

Email from neighbourhoodplan@bentworthparishcouncil.org
to localplan@easthants.gov.uk



18th March 2019

Dear EHDC Planning Policy Team,

EHDC DRAFT LOCAL PLAN – COMMENTS FROM BENTWORTH

This communication is on behalf of Bentworth Parish Council and Bentworth Parish Neighbourhood Plan Steering Committee. It constitutes our collective response to the EHDC Draft Local Plan and accompanying documents, in particular the Interim Infrastructure Plan, the Interim Community Facilities Study and the Interim Settlement Policy Boundary Methodology. We welcome the opportunity to comment at this early stage in the consultation process. Our comments incorporate, where relevant, the views of the parishioners of Bentworth, whom we have been consulting in the preparation of a Neighbourhood Plan for the parish. We have put the completion of this Neighbourhood Plan on hold pending the outcome of your ongoing work on the new Draft Local Plan.

Draft Local Plan

We welcome the fact that the Local Planning Authority's **additional housing needs** are proposed to be predominantly met through additional growth at Whitehill & Bordon and a new settlement at Northbrook Park (page 19 of the Draft Local Plan). We believe that this sensibly concentrates development in towns which can support it sustainably.

We welcome the updating of the **Settlement Hierarchy** and agree that Bentworth should be in Tier 5, "Rural Settlement" (page 20). We believe that this accurately reflects Bentworth's situation: no railway station, very limited (and decreasing) bus service, no shops or post office, no mains gas or waste water, very limited employment opportunities, relatively poor broadband facility and narrow minor roads. The Vision in the emerging Neighbourhood Plan stresses the importance of Bentworth, part of which is a Conservation Area, retaining its rural character.

We welcome the following **proposals for Bentworth** (page 112):

- The minimum of 6 dwellings (all have planning permission)
- That there are no proposed allocations for Bentworth
- The proposal not to proceed with the allocation for land at corner of Church Street and Ashley Road (also mentioned at page 355).

This leaves us the flexibility to go for a modest increase in housing stock, if we establish that there is a local need. We welcome the fact that, in setting the proposed minimum of 6 dwellings, EHDC have taken account of ongoing windfall developments.

We welcome the proposals for the development of the **rural economy** (page 193ff). Farming, forestry and horse-related activities are the traditional rural employers, and those involved in them are key to management of the countryside. We can see nothing in the draft that would cause concern. It all seems measured and sensible.

We welcome the proposed Policy S17 (page 214), which reinforces the Local Planning Authority's priority, which is to **protect the countryside** for its intrinsic value, while allowing some flexibility for appropriate developments to be considered in the countryside in certain circumstances.

We welcome the proposed Policy S18 (page 216), which provides that "Development proposals must conserve and wherever possible **enhance the special characteristics, value and visual amenity of the Area's landscapes**". Our proposed Vision in our emerging Neighbourhood Plan notes that the parish is "surrounded by beautiful countryside of farms and woodlands, with fine tree and hedgerows. There are good views and a number of protected local green spaces". Bentworth parishioners attach importance to the maintenance of the current views. We also support proposed Policy DM26 (page 222) on the protection of trees, hedgerows and woodland.

We welcome proposed Policy S27 (page 249), stating that "New development will be permitted where it would help to establish a strong sense of place, by reinforcing or enhancing **local character**, and would function well in its surroundings..." This mirrors language in our emerging Objectives and Policies stressing the importance of new buildings being of high architectural quality, including design, materials, fenestration and palette, reflecting the local vernacular.

We welcome the recognition in proposed Policy S29.2 (Page 279) that "development proposals must consider all of the **infrastructure implications** of a scheme: not just those of the site or its immediate vicinity". We have some concern that proposed developments in Alton and Four Marks/Medstead might have some negative implications for Bentworth.

In particular we have the following concerns:

- We are worried that additional growth of population in these neighbouring towns might further increase the **traffic** through Bentworth. Our traffic surveys already indicate a 33% increase over the last couple of years, particularly in the number of heavier vehicles using our roads, causing enhanced traffic noise, pollution and potholes. This trend has been accentuated since the start of 2019, with the closure of the Butts Bridge in Alton. We believe that particular care must be taken in the development of new road infrastructure and signage to ensure that vehicles use major rather than minor roads and avoid "rat-runs" through rural villages like Bentworth.
- We are concerned that the additional development will create increased pressure on local **healthcare** providers, particularly GP services. This could have a negative effect on access to healthcare for our parishioners. Bentworth has an ageing population and thus an increasingly heavy reliance on already hard-pressed GP surgeries.

Interim Infrastructure Plan

We note with some concern that the draft does not envisage any increase in **Primary Care** provision in either Alton or Four Marks/Medstead, but only in Whitehill & Bordon (page 33 of the plan).

As regards **education**, we note the statement (page 22ff) that education provision is the remit of Hampshire County Council (HCC) and the estimated pupil numbers at each phase of education determines the school provision in the area. Plans to add to existing schools are proposed. But our understanding is that HCC cannot build a new school. New schools must be built as an Academy or

Free School - see the new Mill Chase Academy being built for Bordon.

We have one school in the parish: St Mary's Bentworth Church of England Primary School (page 25). We note that there is no provision for additional housing development within the catchment area of this school (five villages). St Mary's has a number of pupils from outside its catchment area. The school anticipates that this will continue, as there is some parental choice in applying for school places at the start of Primary School.

St Mary's note that there is no clear statement about guaranteeing daily public transport services to rural locations such as Bentworth. This suggests that travel to/from St Mary's will continue to be by car for those families that do not qualify for HCC school transport services.

Interim Community Facilities Study

We note that information is sought (page 5 of the study) on community facilities in certain parishes, including Bentworth. Bentworth has one such facility, details of which are as follows:

Facility	Uses	Usage	Condition of Building (Interior and Exterior)	Comment
Jubilee Hall, Bentworth	<ul style="list-style-type: none">• School• Parish Council Meetings• Fitness/Yoga Classes• Church Events• Charity Events• Community Events• Performances	Daily	Good (complete renovation in 2012)	Owned and managed by St Mary's CofE Primary School and co-located on same site as school. The building is disabled-accessible.

Settlement Policy Boundary Proposals

We note that there appears to be something wrong with the numbering of the individual proposed changes for Bentworth. There are 17 numbers on the map, but only 16 descriptions of change. This needs to be sorted out.

We welcome the tidying up of the Settlement Policy Boundary (SPB) where this involves the redrawing of the boundary along the edge of the road closest to settlement (map ref 1, 5, 8, 11, 13 and 15).

We welcome the proposed removal of land at Church Street and Ashley Road (map ref 2), as this is no longer proposed as an allocation in the Draft Local Plan.

We welcome the proposed adjustment to the boundary which runs through Bentworth St Mary's CofE Primary School (map ref 4), as this includes the extension to the school. We note that the hard surface playground and field are outside the SPB.

We are, however, concerned about the other proposed changes to the SPB. These would appear to be arbitrary and unnecessary. We believe that, unless there is one or more positive reasons for changing the SPB, it should remain unaltered. That a property's garden may be extended into

what was previously a field is not, in our view, a reason to change the SPB. Nor should properties which are not currently within the SPB be brought inside it, without sound reason. There are a number of properties adjacent to the SPB which are not included: Mulberry House, Ham Farm, Drury Farm and other houses on Drury Lane and Ashley Road. Moreover, by extending the SPB to take in Hall Farm and greater parts of the land adjoining properties like Ivall's Farm, St Mary's House, Lindsay's Cottage and Kings Barn, you would be increasing the likelihood that this land will be developed. This is not consistent with the sentiment in Bentworth. When asked in a Questionnaire whether further back-land development of gardens should be permitted 65% of parishioners agreed or strongly agreed that it should not. 95% agreed or strongly agreed that rules should be set on housing density to ensure adequate separation between buildings and to preserve the views from the roads/lanes.

We are also concerned at the proposal to include The Sun Inn (map ref 17). We do not know the justification for this, as no criteria/principle is stated. But the inclusion would appear arbitrary and unnecessary (see above) and could make it easier for a developer to argue for conversion of the inn to residential development, which is contrary to the strongly expressed views of parishioners. We believe you should consider drawing the SPB in such a way as to exclude the land at Glebe Close, currently owned by EHDC, which we propose to designate as green space. This would help ensure it was not considered for development in future.

We believe you should also exclude from the SPB the car park/turning area at the front of Glebe Fields, as this too should not be considered for development.

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Bentworth Parish Neighbourhood Plan Steering Committee