

EHDC Local Plan Public Consultation – Your say.

EHDC have launched their Local Plan (the “Plan”) Public Consultation, which gives you the opportunity to have a say in it. Below, we describe what the Plan is and how it affects Bentley. The Plan particularly features two concepts: Sustainability and Accessibility. We explain what these concepts will mean to you and to the place you live, Bentley. We have included some thoughts that you might find useful in forming your own comments. Finally, we provide a link to the EHDC website to enter your views. The closing date for comments is Monday 4th March.

What is a Local Plan?

A Local Plan, prepared by a local planning authority in consultation with its community, sets out a vision and framework for future development of the district. The Plan includes planning policies by which planning applications are assessed. The Plan, together with a Neighbourhood Plan, becomes part of the statutory Development Plan.

How long does the Local Plan last?

The Plan being prepared by EHDC will last until 2040.

How many houses need to be built in EHDC?

Between 2021 and 2040, the plan period, 9082 dwellings are required as a minimum. This is made up of; 940 already completed, 3965 existing planning permissions, 1320 windfall dwellings, leaving a minimum requirement of 2857 further dwellings. (478 per annum over 19 years).

How does the community get involved?

You can comment on the Plan during the Public Consultation. This is a six week period which ends on Monday 4th March.

How will the Plan affect Bentley?

The major effect on Bentley will be to move the village up the Settlement Tiering Hierarchy. The Plan proposes that Bentley becomes a Tier 3 settlement alongside settlements like Four Marks and Clanfield, which as you know are much larger than we are. Lower, Tier 4 settlements include Medstead, Bentworth, Ropley. You may think Bentley looks more like these settlements. After all, these three settlements all have primary schools just like Bentley.

Bentley has also been given an allocation of 20 houses over the plan period. Clearly, this is just a starting point. The Plan states that the largest growth will come in the higher order settlements. As a Tier 3 settlement over the course of the next 16 years we could be expected to take many more houses.

On what is the tiering based?

The tiering is based on two concepts: Sustainability and Accessibility. They refer to the facilities that Bentley possesses and how easy it is to reach them, by walking or cycling.

Sustainability

Why is Bentley not able to support any sustainable growth?

Bentley is a small village, some 500 dwellings, with 72 being added since the last Local Plan and a population of 1400. There are limited local facilities: School, Shop, Post Office, Pub, Church, Village Hall. Many of the Tier 4 settlements are of a similar size and have similar facilities to Bentley. Bentley is not unique amongst villages in northeastern Hants in terms of facilities: Most villages are remarkably similar, in fact.

Here are some points that you might like to consider when deciding whether Bentley is sufficiently sustainable to be graded as a Tier 3 Settlement:

Medical: The village surgery and pharmacy recently closed meaning residents need to travel at least to Alton to visit a GP or collect prescriptions. Our GP's and pharmacies are no closer than for many other settlements.

Retail: Although there is one grocery store in the village and is convenient for small items it is not sufficient for most residents' weekly shop. They have to travel by car to either Farnham, Alton or Bordon to shop, both for groceries and other items.

Medstead and Ropley both have Post Offices and grocery shops.

Education: Bentley has an excellent primary school, but so does Medstead, Ropley and Bentworth

Recreation Grounds: Bentley has a recreation ground, of course, but so do Medstead, Ropley and Bentworth, not to mention Froyle and Binsted.

Church: St Mary's Bentley is part of a larger benefice, but there are also active churches in Bentworth, Ropley and Medstead.

Sewage: Thames Water (TW) continually tell us that there is headroom (capacity for more dwellings to be connected to the sewage system) for further development, based on their modelling. But this is difficult to justify given the conspicuous pollution overflowing from the Bentley Sewage Treatment Works (STW) into the River Wey. In 2022 the Bentley STW spilled 62 times for a total of 595.90 hours into the River Wey (reference: The Rivers Trust Sewage Map). The raw sewage is having a devastating effect on the ecology of this chalk stream east of Bentley.

This has been much the worst entry point to either the North or South Wey in Hampshire and Waverley. Therefore, the evidence of headroom does not match the modelling. Although, TW are building a storm surge tank to mitigate some of the spillage, the ground water ingress into the system, remains a major problem and one which they are unlikely to fix in the immediate future.

Local Employment: This is identified in the Plan as being important to sustainability. However, in 2015 when Bentley was making its first Neighbourhood Plan, we included an Employment Policy which safeguarded land adjacent to the industrial estate south of the Main Road. During examination the need for further employment land in the village was deemed unviable and the policy was therefore deleted. Subsequently, an application for change of use was allowed on the land and 8 dwellings were built. Is Bentley a sustainable centre for further employment?

So why is Bentley regarded as a Tier 3 settlement, when many similar settlements are Tier 4 and 5?

Accessibility

Accessibility has become a major consideration in the Plan to support the claim that there is a climate emergency. EHDC have embraced a couple of concepts:

1. “living locally” which encourages people to limit travel and use their local facilities for “living, working, supplying, caring, learning and enjoying”.
2. “20 minute neighbourhood”. 20 minutes refers to the time it takes to arrive at a destination by foot or bicycle. However, the consultants who wrote the report recognise that most people will not walk or cycle more than 10 mins, so 20 mins has been modified as the time taken as a “round trip”.

EHDC are, therefore, seeking to reduce carbon emissions through the Plan. Some 43% of emissions in the district come from transport. They do not state what proportion we are responsible for, i.e. not produced by vehicles through and aircraft travelling over the district, e.g. on the A3 or A31, and over, e.g. from Farnborough Airport.

A stated objective in the Plan is, “*Enable people to live locally and reduce their reliance on the private car, to help reduce the impacts of transport on the environment and improve health and wellbeing.*”

The “20 minutes Neighbourhoods” is ultimately a wish to restrict where and how far you travel. This is a recent urban/suburban concept being applied to a rural setting: Access and delivery of services in a small rural settlement is completely different to an urban setting.

The study to revise the settlement hierarchy (Revised Settlement Hierarchy report) makes mention of taking into account topography when travelling, but there is not a single mention of weather, rain or snow in the entire report. No mention of walking to and from the station in darkness.

Bentley is being regarded as a settlement node where residents from other villages will come to use our facilities (such as they are). Realistically, nobody in Froyle or Binsted or even Isington is going to use Bentley as a settlement node by walking or cycling.

Paragraph 5.18 of the EHDC’s Revised Settlement Hierarchy report states that Bentley scores 16.7 for accessibility, Tier 3 is between 16.0 – 20.0. The current version of the Plan should allow for the tenuous basis whereby Bentley just scrapes into the Tier 3 bracket.

Public transport:

In the report it makes mention of Bentley Station, paragraph 4.12, *Bentley benefits from mainline station*. This appears to be from where much of the scoring for Bentley’s Tier 3 grading comes.

Bentley Station is not accessible by walking, or even cycling realistically in 10mins. The station is not in the village, or even in the parish. It is 0.98 miles, or 1.58 km, from Bentley Crossroads. From the Crossroads via Footpath 13 (down Rectory Lane and over the A31 footbridge) it is exactly the same distance.

Since accessibility is based on walking or cycling to a destination in 10 minutes there appears to be a contradiction between the Accessibility criteria and the Tiering category: Under the terms of Accessibility, Bentley Station is not accessible from the village.

A further point on the station is that the carpark is full by 7:20 am. most weekdays and there is no opportunity to expand the carpark. Many cars park on verges beyond the yellow lines. This is not a sustainable proposition.

The other public transport option, the bus service to Alton or Farnham is once every hour. Impractical for most commuters or travellers.

Some thoughts:

Are Ridge and Partners, the consultants chosen by EHDC, sufficiently experienced to conduct the accessibility planning for a rural setting? Their project portfolio suggests not: Out of the 180 projects listed on their website, only three could loosely be described as rural. Their Transport portfolio projects are small scale urban and suburban projects and their Residential and Housing section states, *"Sorry, we found no results for your search"*. There is no "Rural or Countryside" tab to check.

Bentley Station is primarily used by commuters and travellers to London. It is not a general mode of transport to get to larger local settlements and their facilities. For example, the Alton Sports Centre, and doctors.

Given that Bentley is 0.98 miles from Bentley Station why has it been assessed by Ridge & Partners as Tier 3? It may be due to the Bentley Station settlement – a separate settlement being conflated with Bentley within the assessment.

Is a mother going to take her two children to a swimming lesson by train or bus and then cycle or walk at both ends? Local public transport in larger settlements like Alton unlikely. The costs will be prohibitive for such a service.

Is the suggestion that we cycle or walk to the railway station or bus stop to do our weekly supermarket shop in Farnham or Alton? Then carry the shopping between bus stops and stations and home.

What do people do that are old and can't walk or cycle? What do you do if you can't ride a bike?

Where is the evidence that residents currently use a bicycle as their mode of transport for their work, leisure, shopping etc? 2021 Census data show that 0.5% of Bentley residents travel by bicycle to work, 3% of residents walk to work.

Where is the plan to add cycle paths to help accessibility?

After school activities are not accessible by public transport. Although some are conducted in the village, many are not. The time constraints and distances make public transport, of any sort, impossible. Children often need to be at the venue within 30 mins to make the activity viable in the available time.

Are EHDC planning to localise these children's activities? Duplicating facilities and staff is not possible and would just cause the collapse of existing businesses. This could have a major impact on children's sport and increase health problems.

Are parents and children going to walk or cycle to Farnham or Alton to play mini rugby or football on cold, wet winter mornings?

In summary:

Does it make sense to assess Bentley (population 1,400) as being in the same tier as settlements such as Four Marks (population 5,600) and Clanfield (population 5,900)? On previous rankings (Figure 2, Revised Settlement Hierarchy) Bentley scored 4 out of 40 compared to Four Marks at 19 and Clanfield 18.

Is it reasonable to use accessibility and sustainability for a largely rural area? EHDC state that the largest settlement has a rating of 58.6, the lowest 2.1 with a very low median of 4.9. This is clear proof that huge areas of East Hampshire are very rural, necessitating the use of private transport to live, work, supply, care, learn and enjoy.

The reason for Bentley's higher ranking appears to be a railway station. A railway station that is 0.98 miles from Bentley and cannot be reached by walking or, to most, cycling in 10 minutes. This is before even considering bad weather or darkness.

EHDC are constraining economic, social and domestic activity in the district to reduce carbon emissions in an attempt to justify their declaration of a climate emergency. An attempt which is unlikely to make any difference to climate change.

Making a comment

The EHDC Local Plan Consultation link is <https://ehdclocalplan.commonplace.is/> . There are 11 categories to enter comments. However, we suggest that you aim at the following:

- Vision and Objectives
- Managing Future Development
- Responding to the Climate Emergency

Most of the notes above fall into these three categories. We hope they are useful to form your own comments. Remember closing date for comments is Monday 4th March.