

# Brighton and Hove City Council City Plan Part 2

Housing and Strategic Site Allocation for Benfield Valley, Hove

## Response to Inspector's Matters, Issues and Questions Matter 10

Prepared on behalf of  
Benfield Valley Investments Ltd  
by Enplan  
Respondent No. 268

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## 1.0 INTRODUCTION

- 1.1 This document is prepared by Enplan on behalf of Benfield Valley Investments Ltd. It provides a response to the MIQs (INSP03) under Matter 10 'Special Area policy SA7 – Benfield Valley'.
- 1.2 Enplan has made previous representations (October 2020) on behalf of Benfield Valley Investments Ltd in relation to the proposed Benfield Valley site allocation in the Regulation 19 version of the City Plan Part 2. This submission is made in further support of those representations.

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## 2.0 RESPONSE TO QUESTIONS

### Matter 10 - Special Area policy SA7 – Benfield Valley

**1. How would the identification of this area secure the long term and enduring positive management, maintenance and enhancement of the Benfield Valley and its relationship to the National Park and urban areas?**

- 2.1 The identification of the area alone does not secure these benefits. The inclusion of an allocation of appropriate areas for residential development will deliver funding for long term management and maintenance of the Benfield Valley wider site as well as enhancements to biodiversity and heritage. Proposals for enhancements to footpaths along with improved visitor facilities (such as bike hire, information boards and café) would provide a stronger relationship between the site, the National Park and the local urban area. This improvement to the link to the National Park was highlighted in the representations of the South Downs National Park Authority to the Regulation 19 stage of the Plan as a reason for their support of the policy.

**2. Is the boundary of the Special Area policy appropriate? Is there any justification for amending the boundary?**

- 2.2 As set out in our previous representations, we consider that boundaries of the areas allocated for housing within Benfield Valley need amendment better to relate to the on-site constraints such as site levels, heritage and ecological/habitat considerations. It is further considered that the policy does not seek to make the most effective use of land on the Benfield Valley site by restricting development to the small areas shown. This is not consistent with national policy which seeks to make the most effective use of land. The boundaries of the housing areas should be amended and extended to maximise the use of the land and ensure that the effects of the development are minimised and its benefits optimised. Such revisions would provide flexibility and the opportunity for the site to accommodate additional units of housing to help meet the identified need in the city without resulting in any further material impact on heritage, landscape, infrastructure, ecology or highway capacity and safety.

- 2.3 Notwithstanding the above, the overall boundary of the Special Area policy is considered to be appropriate.

**3. What are the potential benefits and adverse impacts of allocating a part of the site for housing? Would this be compatible with the policy aims and its status as a LWS, and recognition as a green wedge? How would this impact on the proposed designation of the rest of Benfield Valley as a Local Green Space? How have the heritage, ecology, biodiversity, open space/recreation, visual impact, landscape, traffic and air quality and the community use of the area been addressed in the proposed allocations? What would be the adverse impacts and how have they been taken into account? Could any adverse impacts be mitigated (the detailed**

**issues of the proposed allocations will be dealt with under H2 site allocation in the urban fringe)?**

- 2.4 The potential benefits of the housing allocation are as follows:
- The provision of much needed housing, including family housing and affordable housing.
  - Biodiversity net gains.
  - Restoration of the Benfield Valley Conservation Area and the provision of heritage information boards to provide better understanding for visitors of the history and heritage of the site.
  - Long term management and maintenance of the wider site to prevent further natural decline and preserve protected species.
  - Improvements to footpath/cycle ways and enhanced visitor facilities including environmental/ecology information boards, cycle hire and café.
  - Improved access to the site as well as the links to the National Park.
- 2.5 With regard to effects, there would be an associated increase in traffic movements and impact on air quality as a result. However, as set out in the GTA Civils Statement attached, these would be limited. There would also be some visual impact on the landscape as a result of new built form. This would be satisfactorily mitigated by utilising the lower parts of the site on either side of Hangleton Lane for housing, whilst leaving the higher ground further north undeveloped. There is also extensive boundary planting to the site and this would be retained to provide screening of the built form to further mitigate the visual impact. Furthermore, in views from the South Downs National Park the development would be seen in the context of surrounding existing residential development as well as significant tracts of established planting which would further mitigate impacts.
- 2.6 The introduction of some residential development within small areas of the overall Benfield Valley site (the total area covered by SA7) would not result in any material loss of its function as a green, recreational resource and local wildlife site. In fact the proposals include improvements to the existing extensive footpath network in addition to the new visitor and gateway facilities providing a stronger link to the National Park to the north. The area to the north of the proposed housing allocation site on the northern side of Hangleton Lane would continue to perform the role of a green wedge into the urban area as set out in the first paragraph of policy SA7.
- 2.7 With regard to the proposed Local Green Space designation, this must be consistent with sustainable development and the provision of sufficient homes (refer to para 101 of the NPPF).

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2.8 Benfield Valley (ie the area covered by policy SA7) extends to some 26ha and comprises a number of parcels of land. Parts of the site are covered by a number of other policy designations as follows:

- Local Wildlife Site (policy DM37 of CPP2) – extends from the A27 to just north of Sainsburys on the eastern side of the A293 as well as from the A27 on southwards to the Old Shoreham Road on the western side of the A293.
- Nature Improvement Area (policy CP10 of CPP1) – covers the entirety of the Benfield Valley site other than the area of land to the east of the Sainsburys site.
- Urban Fringe (policy SA4 of CPP1) – extends from the A27 in the north to Sainsburys in the south on the eastern side of the A293 as well as from Hangleton Lane in the north to the Old Shoreham Road in the south on the western side of the A293.
- Archaeological Notification Area (policy DM31 of CPP2) – covers the area between the A27 and Hangleton Lane to the east of the A293.

2.9 These policy designations limit development irrespective of the proposed Local Green Space designation under draft policy DM38 which covers all of the Benfield Valley site as set out in policy SA7 (i.e. everything to the east of the A293 with the exception of the Sainsbury site and the housing sites to the north and south of Hangleton Lane as proposed under policy H2).

2.10 Overall, the housing allocations would provide funding for and the long-term management of all the heritage, ecology, biodiversity and open space/recreation benefits listed above. Therefore, it is considered that this allocation is compatible with the aims of the designation of other parts of Benfield Valley as a Local Green Space.

***4. What is the justification for residential densities to be higher than the surrounding residential areas and up to three storeys? Is it based on robust evidence? Was this based on a site specific LVIA as requested by Natural England? How has this been dealt with? How were the buffers around the development sites identified? Are they soundly based?***

2.11 The justification for the higher residential densities than the surrounding area is set out in policy CP14 of CPP1 (CD01) which seeks to make most effective use of land by setting a minimum residential density of 50dph for new development. Other sites in the urban fringe, such as Toads Hole Valley, also provide higher density development for the same reason. The Urban Fringe Assessments (ED21, ED22, ED24) included an assessment of the landscape impacts of the proposed allocations for housing sites which helped inform the scale of potential development in these locations.

- 2.12 As set out above, the site areas for the housing allocation and the buffers need to be better related to the physical constraints in order to be sound. With extension they will also allow most effective use of the available land and provide flexibility.

***5. Is the detailed policy wording clear and effective, justified and consistent with national policy?***

- 2.13 As set out in previous representations, the policy wording currently is not considered to be effective and consistent with national policy. In view of this, the conclusions of the October 2020 representation document include proposed revised wording for policy SA7 which is considered to provide a sound policy framework for the site and to secure the Council's objectives.

enplan