

Bentley Neighbourhood Plan – Submission Plan Consultation Representations

19th June 2015 – 31st July 2015

BEH-01 Colin Smith Planning

BEH-02 Ministry of Defence

BEH-03 Environment Agency

BEH-04 Natural England

BEH-05 Waverley Borough Council

BEH-06 Colin Walters & Petrina Rance Walters

BEH-07 Louise Bonnington obo Mr and Mrs Walters

BEH-08 D J Miles

BEH-09 Dennis Trimming

BEH-10 Historic England

BEH-11 South Downs National Park Authority

BEH-12 Stuart Macnaghten

BEH-13 Savills-SmithsGore obo Mr S Bladon

BEH-14 CY Developments

BEH-15 Geoff Woollen

BEH-16 Bob & Sarah Burton

BEH-17 John & Lyn Anderson





Ms V Potts
 Planning Policy Team Manager
 East Hampshire District Council
 Penns Place
 Petersfield
 Hampshire
 GU31 4EX

Our ref EHANTS/15/01
 Your ref
 Date 06.07.15

Notification of publicity of the Bentley Neighbourhood Plan under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.

Dear Ms Potts,

I refer to the above consultation exercise in relation to the draft Bentley Neighbourhood Plan. I act for a client who has an interest in the site at School Lane, Bentley, identified as a housing site under Policy 2. This letter constitutes my clients representations in relation to the draft Neighbourhood Plan. The draft Neighbourhood Plan has been prepared by the Parish Council and submitted under Regulation 15 to your Council.

The National Planning Practice Guidance (NPPG) document sets out, at paragraph 057 under the heading "Neighbourhood Planning", how the public can make their views known. The paragraph says;

"Those wishing to make their views known to the independent examiner, or who wish to submit evidence for the examiner to consider, will do this by submitting written representations to the local planning authority during the statutory publicity period on the submitted draft neighbourhood plan or Order, which must be at least six weeks.

Representations should address whether or not the draft neighbourhood plan or Order proposal meets the basic conditions and other matters that the independent examiner is required to consider under paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended)."

Paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended) sets out that the examiner must consider the following matters;

- a) *"whether the draft neighbourhood development order meets the basic conditions (see sub-paragraph (2)),*
- b) *whether the draft order complies with the provision made by or under sections 61E(2), 61J and 61L,*
- c) *whether any period specified under section 61L(2)(b) or (5) is appropriate,*
- d) *whether the area for any referendum should extend beyond the neighbourhood area to which the draft order relates, and*
- e) *such other matters as may be prescribed."*



Sub paragraph 2 sets out the basic conditions, which are;

- a) *“having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,*
- b) *having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,*
- c) *having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,*
- d) *the making of the order contributes to the achievement of sustainable development,*
- e) *the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),*
- f) *the making of the order does not breach, and is otherwise compatible with, EU obligations, and*
- g) *prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.”*

Having regard to the above, these representations confine themselves to the following basic conditions;

- having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
- the making of the order contributes to the achievement of sustainable development,
- the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

The Parish Council have prepared a Basic Conditions Statement, where an assessment has been made as to whether the draft Neighbourhood Plan meets the Basic Conditions. This Statement will be assessed and additional comments made, specifically in relation to Policy 2 of the draft Neighbourhood Plan.

Policy 2 of the draft Neighbourhood Plan states that;

“Policy 2: Housing Site Allocation - Land off School Lane

The Neighbourhood Plan proposes Land off School Lane as shown on the policies map as a housing site for approximately 10 dwellings, comprising 2 and 3 bed open market homes, to be delivered in the period 2021 – 2028. Development proposals for this site will be supported, provided they accord with all of the following principles:

- i. *the built form shall create a positive street frontage that is in character with the existing streetscene;*



- ii. *buildings and landscape shall be of a character and materials that complement the village and respond to the site;*
- iii. *the built form within the site shall consider long views of the site and create a roofscape that is sympathetic to the rural setting;*
- iv. *a landscape edge treatment shall be provided to the eastern boundary to create a strong, attractive and defensible site boundary;*
- v. *the site layout shall consider views, and protect privacy and amenity of existing dwellings and back gardens; and*
- vi. *parking shall be integrated with the building layout to create a safe and attractive pedestrian environment and to avoid parking problems on local roads."*

Regard to national policies and advice

The Parish Council's Basic Conditions Statement identifies four paragraphs of the NPPF that they consider to be relevant to the production of the Neighbourhood Plan- paragraphs 16, 183, 184 and 185.

Paragraph 16 of the NPPF refers to the application of the presumption in favour of sustainable development. The presumption is identified in paragraph 14, and paragraph 15 identifies that;

"policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay"

As the site has been allocated in the draft Neighbourhood Plan, it is presumed that the site has been assessed for its sustainable development credentials, and meets them. My clients support the allocation of the site- it is in an edge of village location and the village of Bentley is identified as a Level 4 settlement. A Level 4 settlement is described as a settlement with a settlement policy boundary having a limited range of local services and may be appropriate for some further small scale local development. Under this definition, Bentley is clearly able to support additional development of the scale set out in the allocation.

Paragraph 183 identifies that parishes are able to use neighbourhood planning to set planning policies through neighbourhood plans to determine decisions on planning applications. The allocation of the site as set out in the policy for housing development is supported in order to give some certainty for developers of the site.

Paragraph 184 requires neighbourhood plans to be in general conformity with the strategic policies of the Local Plan. This will be addressed below.

Paragraph 185 identifies that neighbourhood plans will be able to shape and direct sustainable development in their area. To the extent that there is a requirement in the Core Strategy for additional housing, and that the village is capable of accommodating limited additional development, the allocation of the housing site will direct and assist in shaping sustainable development.



In broad terms, the allocation of the housing site through Policy 2 is in part in conformity with national policies and advice. My client supports the allocation of the site for housing. However, the policy identifies that development should not be delivered until the period 2021-2028.

Paragraph 47 of the NPPF sets out how planning authorities should *boost significantly* the level of housing supply. In part, this should be done by identifying sites sufficient to provide five years supply of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. It is noted that the NPPF does not express this figure as an absolute target.

East Hampshire Council, as the planning authority, have chosen to allow neighbourhood plans to identify allocated sites for residential development as set out in policy CP10 of the Core Strategy. Policy CP10 also identifies that a minimum of 150 dwellings should be provided at other villages outside the National Park (including Bentley), as part of a minimum increase of 10,600 dwellings over the period 2011 to 2028. It is of note that this is a *minimum* increase.

The Council have prepared a housing trajectory and have published a five year housing supply statement (as at 01.04.15). The housing trajectory (at Appendix 2 of the adopted Core Strategy) demonstrates that over the initial period, the supply of housing will be below the annual housing target for the Core Strategy of 600 units per year. In fact it is only in 2024/25 when the cumulative number of units exceeds the housing requirement. This is because the housing delivery depends heavily on the provision of 2,725 dwellings at the strategic allocation sites of Whitehill and Bordon. The majority of these dwellings are to be delivered in the later years of the plan. However, if these units are not delivered, or there is a delay in delivery, then it is essential to ensure that the housing delivery in the earlier years of the trajectory is above the required target. Removing the limitation in the Policy 2 to only deliver the units after 2021 will give increased comfort that the housing delivery will be achieved over the life of the plan. If the draft Neighbourhood Plan Policy 2 was modified to exclude the time limitation, then this would ensure that the Neighbourhood Plan was positively supporting the up to date Local Plan policies, as required by paragraph 184 of the NPPF.

The NPPF requires planning authorities to use the evidence base to ensure that their local plans meet the full, objectively assessed needs of the market (paragraph 47). The most recent Strategic Housing Market Assessment (SHMA) identifies at paragraph 6.18 and Core Output 8 that the estimate of household groups who have particular housing requirements include family households with three or more children. In addition, the Parish Council's evidence sets out the population distribution of Bentley (paragraph 2.22 of the draft Neighbourhood Plan), and it identifies that the largest section of the population is in the 25-54 age group (some 38%). In addition 29% of the population is in the 3-16 age group. This relatively close correlation suggests that family units with children are prevalent within the village, and this evidence suggests that family sized dwellings would be appropriate for the population profile. Smaller units (2 bed units for example) would appear to not meet the population profile of the village. As a result, the identified market needs are not likely to be met with smaller 2 and 3 bed dwellings. In this way the proposed allocation being specific to 2 and 3 bed dwellings means that the draft Neighbourhood Plan does not have regard to the policy guidance in the NPPF.



The evidence set out above identifies that the draft Neighbourhood Plan has not had full regard to the policy guidance in the NPPF and as such does not meet the relevant basic condition.

Achievement of sustainable development

To the extent that the allocation of the site in Policy 2 for housing supports the overall requirement for the increased housing delivery target in Core Strategy policy CP10, then it is achieving sustainable development. However, the reasoning given for the delay in delivering the housing on the allocated site is given in the amplification to the policy, and can be summarised as follows;

- Development of 70 new homes in Froyle and 37 new homes on site already with permission in Bentley will be likely to be completed in December 2015 and December 2018 respectively. The Parish Council say that this will result in an increase in use of the services of the village and traffic through the village;
- 4,000 new homes are likely to be delivered in Whitehill and Bordon prior to December 2019, resulting in a significant increase in traffic through the village;
- Additional dwellings are currently being constructed in Bentley (13 in total) which will add to the increasing demand on Bentley services;
- The community preference is for small scale, gradual growth;
- The impact on local infrastructure, in particular waste water and sewerage services.

The likely timings of the other developments in the locality are noted. However, the potential impact on the village centre and traffic through the village are not appropriate or justified reasons for delaying development. Presumably, if the development of the allocated site in Policy 2 is delayed until 2021, then at this point the cumulative impact of the development, together with all other developments noted above, will be the same as if the developments were all completed by 2019, or even earlier. In granting planning permission for the sites noted above, or allocating them in the development plan, it will have been necessary to consider the traffic impact of each development in isolation and in tandem with other developments, and also to consider the impact on local infrastructure. As planning permission has been granted or the sites allocated, it is assumed that the impact on traffic and local services and infrastructure is considered acceptable.

It should also be noted that according to the housing delivery trajectory for Whitehill and Bordon at Appendix G of the Council's Five Year Housing Supply document dated 01.04.15, it is planned to deliver 626 new dwellings up to 2019/2020, not the 4,000 set out in the draft Neighbourhood Plan.

The preference of the community for "small scale, gradual growth" is noted. However, apart from the 37 dwellings in the village already granted planning permission, the other sites noted in the amplification above all fall below the definition of major development (10 dwellings or more). The proposed allocated site of Policy 2 only just meets this threshold of major development. The village therefore will experience small scale and gradual growth if the policy is modified to exclude the time limitation.



There is therefore no justification for delaying the development. In accordance with paragraphs 14 and 15 of the NPPF (as noted above) there is a presumption in favour of sustainable development, and;

“policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay”
(paragraph 15)

As such, the draft Neighbourhood Plan does not meet the basic condition of achieving sustainable development due to the proposed time limitation, which would unjustifiably delay development.

General conformity with the strategic policies contained in the development plan

The development plan consists of the Core Strategy adopted in 2014 and the saved policies of the Local Plan 2009. It is noted however that the Local Plan 2009 is increasingly out of date, and it is anticipated that the policies in it will be replaced shortly by the emerging Local Plan 2- Site Allocations and Local Plan Part 3- Development Management.

As noted above, the allocation of the site in Policy 2 will contribute towards the increased housing requirement set out in the Core Strategy, as will the allocation of the site through the Neighbourhood Plan process. To this extent, the allocation is in general conformity with the development plan.

However, for the reasons given above, the delay in the delivery of the site and the limitation to 2 or 3 bed dwellings will potentially compromise the delivery of the required number of units over the plan period, particularly in the short term, and particularly if other, larger sites are not delivered in the anticipated timescale. The evidence set out above is not repeated here in order to avoid unnecessary repetition, but the limitations on the timescale and size of dwellings results in the planning authority being at risk of not achieving its strategic objectives as set out in the Core Strategy in relation to meeting housing need (both in terms of numbers and mix of tenure). As a result, the allocation of the site does not meet the basic condition.

I would also request that I am informed of any decision made by East Hampshire District Council under Regulation 19 in relation to the outcome of the examination.

Yours sincerely,





Ministry
of Defence

BEH-02

Defence Infrastructure Organisation

East Hampshire
Neighbourhood Plans
Penns Place
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www.mod.uk/DIO

14 July 2015

Dear Sir/Madam

Neighbourhood Plan Bentley

Thank you for consulting the Ministry of Defence (MOD) in relation to the above consultation.

The statutory height consultation zone encompasses the area of Bentley, in particular the designated area falls within the 91.4m height zone. The MODs main concern is development which may have the potential to infringe/inhibit air traffic movements.

Therefore, any development exceeding this height criterion should be referred to this office for review.

I trust this adequately explains our position on this matter.

Yours sincerely

[REDACTED]
Louise Dale
Assistant Safeguarding Officer (Statutory & Offshore)
DIO Safeguarding

Planning Policy
East Hampshire District Council
Penns Place
Petersfield
Hampshire
GU31 4EX

Our ref: HA/2006/000141/PO-
07/SB1-L01

Your ref:

Date: 16 July 2015

Dear Sir/Madam

Bentley Neighbourhood Plan 2015 - 2028 – Submission Plan

Thank you for consulting the Environment Agency on the submission version of Bentley Neighbourhood Plan.

Having reviewed the document we have the following comments to make;

We are pleased to see that the proposed allocation in this document has been directed to an area at the lowest probability of flooding and is therefore located in Flood Zone 1.

We are also supportive of Policy 10 (Sustainable Drainage) which intends to ensure that the risk of surface water flooding from new development proposals is managed.

If you have any queries regarding the above please do not hesitate to contact me using the details below.

Yours faithfully

Mrs Laura Lax
Senior Planning Advisor

Direct dial: [REDACTED]

Direct e-mail: [REDACTED]

Environment Agency
Canal Walk, ROMSEY, Hampshire, SO51 7LP.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
End

Hannah Collier

From: Barker, Francesca (NE) [REDACTED]
Sent: 16 July 2015 12:43
To: EHDC - Local Plan
Cc: Amanda Dunn
Subject: BENTLEY NEIGHBOURHOOD DEVELOPMENT PLAN, HAVANT
Attachments: NRM6.pdf; ATT00001.txt

Dear Sir/Madam,

We have reviewed the Bentley proposed submission Neighbourhood Plan.

Natural England notes that parts of this Neighbourhood Planning area/Parish lies within 5km of Thames Basin Heaths Special Protection Area (SPA) and adjacent to the South Downs National Park.

In accordance with retained South East Plan Policy: NRM6 (attached), new residential development that falls within 5km of Thames Basin Heaths is likely to have a significant effect on the SPA, therefore mitigation will be required.

Although it appears that the Neighbourhood Plan is only proposing new housing that is >5km from the SPA, we advise that a policy should be included in this Neighbourhood Plan for the purposes of any windfall sites (within 5km of the SPA) that specifically refers developers to Policy NRM6. Natural England is prepared to support the Neighbourhood Planning team with the wording of this policy.

Given that the Plan also lies within the setting of the South Downs National Park (SDNP), we advise that another policy is included: which sets out that new development should be situated and designed so that there are no adverse effects on the special qualities of the National Park or the SDNP Management Plan.

If you have any queries, please don't hesitate to contact me.

Warmest wishes,

Francesca Barker
Land Use Lead Adviser
Dorset, Hampshire and Isle of Wight Area Team

Natural England
Area 3A Nobel House,
17 Smith Square,
London SW1P 3JR
Tel: [REDACTED]
Mob: [REDACTED]

www.naturalengland.org.uk

If you have just sent me a land use consultation, please resend to consultations@naturalengland.org.uk or, for any other land use query, please contact our Land Use Planning Enquiry line (0300 060 3900) in the first instance.

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England is accredited to the Cabinet Office Customer Service Excellence Standard

Thames Basin Heaths Special Protection Area

POLICY NRM6: THAMES BASIN HEATHS SPECIAL PROTECTION AREA

New residential development which is likely to have a significant effect on the ecological integrity of Thames Basin Heaths Special Protection Area (SPA) will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Such measures must be agreed with Natural England.

Priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures. Where mitigation measures are required, local planning authorities, as Competent Authorities, should work in partnership to set out clearly and deliver a consistent approach to mitigation, based on the following principles:

- i. a zone of influence set at 5km linear distance from the SPA boundary will be established where measures must be taken to ensure that the integrity of the SPA is protected**
- ii. within this zone of influence, there will be a 400m “exclusion zone” where mitigation measures are unlikely to be capable of protecting the integrity of the SPA. In exceptional circumstances, this may vary with the provision of evidence that demonstrates the extent of the area within which it is considered that mitigation measures will be capable of protecting the integrity of the SPA. These small locally determined zones will be set out in local development frameworks (LDFs) and SPA avoidance strategies and agreed with Natural England**
- iii. where development is proposed outside the exclusion zone but within the zone of influence, mitigation measures will be delivered prior to occupation and in perpetuity. Measures will be based on a combination of access management, and the provision of Suitable Accessible Natural Greenspace (SANG).**

Where mitigation takes the form of provision of SANG the following standards and arrangements will apply:

- iv. a minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) should be provided per 1,000 new occupants**
- v. developments of fewer than 10 dwellings should not be required to be within a specified distance of SANG land provided it is ensured that a sufficient quantity of SANG land is in place to cater for the consequent increase in residents prior to occupation of the dwellings**
- vi. access management measures will be provided strategically to ensure that adverse impacts on the SPA are avoided and that SANG functions effectively**
- vii. authorities should co-operate and work jointly to implement mitigation measures. These may include, inter alia, assistance to those authorities with insufficient SANG land within their own boundaries, co-operation on access management and joint development plan documents**
- viii. relevant parties will co-operate with Natural England and landowners and stakeholders in monitoring the effectiveness of avoidance and mitigation measures and monitoring visitor pressure on the SPA and review/amend the approach set out in this policy, as necessary**
- ix. local authorities will collect developer contributions towards mitigation measures, including the provision of SANG land and joint contributions to the funding of access management and monitoring the effects of mitigation measures across the SPA**

- x. **large developments may be expected to provide bespoke mitigation that provides a combination of benefits including SANG, biodiversity enhancement, green infrastructure and, potentially, new recreational facilities.**

Where further evidence demonstrates that the integrity of the SPA can be protected using different linear thresholds or with alternative mitigation measures (including standards of SANG provision different to those set out in this policy) these must be agreed with Natural England.

The mechanism for this policy is set out in the TBH Delivery Framework by the TBH Joint Strategic Partnership and partners and stakeholders, the principles of which should be incorporated into local authorities' LDFs.

9.31 The Thames Basin Heaths Special Protection Area (SPA) is designated under European Directive 79/409/EEC because of its populations of three heathland species of birds – Dartford Warbler, Nightjar and Woodlark. This designation covers parts of 15 local authority areas and three counties and is likely to have a major impact upon the potential for development within these areas and others adjoining it. See following diagram showing local authority boundaries, 400m and 5km zones:

9.32 Natural England has identified that net additional housing development (residential institutions and dwellings) up to 5km from the designated sites is likely to have a significant effect (alone or in combination with other plans or projects) on the integrity of the SPA. Initial advice from Natural England is that an exclusion zone of 400 metre linear distance from the SPA is appropriate. The district level housing allocations for the sub-region presuppose that an effective approach to dealing with the effects of development on the SPA can be found. Local authorities that are affected by the designation should deal, in their LDDs, with the issue of the effects of development on the SPA, and put forward a policy framework to protect the SPA whilst meeting development requirements. The focus of this policy is on avoidance and mitigation of the effects of residential development. This does not obviate the need for possible Habitats Regulation Assessment on other forms of development.

9.33 Nor do the provisions of this policy exclude the possibility that some residential schemes (and, in particular, relatively large schemes) either within or outside the 5k zone might require assessment under the Habitats Regulations due to a likely significant effect, alone or in combination with other plans or projects, and subject to advice from Natural England.

9.34 Applications for all non-residential development will need to be subject to Habitats Regulations Assessment where they are likely to have a significant adverse impact on the integrity of the Thames Basin Heaths SPA.

9.35 To assist local authorities in the preparation of LDDs and to enable development to come forward in a timely and efficient manner, Policy NRM6 sets out the extent of mitigation measures required, based on current evidence. The evidence available indicates that effective mitigation measures should comprise a combination of providing suitable areas for recreational use by residents to buffer the SPA and actions on the SPA to manage access and encourage use of alternative sites. Such measures must be operational prior to the occupation of new residential developments to ensure that the interests of the SPA are not damaged. Local Authorities and Natural England will need to co-operate so that the effect of mitigation measures can be monitored across the SPA.

9.36 Where developers propose a bespoke solution, this will be assessed on its own merits under the Habitats Regulations. The SANG requirement for bespoke solutions may vary according to the size and proximity of development to the SPA; early consultation with Natural England and the local planning authority is encouraged.

9.37 Should it become apparent during the lifetime of this Plan that alternative arrangements may need to apply, these must be brought forward with the agreement of Natural England.

9.38 One route would be the publication of supplementary guidance to this Plan by Natural England to set out alternative arrangements or further details.

Hannah Collier

From: Ian Motuel [REDACTED] >
Sent: 20 July 2015 09:26
To: EHDC – Neighbourhood Plans Shared; EHDC - Local Plan
Cc: Vera Kektsidou
Subject: FW: NOTIFICATION OF PUBLICITY OF THE BENTLEY NEIGHBOURHOOD DEVELOPMENT PLAN

Dear Sir/Madam,

Thank you for consulting Waverley Borough Council on the Bentley neighbourhood plan.

Having reviewed the document, the Council has decided not to make any representations.

Regards,

Ian Motuel
 Principal Planner (Policy)
 Tel: [REDACTED]
 Email: [REDACTED]



The Burys
 Godalming
 Surrey, GU7 1HR
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Please consider the environment before printing this email

From: EHDC - Local Plan [<mailto:localplan@havant.gov.uk>]
Sent: Friday 19 June 2015 14:49
Subject: NOTIFICATION OF PUBLICITY OF THE BENTLEY NEIGHBOURHOOD DEVELOPMENT PLAN

Dear Sir/Madam,

NOTIFICATION OF PUBLICITY OF THE BENTLEY NEIGHBOURHOOD DEVELOPMENT PLAN UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012

I write to inform you, as a consultation body or consultee identified in Bentley Consultation Statement that we are now in receipt of the final submission version of the Bentley Neighbourhood Plan along with all accompanying documentation required under Regulation 15.

What documents comprise the ‘plan proposal’?

The plan proposal comprises the following documents:

- (a) A map identifying the area to which the proposed neighbourhood development plan relates;
- (b) A consultation statement;
- (c) The proposed neighbourhood development plan;
- (d) A statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990

Where can the plan proposal be inspected?

BENTLEY NEIGHBOURHOOD PLAN: PUBLIC SUBMISSIONS

We submit that land to the east of Rectory Lane, situated between The Old Rectory and Rectory Lane cottages should have been considered for inclusion within the proposed Neighbourhood Plan for the following reasons:

1) We understand that only land registered as SHLAA sites for potential development were considered.

However, we first contacted EHDC in 2011 asking for this small parcel of land - shown on the accompanying map with a proposed curtilage set within current building lines - to be included in any re-drawing of the settlement boundary, thus essentially in-filling a small gap between two settlement boundary zones.

This 80 metres wide strip specifically EXCLUDES the remainder of the field and would retain the open aspect to the south of the village.

At the time we also had discussions with the then Chairman of the Parish Council, Richard Leonard, and offered to give whatever assurances were necessary to ensure that the remainder of the field was protected from further development.

In 2013 we were informed that, due to changes in planning strategy, there were no immediate plans to draw up a new settlement boundary for Bentley, and were therefore advised to apply for planning permission under EHDC's Interim Housing Policy which was introduced on 1st August 2013.

Over the following year, in conjunction with local architect, Louise Bonnington, we had numerous informal discussions with both EHDC and Bentley parish councillors. During one such discussion with then parish councillor David Darrah, it was suggested that we might consider registering the land as a SHLAA site for potential development. However, we were advised that large-scale potential sites were required and, since our prime objective at the time was to build a single dwelling for our own use, we took the view that we did not want to list the site as a SHLAA, thus causing unnecessary concern to our neighbours about the prospect of large-scale development.

At no time was it suggested to us that this would be a prerequisite for inclusion in any future Neighbourhood Plan. (Indeed, since we are no longer resident in the village, we were unaware of the local consultations.)

2) We believe that our proposal for a small-scale development is fully in keeping with the overall vision for development outlined in the proposed Bentley Neighbourhood Plan, providing new homes as stated in paragraph 4.1 "in small clusters on sites that do not detract from the character and setting of the parish" and meeting many of the key objectives listed in paragraph 4.2.

We believe that our site complies with key objectives 1, 3, 4, 5, 6, 7, 8 and 9 as outlined in paragraph 4.2.

In particular we share key objective No.7 that open views towards the South Downs should be protected which was our own prime reason for not wishing to list this field as a SHLAA site. Indeed during the more than 20 years that we have owned this field we have planted more than 100 trees along the boundary and ensured that it was not grazed or cut to provide a habitat for ground-nesting birds .

3) Our proposals, previously submitted under the interim housing guidelines to build one large and two smaller houses on this site, fully conform to the Design and Development Principles outlined in Policy 3.

4) While we are fully in accord with the principles set out in Policy No 10: Sustainable Drainage, to our knowledge there has never been any flooding to this section of field or road. This has been confirmed to us by neighbours on both sides of the proposed site. Flooding in this field is confined to drainage from the 'hump' on the far eastern side which in wet weather makes another excellent wildlife habitat.

5) Policy 12: Traffic Impact

We recognise that Rectory Lane is a narrow, single track road and for this reason we have proposed creating a passing place alongside the frontage of any new development which would benefit those living in existing properties further down the lane. No such passing place exists at present and this would constitute a real improvement to the road.-

Colin Walters and Petrina Rance Walters



BENTLEY NEIGHBOURHOOD PLAN: PUBLIC SUBMISSIONS

We submit that land to the east of Rectory Lane, situated between The Old Rectory and Rectory Lane cottages should have been considered for inclusion as an area of land for development within the proposed Neighbourhood Plan for the following reasons:

1) We understand that only land registered as SHLAA sites for potential development were considered.

However, we first contacted EHDC in 2011 asking for this small parcel of land - shown on the accompanying map with a proposed curtilage set within current building lines - to be included in any re-drawing of the settlement boundary, thus essentially in-filling a small gap between two settlement boundary zones.

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Over the following year, in conjunction with local architect, Louise Bonnington, we had numerous informal discussions with both EHDC and Bentley parish councillors. During one such discussion with then parish councillor David Darrah, it was suggested that we might consider registering the land as a SHLAA site for potential development. However, we were advised that large-scale potential sites were required and, since our prime objective at the time was to build a single dwelling for our own use, we took the view that we did not want to list the site as a SHLAA, thus causing unnecessary concern to our neighbours about the prospect of large-scale development.

At no time was it suggested to us that this would be a prerequisite for inclusion in any future Neighbourhood Plan. (Indeed, since we are no longer resident in the village, we were unaware of the local consultations.)

2) We believe that our proposal for a small-scale development is fully in keeping with the overall vision for development outlined in the proposed Bentley Neighbourhood Plan, providing new homes as stated in paragraph 4.1 "in small clusters on sites that do not detract from the character and setting of the parish" and meeting many of the key objectives listed in paragraph 4.2.

We believe that our site complies with key objectives 1, 3, 4, 5, 6, 7, 8 and 9 as outlined in paragraph 4.2.

In particular we share key objective No.7 that open views towards the South Downs should be protected which was our own prime reason for not wishing to list this field as a SHLAA site. Indeed during the more than 20 years that we have owned this field we have planted more than 100 trees along the boundary and ensured that it was not grazed or cut to provide a habitat for ground-nesting birds .

3) Our proposals, previously submitted under the interim housing guidelines to build one large and two smaller houses on this site, fully conform to the Design and Development Principles outlined in Policy 3.

4) While we are fully in accord with the principles set out in Policy No 10: Sustainable Drainage, to our knowledge there has never been any flooding to this section of field or road. This has been confirmed to us by neighbours on both sides of the proposed site. Flooding in this field is confined to drainage from the 'hump' on the far eastern side which in wet weather makes another excellent wildlife habitat.

5) Policy 12: Traffic Impact

We recognise that Rectory Lane is a narrow, single track road and for this reason we have proposed creating a passing place alongside the frontage of any new development which would benefit those living in existing properties further down the lane. No such passing place exists at present and this would constitute a real improvement to the road.

Colin Walters and Petrina Rance Walters



20th July 2015

Telephone: [REDACTED] Mobile: [REDACTED]
 Email: Home: [REDACTED] Work: [REDACTED]

Planning Policy Team Leader
 East Hampshire District Council
 Penns Place
 Petersfield
 Hampshire
 GU31 4EX

21st July 2015

**Objections and Considerations raised by Bentley Neighbourhood Plan
 2015 – 2028**

The proposals contained within the current Neighbourhood Plan, raise concerns at a variety of levels given its blinkered approach which fails to take into account the possibility of more central and acceptable development possibilities. Also the composition of the Steering Committee fails to fulfil the requirements laid out in the group's Terms of Reference regarding Roles and Responsibilities, most particularly where vested interest is concerned.

- 1) Village boundaries are being pushed and an attempt is being made to exclude more central, contained sites which would have less impact on the environment while providing safer routes to all facilities.
- 2) Issues such as the expansion of the school and the much needed improvement of parking and safety during pickup/drop off times have not been addressed and would indeed be greatly restricted if the new plan was adopted.
- 3) Members of the Neighbourhood Plan Working Party should not have a vested interest in promoting a particular scheme. They are effectively co-opted to the Parish Council and should be bound by its guiding principles while observing their own Terms of Reference.
- 4) The original scheme, which gained majority acceptance, was overturned as a result of this vested interest and was replaced by a single scheme in a process which offered no alternatives. It was designed to be acceptable to protect a few.

A previous Neighbourhood Plan formulated last year by members of the Bentley Parish Council received 'overwhelming support' according to the Parish Council Newsletter which revealed that 92% of those who provided feedback on the Bentley Plan (LIPS) agreed with the concept of a few small developments scattered around the village rather than one large development. Inevitably, as with any scheme, this would have an impact on some residents in the village, a group of whom subsequently decided to discard the initial detailed research and implement a scheme to deflect the development focus away from their homes by submitting a plan which wouldn't impact on their lives or residential outlook.

It is understandable that those affected will wish to voice their opinions by following correct procedure but since this is a Parish Council initiative, and is ratified by that body, then those co-opted to draw up the plan should have nothing to gain should it be accepted. There is a clearly stated requirement to observe that fundamental rule which demands openness and transparency when it comes to the disclosure of personal interests when acting for Steering Groups, especially on behalf of Parish Councils.

This later proposal was made so innocuous that it would inevitably gain majority support but in so doing it failed to address the needs of a potentially expanding village by being unrealistically restrictive.

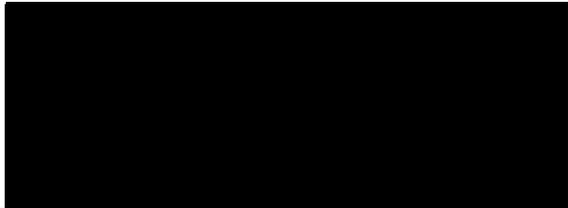
It recommends that all residential development be confined to a site right on boundary of the village on the east side of School Lane (BEN014) just north of, and adjoining the school. This would preclude any substantial expansion of the school and a much-needed scheme to relieve the highly dangerous situation which exists when a multitude of parents arrive in their cars to drop off or pick-up their children along School Lane.

Furthermore it seeks to create an open space in an area which had been marked out in the Parish Council's initial plan as **access** to possible future development in the field to the north of Eggar's Field and south of Hole Lane. This would have provided another opportunity for additional school parking while enabling safe walking routes to the school and the village facilities.

In addition to this restriction the later scheme also attempts to prevent any future **building** north of Eggar's Field, on SHLAA sites BEN 015 & 016. These are possibly the most suitable areas for development in the village given their central location and proximity to the shops, school and recreation ground. Residential development here would not impinge on the village boundaries, cause any residential sprawl or be detrimental to views of the village from afar.

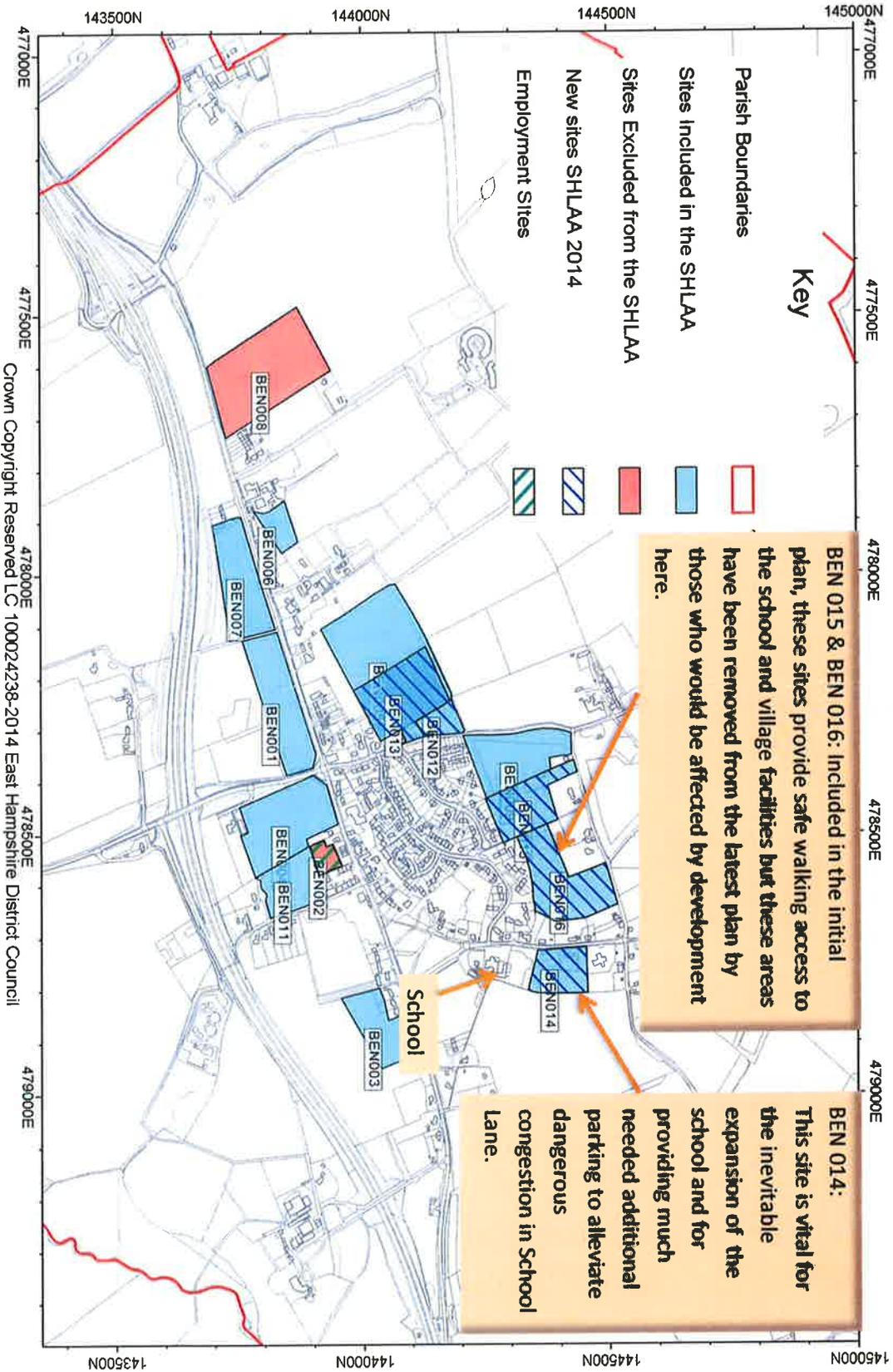
Doubtless the District Council will take into account all these factors when it comes to deciding if and how Bentley will set about providing extra housing but I felt it necessary to raise my objections to this recent change to the Village Plan since, rather undemocratically, no choices or alternatives were offered in the consultation process. This single proposal has resulted in an unrealistic scheme driven by the self-interests of a few and could end up precluding beneficial expansion and development of the village and its facilities in the future. Therefore is difficult to see how it can be reasonably adopted under Parish Council rules let alone the fact that it fails to meet the needs of an expanding village in an intelligent way.

I have enclosed a plan to help make my case clear.



D J Miles

Employment and Strategic Housing Availability Assessment Sites Bentley - August 2014



Hannah Collier

From: Dennis Trimming [REDACTED]
Sent: 28 July 2015 15:19
To: EHDC - Local Plan
Subject: Notification of Publicity of the Bentley Neighbourhood Development Plan

Dear Sirs,

I should like to put in a representation objecting to some aspects of the proposed Bentley Neighbourhood Development Plan, in particular the Parish Council's wish that house building should not occur south of the old main road in Bentley, and indeed the Parish Council have marked up viewpoints which they consider are important across to the South Downs – refer to 2.12, item 5 of the Plan.

The part of their Plan which states that “open views southwards towards the South Downs are to be protected” has been contradicted by a few recent events. There has been a SHLAA allocated to the land immediately to the south of Bentley Industrial Centre (BEN011), and an Appeal Inspector has upheld an Appeal for 5 new houses on a field opposite the Recreation Ground. The Appeal Inspector in this case stated in her Report that the new houses planned as an infill of the ribbon development along the main road “would not be a change of such magnitude to be harmful to the wider landscape character of the area”. This was all backed up by a specialist Landscape and Visual Impact Survey and Report.

The Bentley Neighbourhood Plan refers within its pages to loss of views to the South Downs. This is basically wrong for a starter : Part of Alice Holt Forest which is within the South Downs National Park can be seen from a few parts of Bentley and a few sections of the old main road, but the actual South Downs are out of actual viewpoint...unless one is in a helicopter or on very high land a mile or so to the north of Bentley.

Planning law is enshrined in that the loss of private views cannot be taken into account in a Planning Application. New housing needs to be built on the two fields either side of Bentley crossroads and not tucked away off of remote and dangerous country lanes such as the 15 proposed (Refused) off of Hole Lane. Anywhere else in the country the spare land between an old road and a new by pass (now 21 years old in Bentley's case) would have been built on by now. Bentley has excellent transport links, but I would agree that an eastern access onto the A31 from the west side of Bentley would be of great help to prevent Froyle and traffic users beyond having to drive all through Bentley.

If new houses were allowed on the fields either side of the crossroads in Bentley (BEN001 and BEN004) there would be some loss of long distance views for a handful of houses along the main road, but surely this would be more than offset by the new houses having the benefit of some of these views. Views of course can change over the years, and in recent years the hedging and trees planted by Hampshire County Council some 20 years ago have blocked the long distance views especially when viewed from River Road. Proposed trees and reinstatement of hedges to the northern edges of these two corner fields will in any event block views in future years.

To summarize, I object to Bentley Neighbourhood Plan in that there is no good reason why new housing should not be built south of the old main road. No one can see the “South Downs” and in my opinion the limited views that one has over to Alice Holt Forest are not special in a County which can boast far greater and more spectacular stretches of countryside and viewpoints than the ones in Bentley. The Bentley Neighbourhood Plan should be altered to reflect the long standing SHLAA allocated sites (allocated since 2006) on the south side of the old main road.....for reference these include BEN003 (now part of area Consented on Appeal for 5 private houses), BEN001, BEN004, BEN007 and the recent and newish SHLAA

site BEN011. There is undoubtedly still a great demand for new housing in Bentley, both private and affordables and these new houses should be built on fields south of the old main/London Road.

Yours sincerely,

Dennis Trimming

Hannah Collier

From: Dennis Trimming [REDACTED]
Sent: 28 July 2015 15:45
To: EHDC - Local Plan
Subject: Representation/Objection of the Bentley Neighbourhood Development Plan

Dear Sirs.

I sent you my email Representation with certain objections with regard the Bentley Neighbourhood Development Plan earlier today. Just to let you know, that although I no longer live in Bentley, I did live on the south side of the old main road for 19 years and also ran a building business from Bentley for even a longer period. I and my family also own Bentley Industrial Centre, Red Lion House, The Forge and Red Lion Lodge (18 separate tenants) together with grazing pasture totalling 15 acres. In years gone by I did own numerous other houses and my companies have built a good deal of the private housing stock, surgery, school extension, industrial units, large additions to both nursing homes etc in Bentley over the years. I hope that my views will be given full consideration and weight, as I should like to see the Bentley Neighbourhood Plan amended to accept further new housing to be built on the southern part of the village.

Yours sincerely,

Dennis Trimming



Planning Policy
East Hampshire District Council
Penns Place
Petersfield
Hampshire
GU31 4EX.

Our ref: HD/P5236/01/PC3
Your ref:

Telephone [REDACTED]
Fax

29th July 2015

Dear Sir or Madam,

Bentley Neighbourhood Development Plan Reg 16 Consultation

Thank you for your e-mail of 19th June advising Historic England of the consultation on the Bentley Neighbourhood Plan under Reg 16 of the Neighbourhood Planning (General) Regulations 2012. As the Government's statutory adviser on the historic environment we are pleased to make the following comments.

English Heritage welcomes the description of the historical development of Bentley in paragraphs 2.4 - 2.8 and the reference to the Conservation Area in paragraphs 2.12 - 2.19. However, reference could also be made here to the Hampshire Historic Landscape Character Assessment and the Hampshire Historic Environment Record or the Hampshire County Archaeologist, although this is not essential.

Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity. The National Planning Practice Guidance (NPPG) states "*... where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions*".

We therefore welcome the identification of "Bentley Buildings of Interest" on Plan C, but there is no explanation about these in the text of the Plan other than a note that "*Other buildings are also of some historic or architectural interest*". Is there a comprehensive list of locally important buildings and features for the parish ?

Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. Paragraph 58 the National Planning Policy Framework (NPPF) states that Local and Neighbourhood Plans should "*... develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics*".



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone [REDACTED] HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



A characterisation study can also help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.

We understand that there is a Character Appraisal for the Conservation Area but has any character assessment been undertaken for the rest of the village or the parish as a whole ? If not, this is a little unfortunate, particularly as it would have underpinned Policy 3 and the references to character in Policies 2, 3 and 9 of the Plan.

However, in terms of the basic conditions, we consider that that Policy and its reference to the Conservation Area Character Appraisal, and the Vision and Objectives for the parish, are sufficient in our view to satisfy the basic condition to have regard to national policy as set out in paragraph 58 of the NPPF.

We welcome the recognition of the relevance to the Plan of Policy CP30 (Historic environment) of the East Hampshire Joint Core Strategy in paragraph 3.8. This is one of the strategic policies in general conformity with which the Plan should be and, in our opinion, is.

We welcome the reference to retaining character and identity in the Vision for Bentley Parish in paragraph 4.1, but are disappointed that there is no reference to the historic environment or historic buildings. However, we welcome and support Objective 8, which we are pleased to note has been reworded as we suggested.

We welcome and support principle ii of Policy 2, Policy 3, criterion i of each of Policy 4 and Policy 5 and the reference to character in Policy 9.

Has the Historic Environment Record and County Archaeologist been consulted to ascertain whether the site off School Lane (Policy 2) has any known or potential archaeological interest as we previously noted was important to do ? (It should be noted that our comments are without prejudice to any comments we may wish to make on any future applications for the development of the site off School Lane).

Policy 3 could also refer to and perhaps be more closely related to the Conservation Area Management Plan and its recommendations. We would also welcome a specific policy in the Plan for the conservation and enhancement of the historic environment and heritage assets in the parish to put "*broader strategic heritage policies from the local plan into action at a neighbourhood scale*" (NPPG), although we do not consider this essential for the Plan to meet the basic conditions.

We have previously supported criterion i of Policy 11, but on reflection this may be considered to be too strict. We consider criterion v of the Policy, now amended as we previously suggested, provides sufficient protection for the Conservation Area, although it would be helpful if it specifically mentioned the Conservation Area e.g. "*...landscape setting or historic significance of the surrounding area, particularly the Conservation Area*".



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
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Finally, two general observations. The Plan does not appear to set out anywhere the issues affecting Bentley that the Plan's policies and proposals are intended to address. In our experience Neighbourhood Plans usually include a section on issues that have been identified through the community consultation process, which then inform and justify the Plan's policies and proposals.

Also, the preparation of the Neighbourhood Plan offers the opportunity to harness a community's interest in the historic environment by getting the community to help add to the evidence base, perhaps by undertaking a historic characterisation survey as indicated above, inputting to the preparation of the review of the conservation area appraisal, the preparation of a comprehensive list of locally important buildings and features or undertaking a survey of grade II buildings at risk from neglect, decay or other threats.

We hope you find these comments helpful. Should you wish to discuss any points within this letter, or if there are particular issues with the historic environment in Bentley, please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours faithfully,



Martin Small
Principal Adviser, Historic Environment Planning
(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

E-mail: 



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Telephone  HistoricEngland.org.uk

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Planning Policy
East Hants District Council
Penns Place
Petersfield
Hampshire
GU31 4EX

30 July 2015

Dear Ms Potts

Subject: South Downs National Park Authority (SDNPA) response to the Submission version of the Bentley Parish Neighbourhood Plan.

I enclose a copy of the SDNPA representation on the Submission version of the Bentley Parish Neighbourhood Development Plan (BPNP).

The SDNPA would like to commend the hard work and effort of the Neighbourhood Planning group and Bentley Parish Council in the preparation of the BPNP. In particular the SDNPA welcomes the ambition of the plan to allocate land for housing to meet some of the identified need in the local community.

The BPNP has made occasional reference to the villages close proximity to the National Park, and the importance of conserving and enhancing the views and rural nature of the Parish. However, as the following representation sets out the SDNPA suggest it would be appropriate for the BPNP to strengthen these references to ensure any future development in the Parish enhances views and the rural nature of the surrounding area.

In summary the SDNPA believes that the minor modifications proposed in the attached representation will ensure the BPNP will be effective in influencing the future growth and change in the village.

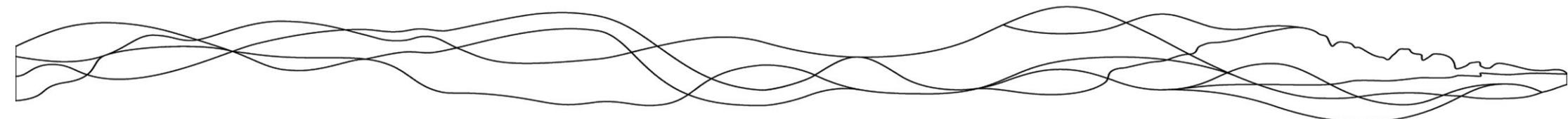
If you have any questions regarding our enclosed representation please do not hesitate to contact Communities Lead Chris Paterson who will be able to provide further clarification if necessary.

Yours Sincerely

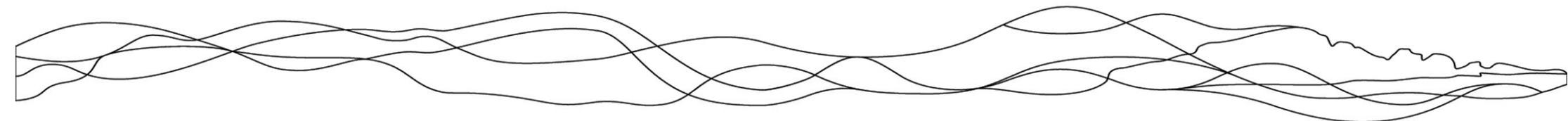

Tim Slaney
Director of Planning

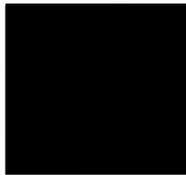
SDNPA response to the Submission Bentley Parish Neighbourhood Development Plan

Ref	Comment	SDNPA recommendation to Bentley Parish Neighbourhood Plan
General Comment		
1.4	The text states that the BPNP is amongst the first NDP prepared in England, there have been 75 NDPs passed examination, with over 1500 in the process of being prepared so this statement will need to be reviewed	Review statement at section 1.4 to better reflect current NDP progress
1.5	Text states that the intention is to submit the plan for examination in spring 2015	Amend text at 1.5 to reflect current status of the NDP examination
2.1	If possible could the location of the South Downs National Park be shown on Plan B to reinforce the close proximity to the National Park	Include South Downs National Park boundary on plan B
2.13	Consideration should be given to expanding this paragraph to incorporate more detail on the close proximity of the South Downs National Park, particularly given the reference to views out to the Downs	Consider including reference to the South Downs National Park special qualities especially the first special quality which relates to diverse, inspirational landscapes and breath-taking views
2.21	First bullet point reference to PAN, please explain what this term refers to in the text	Explanation for PAN (Pupil admission number?)
3.3	Reference to East Hampshire Local Plan saved policies 2009, this should be 2006	Amend text to correct 2009 to 2006
3.5	Text states that Bentley is only required to provide some commercial and community uses, however the JCS also required the parish to provide a small amount of housing development to meet the needs of local people (a proportion of the 150 for villages outside the National Park as set out in the JCS)	Amend text to include reference to requirement to deliver small amount of housing development
3.9	The BPNP will also need to demonstrate general conformity with NPPF	Consider text amendment
3.9	Final sentence. NDPs can also add more local finer level of detail to existing strategic policies	Consider text amendment
3.19	Proposed phasing of development. Experience from the Petersfield Neighbourhood Plan examination suggests that attempting to phase development does not conform with National guidance. It has been recommended that the timing of development should be linked to the provision of the necessary infrastructure to ensure development does not overwhelm infrastructure and services. Suggest making reference to the evidence provided in 4.18 to support the phasing of development.	Consider the use of phasing development as suggested in 3.19
4.10	The supporting text for Policy I states that it confines development to brownfield land. The policy establishes a Settlement Policy Boundary but it is questioned as to whether it also is able to confine	Suggest removal of reference to brownfield land. If it is to remain,



	development to brownfield land considering that garden land is not classified as such	suggest using the term previously-developed to more accurately reflect the NPPF.
4.15	The supporting text for Policy 2 suggests that approximately 10 dwellings will be provided on 'Land off School Lane'. Has the BPNP group considered allocating the site for a minimum of 11 dwellings to ensure an affordable housing contribution from the site to enable the development of affordable housing to meet local needs?	Consider allocating the site for a minimum of 11 dwellings to ensure an affordable housing contribution is realised from the development
4.20	Check text and insert full date for approval of the Bentley Conservation Area Appraisal and Management Plan.	Amend text
Policy 6	Consideration should be given to allocating the open spaces identified at iv, v and vi as Local Green Spaces to ensure their protection?	Consider allocation of additional LGS as set out in Policy 6
Policy 8	Consider providing clarification on what would need to be done to demonstrate that the continued use is no longer viable, for example a marketing exercise. Have the BPNP group considered a stepped approach to change of use? For example the group may not want to lose a retail unit to residential development but a change of use to a café or nursery may be welcome if that particular use is required in the Parish. This approach would make this policy more flexible in terms of change of use and still resist particular forms of change if appropriate	Consider amending text to provide more flexibility in terms of change of use.
Policy 11	Is this policy intending to allow 100% affordable housing development outside the SPB, if so, why does the policy then go on to allow a minimum number of market housing under clause ii. The JCS allows a maximum of 30% market housing on rural exception sites, is this considered appropriate, if so is clause ii of Policy 11 required.	Consider amending text to reflect policy in the JCS
5.5	Replace the word 'in' with 'is' for the sentence to read properly	Amend text





Simon Jenkins
Planning Policy Team Leader
East Hants District Council
Penns Place
Petersfield
Hampshire
GU31 4EX

29 July 2015

Dear Mr Jenkins

RE: Issues raised by Bentley Neighbourhood plan 2015 - 2028

I am writing to you to express concerns regarding the Bentley Neighbourhood plan. Our comments on the Bentley Neighbourhood Plan 2015-2028 are listed below. However by way of introduction we are stating that our main concern relates to the process by which the current plan was arrived at. An additional concern relates to the influence of vested interests in a small community. Finally, we will be stating that we believe the Bentley plan has been compromised by external events, is bad for the village and needs to be re-drawn.

- In early summer 2014 we were approached by a representative of the Parish Council and their consultant Mr O'Neill to ascertain whether, in principle, we would be prepared to release a small area of land at the South of our property for development. After some thought, and given our age and stage (downsizing being in our minds) we indicated that we would not be averse to this idea.
- From June 2014 for a period of about six months Bentley Parish Council carried out extensive consultations with residents to determine which sites in the village might be suitable for development – 'the least worst options' given the accepted need for additional housing in Bentley. The result of this was that there was overwhelming support for small clusters of development on 'contained' SHLAA sites such as BEN 12 (land East of Hole Lane) adjacent to our property. (Not to mention our own site – for we, too, have a vested interest)
- As a result of this extensive research, certain key principles – the Vision for Bentley - were accepted as part of the terms of reference for the Bentley Plan. Two of these were:
 'There would be a few smaller developments instead of one large development and:
 Areas around the northern and western edge of the village may be acceptable for development.
- These areas were put forward for a number of reasons – they were contained, they were in easy walking distance of shop, church and school and utilised existing footpaths and would thus reduce traffic, which is a big problem during school hours. It has also been acknowledged that the school might need to be extended – BEN 14 being the obvious choice.

- The working party was then set up to draw up the plan. However, within about a week an outline proposal for 37 houses on the Somersets Field site (not contained, no footpaths, drainage issues etc) was accepted by EHDC.
- The terms of reference immediately changed and working party members decided that there should be no development on contained sites within the village – but instead, put forward BEN14 – adjacent to the school and to open countryside – as the only development permitted until 2028. Strangely, no one on the working party lived anywhere near, let alone adjacent, to this site.
- Many members of the working party had vested interests in preventing development on BEN 15 and BEN16, having homes in Eggars Field or along School Lane and thus adjacent to BEN 16.
- The owner of Somersets Field was on the working party and was heard to remark that the three fields to the East of Hole Lane (BEN 12, BEN 15 and BEN 16) were 'sacrosanct' to the character of the village.
- Were there reasonable endeavours to ensure a wide demographic formed the working party? How, in a small community can there ever be an objective overview?
- We contend that once the 37 houses were allowed on Somersets Field, the Parish Council ought to have started again. Unfortunate but democratic and preferable to making up policy on the hoof which is what the working party ended up doing.
- We seem to have ended up with a plan for about 50 houses to be built over the next 13 years. Marvellous for residents, but where are all our children going to live?
- Our view is that Bentley Neighbourhood Plan has been compromised, the original Vision for Bentley was seen as broadly acceptable by a vast majority in the village and that the process by which the current plan has been arrived at is fundamentally flawed.

Yours sincerely

[Redacted Signature]

Stuart Macnaghten

[Redacted Address Line]

Mobile [Redacted]

Hannah Collier

From: Jo Unsworth [REDACTED]
Sent: 31 July 2015 11:31
To: EHDC – Neighbourhood Plans Shared
Subject: Representations to Reg 16 consultation on the Bentley Neighbourhood Plan
Attachments: 1052957 Reps to Reg 16 consultation 31 07 15.pdf

Dear Sir/Madam,

Please find attached representations to the above consultation, made on behalf of Mr S Bladon.

I would be grateful if you could confirm receipt of this email and attachment.

Kind regards,

Jo

Jo Unsworth
Associate
Rural

Savills incorporating Smiths Gore

Ground Floor
 Hawker House
 5-6 Napier Court, Reading , RG1 8BW



Tel : [REDACTED]
 Mobile : [REDACTED]
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 Before printing, think about the environment



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31st July 2015

Planning Policy
East Hampshire District Council
Penns Place
Petersfield
Hampshire
GU31 4EX

Our Ref 1052957

Dear Sir/Madam,

Representations to the Regulation 16 publicity stage of the Bentley Neighbourhood Plan

Savills act on behalf of Mr S Bladon, a resident of the village of Bentley and owner of land to the east of Hole Lane, Bentley. The land has been promoted through the preparation of the Bentley Plan, including the public consultation exercises where it has consistently been supported for residential development. On this basis, a planning application for 15 dwellings was submitted to East Hampshire District Council (ref. 55711) in November 2014. Following the District Council's refusal of the application an appeal was lodged and a Hearing held on 16th July 2015. A decision is therefore expected shortly.

Basic Conditions

If a Neighbourhood Plan is to progress to a referendum and be "made" it is necessary for it to meet the basic conditions which are provided in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, including:

- That the Neighbourhood Plan is appropriate having regard to national policy;
- That the Plan contributes towards the achievement of sustainable development;
- That the Neighbourhood Plan is in general conformity with the strategic policies in the Development Plan for the local area; and
- That the Plan is compatible with EU obligations.

Having regard to the basic conditions above, our representations to the Submission Neighbourhood Plan (dated April 2015) are set out below.

1. Is the Neighbourhood Plan appropriate having regard to national policy?

The NPPF encourages local communities to prepare Neighbourhood Plans "to ensure that they get the right types of development for their community" (paragraph 184). In applying the presumption in favour of sustainable development, paragraph 16 requires that Neighbourhood Plans "support the strategic development needs set out in Local Plans, including policies for housing and economic development" and "plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan".

The Bentley Settlement Boundary (BSB)

Policy 1: Spatial Plan seeks to establish a strong presumption against development outside the Bentley Settlement Boundary (BSB) – explaining that this is “*for the purpose of containing the physical growth of the village over the plan period*”. This is clearly not planning positively. In particular, the BSB is drawn tightly around the existing built up area of the village (save for the new housing allocation identified in Policy 2) – an approach which has expressly been found (e.g. by the Examiner into the Rolleston-on-Dove- Neighbourhood Plan) to be contrary to the provisions of the NPPF.

The NPPF establishes a strong presumption in favour of sustainable development that has implications for how communities engage in neighbourhood planning (paragraph 16) – it requires communities to plan positively and for “all plans to be based upon and reflect the presumption in favour of sustainable development” (paragraph 15). The adopted development plan is the Core Strategy which is silent with regard to the quantum and location of housing in Bentley (other than the need for it to contribute towards an overall requirement of 150 dwellings in the villages outside the South Downs National Park). As such the positive presumption is engaged. Given that there is no adopted housing allocation for Bentley yet¹, and that it is not possible for the development requirements of Bentley to be accommodated without greenfield urban extensions, it would not be appropriate or justifiable to draw the settlement policy boundaries so tightly; and indeed to do so would be contrary to the positive presumption. It should be noted that the Examiner in the case of the Rolleston-on-Dove Neighbourhood Plan, in relation to a similarly tightly drawn SPB, came to this conclusion i.e. that the policy was contrary to the Framework because the Neighbourhood Plan failed to plan positively to support local development, and as a consequence he recommended that the policy be deleted.

From the above, and in the absence of a specific and adopted housing allocation, it is clear that the Neighbourhood Plan cannot be seen to unduly restrict development.

Community Support

The NPPF highlights the importance of community-led planning and the power that Neighbourhood Planning provides to local communities. Clearly, therefore, it is vital for the Neighbourhood Plan to accurately portray the views of the community that it purports to represent. At present this is not the case for the Bentley Neighbourhood Plan: a number of consultations by the Parish Council and the District Council have indicated that by far the strongest preference of the community is for residential development to take place on our clients land to the east of Hole Lane (SHLAA site BEN009). However the Neighbourhood Plan specifically excludes this site from the SPB and instead re-draws the SPB around the site at School Lane identified in Policy 2. This development strategy is a significant change from that which was proposed in earlier consultation stages of the Bentley Plan; and there is no justification in the Submission Plan for this change in the development strategy.

2. Does the Plan contribute towards the achievement of sustainable development?

In order to meet this basic condition, the Neighbourhood Plan needs to demonstrate how the allocation that it makes is the most sustainable option. The ‘Bentley Site Evaluation’ (Appendix K to the Consultation Statement ranks the land to the east of Hole Lane (ref. BEN009) as 3rd best in the village on the basis of policy breaches and policy adherence. Sites BEN002 () and BEN014 (land xxx) are the only sites ranked higher.

However this assessment of the sites is flawed for the following reasons:

- No account is taken of the fact that BEN002 is part of the Bentley Industrial Area and is protected, in planning policy terms, for use as an employment site. This is a serious ‘policy

¹ Although a requirement of ‘about 50’ is contained within EHDC’s Submission Draft Local Plan: Housing and Employment Allocations document

breach' which is not considered at all in the Table – and in fact for this reason the site was excluded from any further assessment by EHDC in their SHLAA.

- BEN009 is identified as breaching policy in respect of 'protection of listed and historic buildings'. However this is clearly incorrect and there has been no suggestion by the Neighbourhood Plan community, or EHDC through their consideration of the planning application, that this site would have any adverse impact on listed and historic buildings. The assessment should therefore be changed to one of policy adherence rather than breach.
- Site BEN009 is assessed as 'n/a' under the provision of housing for local people. This is clearly not the case as the application proposes the provision of 40% affordable housing in accordance with the requirements of the adopted Joint Core Strategy. In contrast, where site BEN014 is identified as 'n/a' under this criteria, it should be amended to 'no' to reflect the fact [REDACTED] using allocation in the Neighbourhood Plan requires this site to deliver only market housing, and no affordable housing for local people.

Taking the above into account, sites BEN002 and BEN0414 score more negatively than the assessment currently provides, while BEN009 scores more positively on two separate counts. Policy 2 of the Neighbourhood Plan therefore does not provide for the most sustainable development in the village, on the basis of the assessments undertaken.

3. Is the Neighbourhood Plan in general conformity with the strategic policies in the Development Plan?

Policy 2: Housing Site Allocation provides for the development of 10 dwellings on land at School Lane to contribute towards meeting the future housing needs of the Borough. The identification of this single allocation is based on the acknowledgement (at para 4.17) that planning permission exists elsewhere in the village for some 9 dwellings (at Crocks Farm) plus 37 dwellings (at Somerset Field).

However, permission for the 9 dwellings at Crocks Farm was originally granted back in 2008 and therefore does not contribute to the housing requirement for the village for the reasons set out below.

The Joint Core Strategy identified a need to provide for 10,060 new homes over the period 2011-2028. The consent at Crocks Farm pre-dates this.

In any event, the Joint Core Strategy acknowledged that some of the 10,060 dwelling requirement had either already been constructed or consented, and therefore the allocations set out at Policy CS10 formed the residual numbers required to achieve this overall figure.

It is therefore clear that the requirement in Policy CS10 to provide 150 homes at the villages outside the South Downs National Park is in addition to the already-consented scheme at Crocks Farm, which would have been taken into consideration when arriving at this figure.

As such the Neighbourhood Plan provides for only 47 dwellings at Bentley in the plan period (37 at Somerset Field and 10 at School Lane). Whilst the Development Plan is silent on the specific matter of how much development Bentley should deliver as a contribution towards the 150 in Policy CS10, this falls below the requirement for "about 50" in the emerging East Hampshire Local Plan: Housing and Employment Allocations document (which is itself a contribution towards a "minimum" of 150). Whilst this is not yet part of the adopted Development Plan, it is prudent for the Neighbourhood Plan to adhere to its requirements to avoid being 'out of date' very soon after being 'made'.

As an aside to this point, it is noted that the BSB has been drawn to include the proposed allocation at School Lane but to exclude the consented development at Somerset Field. This is inconsistent and in fact illogical, given that the Somerset Fields development is at a more advanced stage in the planning process.



From the above it is clear that, in order to meet the basic conditions and progress to a referendum, the Neighbourhood Plan needs to plan positively for new development and allocate the site to the east of Hole Lane (BEN009) for the development of 15 dwellings, as the most sustainable development option for the village and to reflect the community's views.

We would like to take this opportunity to note that we wish to be notified of any decision EHDC make under Regulation 19 in relation to the outcome of the examination – contact details are provided below.

Yours sincerely

[Redacted signature]

Jo Unsworth • BSc MSc MRTPI
Associate

e [Redacted] • t [Redacted]

Hannah Collier

From: Drew <[REDACTED]>
Sent: 31 July 2015 13:51
To: EHDC – Neighbourhood Plans Shared
Subject: Land Adjacent to Bentley Industrial Estate
Attachments: 003 Bentley Financial Appraisal Report with appendices 2.pdf; Bentley Employment Statement 280515.docx; Land at Bentley Industrial Centre - AI Assessment Report-2.pdf; 13003 P003 Large block plan.pdf

Dear Sir/Madam

Further to Victoria Potts letter of the 19 June 2015 I hereby object on behalf of CY Developments Ltd to the inclusion of the above named land in the Neighbourhood Plan for Employment purposes.

As you may be aware, there is a current application and appeal on the site and as part of this, the applicant has had both an Employment Statement and a Financial Appraisal prepared by QUOD ltd. These are attached.

In furtherance to this, Adams Integra have on behalf of the Council responded to these documents. They would not support the retention of the land for Employment purposes. Their findings are attached.

In summary, the site has an old permission which lapsed (for employment purposes) and was not implemented. This no longer continued to be a viable option for the landowner and following a significant period of time for marketing (full details of which are part of the application - Eleanor Evans is the case officer if that helps in referencing the documentation), the site has now been demonstrated to both be not in demand and not viable for employment purposes.

I have also included the large Block Plan from the application for identification purposes.

Kind regards
Drew Blackman

**ADAMS
INTEGRA**

*Viability, affordability
and planning specialists*

East Hampshire District Council



Evaluation of Financial Viability Report

Land West of Bentley Industrial Centre, Old A31, Bentley,
Farnham, GU10 5NJ



July 2015

Contents

Introduction	3
The Current Position	3
The Scope of this Report	4
The Policy Context	4
The Previously Consented Scheme	5
Methodology	5
Assessing the Evidence	6
The Tested Scheme	7
Base Appraisal	7
Conclusion	9



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1 Introduction

- 1.1 Adams Integra has been commissioned by Eleanor Evans, Principal Planning Officer at East Hampshire District Council [EHDC] to provide an opinion on the robustness of the Financial Viability Assessment [FVA] supplied in support of planning application 49352/005 for the construction of 8 dwellings on Land West of Bentley Industrial Centre, Old A31, Bentley, Farnham, GU10 5NJ [the site] following refusal of Applications 49352/004.
- 1.2 This report has been based on the following documents and information:
- Response to comment from Economic Development Service 20/7/15
 - 005a Bentley Viability 20th July -Quod
 - Financial Appraisal by Quod- May 2015
 - Planning Application 49352/001 and associated documents
 - Bentley Neighbourhood Plan v3 Final Submission
 - Bentley Employment Statement – Quod-
 - Marketing Report and Development Appraisal – Park Steele -2014
 - BCIS on line
 - www.google.co.uk/maps
- 1.3 Other information such as the plans from the 2006 Planning Application 49352 on the EHDC planning portal has also been taken into consideration.
- 1.4 This report has been prepared by Alex Medhurst BSc (Hons) Dip Surv, MRICS who has over 20 years of relevant post qualification experience. He is an RICS Registered Valuer [No. 0092721]. He has extensive experience of the valuations, sales and lettings of commercial property as an agent, surveyor and developer. Adams Integra has no conflict of interests in preparing this report.

2 The Current Position

- 2.1 It is understood that the applicant C.Y. Developments Ltd [the applicant] is seeking to purchase the site from Linden Homes who the application records as the current owners. The applicant has applied for permission to construct 8 dwelling houses on the site which is identified in the proposed Neighbourhood Plan and by EHDC's Local Plan as being reserved for employment.
- 2.2 The applicant maintains that the site is not viable for the previously consented employment use and seeks to demonstrate the lack of viability through the various reports and assessments provided.

- 2.3 The site is currently 'bare' with no buildings on it. The site is not described in detail here as this is covered in other reports.

3 The Scope of this Report

- 3.1 This report assesses the information provided by the applicant's consultant, Quod, along with other information gathered from the sources listed above.
- 3.2 From these assessments a conclusion is drawn about whether the applicant has robustly demonstrated that there is no longer a need for reserving the site for employment use and whether the previously consented employment use is not viable.

4 The Policy Context

- 4.1 Quod have referred to the relevant National and local planning policy under paragraph 2.4 of their FVA Report. Therefore we do not need to repeat the relevant local planning context nor are we asked to comment on the relevant policies which EHDC will react to.
- 4.2 However we do add from the NPPF the following policies which have not been included as they are considered relevant to the context:

18. The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.

19. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

20. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.

21. Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:

- set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;

5 The Previously Consented Scheme

- 5.1 The consented scheme in 2006 was for 9 business units where the ground floors were restricted to B1(b) and B1(c) uses with B1(a) uses on the mezzanine floors of Units 7 to 9 only. Full B1(a) (office) use of units 1-6 was restricted on the grounds of the amount of car parking available.
- 5.2 Linden Homes obtained approval to Planning conditions requiring approval to the materials to be used for construction, in June 2009.
- 5.3 The gross external floor area of ground and mezzanine floors amounted to 1,195 m² [12,862 ft²]¹. The site area is recorded as 0.277 Ha [0.68 acres] in the application form.
- 5.4 The current access to the site from the public highway is through the middle of the existing Bentley Industrial Centre.

6 Methodology

- 6.1 The method used here is to assess whether the reserved employment use is sufficiently viable. To do this we consider firstly whether the marketing has been sufficiently robust and offered on competitive terms in order to demonstrate whether there was demand for the completed development.
- 6.2 Furthermore we also consider the accepted methodology ² of carrying out a residual appraisal using current market values and inputs. The outcome is then bench marked against what is considered to be an acceptable land value to incentivise a reasonable land owner to sell the land. This level will

¹ Drawing CDP1315/6- Feb 2006

² RICS Financial Viability in Planning Guidance Note [1st Edition] GN94/2012

allow a developer to bring the scheme forward, leaving a sufficient margin to reward the developer's risk.

- 6.3 The residual land value is expected to be a positive figure and at a high enough level compared to comparable values for a similar use of the land in the local area.

7 Assessing the Evidence

- 7.1 We have considered the Marketing Report prepared by Park Steele. This records a marketing campaign carried out jointly with Wadham & Isherwood since 2013.
- 7.2 We consider both agencies to be appropriately experienced and local to the property to be competent commercial property advisors and letting/sales agents for this site. We have considered the period of the marketing, the marketing measures that have been carried out and the marketing material used. We do not have any adverse observations or comments to make and consider that the marketing has been demonstrated to have been robust.
- 7.3 The limited number of enquiries is reported as disappointing and demonstrates the lack of demand either for the site or the completed buildings on a leasehold or freehold basis.
- 7.4 A number of reasons may be deduced from the evidence. Firstly that the occupiers for relatively small business units in this location would be expected to be small businesses, with quite immediate needs. The fact that planning permission had lapsed and the units had not been built meant that the agents could not offer any certainty to interested parties.
- 7.5 Secondly because a developer will need to fund the development through a commercial loan, this would inevitably need to be secured against the property with appropriate evidence that the developer has income to service the loan. It is recognised that the short term leases and the inherent risk of voids would restrict the type of funding that would be available for a speculative commercial scheme.
- 7.6 Furthermore it has been clear that the Government's current Empty Property Rates scheme deters a developer from speculative development. Following practical completion of the scheme, the developer would be liable for paying Empty Business Rates. Based on the tone of Rateable Values on the adjacent scheme, the completed scheme could attract a Business Rates liability in the order of £57,000³ per annum until occupied.

³ 1195 m² x £100 per m² x 0.48p= £57,360 for 2015/16.

8 The Tested Scheme

- 8.1 The market norm for the density of an industrial development is to construct a building covering no more than 40% of the site. This allows sufficient space for staff and customer parking, loading and unloading areas, bin storage, landscaping etc.
- 8.2 On this basis the tested scheme would be expected to show buildings of at least 40% of 0.277 Ha being 1,108 m². The consented scheme was 1,195 m². This includes the mezzanine offices which require an equal proportion of the car parking and circulation space. Therefore the scheme cannot be criticised for not maximising the use of the site.
- 8.3 We have considered other industrial uses and building configurations including a single building. Whilst the construction costs may be less due to savings from quantum and less materials (i.e. less dividing walls, lower number of doors, less services, etc), the achievable terms would also be discounted for quantum. These more or less cancel each other out, particularly once the risk of voids are factored in.
- 8.4 From the comments about the small village location, road access and limited catchment of employees, we see the tested small unit scheme aimed at smaller local businesses, to be the optimum model to test.

9 Base Appraisal

- 9.1 Quod set out their rationale under the heading Base Appraisal in their FVA. We will not go through the inputs in detail. Many are market 'norms' such as professional fees and acquisitions costs. Rather we comment on the larger influences and variables which are open to bigger discrepancies. These as follows:
- 9.2 Quoting terms/Gross Development Value
Quod give a good level of detail in reaching their concluded figure of £10 per ft². The CIL FVA's that are referred to were carried out by this company. The £7.50 per ft² rate was a generic level of Estimated Rental Value [ERV] applicable for all unit sizes across the East Hampshire district. The £10 per ft² rate used by Quod would be more appropriate for smaller units where a premium is usually charged to reflect the higher construction costs and is considered to be a reasonable level to be used.
- 9.3 Yields
Quod have tested a range of All Risks Yields from 7% to 8% to capitalise the estimated rental values. We consider the rates tested are appropriate

to the size, location and nature of the risks associated with the proposed development in the current economic climate and market conditions.

9.4 Incentives/Void Periods

The levels used are considered reasonable. Usually speculative developments of this nature are completed to a 'shell' finish whereby the occupier is required to fit out any offices, staff rooms, kitchens to their own specification and a rent free period is given to off-set some of these costs and also to incentivise the occupier until the unit is ready for occupation. The 3 month rent free period adopted by Quod is considered reasonable in the context of shorter leases and 'full' quoting terms.

9.5 Costs

Other than the ERV and yields, construction costs can have the largest impact on viability. Selecting the most appropriate build costs has been demonstrated to be thorough and robust. Whilst the use of Mean, Lowest, Lower Quartile or Median BCIS build rates are open to challenge, Quod have provided a reasoned approach to the resultant figure used.

9.6 It may have been more appropriate for Quod to have used a higher build cost of £79.52 per ft² (BCIS 'Factories Generally' - £856 per m²- sample 157 projects- July 2015-Rebased to East Hampshire) than the £72 per ft² used, particularly to allow for the smaller unit construction costs and the current cost inflation prevalent in the construction industry generally. However a higher construction cost would have had an even more detrimental effect on viability.

9.7 Developers Return

We would have expected a developer's return/profit level of 20% of the total development costs to be used for a small unit speculative scheme. This higher level is the industry norm. The 15% rate used by Quod reduces the development costs and increases the residual amount left to fund the purchase of the site, hence assisting in increasing the viability. Therefore we cannot criticise the level used by Quod as being too high.

9.8 Professional fees

We would have expected a rate of 12%-14% for professional fees including architects, structural engineers, electrical and mechanical consultants, quantity surveyors, landscape architects, etc. Quod have used 9% again reducing rather than attempting to inflate the development costs.

9.9 Benchmark Values

The land is reserved for employment so the appropriate benchmark value to test the outputs against is the Employment Lower value of £945,000

per Ha/ £382,000 per acre referred to from the EHDC CIL FVA. Adjusted to the site size this equates to a threshold of £248,000 or thereabouts. This being the level we are looking to see if the residual land value reaches in order to reward the land owner to sell.

10 Conclusion

- 10.1 We have concluded that the applicant has demonstrated that the scheme has been robustly marketed. The outcome of the marketing has demonstrated a lack of demand for the site from owner occupiers, or pre-letting or pre-sales demand for new units on the site.
- 10.2 We see that the risk of this type of development includes voids, Empty Business Rates and difficulties in securing commercial property mortgages/loans on acceptable terms. These factors have an impact on the viability of speculative small unit development generally. This is likely to continue until the property cycle improves and business/occupier confidence increases enabling commitments to pre-letting transactions to reduce the level of risk.
- 10.3 We have run our own residual appraisals and tested the sensitivity to the various variables for a B1(b)/(c) development. However, even with a best case scenario using:
- ERV: £10 per ft²
 - Density: 12,538 ft²
 - Yield: 7%
 - Build Costs: £72 per ft²
 - Professional Fees: 9%
 - Developers Return: 15%
- 10.4 The residual site value comes out at only £172,000 which is below the bench mark target value sought of £248,000. Using the rates that we would have expected Quod to have used, produces a significant negative land value in the region of -£194,000 as they have reported.
- 10.5 A large cause of this outcome is the rapid increase in construction costs evident since 2008. Limited supplies, increased labour costs, increased fuel costs and greater demand for building services has resulted in much higher construction costs compared to 2006. This situation of increasing costs is not expected to diminish in the short to medium term.
- 10.6 In summary we consider that the evidence provided robustly demonstrates that an employment use on this site is not currently viable.

End of report - Adams Integra - July 2015



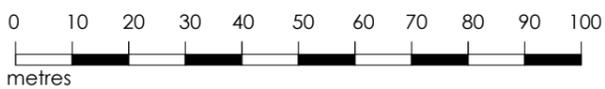
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scheme	drwg. no.	revision
- Bentley Industrial Estate, Bentley	- 13003-P003	- #
title	scale	date
- Location Plan showing site layout	- 1:1250@A3	- Jan '15

Nye saunders
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Bentley Employment Statement

31 July 2015



Contents

1.	Introduction	1
2.	Policy Context	2
3.	The Relative Need for Different Land Uses.....	3
4.	The District-Level Impact of Release.....	6
5.	Local Impacts of Release	8
6.	Summary and Conclusions	12

1 Introduction

- 1.1 The Site is adjacent to Bentley Industrial Estate, in Bentley, East Hampshire. Other neighbouring uses are houses, parking, gardens, and a field. The Site itself has been allocated for industrial and business uses since the Local Plan Second Review (March 2006).
- 1.2 The site has been marketed since August 2013 and remains on the market but without success. Planning permission was granted for 1,195 sqm of industrial and office space in 2006, but this was not been taken up. The Financial Appraisal demonstrates that industrial uses are not viable at this site.
- 1.3 With no reasonable prospect of the Site being used for its allocated purpose, alternative uses must be considered. This report shows that:
 - The relative need for housing is greater than the need for employment
 - Employment in the district would not be materially affected by the loss of this allocated site
 - Local circumstances do not require retention of this Site for employment, and the benefits of housing would override those of employment.
- 1.4 In the nine years since it was allocated, the site has made no contribution towards sustainable development. The opportunity to provide housing means that, with appropriate flexibility, the Site could finally deliver positive benefits to the local area.

2 Policy Context

- 2.1 The “golden thread” of planning is “a presumption in favour of sustainable development” and local planning authorities should “positively seek opportunities to meet the development needs of their area” (National Planning Policy Framework paragraph 14).
- 2.2 To do this means balancing competing demands for land. NPPF paragraph 22 states that policies should “avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.” It goes on to say that in these circumstances, applications for alternative uses should be “treated on their merits”, having regard to market signals and “the relative need for different land uses” to support sustainable local communities.
- 2.3 This approach is reflected in local policy too, with the East Hampshire District Local Plan, Second Review (2006) policy IB4. The supporting text paragraph 655 states that:

“the Council may consider granting planning permission for the redevelopment of existing industrial or business sites to alternative uses where overriding local benefits would result from the proposed development”.

- 2.4 Policy CP4 of the East Hampshire District Local Plan: Joint Core Strategy states that:

“The use of employment land for alternative uses will be permitted where the site can be shown to be no longer suitable for employment use of some form and the alternative use is in conformity and consistent with other policies and strategies of the Local Plan: Joint Core Strategy.”

3 The Relative Need for Different Land Uses

- 3.1 The NPPF states that in these circumstances, applications for alternative uses should be treated “on their merits”, having regard to market signals and “the relative need for different land uses”. This section considers the relative need for employment and housing land. It concludes that while both are needed, market signals clearly show that the need for housing is much greater.
- 3.2 East Hampshire has very low rates of claimant count unemployment, at 0.6% it is less than a third of the England and Wales average¹. Only 406 residents in the whole of East Hampshire are recorded as claiming out-of-work benefits. Lack of accessibility to employment opportunities is not one of the area’s weaknesses.
- 3.3 Vacancies for industrial and office space in East Hampshire are “slightly below” normal market rates², and one of the main attractions for firms are “relatively low rents” compared to neighbouring districts³. The Joint Core Strategy (paragraph 5.10), notes the evidence for a “modest” requirement for additional land over the plan period.
- 3.4 By contrast the market signals for housing need are extremely strong. Housing affordability is generally measured by the ratio of lower quartile prices to lower quartile earnings. By this measure East Hampshire has some of the least affordable housing in the country – at 11.67 the price/earnings ratio is higher than any other Hampshire district, in fact outside London there are only seven other districts in England with a worse affordability ratio⁴. Figure 1 below shows East Hampshire’s housing affordability problem in the national context.
- 3.5 The 2013 SHMA found that on standard affordability measures 71% of households would be unable to buy a home in East Hampshire, while 38% would be unable to afford to privately rent a home in the District, noting:

¹ April 2015 figures

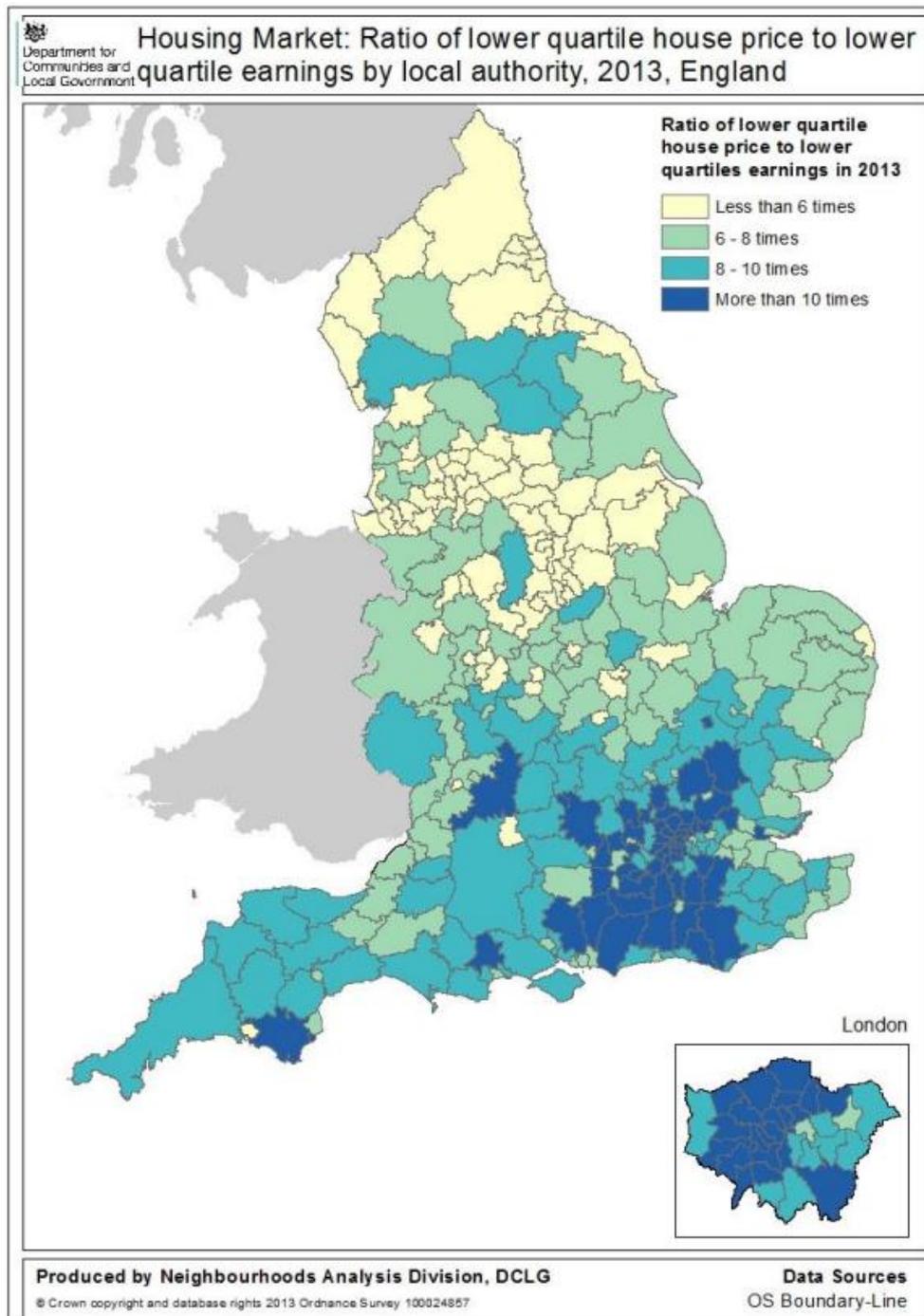
² East Hampshire Employment Land Review Update 2013, paragraph 3.9

³ Employment Land Review Update 2013, paragraph 4.5

⁴ DCLG 2013 figures, Live Table 576 and Chart 575

“This highlights the scale of affordability pressures that face households in East Hampshire” (E Hants SHMA 2013, paragraph 3.57).

Figure 1. House Price Affordability Ratios



3.6 In response to these price signals and demand, East Hants District Council has raised housing targets to 592 dwellings per annum, but the March 2015 “Updated Factual Summary – Five Year Housing Land Supply” report notes that give the size of the current shortfall:

“It must be concluded that there is no realistic prospect of meeting the annualised target that includes the current shortfall figure in the next five years”.

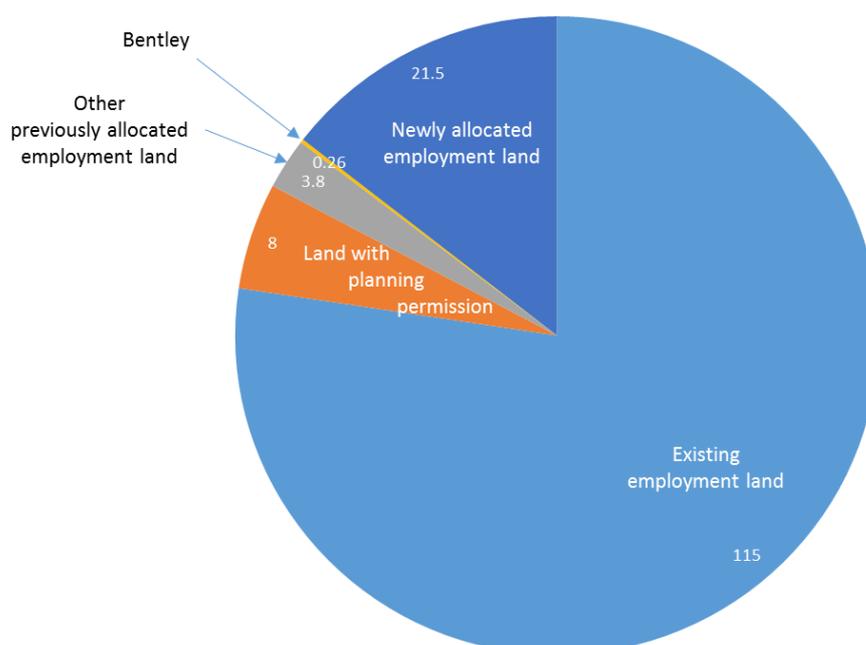
3.7 It is clear that the market signals show that the *relative need* for housing land is much more acute than for employment land. Employment land may be needed in time, as the plan period progresses, whereas housing supply is already in shortfall with no prospect of catching up quickly. Business rents are relatively low compared to neighbouring districts, whereas housing costs are exceptionally high.

3.8 In this situation, NPPF paragraph 22 requires a housing application for an unviable employment site to be considered on its own merits.

4 The District-Level Impact of Release

- 4.1 The Site has been unsuccessfully marketed for employment uses since 2013 and the Financial Appraisal demonstrates that industrial uses are not viable at this site. This next section demonstrates that even in the hypothetical situation that the site was viable for employment, its loss would not materially affect employment in the district.
- 4.2 The Employment Land Review and Joint Core Strategy identify a need for the District to have 149 hectares of employment land by 2028. This includes 115ha of existing employment, 8ha with planning permission, 4.1ha of land previously allocated that is to be carried over (including the land at Bentley Industrial Estate), and 21.5ha of additional land allocated in the Core Strategy.
- 4.3 The Site at Bentley is very small, one of the smallest considered by the ELR, representing just 0.18% of the total employment land planned for by 2028. There is good reason to think that it will not be required in order for the district to meet its needs. The ELR allows for a safety margin of three years' take-up, equivalent to around 5ha. It also assumes that a further 5ha of the newly-allocated employment land is specifically to replace losses elsewhere (anticipating just such a release as this).

Figure 2. Employment Land Areas to 2028 (Hectares) – Joint Core Strategy 2014



- 4.4 These allocations are not intended to merely match current demand, they are an estimate of future demand too, and are intentionally generous to allow flexibility and spare capacity. In the unlikely event that this is not enough to ensure employment land allocations last the full 15 year plan period, East Hampshire has already identified the next tranche of land – a further 2.8ha at Whitehill and Bordon in the period 2028 to 2036⁵.
- 4.5 The NPPF is clear that Local Plans and land allocations should be flexible, and regularly reviewed to reflect changing circumstances. Given that Bentley represents only about one and a half months' worth of future employment land supply, its loss would mean, at worst, bringing forward the additional allocation at Whitehill and Bordon by about six weeks to bring supply back into balance in 2028.
- 4.6 Employment has a 15 year land supply with three years' safety margin built in and additional land planned for after 2028, whereas housing has only a 5 year housing land supply with a 5% buffer built in (equivalent to only three months), and a past shortfall that needs to be made up.
- 4.7 Release of this Site will therefore not have any material effect on the actual amount of employment floorspace delivered in East Hampshire, or on the number of jobs. It would however have a net positive impact on housing delivery.
- 4.8 Indeed the Core Strategy's figures effectively assume just such releases will occur – the ELR includes an allowance for losses, whereas the housing land supply assumes windfalls will contribute to supply, with 43 homes per year for five years.

⁵ Joint Core Strategy paragraph 5.12

5 Local Impacts of Release

- 5.1 The previous planning consent for employment uses on the Site allowed car and cycle parking for 36 employees. In a district with around 58,000 working residents⁶, this is not significant, and as shown in the last section the employment allocations mean there is actually not likely to be *any* district-wide loss of potential employment.
- 5.2 That leaves the question of whether there are special local impacts that still need to be taken into account – whether there are overriding reasons for policy to prefer employment to be delivered here rather than elsewhere in the district.
- 5.3 This section considers this and concludes that it is a poor location for employment, with little connection to Bentley’s economy or labour market, and that it would be more compatible with sustainable development for the employment growth to happen elsewhere.
- 5.4 The statistics in this section are primarily drawn from the 2011 Census because this allows more local analysis than other data sources. The smallest Census data areas are Output Areas, and Bentley is covered by two: E00114796 and E00114796, shown in the figure below. Where Census data for Bentley is quoted in this section it refers to these two areas combined.

Figure 3. Census Output Areas covering Bentley



⁶ Census 2011

5.5 There are a number of jobs in Bentley – not just the existing Bentley Industrial Estate, but also the Red Lion Lane Business Estate, the convenience store, school, care home etc. Altogether the Census found around 300 people working in Bentley, including those working at or from home. This is only a little lower than the number of Bentley residents in work. However there is very little connection between the two.

5.6 On the whole, jobs in Bentley are filled by people who commute into the area, while residents of Bentley commute out to work. The Census records only nine Bentley residents who work in the village (excluding those working at or from home). Anecdotal evidence suggests few if any of these nine people are working in the Bentley Industrial Estate.

The existing Bentley Industrial Estate

A survey of occupiers was conducted by the owner of the exiting Bentley Industrial Estate in May 2015. It found a total of 23 full-time employees and three part time employees. None lived in Bentley, nor within four miles of the Site, and the average distance travelled to work in the industrial estate was over seven miles. All travelled to work by car or van.

5.7 The industrial estate is not providing work for Bentley residents because it is not the sort of employment that they are seeking.

5.8 Bentley’s residents are relatively old, well qualified, and disproportionately working in high-skilled occupations, compared to the English average, and indeed even compared to the rest of East Hampshire.

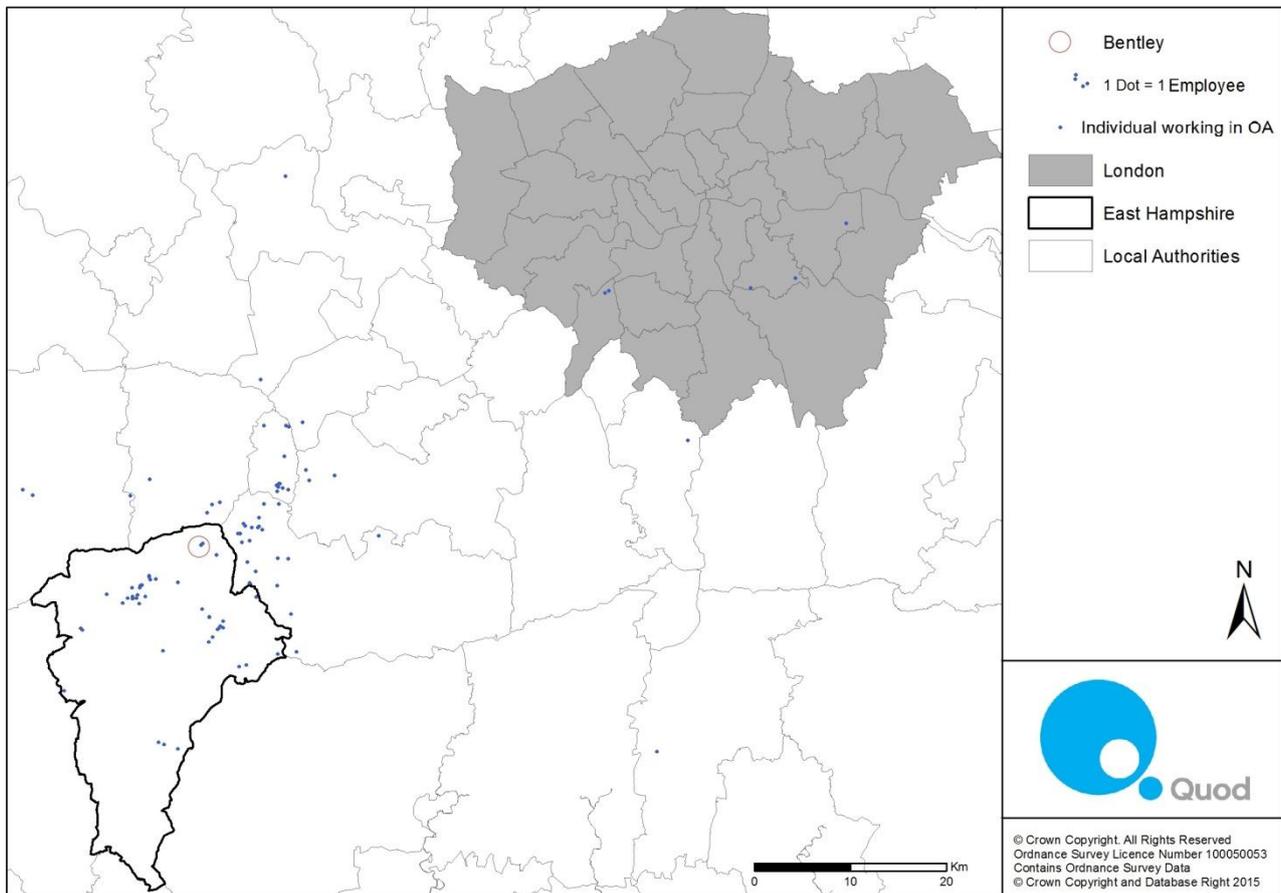
Table 1. Socio-economic Profile

	Bentley	East Hampshire	England
Age over 65	22%	19%	16%
Degree level qualification	42%	34%	27%
High Skilled occupation	59%	48%	41%

- 5.9 Data on people claiming unemployment benefits is only available at Lower Super Output Area, which covers Bentley plus a mile or two surrounding it in each direction, and a population of 1,572. Within this area there were only 10 people claiming out-of-work benefits, and five of them were listed as “corporate managers”. The higher-skilled professional occupations sought by Bentley’s well-education population are more likely to be found in larger firms, or firms in larger clusters of employment than the Site could ever provide.
- 5.10 Adding more industrial/storage floorspace in Bentley will not provide work for local people, it will bring in more predominantly car-based commuters, many of whom will come from some way away. Looking at all workplace jobs in Bentley (a proportion of which are in the existing business and industrial space), around half of these jobs are taken by people who live outside East Hampshire altogether. The Figure below shows how dispersed the people who work in Bentley are, and how little the jobs here contribute towards employing local residents⁷.
- 5.11 As the map shows, many of the people who work in Bentley commute from Alton or Bordon/Whitehill. A survey of occupiers was conducted by the owner of the exiting Bentley Industrial Estate in May 2015. It found a total of 23 full time employees and three part time employees. None lived in Bentley nor within four miles of the Site, and the average distance travelled to work in the industrial estate was over seven miles. All travelled to work by car or van.
- 5.12 Bentley is too small to achieve any significant degree of economic containment, and its residents already have excellent rail access to nearby large employment markets. The small parcel of allocated employment land here serves no real labour market role within the village.

⁷ Figure 4 uses data for Output Area E00114797, which is the one covering the Bentley Industrial Estate (as well as other employment in west Bentley).

Figure 4. Residence of people who work in Output area covering Bentley Industrial Estate, Census 2011



5.13 It would be more consistent with the principles of sustainable development (and more viable) for new employment floorspace to be concentrated instead at Whitehill/Bordon as part of the new community there..

5.14 The Joint Core Strategy reflects this reality, with paragraph 3.6 stating that:

“Economic development will build on the strengths of the District with Alton, Petersfield, Horndean and Whitehill & Bordon providing the main bases for industrial development.”

5.15 Paragraph 5.10 says that:

“any new site allocations outside of Whitehill & Bordon be distributed among the most sustainable and commercially viable settlements of Alton, Petersfield and Horndean.”

6 Summary and Conclusion

- 6.1 Market signals show that the strongest need for land in East Hampshire is for housing rather than employment. Therefore this site, where industrial uses are not viable, should be used instead for housing, in line with local and national policy.
- 6.2 There is unlikely to be any negative impact on employment in the borough resulting from such a change, indeed regular small shifts to housing are both anticipated by, and allowed for, in the calculations of both employment and housing land requirements.
- 6.3 Existing employment opportunities in the village contribute almost nothing to the employment of residents, mainly bringing in commuters instead. Releasing this Site for housing, and then instead concentrating employment land in larger settlements would be more in line with the principles of promoting sustainable development.



FINANCIAL APPRAISAL

BENTLEY

CY DEVELOPMENTS

May 2015

Our Ref: Q60227



Contents

1	EXECUTIVE SUMMARY	3
2	BASIS OF REVIEW	4
3	BASE APPRAISAL	8
4	SENSITIVITY TESTING.....	15
5	CONCLUSIONS.....	17

Tables

Table 1 Rental Comparisons.....	9
Table 2: BCIS Costs Comparable	11

1 EXECUTIVE SUMMARY

- 1.1 The purpose of this financial appraisal is to establish the viability of a potential industrial development on the subject site on land adjacent to Bentley Industrial Centre, Farnham, East Hampshire.
- 1.2 The appraisal involves the interrogation of local market research on achievable rents, yields & capital values and robust analysis of local build costs for this form of development. This has been carried out to provide us with a representative position in relation to the viability of the proposed scheme. The potential risk profile of the scheme has also been reviewed and, linked to this, an appropriate return for the developer.
- 1.3 The results of the appraisal show a negative residual land value (based on the proposed development) which would indicate that the proposed use would not be brought forward at the site. A range of sensitivities have also been undertaken which range from substantially negative residual land values through to a small surplus (less than £30,000).
- 1.4 Based on the analysis undertaken it is concluded that the proposed industrial development would not deliver a competitive return to the landowner as defined under National Planning Policy and would in fact offer a negative land value under most sensitivities. Given this point it is appears clear that the proposed use is not viable at the site.

2 BASIS OF REVIEW

- 2.1 This Financial Appraisal report has been prepared in relation to a planning application to be submitted to East Hampshire District Council on behalf of CY Developments in respect of a site on land west of Bentley Industrial Centre, Old A31, Bentley, Farnham, GU10 5NJ.
- 2.2 The subject site is a greenfield site of 0.277 ha on land adjacent to Bentley Industrial Centre. The site is currently storing a small amount of plant and scaffolding.
- 2.3 The report has been prepared by Quod, to provide an overview of the financial viability of an appropriate industrial development in line with the current site allocation.

PLANNING POLICY

- 2.4 The NPPF Paragraph 22 states that; *“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”*
- 2.5 The site was allocated in the Local Plan Second Review (March 2006) for Industrial and Business use under Policy IB1. Policy IB1 states; “the following sites are allocated for industrial and business use as defined in the list below: - 6 Adjacent to Bentley Industrial Centre.” The supporting text (Para 6.26) states; “The site is suitable for development for small units for B1 and B2 uses. It is estimated that 1,000 square metres of floor space could be accommodated.”
- 2.6 Policy IB4 of the Local Plan Second Plan Review (Retention of Industrial or Business Use) notes that to retain industrial or business uses, planning permission will be granted for the redevelopment of industrial or business sites for other uses only if the present use harms the character or amenity of the nearby area or the site has restricted potential due to factors such as:

- its size, shape, location or access; or

- proof of financial unviability for industrial or business use; and
 - no reasonable offer having been received for sale or rent, following realistic and active marketing undertaken to the satisfaction of the local planning authority.
- 2.7 Supporting text to this policy (Para 6.55) states that; “Where a change from industrial or business use is proposed, a case will need to be made for the alternative use with evidence demonstrating why an industrial or business use cannot be sustained.”
- 2.8 It also notes that “Where an employment use is argued to be unviable, or that there is no demand, evidence of viability will be required and that all reasonable efforts have been made to market the site as extensively as possible at a competitive market price. In certain circumstances the Council may consider granting planning permission for the redevelopment of existing industrial or business sites to alternative uses where overriding local benefits would result from the proposed development.”
- 2.9 In relation to existing employment land, the East Hampshire District Local Plan: Joint Strategy (June 2014) Policy CP4 notes that “The use of employment land for alternative uses will be permitted where the site can be shown to be no longer suitable for employment use of some form and the alternative use is in conformity and consistent with other policies and strategies of the Local Plan: Joint Core Strategy. Where development is proposed which would result in loss of an existing industrial or business site, a planning obligation may be negotiated with the applicant to offset the loss of employment on the site and mitigate the economic impact.”
- 2.10 The Parish Council has recently prepared a neighbourhood Bentley Plan following consultation events in summer 2014. The Neighbourhood Plan aims to help manage development in Bentley over the next 15 years. The Draft Pre-Submission Bentley Neighbourhood Plan (2015-2028) was published in December 2014 and according to the Council consultation is due to commence in the coming months.
- 2.11 The subject site is a designated employment site under the neighbourhood plan (Policy 7: Local Employment) it states that the Neighbourhood Plan will support proposals for the development of Land adjacent to Bentley Industrial Centre, as shown on the Policies Map for employment uses provided;

- i. they contribute to the vitality and viability of the village;
- ii. the access is through the existing employment site;
- iii. the built form does not exceed the height of the existing buildings on this adjacent site;
and
- iv. they do not have a detrimental impact on the residential amenity of the neighbouring buildings.

2.12 The policy also notes that “For the avoidance of doubt, employment uses are those of Use Classes B1-B8 of the Use Class Order and other uses with a reasonable employment density and/or strategic employment benefit. They expressly do not include uses falling in Use Classes A1-A5 of the Use Class Order.”

PLANNING HISTORY

2.13 The subject site gained planning permission (F.49352//FUL/TW) on 26th April 2006 for the erection of 3 blocks of light industrial units - containing a total of 9 industrial units and 3 offices (situated above industrial units). This application was never implemented due to the subsequent economic downturn and resultant lack of demand for this type of development in the area.

2.14 An application (49352/004) was submitted in September 2014 for the erection of 8 dwellings consisting of - 2 detached two storey dwellings and 6 semi-detached two storey dwellings comprising two 4no bed dwellings, four 3no bed dwellings and two 2no bed dwellings. The application was refused on a number of grounds. One of the reasons for refusal of this (in addition to the unacceptable loss of employment land) was that such a loss had not been fully justifiable in viability terms within the application. In light of this it is the purpose of this report to assess whether an industrial development in this location is a viable option.



APPROACH TO APPRAISAL

- 2.15 In light of the policy position, specifically, Policy IB4, as stated the purpose of this report is to demonstrate whether an industrial development in this location is viable. Currently, the site has been marketed since August 2013 (21 months) and remains on the market. As was the case previously (at the time of the previous application) the marketing exercise (verified by the agent) still concludes that there has been no interest in the land. The paragraphs below provide a brief summary of the marketing activities to date.
- 2.16 The property has been marketed as a site and individual/combinations of new build units to let or for sale. This has been offered on a flexible basis so that any potential requirement which could physically fit the site would be identified and considered. The site has also been offered for sale in the event a developer wished to acquire and build commercial/industrial units speculatively.
- 2.17 In terms of actual advertising, details of the property have been mailed on a regular basis to a list of applicants and other commercial agents and agency boards were erected at numerous positions close to the site. In addition to this various advertisements were placed in the local press and property press and on numerous property websites. The agent has confirmed that they have not received any offers in the past 21 months from potential tenants or purchasers for newly built units or the purchase of the site.
- 2.18 The Council previously noted (as part of Officer Report 49352/004 December 2014) that this lack of interest may be, “affected by the fact that no units have actually been built and this may well affect the attractiveness of the premises to potential owners or occupiers who may be looking for accommodation that is currently available or available in the short to medium term”. We would note that the level of risk associated with developing the site without any prospective tenants would be unlikely to be acceptable to a developer. The fact that pre-lets are not achievable is also likely to be indicative of the strength of the local market for this type of space.

3 BASE APPRAISAL

- 3.1 In order to test a robust scenario as part of the financial appraisal we have based our model on the previously approved application (F.49352//FUL/TW) which was granted permission in 2006 (see Appendix 1 for approved floor plan). The details of this scheme are similar to those described in the Local Plan Second Review (March 2006). The subject site is 0.277 ha (0.684 acres).
- 3.2 This permission was for 3 separate blocks of light industrial (B1) units (9 units). The larger block contains two large light industrial units and one smaller light industrial unit approximately half the size of the other two to the ground floor and two large office units and one smaller office unit to the first floor. This had an approved footprint of 12m x 30.4m, a ridge height of 8.65m and eaves heights of 6m.
- 3.3 The two other buildings are identical to one another and were proposed to be situated to the north of the access road. These were to have a footprint of 12m x 18m each and a ridge height of 7.15m. Using these approved floorplans the total floor space in the appraisal was c. 12,862 sq. ft. (GIA)

Revenue

Rents

- 3.4 In assessing potential revenue we have taken advice from a local agent, reviewed comparables and also had regard to the recent East Hampshire CIL study evidence base.
- 3.5 In order to achieve an up-to-date robust evidence we have carried out market research to provide us with an informed opinion on current values. As a result of this, we have found a number of local comparable properties in the area. These included two properties in the Bentley Industrial Estate which have been let at rents between £9 -£10 psf, two properties in the Blacknest Industrial Estate, which is located a short distance away (0.6 miles from Bentley Station) thereby providing a good comparison due to its rural nature and proximity.. In addition to these there are another three properties in the Alton and Borden/Kingsley area, currently on

the market for between £7 - £8 psf. These properties are set out in the following table (see Appendix 3 for further details of these properties).

Table 1 Rental Comparisons

Location	Details	Size sq. ft.	Rent	Price psf
Blacknest Industrial (Unit 5C & 5D)	Modern Industrial/warehouse Unit	3324-6648	£19,500	£5.80
3 Grove Park, Alton	Modern Light Industrial Unit	3337	n/a	£7
Kingsley Business Park, Borden	Industrial Park, Light Industry	1173	£9,500	£8
42 Woolmer Trading Estate	Modern/Industrial Warehouse Unit	2848	£19,936	£7
Blacknest Industrial (Unit) 5k	Industrial Warehouse Unit	3,511	£22,000	£6.26*
Bentley Industrial Estate Unit 3	Light Industrial Warehouse Unit	1,355	£13,500	£9.90
Bentley Industrial Estate Unit 9	Light Industrial Warehouse Unit	2,388	£22,000	£9.20

*Note – building includes large mezzanine, rent equates to £7.55/ft² if mezzanine valued at half rent

- 3.6 In addition to the above, the examination of past lets from Estates Gazette shows rental rates in the local postcode of GU10 between £4.13 - £8.80 psf (this data is shown within Appendix 3). However, these samples were based on smaller unit sizes (in comparison to modelled scheme) and the most recent lettings were in July 2013 and hence are dated and consequently likely represent an under valuation when compared to current market conditions. Therefore, they are not considered to be directly comparable.
- 3.7 The recent East Hampshire District Council Viability Report for CIL (2014) reported that agents had seen a slight upturn in demand for industrial and warehouse property but was unable to “find any transactional evidence to support a rental rate above £75 per m² (£7 psf) for prime new large scale industrial/warehouse units. Even with a reduced investment yield from 7.5% to 7.25%.”
- 3.8 In light of the above research, it would appear that a rental rate of c. £7.50 psf would represent a reasonable market rate for a property of this type. However, from discussions with a local agent and reflecting the fact that the scheme would be new build of good quality, a rent of £10 psf would be achievable, particularly for smaller units. Therefore we have adopted £10 psf within our baseline appraisal and have also sensitivity tested at a rate of £7.50 psf.

Yield

- 3.9 We have considered the type of occupier likely to rent space at a development of this nature and also appropriate lease terms. Based on this and discussions with a local agent, we have identified that a yield of c. 8% would be appropriate. As noted above, the East Hampshire District Council Viability Report for CIL (2014) suggested optimistic yields of up to 7.25%. We have therefore sensitivity tested at 7 and 7.5%

Incentives

- 3.10 A rent free period of 3 months has been allowed for in line with market evidence from the agent. Further incentives may be required but have not currently been included.

Void Periods

- 3.11 Based on local market conditions it has been assumed that the new units will be let over a 9 month period with 2 being let immediately on completion, 2 after a further three months, 2 after six months and 3 after nine months.

Costs

- 3.12 In determining an accurate build cost we have carried out research into appropriate figures and also had regard to the recent East Hampshire CIL study evidence base.
- 3.13 In terms of base build costs the appraisal has been informed by the latest costs from BCIS (rebased to East Hampshire as of 16-May-2015). These base build costs (see Appendix 2) have been based on the mean average of general/warehouse store use, to reflect the higher spec of these units, of £778 per sq. m. (£72 psf). This has been further scrutinized through examination of similar scale buildings which are used to inform this rate. These are set out in the following table.

Table 2: BCIS Costs Comparable

Location	Type of Development	Floor Area sq. ft.	Cost/ sq. ft. (Rebased to East Hampshire)	Externals	Year
Waltham Abbey, Essex	9 single storey warehouses with external works	17,179	£90	43%	2007
Fleetwood, Lancashire	2 Storey Maintenance Depot	11,334	£81	6.5%	2012
Craigavon, Northern Ireland	9 single storey industrial unit shells	9,063	£113	46%	2008
Inverness, Highland	Single storey warehouse and link corridor	14,068	£95	22%	2010
Hartlepool, Cleveland	Single storey extension to industrial unit	11,474	£94	5.5%	2010

Location	Type of Development	Floor Area sq. ft.	Cost/ sq. ft. (Rebased to East Hampshire)	Externals	Year
Burton on Trent, Staffordshire	Distribution Warehouse and Office	16,242	£75	38%	2014

3.14 East Hampshire District Council Viability Report for CIL (2014) based its base build costs on BCIS data. The Report was published in March 2014 and at that time, build costs for Industrial/Warehouse Use was £601 per m2.

3.15 In light of the above costs per sq. ft., a rate of £72 psf has been used within the base appraisal. This is at the lower end of the range.

3.16 The above table also demonstrates that the rates for externals vary significantly across the various sites. We have adopted a lower rate, in line with industry standards and the relatively simple nature of the site of 15% on base build costs.

Finance

3.17 The appraisal incorporates development finance costs on land and building at a rate of 7%. This is the same rate (7%) which is utilised within the Adam’s Integra Viability Report for CIL for East Hampshire District Council 2014. This rate also reflects the likely debt financing costs applicable to a project of this type, however it should be noted that this does not include arrangement fees and exit fees.

Developer’s Return

3.18 The NPPF states that scheme viability for planning should consider competitive returns to a willing developer to enable the development to be deliverable. The NPPG recognises that ‘this return will vary significantly between projects to reflect the size and risk profile of the development and the risks to the project. A rigid approach to assumed profit levels should be avoided and comparable schemes or data sources reflected wherever possible’.

- 3.19 It is our view that a minimum developer's profit of 15% on costs would be reasonable given the nature of this small scale industrial development.

Professional Fees

- 3.20 Professional fees have been used at a proportion of 9% of construction costs to reflect the nature and scale of this development.

S106

- 3.21 The s106 contributions are informed by the Guide to Developer's Contribution May 2014 (Amended September 2014). It notes that the Local Authority will apply transport contributions as set out in the Transport Contributions Policy in Hampshire 2007 – in relation to this development for B1 business use it notes a payment of £4,301 per 100 sq. m. For the modelled scheme of 1,165m² this equates to a contribution of £50,106.

Build Programme

- 3.22 In relation to the build program we have assumed a lead in period of 3 months and a build period of 12 months. It is felt that this is reflective of the scale and nature of this proposed development.

Outputs

- 3.23 The base appraisal (see Appendix 4) indicates a resulting land value of - £175,964.
- 3.24 This demonstrates that using the above scheme based on the approved plans and using the stated assumptions the scheme would be unviable and therefore will not be brought forward by a landowner/developer under the allocated use.

Land Value

- 3.25 The NPPF¹ notes that “to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable”.
- 3.26 In order to determine whether the scheme is viable and offers a competitive return to a willing land owner it is necessary to compare the residual land value from the appraisal to a reasonable benchmark.
- 3.27 The Council’s CIL viability Report (March 2014) gives guidance on benchmark land values. The report identified a number of benchmark land values as follows:
- Agricultural: £450,000
 - Employment lower: 945,000
 - Employment higher: £1,386,000
- 3.28 For the purpose of this report it is appropriate as a starting point to adopt the current use benchmark of £450,000 per hectare for agricultural use. According to Land Registry House Price Index (April 2015) there was an annual change of 9% in East Hampshire, therefore we have applied this increase to the benchmark resulting in an updated benchmark of £494,505 per hectare (£136,977 per acre).
- 3.29 Whilst the above is a useful reference point, it is our view that the current market value of the site would exceed the stated figure. However, given that none of the appraisals considered reach this figure this issue has not been further explored.

¹ NPPF - Paragraph 73

4 SENSITIVITY TESTING

- 4.1 In order to achieve a comprehensive understanding of the scheme and the impacts which may occur it was deemed appropriate to carry out further sensitivity testing on the appraisal. The sensitivity testing allows us to examine different outcomes under various different scenarios e.g. increases/decreases in costs and values.
- 4.2 We have carried out five sensitivity tests based on potential variables / uncertainties. These five sensitivity tests along with the resultant residual land values are set out in the table below.
1. Rent Sensitivity - The market research shows that current market rents being achieved in the area are in the region of £7.50 psf, this level has therefore been tested.
 2. Yield - The adopted rate of 8% has been informed by local agent's advice and it is felt that this reflects the risk of this type of development. However, as noted in the CIL Viability study (March 2014) an optimistic yield rate would 7.25% to 7.5%, therefore we have tested the model at both 7% and 7.5%.
 3. Costs – Due to the fact that the scheme is at outline stage and to reflect the uncertainty of costs in a scheme coming forward, sensitivity testing has been carried out with a cost increase and decrease of 10%.
 4. Density – As described earlier in the report, the current scheme is based on the proposed scheme (2006) which measured approximately 1,160m². In order to reflect the description of development in Policy IB1 (Second Plan Review 2006) a sensitivity of testing lower density of 1,000m² has been carried out.

No.	Sensitivity	Variation	Resultant - Residual Land Value
1	Base	Base appraisal	-£175,964
2	Rent	Current Market Rent of £7.50 psf	-£512,029
3	Yield	7%	£29,247
4	Yield	7.5%	-£80,119
5	Costs	Increase 10%	-£318,249
6	Costs	Decrease 10%	-£33,679
7	Density	Limit to 1,000m2 floor space – policy guidance	-£156,092

5 CONCLUSIONS

- 5.1 The results of the base appraisal show that the scheme is unviable demonstrating a negative residual land value. A reasonable range of sensitivities have also been undertaken indicating that the scheme remains unviable and unable to deliver an appropriate return to a landowner in accordance with the NPPF (Para 173) requirements to provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

APPENDICES





APPENDIX 1

SAMPLE SITE LAYOUT

Proposed Development - Bentley Industrial Centre

EHDC PLAN REG.
16 FEB 2005
F.49932/

SCHEDULE OF DEVELOPMENT

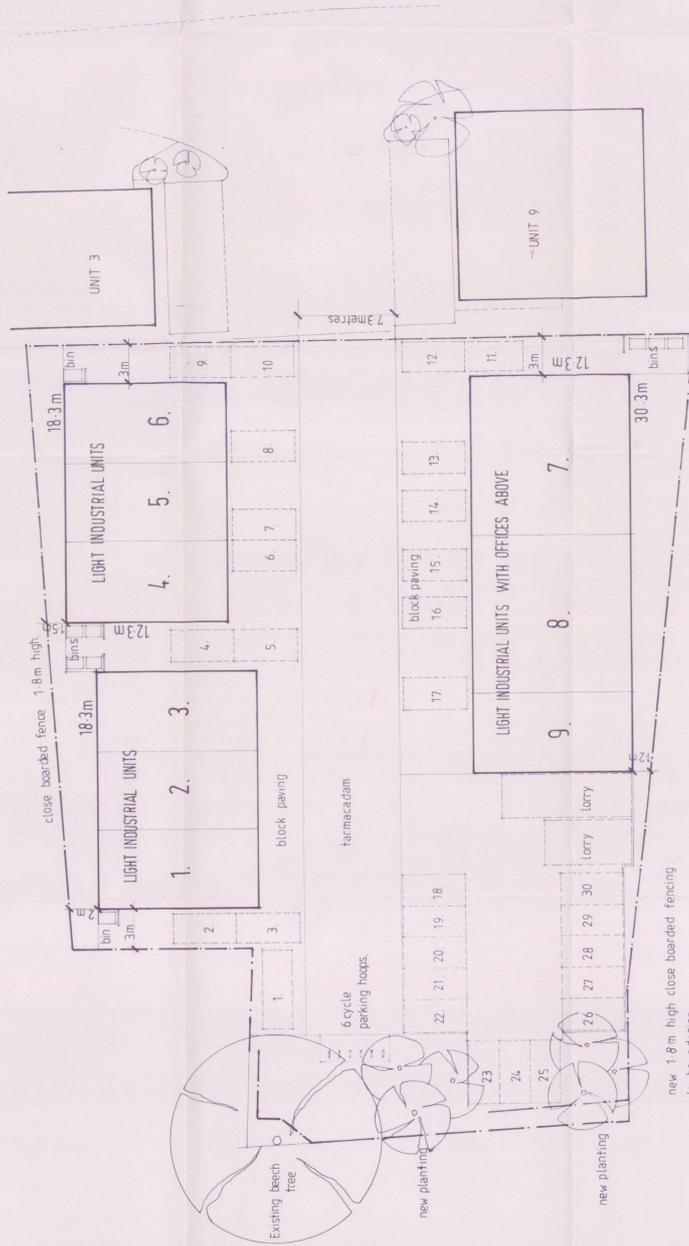
Light Industrial - 790 sq. m. gross floor area
Offices - 405 sq. m. gross floor area

- 30 Car parking spaces
- 2 Lorry parking spaces
- 6 Cycle bays



O.S. Copyright
Licence No. 100007187

Location Plan - scale 1:1250



remove group of poplar trees as discussed and agreed with EHDC Arboricultural Officer and adjoining owner

Site Layout Plan - scale 1:200 - Block Plan

Job Title
PROPOSED LIGHT INDUSTRIAL DEVELOPMENT WITH SOME OFFICES at BENTLEY INDUSTRIAL CENTRE ALTON ROAD BENTLEY HANTS for LINDEN HOMES LTD

Drawing Title
Site Layout and Location Plans

Architect
C. W. Dodge Dip Arch (Hons) RIBA FASI
Wakenhills Cottage Hedgehog Lane
Haslemere Surrey. tel./fax. 01428 652427
E-mail colin@cwddodge.freeserve.co.uk

Scale
1:200 and 1:1250

Date
February 2006

Drawing Number
CDP 1315/6



APPENDIX 2

BCIS Build Costs

Comparable May 2015 – Rebased to East Hampshire

£/m² study

Description: Rate per m² gross internal floor area for the building Cost including prelims.

Last updated: 16-May-2015 12:20

🔄 Rebased to East Hampshire

Maximum age of results: Default period

Building function (Maximum age of projects)	£/m ² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
Builders yards, Local Authority maintenance depots (15)	1,091	619	816	1,061	1,419	1,539	5
Warehouses/stores							
Generally (15)	778	249	494	616	868	3,824	65
Up to 500m ² GFA (15)	1,501	688	850	1,072	1,619	3,824	9
500 to 2000m ² GFA (15)	745	394	522	626	885	1,476	17
Over 2000m ² GFA (15)	627	249	478	536	743	1,327	39
Advance warehouses/stores (15)	607	375	465	532	765	1,160	17
Purpose built warehouses/stores							
Generally (15)	828	249	516	634	887	3,824	46
Up to 500m ² GFA (15)	1,692	688	1,051	1,181	2,023	3,824	7
500 to 2000m ² GFA (15)	707	394	505	580	838	1,476	15
Over 2000m ² GFA (15)	651	249	492	600	753	1,278	24



APPENDIX 3

RENTAL COMPARABLE



5C & 5D Blacknest Industrial Estate, Blacknest, Nr



Marketed by



Nick Reeve
01252 710822

Property details

Details

Modern industrial/warehouse unit

Property type

Office, Industrial Park, Light Industrial, General Industrial, Offices, Industrial

Tenure

To Let

Size

3324 - 6648 Sq Ft

Rent

£19,500.00-£19,500.00 exclusive

Location

5C & 5D Blacknest
Industrial Estate,
Blacknest, Nr
Farnham
GU34 4PX

[View on map](#)

Nearby stations

Bentley (0.6 miles)
Farnham (4.2 miles)
Alton (4.6 miles)



3 Grove Park, Mill Lane



Marketed by



Matthew Seary
01252 710822

Property details

Details	Modern industrial unit
Property type	Industrial Park, Light Industrial, General Industrial, Industrial
Tenure	To Let
Size	3337 Sq Ft
Rent	£7.00-£7.00
Location	3 Grove Park, Mill Lane Alton GU34 2QG
	View on map
	Nearby stations
	Alton (0.3 miles)
	Bentley (4.3 miles)
	Liss (8.2 miles)



Kingsley Business Park



Marketed by



Matthew Seary
01252 710822

Property details

Details

Industrial/Warehouse Accommodation

Property type

Industrial Park, Light Industrial, General Industrial, Industrial

Tenure

To Let

Size

1173 Sq Ft

Rent

£9,500.00-£9,500.00

Location

Kingsley Business Park
Kingsley Business Park
Kingsley
Bordon
GU35 9LY

[View on map](#)

Nearby stations

Bentley (2.9 miles)
Alton (4.4 miles)
Liphook (5.5 miles)



42 Woolmer Trading Estate



Marketed by



Matthew Seary
01252 710822

Property details

Details	Modern industrial/warehouse unit
Property type	Industrial Park, Light Industrial, General Industrial, Industrial
Tenure	To Let
Size	2848 Sq Ft
Rent	£19,936.00-£19,936.00
Location	42 Woolmer Trading Estate Bordon GU35 9QF
	View on map
	Nearby stations
	Liphook (3.8 miles)
	Liss (4.6 miles)
	Bentley (5.0 miles)



ParkSteele

Chartered Surveyors & Commercial Property Agents

01252 717979

LIGHT INDUSTRIAL/WAREHOUSE UNIT TO LET



**UNIT 3 BENTLEY INDUSTRIAL CENTRE
BENTLEY
FARNHAM
GU10 5NJ**

Whilst these particulars are believed to be correct they do not form part of any contract.
The condition of the building systems or their continuing operation have not been checked. All prices quoted are net of VAT.

LOCATION: Bentley Industrial Centre a small estate of light industrial/warehouse units within the centre of the village, close to the local shop and other facilities. Bentley is situated midway between Farnham and Alton.

There is easy access to the A31, which in turn leads to the A3, M3 and the motorway network beyond. Bentley has its own mainline station providing a regular fast service to London Waterloo.

DESCRIPTION: The property comprises a modern single storey light industrial unit suitable for workshop and storage purposes. The gross internal floor area is:

Ground Floor	90.39 SQ M	(973 SQ FT)
Mezzanine	<u>35.45 SQ M</u>	<u>(382 SQ FT)</u>
Total	125.84 SQ M	(1,355 SQ FT)

AMENITIES:

- * Male and Female Toilet Facilities
- * Minimum Eaves 3.97M
- * Three Phase Power
- * Loading Door
- * Benson Gas Fired Blower Heater
- * On Site Parking

LEASE: The premises are available by way of a new full repairing and insuring lease for a term to be agreed.

RENT: £13,500 per annum exclusive.

RATES: Rateable Value £8,800 payable at 47.1p in the £ (2014/2015)

EPC: D79

VIEWING: By appointment through joint sole agents Park Steele 01252 717979

WWW.PARKSTEELE.COM



ParkSteele

Chartered Surveyors & Commercial Property Agents

01252 717979

**INDUSTRIAL/WAREHOUSE UNIT
326.17 SQ M (3,511 SQ FT)
FOR SALE/TO LET**



**UNIT 5K BLACKNEST INDUSTRIAL PARK
BLACKNEST
ALTON
GU34 4PX**

Whilst these particulars are believed to be correct they do not form part of any contract.
The condition of the building systems or their continuing operation have not been checked. All prices quoted are net of VAT.

LOCATION: Blacknest Industrial Park is an established industrial estate located just outside the village of Bentley and close to the mainline station (Waterloo). The towns of Alton and Farnham are both within easy reach.

There is easy access to the A31, which in turn leads to the A3, M3 and the motorway network beyond. Bentley has its own mainline station serving London Waterloo.

DESCRIPTION: The property comprises a modern single storey light industrial unit suitable for workshop and storage purposes. The gross internal floor area is:

Ground Floor	189.48 SQ M	(2,040 SQ FT)
First Floor Office	25.72 SQ M	(277 SQ FT)
Mezzanine	<u>110.97 SQ M</u>	<u>(1,194 SQ FT)</u>
TOTAL	326.17 SQ M	(3,511 SQ FT)

AMENITIES:

- * Male and Female Toilet Facilities with Kitchenette
- * Three Phase Power
- * 18ft Eaves
- * Electric Loading Door
- * Blower Heater with Air Conditioning to Offices
- * On Site Parking

TERMS: For Sale Freehold £325,000

OR

New Lease for terms to be agreed at £22,000 per annum exclusive

RATES: Rateable Value £11,000 payable at 47.1p in the £ (2014/2015)

EPC: C 64

VIEWING: By appointment through sole agents Park Steele 01252 717979

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ParkSteele

Chartered Surveyors & Commercial Property Agents

01252 717979

LIGHT INDUSTRIAL/WAREHOUSE UNIT TO LET



**UNIT 9 BENTLEY INDUSTRIAL CENTRE
BENTLEY
FARNHAM
GU10 5NJ**

Whilst these particulars are believed to be correct they do not form part of any contract.
The condition of the building systems or their continuing operation have not been checked. All prices quoted are net of VAT.

Estate Gazette Comparable – GU10

Address	Postcode	Date	Use type	Sub use type	Size (sq. ft.)	per annum	per sq. m	per sq. ft.
Ash, Greenhills Court, Tilford Road, Tilford, Farnham, Surrey, GU10 2DZ	GU10 2DZ	03/07/2013	Industrial / Distribution	General Industrial (B2)	1,305	£11,500	£94.83	£8.81
Unit G, Grovebell Industrial Estate, Wrecclesham Road, Wrecclesham, Farnham, Surrey, GU10 4PL	GU10 4PL	26/06/2013	Industrial / Distribution	Mixed Industrial - B1, B2, B8 (B1/2/8)	2,803	£19,320	£74.16	£6.89
Unit F, The Factory, Crondall Lane, Dippenhall, Farnham, Surrey, GU10 5DW	GU10 5DW	29/05/2013	Industrial / Distribution	General Industrial (B2)	743	£5,000	£72.44	£6.73
Barn 9B, Penn Croft Farm, Itchel Lane, Crondall, Farnham, Surrey, GU10 5PX	GU10 5PX	15/12/2012	Industrial / Distribution	Mixed Industrial - B1, B2, B8 (B1/2/8)	970	£4,000	£44.46	£4.13
Unit H, The Factory, Crondall Lane, Dippenhall, Farnham, Surrey, GU10 5DW	GU10 5DW	14/11/2012	Industrial / Distribution	General Industrial (B2)	2,388	£11,160	£50.27	£4.67
Unit D, The Factory, Crondall Lane, Dippenhall, Farnham, Surrey, GU10 5DW	GU10 5DW	21/09/2012	Industrial / Distribution	General Industrial (B2)	4,230	£26,000	£66.20	£6.15
Unit 12, Finns Industrial Park, Mill Lane, Crondall, Farnham, Surrey, GU10 5RX	GU10 5RX	26/06/2012	Industrial / Distribution	Industrial Park (B1/2/8)	1,953	£13,000	£71.69	£6.66
Baileys Workshops, Shortfield Common Road, Frensham, Farnham, Surrey, GU10 3BJ	GU10 3BJ	28/05/2012	Industrial / Distribution	General Industrial (B2)	1,117	£7,500	£72.23	£6.71
Unit 1, Surrey Sawmills, Wrecclesham Hill, Wrecclesham, Farnham, Surrey, GU10 4JX	GU10 4JX	13/03/2012	Industrial / Distribution	Mixed Industrial - B1, B2, B8 (B1/2/8)	1,306	£9,900	£81.59	£7.58
Unit B, The Factory, Crondall Lane, Dippenhall, Farnham, Surrey, GU10 5DW	GU10 5DW	23/10/2009	Industrial / Distribution	General Industrial (B2)	1,711	£12,000	£75.47	£7.01

APPENDIX 4 - APPRAISAL



Initial Proposed Industrial Option (2006) Development Appraisal

Area Schedule

Total GIA Area	12,538	ft ²
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Revenue

Capital Value		£1,535,905
Void Deduction		-£70,485
Net Capitalised Value		£1,465,420
Purchasers Cost	5.80%	-£84,994
Commercial Sales/Marketing	3.00%	-£43,963
Net Development Value		£1,336,463

Expenditure

Site Clearance/ Enabling	1	£25,000	£25,000
Base Build Costs	12,538	£72	psf £902,736
Externals	15%		£135,410
Total Construction			£1,063,146
Contingency	5.00%		£53,157
Professional fees	9.00%		£95,683
S106 B1 (£4,301/100M ² = £43/m ² or £4/ft)	12,538	£4	£50,152
Profit on costs	15.00%	£1,262,139	£189,321
Total Costs			£1,451,460
Finance	7.00%	£60,967	£60,967
Total Costs inc Finance			£1,512,427

Land Value

Gross Land Value			-£175,964
Less SDLT / Purchaser's Cost	5.80%	£0	£0

Residual Land Value			-£175,964
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Site Size:	0.684	acres	-£257,257
	0.277	hectares	-£635,249

	Area Sq. Ft.	Rate £ psf	Yield	Rent Free Period	Capital Value Rate	Total Capitalised Rent	Months to Let	Void Cost
Unit 1	785	£10	8.00%	3	£122.50	£96,162.50	0	£0.00
Unit 2	785	£10	8.00%	3	£122.50	£96,162.50	0	£0.00
Unit 3	785	£10	8.00%	3	£122.50	£96,162.50	3	£1,962.50
Unit 4	785	£10	8.00%	3	£122.50	£96,162.50	3	£1,962.50
Unit 5	785	£10	8.00%	3	£122.50	£96,162.50	6	£3,925.00
Unit 6	785	£10	8.00%	3	£122.50	£96,162.50	6	£3,925.00
Unit 7	3,126	£10	8.00%	3	£122.50	£382,935.00	9	£23,445.00
Unit 8	3,126	£10	8.00%	3	£122.50	£382,935.00	9	£23,445.00
Unit 9	1,576	£10	8.00%	3	£122.50	£193,060.00	9	£11,820.00
	12,538		8.00%		£122.50	£1,535,905.00		-£70,485.00



						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28				
	Start Date	End Date	Period Days	Period Mths	counter	01/06/2015	01/07/2015	01/08/2015	01/09/2015	01/10/2015	01/11/2015	01/12/2015	01/01/2016	01/02/2016	01/03/2016	01/04/2016	01/05/2016	01/06/2016	01/07/2016	01/08/2016	01/09/2016	01/10/2016	01/11/2016	01/12/2016	01/01/2017	01/02/2017	01/03/2017	01/04/2017	01/05/2017	01/06/2017	01/07/2017	01/08/2017	01/09/2017				
Capitalised Value	01/09/2016	01/09/2016	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Void Deduction	01/09/2016	01/09/2016	0	0	-70,485	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Purchasers Cost	01/09/2016	01/09/2016	0	0	-84,994	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales Marketing	01/09/2016	01/09/2016	0	0	-43,963	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Pre Commencement	01/06/2015	31/08/2015	91	3	£25,000	3	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Base Build	01/09/2015	31/08/2016	365	12	£902,736	12	0	0	0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Externals	01/09/2015	31/08/2016	365	12	£135,410	12	0	0	0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
S106	01/09/2015	01/09/2015	0	0	£50,152	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Contingency	01/09/2015	31/08/2016	365	12	£53,157	12	0	0	0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Professional Fees	01/06/2015	31/08/2016	457	15	£95,683	15	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
Profit	01/09/2015	31/08/2016	365	12	£189,321	12	0	0	0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Purchasers Cost	01/06/2015	01/06/2015	0	0	£0.00	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Scheme	01/06/2015	01/09/2016	16	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	

	Period Mths	Total	Check	Total	01/06/2015	01/07/2015	01/08/2015	01/09/2015	01/10/2015	01/11/2015	01/12/2015	01/01/2016	01/02/2016	01/03/2016	01/04/2016	01/05/2016	01/06/2016	01/07/2016	01/08/2016	01/09/2016	01/10/2016	01/11/2016	01/12/2016	01/01/2017	01/02/2017	01/03/2017	01/04/2017	01/05/2017	01/06/2017	01/07/2017	01/08/2017	01/09/2017					
Capitalised Value	12	£1,535,905	£1,535,905	12	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	
Void Deduction	12	-£70,485		12	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	
Purchasers Cost	12	-£84,994	-£84,994	12	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Sales Marketing	12	-£43,963	-£43,963	12	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Total Revenue				1,336,463	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	
Pre Commencement	3	£25,000	£25,000	3	£8,333	£8,333	£8,333	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Base Build	12	£902,736	£902,736	12	£0	£0	£0	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228	£75,228
Externals	12	£135,410	£135,410	12	£0	£0	£0	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284	£11,284
S106	1	£50,152	£50,152	1	£0	£0	£0	£50,152	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Contingency	12	£53,157	£53,157	12	£0	£0	£0	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	£4,430	
Professional Fees	15	£95,683	£95,683	15	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	£6,379	
Profit	12	£189,321	£189,321	12	£0	£0	£0	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	£15,777	
Total Expenditure				£1,451,460	£14,712	£14,712	£14,712	£161,250	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	£113,098	

Total Balance					-£114,996.69	-£14,712.21	-£14,712.21	-£14,712.21	-£163,249.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59	-£113,097.59
Cumulative Balance				n/a	-£14,712.21	-£29,510.24	-£44,394.60	-£207,903.16	-£322,213.52	-£437,190.69	-£552,838.56	-£669,161.04	-£786,162.07	-£903,845.61	-£1,022,215.63	-£1,141,376.15	-£1,261,031.18	-£1,381,484.79	-£1,502,641.04	-£1,624,943.41	-£1,749,963.91	-£1,878,493.91	-£1,999,963.91	-£2,124,963.91	-£2,253,963.91	-£2,386,963.91	-£2,524,963.91	-£2,667,963.91	-£2,813,963.91	-£2,965,963.91	-£3,124,963.91	-£3,289,963.91	-£3,461,963.91	-£3,641,963.91	-£3,830,963.91	
Yearly Finance	7.00%				£60,967.22	£85.82	£172.14	£258.97	£312.72	£379.58	£455.28	£545.44	£650.95	£774.43	£918.92	£1,086.44	£1,281.02	£1,507.69	£1,771.54	£2,079.68	£2,530.11	£3,093.91	£3,889.91	£4,963.91	£6,483.91	£8,633.91	£11,613.91	£15,733.91	£21,413.91	£29,313.91	£39,413.91	£52,813.91	£70,813.91	£94,813.91	£126,813.91	
Monthly Finance	0.58%																																			
Balance after Finance					-£175,963.91	-£14,798.03	-£14,884.35	-£14,971.18	-£164,462.36	-£114,977.17	-£115,647																									

Hannah Collier

From: Geoff Woollen [REDACTED]
Sent: 31 July 2015 14:56
To: EHDC – Neighbourhood Plans Shared
Subject: Comment on Bentley Neighbourhood Plan = Renewable Energy

Dear Sirs

Re:NOTIFICATION OF PUBLICITY OF THE BENTLEY NEIGHBOURHOOD DEVELOPMENT
PLAN UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL)
REGULATIONS 2012
BENTLEY Village Neighbourhood Plan

I write to you on the final day for comment on the Bentley village neighbourhood plan - 31 July.

I am a resident in Weybank off Station Rd, Bentley. As such I am in the parish of Binsted and thus it is perhaps not quite right for me to comment at this late stage. However we have always considered ourselves to be very much part of the Bentley village and neighbourhood and have a real stake in its successful future.

As I write this email we have the shocking prospect of a **huge solar farm** being built in an arable field in Bentley parish and in close proximity to the village. The plan has identified this location as part of its rural landscape setting which has evolved over many centuries. A planning application has been submitted for this industrial scale development this week. It did occur to me surely the neighbourhood plan would have thought about this issue. I discover this is not the case and have been told the plan is intended to be much more about the housing development and conservation of this beautiful rural village.

I do not intend that my comments should in any way should jeopardise the village plan being adopted. However I do think that something should go on record such that anyone contemplating the future of Bentley should include this consideration.

Councils have a statutory duty to include renewable energy and as such surely the community should have a say in its development. Indeed the parish already has a large solar farm built in a much more discrete location and thus the village has already contributed to providing its share of a sustainable future.

Hopefully the East Hants planners will recognise that this new solar farm proposal jeopardises the rural nature of this village, and the bucolic River Wey valley which is the gateway to Alice Holt forest and the South Downs National Park. The neighbourhood plan has put a lot of effort into outlining a future which should not include such an industrial development adjacent to its centre.

yours sincerely
Geoff Woollen

[REDACTED]

Hannah Collier

From: sarah burton <[REDACTED]>
Sent: 31 July 2015 16:32
To: EHDC – Neighbourhood Plans Shared
Subject: Re Notification of publicity of the Bentley Neighbourhood Development Plan under Regulation 16 of the Neighbourhood planning (general) Regulations 2012 Bentley Village Neighbourhood Plan

Dear Sirs

I am a resident in Station Rd, Bentley. As such I am in the parish of Binsted and perhaps it is not right for me to comment at this late stage.

However we have always considered ourselves to be very much part of the Bentley village, community and neighbourhood and have helped with many Bentley events including the Village Fete.

I am aware from other neighbours in Station Road that they have contacted you regarding a huge solar farm that is being proposed on the field between the A31 and Station Road.

The plan has identified this location as part of its rural landscape setting which has evolved over many centuries and was heralded by Lord Baden Powell and General Pike. Both who I understand from research and local knowledge, when returning from serving their country over seas in war, enjoyed the valley the river so much on their return it helped them tremendously.

My understanding is that a plan has been submitted for this industrial scale solar farm.

I do not wish my comments to have any impact the village plan being adopted, however, I do think that something should go on record that anyone contemplating the future of Bentley should consider the impact of renewable energy on the landscape of this beautiful part of the country. Especially as there is already a huge solar farm in place in this valley and another one will take up many more valuable hectares of our environment scarring its visual impact forever.

I do feel that although the Council have a statutory duty to include renewable energy surely the community should have a say in its development and where? Surely it makes sense not to effect hundreds of residents making them utterly miserable when they have enjoyed the visual aspect and have moved to the area as it is so special? The environmental impact will be horrendous.

Our hopes are that the East Hants planners will recognise that this new solar farm proposal will ruin the rural nature and wildlife of this village forever and not just the 25 years that they say this solar farm will be in place. The River Wey valley is a gateway to Alice Holt forest and the South Downs National Park. The neighbourhood plan has put a lot of effort into outlining a future which should not include such an industrial development adjacent to its centre.

Yours faithfully,

Bob and Sarah Burton
[REDACTED]

Hannah Collier

From: John & Marilyn Anderson [REDACTED]
Sent: 31 July 2015 16:58
To: EHDC – Neighbourhood Plans Shared
Cc: John Anderson
Subject: Notification of publicity of the Bentley Neighbourhood Development Plan under Regulation 16 of the Neighbourhood planning (general) Regulations 2012 Bentley Village Neighbourhood Plan

Importance: High

Dear Sirs

We live in Station Road, Bentley and whilst we are in the Parish of Binsted we very much believe we are part of Bentley village and community, in fact our address clearly says Bentley.

I am contacting you about a huge, industrial solar farm that is being proposed on the field that backs onto Station Road and we believe that a planning application has now been submitted to you.

When considering the village plan for Bentley we do feel strongly that the impact that this industrial solar farm will have on the beautiful villages of Bentley and Binsted should be taken into account. We believe in protecting the global environment, and indeed we have solar panels on the roof on the back of our house, but this is not an excuse to trash the local environment.

We do hope you give our views some serious consideration and review the impact that this industrial solar farm will have on our beautiful county.

Yours faithfully

John and Lyn Anderson
[REDACTED]