

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

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

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		<p>by NP legislation and guidance, only an indication that 3 policies are to be modified and that there are 5 new policies and this is set out in Appendix D but not referred to in the plan itself.</p> <p>See Planning practise guidance:</p> <p>https://www.gov.uk/guidance/neighbourhood-planning--2#updating-neighbourhood-plan</p>	
Para 1.1	EHDC	refers to modifications to the NP – See Planning practise guidance	Edit completed
Para 1.3	EHDC	<p>This para refers to the modification statement published alongside the draft plan – there is no evidence of this document on the PC’s website. The statement is set out at Appendix D but there’s no reference to Appendix D in the NP.</p> <p>It is not the decision of the PC to determine if a referendum will be required or not – this is the role of the independent examiner</p>	1.3 updated to reference the modification statement in Appendix.
Para 1.4 and 1.6 (no para 1.5?)	EHDC	If the statutory bodies were consulted then their responses along with the SEA/HRA screening documentation should be on the website	<p>Now added to website</p> <p>Have created para 1.5</p>
Para 1.7	EHDC	Typo ‘farther’ should be ‘further’	This has been changed
Background & Evidence Base	EHDC	Para 2.2 ‘Boundaries of the village’ should be amended to the ‘boundaries of the parish’ to avoid confusion with SPBs	2.2 amended to; <i>“although outside the SPB, are recognisably part of the village; properties east of the Recreation Ground for example”</i>
Background & Evidence Base	EHDC	Para 2.19 (2.20) Avoid mixing up the conservation area appraisal and design policies – see comments below on design policies.	2.20 amended to; <i>“The BPNP incorporates the Bentley Conservation Area, Character Appraisal and Management Plan, EHDC, Aug 2014, in its Design policy, BEN003, to support recommendations for the design of the new development in the parish”</i>

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

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Background & Evidence Base	EHDC	2.33 Reference to traveller site – we assume this is The Paddocks, Vickery Lane, Station Road which has 8 pitches permitted.	Text amended to; “a Gypsy and Traveller site located near the water treatment plant, The Paddocks, Vickery Lane, which is now 8 pitches and associated buildings”
Background & Evidence Base	EHDC	Para 2.39/2.40 (2.40/41) See HCC website for more details on traffic schemes in and around Whitehill Bordon	No change
Background & Evidence Base	EHDC	Para 2.44 Community views should have been sought to inform this review and this Reg 14 version – something undertaken in 2018 is potentially out of date	No change. Community views were sought in 2018 as part of this review. Due to covid and delays with the emerging Local Plan led to the Reg14 being postponed until 2023. BPC comfortable that the views expressed at that time are still up to date and this is reflected in the minimal number of community responses to the Reg14.
BEN1	EHDC	It is noted that this policy has been reworded. The following wording has been removed: <i>“The inappropriate development of residential gardens, for example, where such development would harm local character, will be refused”</i> . However, para 4.18 under BEN2 refers to resisting development in residential gardens, which is not identified in the policy wording.	Modification made to policy and paragraph 4.18 under BEN2
BEN1	EHDC	The last sentence in policy BEN1 has been made more restrictive and does not conform with the strategic policies within the JCS namely CP10. The Policy lacks clarity.”	Part B of policy amended to conform with CP10: <i>“B. Development outside of the BSB will only be supported if it demonstrates that it will fill a genuine and proven community need or local community aspiration for a countryside location, which cannot be accommodated within the built up area, and reinforces the settlement’s role, character and function”</i>
BEN1	EHDC	EHDC ‘Housing Outside Settlement Boundaries’ applies to all East Hants outside of SDNP – Bentley is not exempt from the application of this SPD. The SPD is based on	Paragraph 4.13 has been amended to include the following sentence: <i>“It is for an applicant to submit evidence to justify whether a site meets the criterion related to the policy.[CP10]”</i>

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		<p>Policy CP10, which is considered strategic and noted in the modified NP para 3.6. The application of the SPD is a planning judgement made at the time of the application.</p> <p>Likewise, Policy CP14 for rural affordable is another strategic policy which applies to Bentley. Policy CP14 is clear that it applies to both settlements with a SPB as well as those without one, by virtue, Bentley is likely to be one of the largest settlements the policy applies to. It would be down to individual applicants to submit evidence to justify whether a site meets the criterion related to the policy.</p>	
BEN2	EHDC	<p>4.18 The supporting text (para 4.18) states new development should be confined to previously developed land, which contradicts Policy BEN1 which advocates development proposals within the SPB will be permitted. There is no wording in Policy BEN2 about previously developed land. Para 4.18 also notes that development in gardens will not be allowed, but this is not mentioned in the policy and the original wording in BEN1 has been omitted.</p>	<p>Policy iii amended to; <i>“consolidating the existing linear layout by avoiding residential garden, backland or tandem development unless there is precedent in that specific part of the village”</i></p> <p>4.18 amended to; <i>“New residential development within the settlement policy boundary should be confined to infilling, redevelopment of previously developed land and buildings, conversion, subdivision or change of use of buildings. The density of housing should always respect the surrounding properties to preserve the rural character of the parish”</i></p>
BEN2	EHDC	<p>Lack of clarity and preciseness as required by Planning Practice Guidance Policy mixes up design matters and title does not reflect the contents</p>	<p>retitled policy “Development Principles” <i>Tidied up numbering for clarity.</i></p>
BEN3	EHDC	<p>Where’s the evidence for this – have AECOM been commissioned to undertake preparation of a Design Code and Design Guidelines?</p>	<p>Amended policy title to <i>“Design</i></p>

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BEN3	EHDC	It would also be helpful to disambiguate the implied distinction between 'reflect' and 'respect'.	Substituted " <i>respect</i> " for " <i>reflect</i> " throughout policy
BEN3	EHDC	Consider taking out the conservation area parts and having these as a separate policy.	No change; decided to keep as one policy
BEN3	EHDC	4.24 There is a tension between the proposal to constrain building articulation to 'inherent architectural attributes' (thus avoiding the perception of a new building's "evolution over time") and part iv of BEN 3, which suggests that new dwellings should harmonise with neighbouring properties, the design of which may, indeed, have evolved over time.	Amended wording in 4.24 final sentence to; " <i>(to avoid inauthentic reproductions or replicating later additions where they are not sympathetic to the original building)</i> "
BEN3	EHDC	4.26 The phrase 'larger properties should present a more open aspect' is vague. EHDC comment Which properties/where in the parish are good examples to follow? Conversely, can you identify bad examples that should not be followed? It is important to clarify what 'open aspect' means (whether from street scenes, public viewpoints; or whether you intend more of morphological rather than an experiential interpretation, where properties are set back from plot boundaries)	Added example to follow as suggested: " <i>Further, new, larger properties should be spaced such that they conform to the layout of similar sized, older properties in the parish, for example, the spacious appearance of older, larger properties along the Main Road between Cedar Cottage and Staceys, and avoid the closely packed style of executive housing, characteristic of recent suburban planning.</i> "
BEN3	EHDC	4.30 Clay with flint deposits form part of the geology of the parish (albeit a minor part, in northern areas of the designated area) according to the Council's Landscape Character Study. It is therefore a contextually appropriate building material even if it has not been used in past architecture. It is more	Final sentence of 4.30 amended to; " <i>However, the use of flint in local building should be discouraged in the village and used sparingly elsewhere in the parish</i> "

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		appropriate to discourage its use in Bentley village and advise that it should be used sparingly elsewhere within the parish.	
BEN4	EHDC	<p>Where's the evidence base? There are no photos or detailed description as to why these buildings are important, only limited commentary in Annex C, with limited emphasis on why these assets warrant protection. Para 4.36 refers to evidence work to be done – evidence should inform the NP, not be written retrospectively. Policy refers to heritage assets on a proposal map – where is the accompanying mapping?</p>	Rationale and justification had been prepared prior to Reg 14 but not finalised. Now published.
Para 4.36	EHDC	Para seems unfinished and includes notes to author	
BEN6	EHDC	<p>Our understanding from general conversations with HCC is that there are no specific plans to extend this school at present. The land proposed for extension is owned by HCC, and as landowner, they would need to be consulted on this as to the availability and deliverability of this proposal. Suggest direct conversations with HCC education regarding this proposal, and their intentions for the future use of this land. We can supply the contact.</p>	<p>That is correct, however, the safeguarding of land for education is unchanged from the previous version of the plan and supporting text notes that there are no plans at present for expansion but HCC school places plan only covers period to 2028 https://documents.hants.gov.uk/education/HampshireSchoolPlacePlan.pdf Bentley admissions 2025/26 PAN 30 https://documents.hants.gov.uk/education/admissions/schoolpolicies/2025/30232025.pdf</p> <p>It is also noted that when the original BNP was written there were no plans to extend the school, an application to extend it was received in 2016 and granted so this ensures the ability to do this again. The school has previously been subject to 5 other extensions in the last 30 years.</p>
BEN7	EHDC	Where is mapping relating to community facilities?	These are now listed individually on the policies Map

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BEN8	EHDC	The use classes order changed in 2020/21 and has introduced Class E which includes a range of activities and planning permission is not required to change activities within the Class – see Appendix A attached.	No change needed to the policy but additional supporting text added in respect of use class order changes and prior approval.
Para 4.53/54	EHDC	Use class A1 no longer exists – see above comments Duplication with BEN 7 – shop is listed under community facilities	Edit completed
BEN09	EHDC	This policy relies on data that is five years old, is there any updated information?	Added 2018 data. Will probably do another survey when the NP is modified again
BEN10	EHDC	<p>Query reference to 6 dwellings and reference to Policy CP21 – where is the justification for that quantum and there’s no need to repeat local plan policies within a neighbourhood plan policy.</p> <p>Given the Environment Act and the introduction of mandatory Biodiversity Net Gain later this year – consider focussing this policy on achieving BNG and linking to the forthcoming Local Nature Recovery Strategy.</p> <p>The policy mixes up different matters – sustainable construction; biodiversity; public rights of way; flooding and GI. Although GI has many benefits, the GI policy should be more specific to GI.</p> <p>Some of the contents in the policy is confusing, for example, it refers to grey and rainwater harvesting to manage surface water flood risk. But rainwater harvesting and grey water are different processes; rainwater</p>	Amendment made in line with comments. Moved the surface water clause to BEN12 and amended to demonstrate purpose is to make best use of surface and wastewater.

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		<p>harvesting is a form of SuDs which does help manage surface water flooding and is the process of collecting and filtering rainfall from the roof of a building. However, greywater recycling, on the other hand, recycles wastewater from domestic appliances such as washing machines, baths, showers and sinks so is a form of water efficiency.</p> <p>Plan E and F source of these – ambitious plans how will these be implemented and funding are these reliant on delivery of new development for funding, if so the NP does not allocate sites for development.</p>	
BEN11	EHDC	<p>Where is the associated mapping? This needs to be accompanied by a detailed evidence base to demonstrate why the sites chosen comply with the requirements of Para 102 of NPPF Para 4.64 refers to the evidence base – but this is not published? Doubtful whether the proposed LGS to the south of the village would satisfy the requirements of para 102. As part of this consultation it is crucial the owners of these parcels of land are made aware of the pending designation</p>	<p>Sites 1, 2 and 3 are existing LGS so no evidence base required.</p> <p>Policy edited in line with evidence obtained</p>
BEN12	EHDC	<p>Repetition of some elements of BEN 10.</p>	<p>Duplication removed from BEN10</p>
BEN12	EHDC	<p>I would also suggest adding to the policy that by maximising of the use of ‘natural’ SUDS features “it not only manages flood risk but has other multiple benefits, such as</p>	<p>Amended paragraph A of policy to include; “<i>able to demonstrate that they maximise natural sustainable drainage where appropriate</i>”</p>

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		<p>improving water quality, increasing biodiversity and providing amenity benefits, such as additional public open space integrating with cycling and walking routes, providing additional habitat, etc.</p>	<p>Included in paragraph 4.65; <i>“A specific objective is to by maximise the use of natural sustainable drainage, since it not only manages flood risk but has other, multiple benefits such as improving water quality, increasing biodiversity and providing amenity benefits, including additional public open space integrating with cycling and walking routes and providing additional habitat”</i></p>
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