

## **Benfield Valley 2024**

Maria Seale

Development Control

Brighton and Hove City Council

Hove Town Hall, Norton Road, Hove BN3 3BQ

Dear Ms Seale

**Re: application BH2024/01720** / *Development of a total of 101 dwellings (C3 use) of 2-4 storeys in height to include change of use of part of footgolf course and car park (F2 use) and demolition of derelict cottages and erection of new dwellings. Works to Benfield Barn to create community hub facility including café and footgolf use (F2 use). Erection of 4 new workshops of 1-2 storeys within footprints of Barn outbuilding ruins (E(g)/F2 use). Community use on ground floor of new residential marker building (F2 use). Landscaping works including allotments/orchards. Ecological works. Creation of and upgrades to pedestrian and cycle routes. Associated alterations to existing vehicular access off Hangleton Lane and provision of car and cycle parking. Associated off-site landscaping and ecological works to wider Valley including provision of parkland south of Hangleton Lane for community use.*

I write on behalf of CPRE Sussex, the countryside charity. We wish to object to the above application.

At the time that the City Plan Part 2 was created, CPRE Sussex strongly objected to the allocation of any of Benfield Valley for housing. We argued, and still maintain, that the inclusion of the site was not consistent with national policy. We said at the time that “The NPPF is clear that the planning system should establish coherent ecological networks that are more resilient to current and future pressures and that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. [The NPPF] is clear that plans should safeguard components of local wildlife-rich habitats including locally designated sites of importance for biodiversity.”

We continue to object to the principle of development on this site, but we acknowledge that, regardless, an allocation for housing in this location was made in the adopted Plan Part 2.

However, the issues that led us to object to the allocation of a site in Benfield Valley remain highly relevant when it comes to determining this application.

Benfield Valley is a precious green space for local people and nature. It is hard to see how the current proposal meets the requirement of Policy SA7 for:

- The continued protection and enhancement of the wider biodiversity and landscape role and character of Benfield Valley as an important green wedge connecting the urban area to the South Downs National Park;
  - Securing biodiversity conservation and enhancements; including wildlife connectivity and buffer zones, as well as the ongoing and positive management of wildlife habitats;
- or the requirements of Policy SA4 that “the proposal has had regard to the downland landscape setting of the city”.

The development would significantly disrupt the character of the valley as a green wedge, and the continuous connectivity of the downland into the city. As the Landscape and Visual Assessment makes clear, the impact on people walking the length of the valley will be moderately significant, and during construction this will rise to a moderate-major adverse effect, and the development will also have adverse effects on views from within the National Park.

The ecological impacts are also deeply concerning. The objections, which we support, made by the Benfield Valley Project cover in detail the likely effects on wildlife and habitat connectivity. In particular, we do not believe that the effects of the development on protected dormice or slow worms can be satisfactorily mitigated. The loss of habitat and fragmentation of the site runs contrary to the idea of “wildlife connectivity” and the “positive management of habitats”. There remains a significant lack of clarity about any plans for “a long term funded management and maintenance plan” to protect and enhance what habitats remain.

Were this development to be located in a more appropriate location, we might well take a different view. We recognise that, in some important ways, the proposal is thoughtful in its approach to density, materials, design and – within the confines of the development itself – a sense of place.

Sadly none of this can compensate for what will be lost by placing this scheme, whatever its other merits, in this location, where the impact on protected wildlife, habitat connectivity, amenity for people walking and cycling through the valley, landscape value, the setting of the South Downs National Park and the connections between urban and rural, will be significant and negative.

We urge that you reject the application.

Yours sincerely

Paul Steedman

Director, CPRE Sussex