TPO trees to be protected
  - Proposed landscape and trees
  - Proposed access
  - ↔ Access point

### Hole Lane, Bentley

Proposed Housing Allocation Site – Context Plan (NTS)  
22 February 2024





**From:** [REDACTED]  
**Sent:** 20 December 2024 15:05  
**To:** [EHDC - Neighbourhood Plans Shared](#)  
**Subject:** 20241220-MOD\_Safeguarding\_Response\_Bentley Modification Reg 16  
**Attachments:** [20241111\\_MOD\\_Response.pdf](#)

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DIO ref: 10065035

Your ref: Neighbourhood Plan - Bentley Modification Reg 16

Dear Planning Policy Team

Please find attached my letter, confirming the safeguarding position of the Ministry of Defence, in respect of the above policy planning consultation

Kind Regards

[REDACTED]  
[REDACTED]  
**St George's House | Defence Infrastructure Organisation Head Office |  
DMS Whittington | Lichfield | Staffordshire | WS14 9PY**



Website: [www.gov.uk/dio/](http://www.gov.uk/dio/)

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# Defence Infrastructure Organisation

Ministry of Defence

Safeguarding Department

DIO Head Office

St George's House

DMS Whittington

Lichfield

Staffordshire WS14 9PY

Your reference:  
Bentley Parish Submission Modified  
Neighbourhood Plan 2021-2040

Our reference:  
10065035

EHDC  
Planning Policy  
PO Box 310  
Petersfield  
GU32 9HN.

20<sup>th</sup> December 2024

Dear Sir/Madam

I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to Bentley Parish submission modified Neighbourhood Plan 2021-2040 consultation document.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 102 of the National Planning Policy Framework (December 2024) requires that planning policies and decisions take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Ministry of Housing, Communities & Local Government (MHCLG) in accordance with the provisions of that Direction

The area covered by any East Hampshire District Council Bentley Parish submission modified Neighbourhood Plan will both contain and be washed over by safeguarding zones that are designated to preserve the operation and capability of RAF Odiham.

**Copies of these relevant plans, in both GIS shapefile and .pdf format are issued to Local Planning Authorities by MHCLG. An assurance review was conducted by the MOD in 2023 which confirmed that, at that time, Local Planning Authorities held the most recent relevant safeguarding data. Any subsequent updates to those plans were then issued by MHCLG. If there is a requirement for replacement data, a request can be made through the above email address**

The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.

To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of the main safeguarding areas of concern is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

- The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Colour coded zones are marked on safeguarding maps that provide heights which, if proposed development would reach or exceed them, would trigger MOD consultation. These zones also indicate areas where development might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the change of use of land to allow/facilitate flying activities; and the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern.
- Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes and marked on safeguarding maps with a heavy dotted line. Aircraft within these zones are most likely to be approaching or departing aerodromes and would be at critical stages of flight. Within these statutory consultation zones the creation or enhancement of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include:

*The landscaping schemes associated with developments including the provision of green/brown roofs, or roof gardens. This would also include both on and off-site provision of Biodiversity Net Gain (BNG). Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and MOD consulted where any element falls within the marked statutory safeguarding zone; and/or*

*The creation of new waterbodies such as reservoirs, wetlands, ponds and/or attenuation basins and other elements associated with sustainable drainage systems.*



Where development falls outside designated safeguarding zones the MOD may have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to

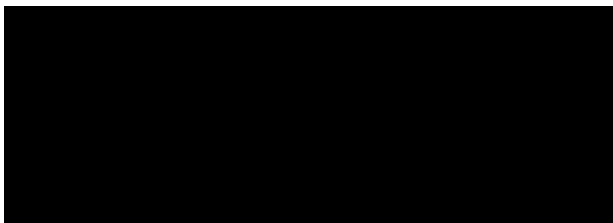
- Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.
- Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of, or exceeding 2m;
- Any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft; and

The Policy BEN10: Green Infrastructure identifies that "Development proposals on land that lies within or immediately adjoining the defined Network must demonstrate how they will maintain or enhance its green infrastructure value in that location, by way of their landscaping schemes, layouts, access and public open space provision, including a minimum 10% Biodiversity Net Gain. Proposals will be supported where they seek to improve the function of the Network, including by sequestering carbon through woodland planting and by the use of planters and mini orchards in development schemes."

The MOD request that; when drafting policy and guidance which addresses biodiversity, ecology, and Biodiversity Net Gain; East Hampshire District Council bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and the MOD should be consulted where any element falls within the marked statutory safeguarding zone.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely



**From:** [National Grid \(Avison Young - UK\)](#)  
**Sent:** 11 December 2024 18:39  
**To:** [EHDC - Neighbourhood Plans Shared](#)  
**Subject:** RE: Bentley Neighbourhood Plan Regulation 16 consultation  
**Attachments:** [11-12 National Grid.pdf](#)

---

You don't often get email from [REDACTED] [Learn why this is important](#)  
Dear Sir / Madam

We write to you with regards to the current consultations as detailed above in respect of our client, National Grid.

Please find attached our letter of representation. Please do not hesitate to contact me via [REDACTED] if you require any further information or clarification.

Kind Regards

[REDACTED]  
Planner  
[REDACTED]

---

**From:** EHDC - Neighbourhood Plans Shared <neighbourhoodplans@easthants.gov.uk>  
**Sent:** Tuesday, November 12, 2024 12:17 PM  
**To:** EHDC - Neighbourhood Plans Shared <neighbourhoodplans@easthants.gov.uk>  
**Subject:** Bentley Neighbourhood Plan Regulation 16 consultation

CAUTION: External Sender

Dear Sir/Madam,

## **PUBLICATION OF THE BENTLEY NEIGHBOURHOOD DEVELOPMENT PLAN UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012**

Bentley Parish Council as the qualifying body has reviewed and prepared a modified Neighbourhood Development Plan, entitled Bentley Parish Submission Modified Neighbourhood Plan 2021-2040, for their parish with the help of the local community.

The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

There is now a six week consultation period on the Neighbourhood Plan in advance of the independent examination.

The consultation period commences on **Monday 11 November 2024 and closes at 5pm on Monday 23 December 2024.**

Details of the Neighbourhood Plan and accompanying submission documentation can be found on our website at:

[Bentley modified neighbourhood plan | East Hampshire District Council](#)

Documents available for inspection include:

- The proposed modified Neighbourhood Plan including a map identifying the area to which the proposed modified Neighbourhood Plan relates;
- A Strategic Environmental Assessment (SEA) screening statement;
- A Basic Conditions Statement explaining how the proposed neighbourhood plan meets the requirements of paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990.
- A modification statement to state how substantial and significant the modifications in the proposed plan are; and
- A consultation statement.

These can be inspected at:

- The Star Inn, Main Road, Bentley GU10 5LW  
(Opening Hours: Monday 12:00pm to 10:00pm, Tuesday 10:30am to 10:00pm, Wednesday 10:30am to 11:00pm, Thursday 12:00pm to 11:00pm and Friday to Saturday 12:00 to 11:30pm)
- Bentley Village Stores, London Road, Bentley GU10 5HY  
(Opening Hours: Monday to Saturday 7:00am to 9:00pm and Sunday 7:00am to 8:00pm)
- East Hampshire District Council, Monterey House, Bedford Road, Petersfield, Hampshire GU32 3LJ  
(Monday to Friday 9:00am – 5:00pm) **BY APPOINTMENT ONLY** please email [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk) or call 01730 234339

Representations can be sent via email to [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk) or by hard copy to:

EHDC, Planning Policy, PO Box 310, Petersfield, GU32 9HN

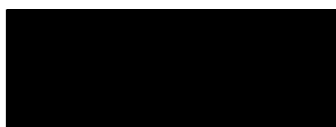
After the close of the consultation, all responses will then be forwarded to the plan's examiner once they are appointed. Your details will be retained in accordance with the [Planning Policy Privacy Notice](#) and will be shared with the

appointed examiner, and published on our website showing your name and (where applicable) organisation. Please state in your representation which section of the plan and any specific policy you are commenting on.

In addition, when making your representation, please can you indicate whether you wish to be informed of any decision EHDC make under Regulation 19 in relation to the adoption of the Neighbourhood Plan in the future.

In the meantime, if you have any questions regarding the process at this stage or in future, or have any problems accessing any of the links set out above please do not hesitate in contacting the Planning Policy Team via [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk).

Regards



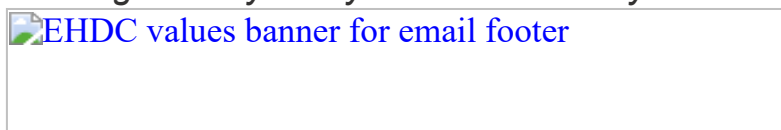
**Adam Harvey**

Planning Policy Manager  
Planning Policy

**Please note the council offices will be closed between Christmas and New Year from 25<sup>th</sup> December to 1<sup>st</sup> January (inclusive)**



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Our Ref: MV/ 15B901605



11 December 2024

East Hampshire District Council  
[neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)  
**via email only**

Dear Sir / Madam

**Modified Bentley Neighbourhood Plan - Regulation 16 Consultation  
November – December 2024  
Representations on behalf of National Grid Electricity Transmission**

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Grid Electricity Transmission**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

**Proposed development sites crossed or in close proximity to NGET assets:**

An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

NGET provides information in relation to its assets at the website below.

- [www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/](http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/)



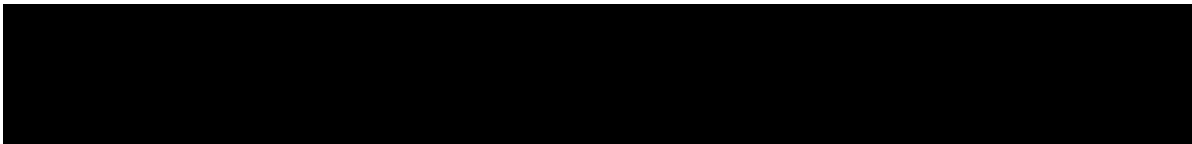
Please also see attached information outlining guidance on development close to NGET infrastructure.

**Distribution Networks**

Information regarding the electricity distribution network is available at the website below:  
[www.energynetworks.org.uk](http://www.energynetworks.org.uk)

**Further Advice**

Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

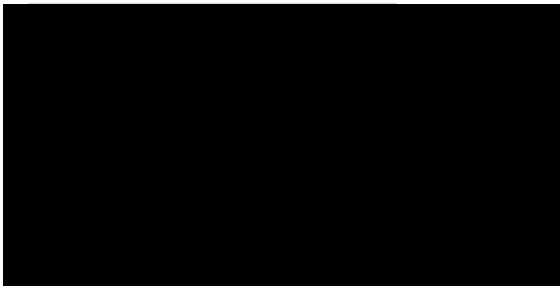


Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

National Grid Electricity Transmission  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**For and on behalf of Avison Young**



NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their *'Guidelines when working near National Grid Electricity Transmission assets'*, which can be downloaded here: [www.nationalgrid.com/network-and-assets/working-near-our-assets](http://www.nationalgrid.com/network-and-assets/working-near-our-assets)

#### How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 20 December 2024 15:35  
**To:** EHDC - Neighbourhood Plans Shared  
**Cc:** [REDACTED]  
**Subject:** FORMAL RESPONSE@2024 12 20: (NH/24/08757) SU 269 161 2024/12/11 Bentley Neighbourhood Plan Regulation 16 Consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**FAO:** East Hampshire District Council

**Our Reference:** NH/24/08757

**Re: Bentley Neighbourhood Plan Regulation 16 Consultation**

Dear Sir or Madam

Thank you for your e-mail dated 12 November 2024, inviting National Highways to comment on the above consultation.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3 and M3.

We have reviewed documents associated with this consultation, which were published on your planning portal and have No Comments.

Regards

[REDACTED]  
[REDACTED]  
National Highways | Bridge House | Walnut Tree Close | Guildford GU1 4LZ

**Web:** <https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>

[REDACTED]

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**National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |**  
<https://nationalhighways.co.uk> | [info@nationalhighways.co.uk](mailto:info@nationalhighways.co.uk)

*Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ*

Consider the environment. Please don't print this e-mail unless you really need to.

**From:** [SM-NE-Consultations \(NE\)](#)  
**Sent:** 18 December 2024 07:19  
**To:** [EHDC - Neighbourhood Plans Shared](#)  
**Subject:** Consultations Response - FAO Adam Harvey - Bentley  
Neighbourhood Plan - Regulation 16 Consultation  
**Attachments:** [493710 NE Response.pdf](#)

---

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

For the attention of Adam Harvey

Please find Natural England's response in relation to the above mentioned consultation attached.

Kind regards,

[REDACTED]  
Officer  
Natural England  
County Hall  
Spetchley Road  
Worcester  
WR5 2NP

[REDACTED]  
[www.gov.uk/natural-england](http://www.gov.uk/natural-england)



**We strongly recommend using the [SSSI Impact Risk Zones](#) (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.**

**Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation**

**licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.**

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

---

**From:** EHDC - Neighbourhood Plans Shared

<[neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)>

**Sent:** 12 November 2024 12:17

**To:** EHDC - Neighbourhood Plans Shared

<[neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)>

**Subject:** Bentley Neighbourhood Plan Regulation 16 consultation

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Dear Sir/Madam,

## **PUBLICATION OF THE BENTLEY NEIGHBOURHOOD DEVELOPMENT PLAN**

### **UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012**

Bentley Parish Council as the qualifying body has reviewed and prepared a modified Neighbourhood Development Plan, entitled Bentley Parish Submission Modified Neighbourhood Plan 2021-2040, for their parish with the help of the local community.

The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

There is now a six week consultation period on the Neighbourhood Plan in advance of the independent examination.

The consultation period commences on **Monday 11 November 2024 and closes at 5pm on Monday 23 December 2024.**

Details of the Neighbourhood Plan and accompanying submission documentation can be found on our website at:

[Bentley modified neighbourhood plan | East Hampshire District Council](#)

Documents available for inspection include:

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- East Hampshire District Council, Monterey House, Bedford Road, Petersfield, Hampshire GU32 3LJ  
(Monday to Friday 9:00am – 5:00pm) **BY APPOINTMENT ONLY** please email [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk) or call 01730 234339

Representations can be sent via email to [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk) or by hard copy to:

EHDC, Planning Policy, PO Box 310, Petersfield, GU32 9HN

After the close of the consultation, all responses will then be forwarded to the plan's examiner once they are appointed. Your details will be retained in accordance with the [Planning Policy Privacy Notice](#) and will be shared with the appointed examiner, and published on our website showing your name and (where applicable) organisation. Please state in your representation which section of the plan and any specific policy you are commenting on.

In addition, when making your representation, please can you indicate whether you wish to be informed of any decision EHDC make under Regulation 19 in relation to the adoption of the Neighbourhood Plan in the future.

In the meantime, if you have any questions regarding the process at this stage or in future, or have any problems accessing any of the links set out above please do not hesitate in contacting the Planning Policy Team via [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk).

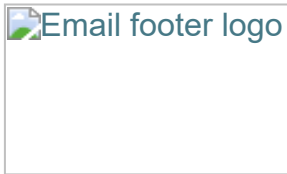
Regards



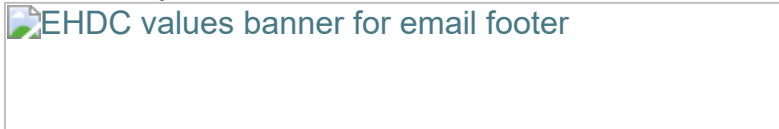
**Adam Harvey**

Planning Policy Manager  
**Planning Policy**

**Please note the council offices will be closed between Christmas and New Year from 25<sup>th</sup> December to 1<sup>st</sup> January (inclusive)**



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Date: 18 December 2024  
Our ref: 493710  
Your ref: Bentley Neighbourhood Plan



Mr Adam Harvey  
East Hampshire District Council

**BY EMAIL ONLY**  
[neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ  
T 0300 060 3900

Dear Mr Harvey

### **Bentley Neighbourhood Plan - Regulation 16 Consultation**

Thank you for your consultation on the above dated 12 November 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

#### **Natural England does not have any specific comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: [REDACTED]

Yours sincerely

[REDACTED]  
Consultations Team

## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic](#)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#).

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>2</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>3</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)<sup>4</sup> website and also from the [LandIS website](#)<sup>5</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](#)<sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>7</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

---

<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>3</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>4</sup> <http://magic.defra.gov.uk/>

<sup>5</sup> <http://www.landis.org.uk/index.cfm>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

## Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> to help understand the impact of particular developments on protected species.

## Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)<sup>12</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)<sup>13</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

---

<sup>8</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>9</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>10</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>11</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>12</sup> <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

<sup>13</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

**From:** [REDACTED]  
**Sent:** 13 December 2024 11:48  
**To:** [EHDC - Neighbourhood Plans Shared](#)  
**Subject:** Bentley Neighbourhood Plan Regulation 16 Consultation  
**Attachments:** [Submission Version of Modified Bentley NDP - SDNPA response.pdf](#)

---

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear EHDC Planning Policy Team,

Please find attached the South Downs National Park Authority's (SDNPA) representation to the Submission version of the Modified Bentley Neighbourhood Plan.

As always, thank you for the opportunity to comment and please do not hesitate to contact me if you wish to discuss the contents of our attached representation.

Kind Regards

[REDACTED]

[REDACTED]

[REDACTED]

South Downs National Park Authority

[REDACTED]

[REDACTED]

South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH  
[www.southdowns.gov.uk](http://www.southdowns.gov.uk) | [facebook](#) | [SDNPA twitter](#) | [Ranger twitter](#) | [youtube](#)

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**From:** EHDC - Neighbourhood Plans Shared  
**Sent:** 12 November 2024 12:17  
**To:** EHDC - Neighbourhood Plans Shared  
**Subject:** Bentley Neighbourhood Plan Regulation 16 consultation

Caution: This email originates from outside of South Downs National Park Authority and could contain malicious content. Please think very carefully before opening attachments or clicking on links.

Dear Sir/Madam,

**PUBLICATION OF THE BENTLEY NEIGHBOURHOOD DEVELOPMENT PLAN  
UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL)  
REGULATIONS 2012**

Bentley Parish Council as the qualifying body has reviewed and prepared a modified Neighbourhood Development Plan, entitled Bentley Parish Submission Modified Neighbourhood Plan 2021-2040, for their parish with the help of the local community.

The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

There is now a six week consultation period on the Neighbourhood Plan in advance of the independent examination.

The consultation period commences on **Monday 11 November 2024 and closes at 5pm on Monday 23 December 2024.**

Details of the Neighbourhood Plan and accompanying submission documentation can be found on our website at:

[Bentley modified neighbourhood plan | East Hampshire District Council](#)

Documents available for inspection include:

- The proposed modified Neighbourhood Plan including a map identifying the area to which the proposed modified Neighbourhood Plan relates;
- A Strategic Environmental Assessment (SEA) screening statement;
- A Basic Conditions Statement explaining how the proposed neighbourhood plan meets the requirements of paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990.
- A modification statement to state how substantial and significant the modifications in the proposed plan are; and
- A consultation statement.

These can be inspected at:

- The Star Inn, Main Road, Bentley GU10 5LW  
(Opening Hours: Monday 12:00pm to 10:00pm, Tuesday 10:30am to 10:00pm, Wednesday 10:30am to 11:00pm, Thursday 12:00pm to 11:00pm and Friday to Saturday 12:00 to 11:30pm)
- Bentley Village Stores, London Road, Bentley GU10 5HY  
(Opening Hours: Monday to Saturday 7:00am to 9:00pm and Sunday 7:00am to 8:00pm)
- East Hampshire District Council, Monterey House, Bedford Road, Petersfield, Hampshire GU32 3LJ  
(Monday to Friday 9:00am – 5:00pm) **BY APPOINTMENT ONLY** please email [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk) or call 01730 234339

Representations can be sent via email to [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk) or by hard copy to:

EHDC, Planning Policy, PO Box 310, Petersfield, GU32 9HN

After the close of the consultation, all responses will then be forwarded to the plan's examiner once they are appointed. Your details will be retained in accordance with the [Planning Policy Privacy Notice](#) and will be shared with the appointed examiner, and published on our website showing your name and (where applicable) organisation. Please state in your representation which section of the plan and any specific policy you are commenting on.

In addition, when making your representation, please can you indicate whether you wish to be informed of any decision EHDC make under Regulation 19 in relation to the adoption of the Neighbourhood Plan in the future.

In the meantime, if you have any questions regarding the process at this stage or in future, or have any problems accessing any of the links set out above please do not hesitate in contacting the Planning Policy Team via [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk).

Regards



**Adam Harvey**

Planning Policy Manager  
**Planning Policy**

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Planning Policy  
East Hampshire District Council

13 December 2024

**Sent via email only.**

Dear Mr Harvey,

**Submission version of the Modified Bentley Neighbourhood Development Plan.**

The South Downs National Park Authority (SDNPA) would like to thank and congratulate the district and parish councils for all their work in modifying the Bentley Neighbourhood Development Plan (NDP). The modified NDP expands Policy BEN2 into three policies and proposes five new policies, with one focused on conserving and enhancing the dark skies.

The neighbourhood area is adjacent to, and in the setting of, the South Downs National Park (SDNP) and, therefore, NPPF Paragraph 182 (Dec 2023) [or NPPF Paragraph 189 (Dec 2024)] is applicable. In this area, the SDNP boundary is delineated by the railway line. Although Bentley Railway Station is in Binsted Parish (and outside the neighbourhood area), the railway station is in proximity and/or connects to the Shipwrights Way and the Bordon-to-Bentley disused railway line. The latter is safeguarded in the South Downs Local Plan for a future non-motorised user (NMU) route. The modified NDP provides an opportunity to conserve and enhance existing, and provide new, walking and cycling routes throughout the parish to improve active travel connections within the parish and to adjacent and nearby assets (such as Alice Holt and the South Downs National Park). The same can be said for opportunities to conserve, enhance and expand the green infrastructure network, both within and outside the parish.

With all the above in mind, we have provided detailed comments overleaf to help improve and strengthen the modified NDP, whilst also acknowledging the statutory duty of all relevant authorities (including the district and parish councils) to seek to further the purposes of the South Downs National Park.

Thank you for the opportunity to comment and please do not hesitate to contact me if you have any questions about the content of this letter.

Yours faithfully

[Redacted Signature]  
Planning Policy Lead  
South Downs National Park Authority  
[Redacted Address]

South Downs Centre, North Street,  
Midhurst, West Sussex, GU29 9DH

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[www.southdowns.gov.uk](http://www.southdowns.gov.uk)  
Interim Chief Executive: Tim Slaney

## SDNPA response to the Submission version of the Modified Bentley Neighbourhood Development Plan (NDP)

Ref	SDNPA Comment	SDNPA Recommendation
Plan A, p6	The key is not entirely shown, and the South Downs National Park is shown in yellow but not labelled.	Please include the South Downs National Park on the key (to highlight proximity and setting) and ensure that the key is entirely visible / readable.
Plan B (p8) & Plan G (p50)	The South Downs National Park is not shown.	Please include the South Downs National Park on the maps and keys to highlight proximity and setting.
Paragraph 2.31, p16	This would be a good opportunity to reference the Shipwrights Way and the safeguarded Bordon-to-Bentley route.	For the more energetic there is a good footpath network for short and long distance walking, <b>with the Shipwrights Way and the safeguarded Bordon-to-Bentley route in proximity to the south of the parish. But However, there is</b> no complete cycle path to Farnham or Alton.
Paragraph 3.4, p22	The East Hampshire Joint Core Strategy has been superseded by the South Downs Local Plan (SDLP) for the National Park Area of East Hampshire.	The Core Strategy sets out the spatial plan until 2028 for East Hampshire <b>and the part of South Downs National Park that falls within East Hampshire.</b> The plan has divided the district into four geographical areas, Bentley is situated to the North of the South Downs National Park <b>area.</b> As such Bentley along with the other settlements in this area, only need to sustain their current role through providing some commercial and community uses.

Ref	SDNPA Comment	SDNPA Recommendation
<p>Section 3, Planning Policy Context, p22-26</p>	<p>An additional sub-section (and paragraphs) should be included to explain the location and purposes of the South Downs National Park, and the requirements of NPPF Paragraph 182 (Dec 2023) [or NPPF Paragraph 189 (Dec 2024)] in relation to the setting of the South Downs National Park.</p>	<p><b>Recommended Text:</b></p> <p>The neighbourhood area is adjacent to, and within the setting of, the South Downs National Park. The National Parks &amp; Access to the Countryside Act 1949 (“the 1949 Act”) enabled the creation of National Parks to ensure that the nation’s most beautiful and unique landscapes would continue to be protected for the future. The 1949 Act was amended by Section 245 of the Levelling Up &amp; Regeneration Act (LURA) 2023. In doing so, all relevant authorities (incl. Bentley Parish Council) must seek to further the National Park Purposes which are defined in the 1949 Act as:</p> <ul style="list-style-type: none"> <li>• <b>Purpose 1:</b> To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and</li> <li>• <b>Purpose 2:</b> To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.</li> </ul> <p>NPPF Paragraph 182 (Dec 2023) [or NPPF Paragraph 189 (Dec 2024)] explains that great weight should be given to conserving and enhancing the landscape and scenic beauty in National Parks, and that development within the setting of a National Park should be sensitively located and designed to avoid or minimise adverse impacts on the National Park.</p>

Ref	SDNPA Comment	SDNPA Recommendation
The Vision, p27	The reference to benefits for pedestrians and cyclists through improved connectivity and additions to the network of footpaths, bridleways and public rights of way is supported.	n/a
Paragraph 4.2, p28	Objective 7 – “open views southwards towards the South Downs are to be preserved” – is supported.	n/a
Policy BEN2 – Development Principles, p31.	Criterion I should be expanded to include views towards the South Downs as set out in Objective 7 above. Criterion VI – in relation to connections, improvements and extensions to pedestrian and cycle routes – is supported.	Preserving open views across and along the valley, and towards <b>the South Downs to the south and</b> higher ground to the north.
Policy BEN3 – Design, p33	In acknowledging NPPF Paragraph 182 (Dec 2023) [or NPPF Paragraph 189 (Dec 2024)] and the duty of all relevant authorities (incl. Bentley Parish Council), it is recommended that a new criterion is inserted as suggested in the column on the right. This is similar to the criterion in the “made” Bramshott and Liphook NDP.	<b>Within the setting of the South Downs National Park, the development should respond and integrate well with its context and surroundings, and avoid or minimise adverse impacts on the landscape and scenic beauty of the National Park.</b>
Policy BEN9 – Traffic Impacts, p41	Criterion B is supported but could be expanded to include connections to the public right of way network.	Proposals should, wherever feasible, enable and encourage cycling and walking from the development site to other part of the village <b>and parish</b> in the design of their layouts and by creating additional walkways and roadside pavements on the site boundary to the highway <b>and public right of way network.</b>
Paragraph 4.57, p41-42	The first bullet point could be expanded to encourage greater links with Bentley Station and the future Bordon-to-Bentley route. It is acknowledged that the above (and the Shipwrights Way) are outside the neighbourhood area. However, they are in proximity and the Bordon-to-Bentley route is safeguarded under Policy SD20 of the South Downs Local Plan. Moreover, the Shipwrights Way (and the safeguarded Bordon-to-Bentley route) provide access into the National Park, supporting National Park Purpose 2.	Providing safe and convenient cycle and pedestrian links to <b>Bentley Station</b> , existing networks (such as the Shipwrights Way), <b>and future routes (such as the safeguarded Bordon-to-Bentley disused railway line).</b>

Ref	SDNPA Comment	SDNPA Recommendation
Policy BEN10 – Green Infrastructure, p42	This would be a good opportunity to encourage new and/or improved connections to, and within, the network. As part of this, the network within the parish should not be viewed in isolation. Therefore, new and/or improved connections to the network outside the parish should also be encouraged. To capture the above, amendments to Criterion B are suggested in the column on the right.	Development proposals on land that lies within or immediately adjoining the defined Network must demonstrate how they will maintain or enhance its green infrastructure value in that location, by way of their landscaping schemes, layouts, access and public open space provision, including a minimum 10% Biodiversity Net Gain. Proposals will be supported where they seek to improve the function of the Network, including by sequestering carbon through woodland planting, <b>new and improved connections to and within the Network (incl. the Network outside the parish)</b> , and <del>by the</del> use of planters and mini-orchards in development schemes.
Policy BEN13 – Dark Skies, p47	The policy is supported as it replicates <a href="#">South Downs Local Plan (SDLP) Policy SD8 [Dark Night Skies]</a> .	Criterion B(ii) should be divided out into sub-criteria (like Policy SD8) for ease of reading and understanding.
Paragraph 4.71, p47	The paragraph should reference the South Downs International Dark Sky Reserve (IDSR).	Bentley adjoins the northern border of the South Downs National Park <b>and South Downs International Dark Sky Reserve (IDSR)</b> . To support <del>their</del> <b>the National Park Authority's</b> Dark Skies Policy, SD8, Bentley observes a similar dark skies policy, wherever possible, to prevent light pollution to the <b>National Park and IDSR</b> .

**From:** [REDACTED]  
**Sent:** 19 December 2024 16:56  
**To:** [EHDC - Neighbourhood Plans Shared](#)  
**Cc:** [REDACTED]  
**Subject:** Representations to the Reg 16 Consultation on Bentley Modified Neighbourhood Plan 2021-2040  
**Attachments:** [Final Representations - Modified Bentley Neighbourhood Plan - December 2024.pdf](#)

---

**Importance:** High  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Dear Neighbourhood Plans,

Please see attached the representations to the Bentley Modified Neighbourhood Plan on behalf of our client.

We would be grateful if these representations could be considered during this review process and prior to formal adoption.

Many thanks

Kind Regards,

[REDACTED]  
[REDACTED]



Office will be closed from **midday** on Tuesday 24<sup>th</sup> December to Wednesday 1<sup>st</sup> January 2025


Office will reopen on **Thursday 2<sup>nd</sup> January 2025**

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Via email  
[neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)

19<sup>th</sup> December 2024

Dear Sir/ Madam

**Reg 16 Consultation on Bentley Modified Neighbourhood Plan 2021-2040  
Representations on behalf of Helios Property Ltd**

These representations are made on behalf of Helios Property Ltd who have a legal interest on land west of Rectory Lane, Bentley. ('development site'). The location of the site is indicated at Figure 1 and the Site Plan at Figure 2.

**Figure 1: OS Plan showing site boundary**



**Figure 2: Site Plan**



Land west of Rectory Lane has been promoted as part of the Local Planning Authority's 'rolling' call for sites and is included in the East Hampshire Land Availability Assessment (LAA) 2024 Ref: LAA/BEN-005 with an indicative capacity for residential development of 42 units. The LPA therefore considers the site to be '*deliverable or developable*'.

The Local Plan recognises the need for growth in the Borough, with Bentley specifically upgraded to a Tier 3 settlement within the Draft Local Plan to reflect the potential for housing growth.

The recently published revised NPPF (December 2024) places an emphasis on housing delivery and that this should ideally be carried out through the plan led system. As a result, housing targets will increase against the new standard method which for East Hampshire will mean targets will double. In choosing to not allocate any sites for development, it is therefore considered that the modified Bentley Neighbourhood Plan misses the opportunity and requirement of the revised NPPF to be able to direct required housing towards sustainable, deliverable and developable locations in the neighbourhood plan area.

The site is well connected by local roads and is relatively well served by local bus services. A range of primary and secondary schools, including Bentley Primary School approximately 0.3miles to the north, are located within the immediate and wider Farnham and Alton areas.

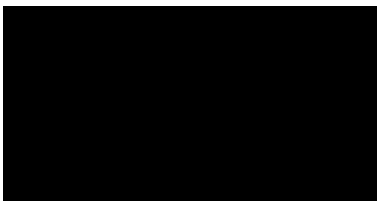


Given the site's position within the village core opposite the Memorial Hall, it is uniquely placed to offer potential for the provision of new public space towards the northern end alongside development to the south and east. The size of the site would allow for generous green buffers to respect existing neighbouring built form and any development of the site could be integrated with existing development of the village in an organic way. This would provide a natural extension to the village settlement boundary, ensuring openness and amenities of the village are respected.

As per the LPA's LAA, the site west of Rectory Lane should be considered as a sustainable, suitable and deliverable site. It is available and there is a willingness by the landowner to bring forward housing on this site which can directly assist with the additional housing land supply required to accommodate the need identified within East Hampshire.

We therefore respectfully ask that this site be considered as a site allocation in the Bentley Neighbourhood Plan and the settlement boundary amended to reflect this and also the changes in the NPPF.

Yours sincerely,



**Associate Planner**



**From:** [Planning](#)  
**Sent:** 06 December 2024 15:53  
**To:** [EHDC - Neighbourhood Plans Shared](#)  
**Subject:** RE: Bentley Neighbourhood Plan Regulation 16 consultation  
**Attachments:** [SEW Response - Bentley Neighbourhood Plan.pdf](#)

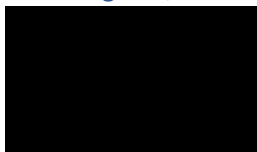
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Dear Sir/Madam,

Hope this email finds you well.

Thank you for getting in touch with South East Water in regards to the Bentley Neighbourhood Plan. Please find our response attached to this email.

Kind regards,



Water Resources

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South East Water, Rocfort Road, Snodland, Kent, ME6 5AH

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**From:** EHDC - Neighbourhood Plans Shared <[neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)>  
**Sent:** 12 November 2024 12:17  
**To:** EHDC - Neighbourhood Plans Shared <[neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)>  
**Subject:** Bentley Neighbourhood Plan Regulation 16 consultation

Dear Sir/Madam,

**PUBLICATION OF THE BENTLEY NEIGHBOURHOOD DEVELOPMENT PLAN  
UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL)  
REGULATIONS 2012**

Bentley Parish Council as the qualifying body has reviewed and prepared a modified Neighbourhood Development Plan, entitled Bentley Parish Submission

Modified Neighbourhood Plan 2021-2040, for their parish with the help of the local community.

The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

There is now a six week consultation period on the Neighbourhood Plan in advance of the independent examination.

The consultation period commences on **Monday 11 November 2024 and closes at 5pm on Monday 23 December 2024.**

Details of the Neighbourhood Plan and accompanying submission documentation can be found on our website at:

[Bentley modified neighbourhood plan | East Hampshire District Council](https://www.easthants.gov.uk/bentley-modified-neighbourhood-plan)  
[\[easthants.gov.uk\]](https://www.easthants.gov.uk)

Documents available for inspection include:

- The proposed modified Neighbourhood Plan including a map identifying the area to which the proposed modified Neighbourhood Plan relates;
- A Strategic Environmental Assessment (SEA) screening statement;
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- A modification statement to state how substantial and significant the modifications in the proposed plan are; and
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(Opening Hours: Monday 12:00pm to 10:00pm, Tuesday 10:30am to 10:00pm, Wednesday 10:30am to 11:00pm, Thursday 12:00pm to 11:00pm and Friday to Saturday 12:00 to 11:30pm)
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Representations can be sent via email to [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk) or by hard copy to:

EHDC, Planning Policy, PO Box 310, Petersfield, GU32 9HN

After the close of the consultation, all responses will then be forwarded to the plan's examiner once they are appointed. Your details will be retained in accordance with the [Planning Policy Privacy Notice \[easthants.gov.uk\]](#) and will be shared with the appointed examiner, and published on our website showing your name and (where applicable) organisation. Please state in your representation which section of the plan and any specific policy you are commenting on.

In addition, when making your representation, please can you indicate whether you wish to be informed of any decision EHDC make under Regulation 19 in relation to the adoption of the Neighbourhood Plan in the future.

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Regards



**Adam Harvey**

Planning Policy Manager  
**Planning Policy**

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South East Water Limited

Registered Office: Rocfort Road, Snodland, Kent, ME6 5AH, UK Place of  
Registration: England Registration Number: 2679874

06<sup>th</sup> December 2024



Our Reference: SEW Response\_BNP\_06/12/24  
Your Reference: Bentley Neighbourhood Plan

Email: [REDACTED]

Planning Policy Team  
East Hampshire District Council  
Petersfield  
Hampshire  
GU32 9HN

[neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)

Dear Sir/Madam,

Proposal: **Bentley Neighbourhood Plan Consultation**

South East Water would like to thank Bentley Parish Council and East Hampshire District Council for bringing the Bentley Neighbourhood Plan consultation to our attention.

Water Resources Planning

Each water company is legally required to prepare a Water Resources Management Plan (WRMP) every five years. South East Water published our WRMP24 in October 2024. This plan sets out how we intend to maintain the balance between increasing demand for water and available supplies over the next 50 years up to 2075. The plan takes into account planned housing growth as well as measures to ensure environmental protection and improvement, and the potential impact of climate change. It also includes our ambitious water efficiency and leakage reduction programmes. For more information please visit our website:

<https://www.southeastwater.co.uk/about/our-plans/future-water/>

In South East Water's most recent business plan, 2025-2030 we have committed to play an active role regionally in relation to the impact of housing growth on water. We will develop a policy together with local stakeholders – appreciating the balance of supplying water, the need for society to ensure environmentally sustainable future water resources, and also the ongoing support of the south east region and its economic development. South East Water aims to respond to 100 per cent of all national, local and regional authority consultations and seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply infrastructure. Please see our latest business plan:

<https://www.southeastwater.co.uk/about/our-plans/business-plan-2025-2030/>

We are also committed partners in the Water Resources in the South East (WRSE) Group that works for the collective good of customers and the environment in the south east region and also within the wider National Framework for long-term for water resources planning.

Growth Forecasting

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As part of the development of our Water Resources Management Plan 2024 we worked in collaboration with specialist demographic forecasting experts to develop property and population forecasts at a water resource zone level. Each water resource zone covers a series of borough/district councils. Our recently published WRMP considers the most recent housing trajectory figures from East Hampshire District Council (inclusive of Bentley Parish Council figures), available at the time we developed our plan.

We are confident that our plans accommodate a level of growth published within local plans at a Borough Council level (although final refinement may be required, based on local plan updates) to ensure that sufficient water is available within the local area to meet a supply-demand balance. The interventions we will deliver to meet this balance are a mix of new water supplies and demand management.

### Water Efficiency

Our aim of reducing household consumption to reach our per capita consumption ambition of 110 litres per person per day by 2050 requires the use of new approaches and technology, including smart metering. The savings are stretching and will be challenging to deliver especially given the impacts that affluence, temperature and rainfall have on our regional water use.

It is recognised that, if we work in isolation, it is unlikely we will be able to achieve the levels of per capita consumption included in our forecast. Our ambitious water efficiency strategy, alongside the water labelling of all water using products (already committed to by government), will achieve the forecast per capita consumption reductions required in the shorter term. Longer term we have made assumptions that wider initiatives will drive water efficiency, and examples include mandated water labelling (with minimum standards), stricter mandated building codes, design and regulations as well as national water efficiency messaging, policies and targets.

South East Water strongly supports any commitment to sustainable design of new residential and commercial development. As the South East is an area of serious water stress, it's therefore appropriate to apply as a minimum the optional building regulations standard of 110 litres per person per day for new development as a minimum water efficiency standard. We believe, and strongly encourage local planning authorities to consider, that all new homes should be built to a minimum standard of 100 litres per person per day, and that proposals should demonstrate how the design will be achieved using the methodology set out in the Building Regulations, with the design performance presented as part of the Sustainability Statement.

### Source Protection

South East Water would like to reiterate that our primary concern is the water that we abstract and treat for public supply purposes and ensuring that the surface and groundwater abstracted does not fall below the tolerances of our water treatment works or the drinking water standards set by our regulators. We would like to take this opportunity to highlight why it is important, to safeguard water supplies, to consider the impact of development on SPZs when determining planning applications in your local area.

South East Water operates in an area of the South East of England classified as seriously water stressed by the Environment Agency, and over 70 per cent of the water we supply comes from groundwater sources (over 250 boreholes and wells). Groundwater also keeps many of our rivers flowing and helps maintain good water quality in these rivers. Contamination

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of groundwater sources can be very difficult and time consuming to clean up. It is, therefore, incredibly important that we all work together to ensure that groundwater sources are protected. We have very little spare water (supply-demand headroom) to manage situations where sources must be removed from supply due to unplanned contamination events, and it can take at least 10-15 years to develop an alternative source at a significant cost to our customers.

SPZs are designated by the Environment Agency (EA) to protect public and private groundwater abstractions used for potable water supply. They are designed to control and restrict activities in the area immediately around points of abstraction that could cause contamination to groundwater used for human consumption. One of the principal reasons the EA define SPZs is to influence planning decisions and to promote pollution prevention through environmental permits, where required.

SPZs are defined in four different zones based upon how long it would take for a pollutant to travel in water below ground (any point below the water table) to the source (the point where water is taken), with SPZ1 representing the area closest to our abstraction. Controls are placed on activities in SPZs and examples of these include, but are not restricted to:

- Septic tanks and soakaways are not allowed to discharge into SPZ1 due to the risk of contamination and can also often be rejected by the EA in SPZ2 and SPZ3. See General Binding Rules - <https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-the-ground>
- Sustainable drainage systems (SuDS) for example in new developments. Where infiltration SuDS are proposed for anything other than clean roof drainage in SPZ1, a hydrogeological risk assessment is required, to ensure that the system does not pose an unacceptable risk to the source of supply.
- Land use changes, for example, livestock housing and storage of organic manures within SPZ1 or within 50 metres of any borehole, well or spring is prohibited.

SPZs were originally included in statutory guidance as the minimum area under the Groundwater Directive (80/68/EEC) that is identified for the protection of drinking water. This directive has since been subsumed into the Water Framework Directive. They are also recognised as an exclusion zone for some potentially polluting activities listed in the Environmental Permitting Regulations.

The Government's Planning Practice Guidance references the need to steer potentially polluting development away from the most sensitive areas, particularly those in the vicinity of drinking water supplies (paragraph: 006 Reference ID: 34-006-20161116).

Regrettably, water companies like South East Water, are not statutory consultees for planning. However, we would like to work with local authorities, as well as the EA, to ensure that SPZs are routinely considered in planning decisions to safeguard water supplies in your local area. We also encourage you to consider the risks to groundwater from activities which might pose a risk such as the redevelopment of brownfield sites with an industrial legacy and wastewater treatment solutions that incorporate reed beds or soakaways as part of the treatment process.

South East Water would like to be kept updated with any developments relating to the Bentley Neighbourhood Plan, using the following mailbox: [planning@southeastwater.co.uk](mailto:planning@southeastwater.co.uk). We look forward to working with Bentley Parish Council and East Hampshire District Council to ensure

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that drinking water supplies remain protected in the area in the future and welcome the opportunity to collaborate to achieve the objectives in a sustainable way.

If you require any further information or have any questions about this letter, please do not hesitate to contact me via the above email address

Yours sincerely,

  
**South East Water**

**Information on SPZs can be found here:**

- Source Protection Zones in your area can be found online:  
<https://magic.defra.gov.uk/MagicMap.aspx>
- Information on SPZs can also be found on the government website:  
<https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>
- Environment Agency Technical Guidance -  
<https://assets.publishing.service.gov.uk/media/5d41a020e5274a0a0bf7757c/Manual-for-the-production-of-Groundwater-Source-Protection-Zones.pdf>
- Environment Agency position statements (including information on restricted activities) <https://www.gov.uk/government/publications/groundwater-protection-position-statements>
- Environmental Protection Act 1990:Part 2A, Contaminated Land Statutory Guidance -  
<https://assets.publishing.service.gov.uk/media/5a757dfa40f0b6360e47489d/pb13735-cont-land-guidance.pdf>

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**From:** [REDACTED]  
**Sent:** 18 November 2024 14:34  
**To:** EHDC - Neighbourhood Plans Shared; neighbourhoodplans@easthants.gov.uk  
**Subject:** RE: Bentley Neighbourhood Plan Regulation 16 consultation

**Follow Up Flag:** Follow up  
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Dear Sir/Madam,

Thank you for your email inviting Southern Water to comment on the Bentley Neighbourhood Plan. I have reviewed our service area maps and confirm that we are not the water supply or wastewater service provider for Bentley Parish, and therefore have no comments to make.

We wish you all the best with the progression of your plan.

Yours faithfully,

[REDACTED]  
Hampshire, West Sussex & Isle of Wight  
 [REDACTED]  
[www.southernwater.co.uk](http://www.southernwater.co.uk)

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**From:** EHDC - Neighbourhood Plans Shared <neighbourhoodplans@easthants.gov.uk>  
**Sent:** Tuesday, November 12, 2024 12:17 PM  
**To:** EHDC - Neighbourhood Plans Shared <neighbourhoodplans@easthants.gov.uk>  
**Subject:** Bentley Neighbourhood Plan Regulation 16 consultation

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Dear Sir/Madam,

## **PUBLICATION OF THE BENTLEY NEIGHBOURHOOD DEVELOPMENT PLAN UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012**

Bentley Parish Council as the qualifying body has reviewed and prepared a modified Neighbourhood Development Plan, entitled Bentley Parish Submission Modified Neighbourhood Plan 2021-2040, for their parish with the help of the local community.

The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

There is now a six week consultation period on the Neighbourhood Plan in advance of the independent examination.

The consultation period commences on **Monday 11 November 2024 and closes at 5pm on Monday 23 December 2024.**

Details of the Neighbourhood Plan and accompanying submission documentation can be found on our website at:

[Bentley modified neighbourhood plan | East Hampshire District Council](#)

Documents available for inspection include:

- The proposed modified Neighbourhood Plan including a map identifying the area to which the proposed modified Neighbourhood Plan relates;
- A Strategic Environmental Assessment (SEA) screening statement;
- A Basic Conditions Statement explaining how the proposed neighbourhood plan meets the requirements of paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990.
- A modification statement to state how substantial and significant the modifications in the proposed plan are; and
- A consultation statement.

These can be inspected at:

- The Star Inn, Main Road, Bentley GU10 5LW  
(Opening Hours: Monday 12:00pm to 10:00pm, Tuesday 10:30am to 10:00pm, Wednesday 10:30am to 11:00pm, Thursday 12:00pm to 11:00pm and Friday to Saturday 12:00 to 11:30pm)
- Bentley Village Stores, London Road, Bentley GU10 5HY  
(Opening Hours: Monday to Saturday 7:00am to 9:00pm and Sunday 7:00am to 8:00pm)
- East Hampshire District Council, Monterey House, Bedford Road, Petersfield, Hampshire GU32 3LJ  
(Monday to Friday 9:00am – 5:00pm) **BY APPOINTMENT ONLY** please email [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk) or call 01730 234339

Representations can be sent via email to [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk) or by hard copy to:

EHDC, Planning Policy, PO Box 310, Petersfield, GU32 9HN

After the close of the consultation, all responses will then be forwarded to the plan's examiner once they are appointed. Your details will be retained in accordance with the [Planning Policy Privacy Notice](#) and will be shared with the appointed examiner, and published on our website showing your name and (where applicable) organisation. Please state in your representation which section of the plan and any specific policy you are commenting on.

In addition, when making your representation, please can you indicate whether you wish to be informed of any decision EHDC make under Regulation 19 in relation to the adoption of the Neighbourhood Plan in the future.

In the meantime, if you have any questions regarding the process at this stage or in future, or have any problems accessing any of the links set out above please do not hesitate in contacting the Planning Policy Team via [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk).

Regards





# Adam Harvey

Planning Policy Manager  
Planning Policy

**Please note the council offices will be closed between Christmas and New Year from 25<sup>th</sup> December to 1<sup>st</sup> January (inclusive)**



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**From:** [REDACTED]  
**Sent:** 19 December 2024 14:43  
**To:** [EHDC - Neighbourhood Plans Shared](#)  
**Cc:** [Planning Consultations/EAI/SCC](#)  
**Subject:** RE: Bentley Neighbourhood Plan Regulation 16 Consultation  
**Attachments:** [SCC MWPA Consultation Response Regulation 16.pdf](#)

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Good afternoon,

Thank you for consulting Surrey County Council as Minerals and Waste Planning Authority regarding the Bentley Neighbourhood Plan Regulation 16 Consultation. Please find attached our response.

Should you have any questions or require further information please contact us.

Kind Regards,

[REDACTED]

[REDACTED]  
**Planning Policy Officer**  
Planning and Placemaking  
Environment, Infrastructure & Growth  
Surrey County Council  
[REDACTED] | [surreycc.gov.uk](http://surreycc.gov.uk)



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[REDACTED]

Our Ref:  
Your Ref:

Adam Harvey  
Planning Policy Manager  
Monterey House  
Bedford Road  
Petersfield  
GU32 3LJ



By email only: [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)

19 December 2024

Dear Mr Harvey,

**Bentley Draft Modified Neighbourhood Plan 2021-2040**

**The Neighbourhood Planning (General) Regulations (2012) - Regulation 16 Public Consultation**

Thank you for consulting Surrey County Council as the Minerals and Waste Planning Authority (MWPA) regarding the Regulation 16 consultation. The MWPA have no comments to make.

I trust the above is self-explanatory and helpful. However, should you have any questions or require further information please do not hesitate to contact me.

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**Sent:** 06 December 2024 16:22  
**To:** [EHDC - Neighbourhood Plans Shared](#)  
**Cc:** [REDACTED]  
**Subject:** Bentley Parish Submission Modified Neighbourhood Plan 2021-2040  
**Attachments:** 24.12.06 Bentley NP Submission issued.pdf

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Dear Sir/Madam

Please find attached our response to the above consultation.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

1<sup>st</sup> Floor West, Clearwater Court, Vastern Road, Reading, Berkshire, RG1 8DB



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Vastern Road  
Reading  
RG1 8DB

06 December 2024

## East Hampshire – Bentley Parish Submission Modified Neighbourhood Plan 2021-2040

Dear Sir/Madam,

Thank you for allowing Thames Water to comment on the above.

Thames Water Utilities Ltd (Thames Water) are the statutory sewerage undertaker for the majority of the East Hampshire District (water is supplied by South East Water) and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments:

### **Policy BEN12: Sustainable Drainage and Wastewater**

We support Policy BEN12 D. in relation to wastewater infrastructure.

Wastewater/sewerage [and water supply] infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses [and/or low water pressure].

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment [and water supply] infrastructure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”

Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”

Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas,

neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”

Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).

It is important to consider the net increase in wastewater [and water supply] demand to serve the development and also any impact that developments may have off site, further down the network. We therefore support Policy BEN12 D. as it is in line with our previous representations.

Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.

The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

It would also be helpful to refer to the above in the supporting text to Policy BEN12 D.

We also support Policy BEN12 in relation to sustainable drainage.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of



surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

### **Site Allocations**

There are no new allocations in the draft Neighbourhood Plan and the level of information does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

We trust the above is satisfactory, but please do not hesitate to contact [REDACTED] on the above number if you have any queries.

Yours faithfully,

[REDACTED]

**From:** [REDACTED]  
**Sent:** 19 December 2024 12:05  
**To:** EHDC - Neighbourhood Plans Shared  
**Cc:** Planning Policy  
**Subject:** Bentley Neighbourhood Plan Regulation 16 consultation

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Dear Sir/Madam

Thank you for giving Waverley the opportunity to comment on the above.

Waverley does not wish to comment on the proposals as the neighbourhood plan only seeks to appropriately manage development within the settlement boundary of the village and does not seek to allocate sites outside the settlement except to safeguard small areas of land for community and educational development. However, as you will be aware from Waverley's previous discussions with East Hampshire it is very unlikely that Waverley will be able to accommodate any unmet housing need arising from East Hampshire because we are currently unable to demonstrate a 5-year housing land supply to meet our own local housing need. Using the standard method in the revised NPPF has resulted in Waverley's local housing need increasing from 710 dwellings to 1481 dwellings pa. (compared to 590 dwellings in the Council's Local Plan). The opportunity to accommodate unmet needs from neighbouring authorities would only arise if there were capacity over and above our own local housing need. This is very unlikely given the significant environmental, policy and infrastructure constraints that exist in Waverley Borough.

Yours faithfully

[REDACTED]  
[REDACTED]  
Waverley Borough  
Council

[www.waverley.gov.uk](http://www.waverley.gov.uk)

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**From:** EHDC - Neighbourhood Plans Shared <[neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)>  
**Sent:** 12 November 2024 12:17  
**To:** EHDC - Neighbourhood Plans Shared <[neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)>  
**Subject:** Bentley Neighbourhood Plan Regulation 16 consultation

[\*\* This email originates from an external source \*\*]

Dear Sir/Madam,

**PUBLICATION OF THE BENTLEY NEIGHBOURHOOD DEVELOPMENT PLAN  
UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL)  
REGULATIONS 2012**

Bentley Parish Council as the qualifying body has reviewed and prepared a modified Neighbourhood Development Plan, entitled Bentley Parish Submission Modified Neighbourhood Plan 2021-2040, for their parish with the help of the local community.

The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

There is now a six week consultation period on the Neighbourhood Plan in advance of the independent examination.

The consultation period commences on **Monday 11 November 2024 and closes at 5pm on Monday 23 December 2024.**

Details of the Neighbourhood Plan and accompanying submission documentation can be found on our website at:

[Bentley modified neighbourhood plan | East Hampshire District Council](#)

Documents available for inspection include:

- The proposed modified Neighbourhood Plan including a map identifying the area to which the proposed modified Neighbourhood Plan relates;
- A Strategic Environmental Assessment (SEA) screening statement;
- A Basic Conditions Statement explaining how the proposed neighbourhood plan meets the requirements of paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990.
- A modification statement to state how substantial and significant the modifications in the proposed plan are; and
- A consultation statement.

These can be inspected at:

- The Star Inn, Main Road, Bentley GU10 5LW  
(Opening Hours: Monday 12:00pm to 10:00pm, Tuesday 10:30am to 10:00pm, Wednesday 10:30am to 11:00pm, Thursday 12:00pm to 11:00pm and Friday to Saturday 12:00 to 11:30pm)
- Bentley Village Stores, London Road, Bentley GU10 5HY  
(Opening Hours: Monday to Saturday 7:00am to 9:00pm and Sunday 7:00am to 8:00pm)
- East Hampshire District Council, Monterey House, Bedford Road, Petersfield, Hampshire GU32 3LJ  
(Monday to Friday 9:00am – 5:00pm) **BY APPOINTMENT ONLY** please email [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk) or call 01730 234339

Representations can be sent via email to [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk) or by hard copy to:

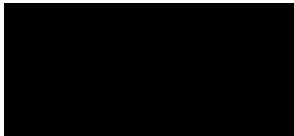
EHDC, Planning Policy, PO Box 310, Petersfield, GU32 9HN

After the close of the consultation, all responses will then be forwarded to the plan's examiner once they are appointed. Your details will be retained in accordance with the [Planning Policy Privacy Notice](#) and will be shared with the appointed examiner, and published on our website showing your name and (where applicable) organisation. Please state in your representation which section of the plan and any specific policy you are commenting on.

In addition, when making your representation, please can you indicate whether you wish to be informed of any decision EHDC make under Regulation 19 in relation to the adoption of the Neighbourhood Plan in the future.

In the meantime, if you have any questions regarding the process at this stage or in future, or have any problems accessing any of the links set out above please do not hesitate in contacting the Planning Policy Team via [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk).

Regards



**Adam Harvey**

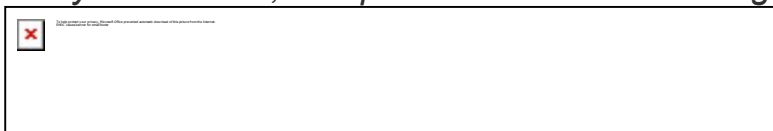
Planning Policy Manager  
Planning Policy

**Please note the council offices will be closed between Christmas and New Year from 25<sup>th</sup> December to 1<sup>st</sup> January (inclusive)**



Your privacy matters. Go to [easthants.gov.uk/privacy-policy](http://easthants.gov.uk/privacy-policy)

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Please visit our website at <https://www.waverley.gov.uk>