

King Alfred Leisure Centre, Hove

EIA Screening Report

Final

JB/LW/SC/35299

September 2025



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Town & Country Planning (Environmental Impact Assessment) (England) Regulations 2017

REQUEST FOR A SCREENING OPINION

Client: **Brighton and Hove City Council**
Site: **King Alfred Leisure Centre, Hove**
Date: **September 2025**
Reference: **JB/LW/SC/35299**

Authors: **Jonathan Buckwell**
Lizzie Withall
Sophie Corney

DHA Environment
Eclipse House
Eclipse Park
Sittingbourne Road
Maidstone
Kent
ME14 3EN

Tel: 01622 776226
Email: info@dhaenvironment.co.uk
Web: www.dhaenvironment.co.uk
Twitter: www.twitter.com/dhagroup



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1 INTRODUCTION

1.1 PURPOSE OF THIS DOCUMENT

- 1.1.1 This report has been prepared on behalf of Brighton and Hove City Council as a formal request for an opinion as to whether the proposed construction of a replacement leisure centre on land adjacent to the existing King Alfred Leisure Centre constitutes a project requiring Environmental Impact Assessment (EIA) in accordance with Regulation 5(4) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹.
- 1.1.2 The preparation of this Screening Request has followed the EIA Regulations and the Ministry of Housing, Communities and Local Government (MHCLG) web-based Planning Practice Guidance: Environmental Impact Assessment which provides guidance on the application of EIA in England.

1.2 CASE DETAILS

- 1.2.1 This Screening Request sets out the information required by the determining Authority in accordance with Regulation 6(2) to determine the need for EIA.
- 1.2.2 It should be noted that the EIA Regulations (Regulation 5(5)) require all screening decisions to state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3.
- 1.2.3 The key details of the proposed development subject to this screening request are set out in **Table 1.1**.

Applicant	Brighton and Hove City Council
Site Address	King Alfred Leisure Centre, Kingsway, Hove, BN3 2WW
Brief Description of Development	Redevelopment of car park and disused former bowling alley to create replacement leisure centre, public car park at basement level, hard and soft landscaping and associated works.
Site Area	9552sqm

TABLE 1.1: KEY DETAILS

¹ Hereafter, all references to Regulations and the "EIA Regulations" refer to this document.

1.3 SITE DESCRIPTION

Location Plan

- 1.3.1 In accordance with Regulation 6(2) a site location plan is provided as **Figure 1.1** below.

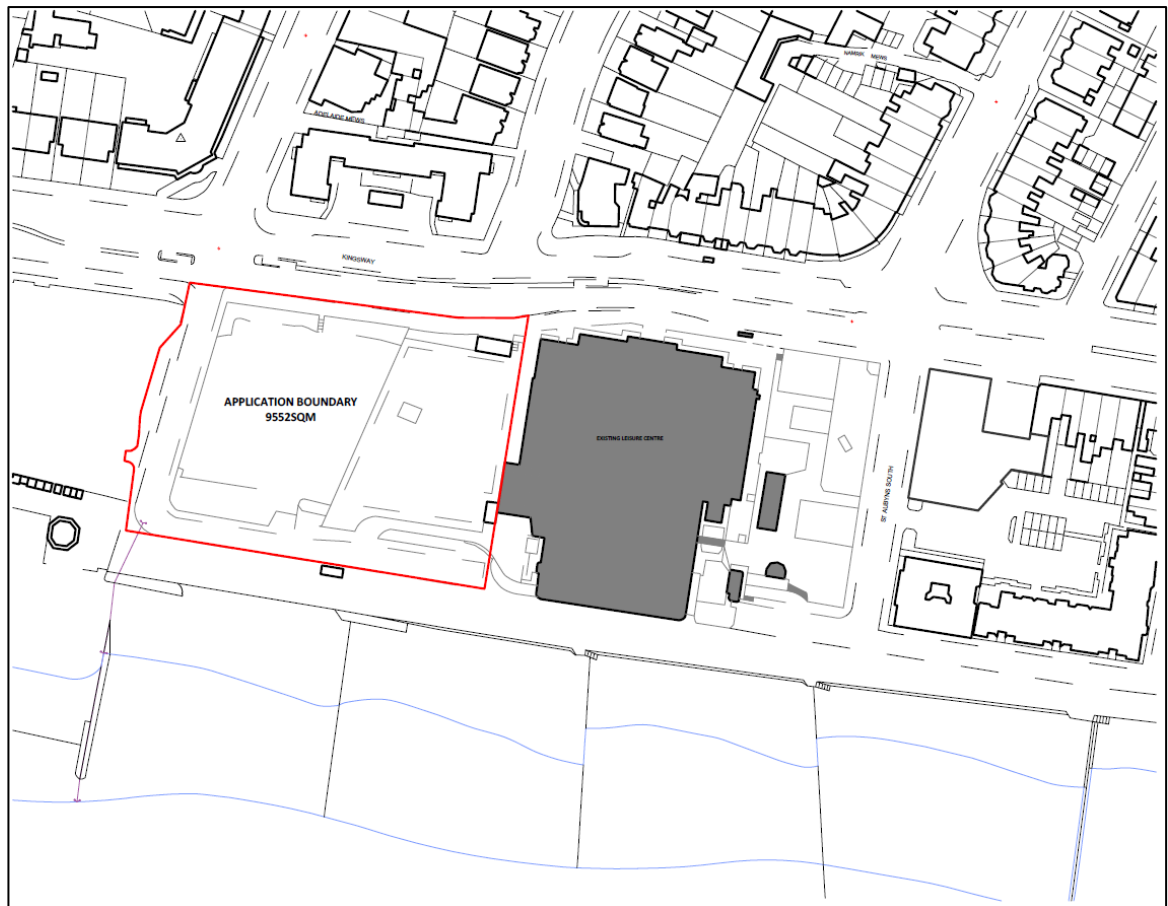


FIGURE 1-1: SITE LOCATION PLAN

Proposed Development Site

- 1.3.2 The site comprises land to the west of the King Alfred Leisure Centre which extends to approximately 9552sqm in area and is bound by the Kingsway (A259) to the north, the King Alfred leisure centre to the east, the King's Esplanade and seafront promenade to the south, and Hove Street to the west.
- 1.3.3 The A259 routes along the Brighton and Hove seafront, routing from Worthing Town Centre to Eastbourne Town Centre. The site itself is on the seafront, in a mixed residential and commercial area.

- 1.3.4 The existing site accommodates a public car park adjacent to the King Alfred Leisure Centre. The site also contains the disused lower ground bowling alley and laser tag area (extending beyond the leisure centre building to the west and is covered by a green roof).

Existing King Alfred Leisure Centre

- 1.3.5 The purpose of the planning application subject to this EIA Screening Request is to provide modern replacement facilities for those in the existing King Alfred Leisure Centre, which is located to the east of the site. This is a large, multi-use sport and leisure facility, offering a wide range of facilities including a 25-metre swimming pool, a lagoon with a water slide, a gym, sports halls for badminton, basketball, and other activities, a ballroom, soft play areas, and a café. It serves a broad community role, providing swimming lessons, gym access, sports courts, and various classes.
- 1.3.6 The current leisure centre building dates back to the 1930s and therefore does not meet modern standards. A replacement has been sought for many years.

Local Plan Allocation

- 1.3.7 With particular regard to the King Alfred site as a whole, Policy SA1 seeks to secure a minimum 400 residential units and the replacement of new indoor public wet and dry sports facilities which provide for the local Hove communities and contribute to the wider mix of facilities in the city.

Planning History

- 1.3.8 The Council's online planning register records the following recent and/or relevant planning history for the site. These are provided at **Table 1.2**.

REF:	DESCRIPTION:	DECISION:
BH1997/00463/AD	ILLUMINATION OF EXISTING ADVERTISING PANEL	Refused 30 June 1997
BH1998/01822/FP	REDEVELOPMENT TO PROVIDE 13 SCREEN CINEMA, FAMILY ENTERTAINMENT CENTRE, RESTAURANTS, THEME BAR, CASINO, NIGHTCLUB, CAR PARK AND HEALTH & FITNESS CLUB	Withdrawn 15 April 1998
BH1999/00826/FP	ERECTION OF MIXED LEISURE AND COMMUNITY SPORTS FACILITY CONSISTING OF A MULTI-SCREEN CINEMA, BARS/RESTAURANTS, CASINO, COMMUNITY HEALTH AND FITNESS CENTRE AND COMMUNITY HALL TOGETHER WITH BELOW GROUND PARKING, LANDSCAPING AND DEMOLITION.	Withdrawn 30 August 2006
BH2005/05594	MIXED USE DEVELOPMENT COMPRISING NEW PUBLIC SPORTS CENTRE, 752 RESIDENTIAL UNITS (INCLUDING AFFORDABLE HOUSING) IN TOW TOWERS AND EIGHT OTHER BUILDINGS, WITH GROUND FLOOR COMMERCIAL USES WITHIN USE CLASSES A1 (RETAIL), A3 (RESTAURANTS & CAFES) AND A4 (DRINKING	Withdrawn 13 October 2006

	ESTABLISHMENTS), WITH BASEMENT PARKING AND DOCTORS SURGERY. THIS APPLICATION IS ACCOMPANIED BY AN ENVIRONMENTAL STATEMENT.	
BH2006/03429	MIXED USE DEVELOPMENT COMPRISING NEW PUBLIC SPORTS CENTRE, 751 RESIDENTIAL UNITS (INCLUDING AFFORDABLE HOUSING) IN TOW TOWERS AND EIGHT OTHER BUILDINGS, GROUND FLOOR COMMERCIAL USES WITHIN CLASSES A1 (RETAIL), A3 (RESTAURANTS & CAFES) AND A4 (DRINKING ESTABLISHMENTS), WITH BASEMENT CAR PARKING AND DOCTORS SURGERY, POLICE OFFICE AND PUBLIC TOILETS.	Approved 12 July 2007
BH2012/03882	INSTALLATION OF NEW CLADDING TO PLANT ROOM AND ADJACENT WALL TO REPLACE EXISTING.	Approved 23 January 2013
BH2015/01044	REPLACEMENT OF 13NO TIMBER FRAMED WINDOWS WITH NEW UPVC UNITS	Approved 29 July 2015
BH2023/01638	INSTALLATION OF AN EXTERNAL AIR HANDLING UNIT TO EAST ELEVATION	Approved 31 July 2023
BH2024/01676	REDUCTION IN HEIGHT OF MASONRY BOUNDARY WALL TO EAST ELEVATION AND REPLACEMENT WITH MESH SECURITY FENCING. REPLACEMENT OF EXISTING FENCING TO SOUTH ELEVATION WITH MESH SECURITY FENCING.	Approved 04 September 2024

TABLE 1.2 RELEVANT PLANNING HISTORY

1.4 NATURE AND PURPOSE OF THE DOCUMENT

1.4.1 Brighton and Hove City Council wish to seek permission for the following development:

"Full planning permission for redevelopment of car park and disused former bowling alley to create replacement leisure centre, public car park at basement level, hard and soft landscaping and associated works"

1.4.2 The proposal will likely comprise elements such as a 25m swimming pool, teaching pool and associated facilities, a gym and cycle studio, café, sports hall and a family entertainment zone. Alongside this, it is anticipated that the site will include associated landscaping and parking facilities.

1.5 APPLYING THE SCREENING PROCESS TO THE PROPOSED DEVELOPMENT

1.5.1 The EIA Regulations are applied to certain types of development that may have significant effects on the environment. The Regulations categorise various development types as 'Schedule 1' or 'Schedule 2' development, with the nature of the proposals, their location and scale being the determining factors as to whether they are likely to have significant effects.

- 1.5.2 All Schedule 1 development and some Schedule 2 developments (where they are likely to have significant effects) are termed "EIA developments". The proposed development is not of a type described within Schedule 1 of The Regulations.
- 1.5.3 In the case of development types categorised in Schedule 2, the location must be examined to determine if the site is in a sensitive area as defined in the Regulations. If the development is in a sensitive area and is likely to have significant effects on the environment, then it is EIA development.
- 1.5.4 If the development site is not in a sensitive area, the next stage is to assess whether the development proposals exceed or meet any of the applicable thresholds and criteria for that particular type/class of development. These thresholds and criteria relate to the attributes of a type of development (e.g. size of the site, production, capacity etc.) Not meeting or exceeding the thresholds is a strong indication that EIA is not required. If the development exceeds or meets any of the applicable thresholds and criteria, then it is termed a Schedule 2 development.
- 1.5.5 The next stage is to assess if the development is likely to have significant effects on the environment. If it is concluded that significant effects are likely, then the development is EIA development.
- 1.5.6 In this case, the proposed development is considered to fall within section 10(b) of Schedule 2: Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas.

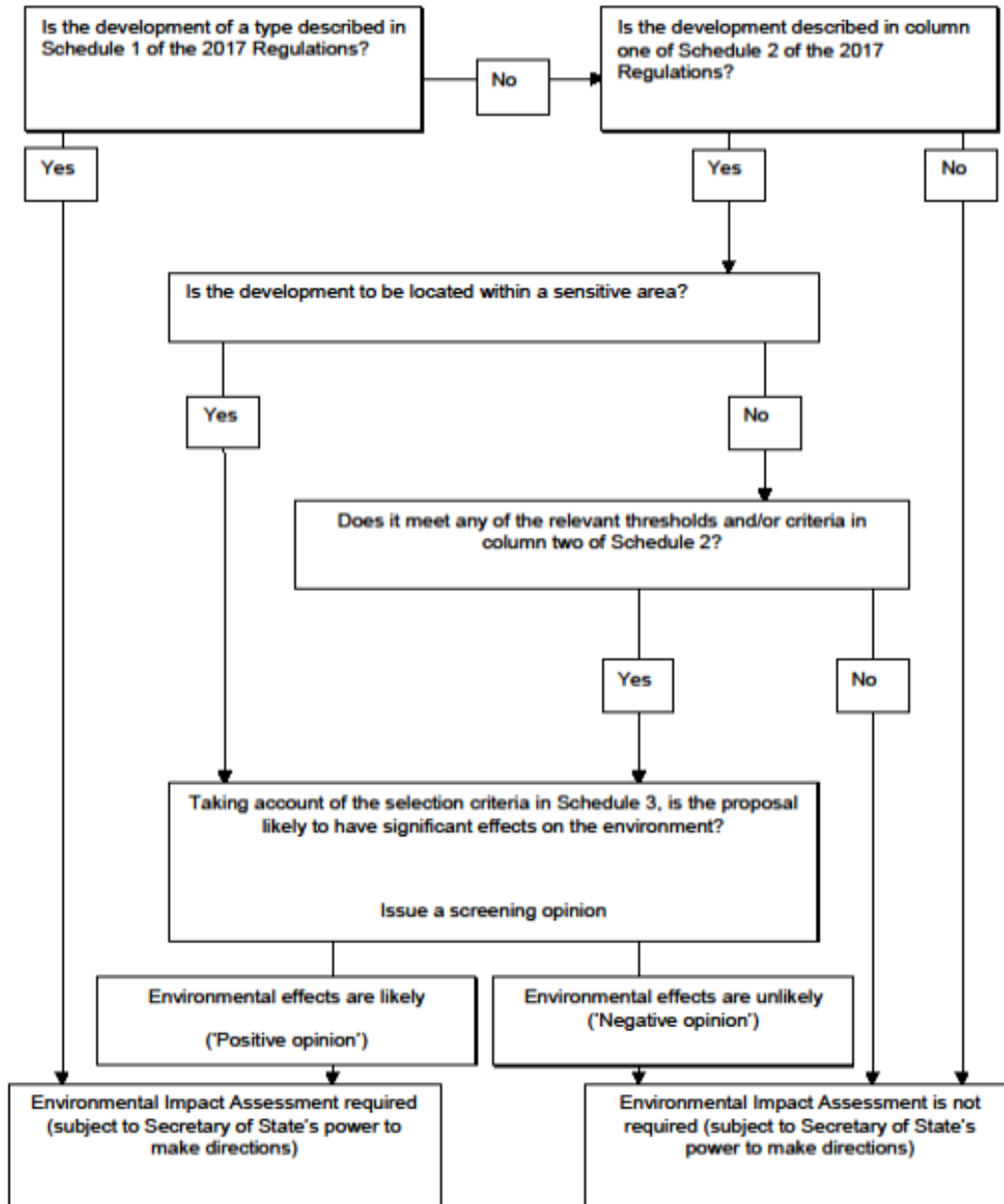


FIGURE 1-5 EIA SCREENING FLOWCHART TAKEN FROM THE GOVERNMENT'S ONLINE NATIONAL PLANNING PRACTICE GUIDANCE [HTTPS://WWW.GOV.UK/GUIDANCE/ENVIRONMENTAL-IMPACT-ASSESSMENT](https://www.gov.uk/guidance/environmental-impact-assessment)

1.6 WHETHER THE SITE IS WITHIN, PARTLY WITHIN, OR NEAR A SENSITIVE AREA

1.6.1 As recognised in the Government’s National Planning Practice Guidance (NPPG), the more environmentally sensitive the location, the more likely it is that the effects will be significant and will require EIA². Regulation 2(1) defines certain designated sites as “sensitive areas” where the thresholds in the second column of Schedule 2 do not apply, and where all developments must be screened for EIA.

1.6.2 The site is assessed against these designations in **Table 1.3**.

SENSITIVE AREA TYPE	APPLICABLE?
(a) land notified under sub-section (1) of section 28 (sites of special scientific interest) of the Wildlife and Countryside Act 1981	No
(b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949	No
(c) the Broads	No
(d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention for the Protection of the World Cultural and Natural Heritage	No
(e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979	No
(f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000;	No
(g) a European site	No

TABLE 1.3: SENSITIVE AREA ASSESSMENT

1.6.3 **Table 1.3** above confirms the site is not located within a Sensitive Area and there are no Sensitive Areas in close proximity to the site of note.

Conclusion

1.6.4 The proposal site is not located within a sensitive area as defined by Regulation 2(1) of the EIA Regulations.

1.6.5 Other statutory and non-statutory designations have been considered, which are not included in the definition of “sensitive areas”, but which are nonetheless environmentally sensitive and so may be relevant in determining whether EIA is

² <http://planningguidance.planningportal.gov.uk/>, section 4, paragraph 032; Reference ID: 4-032-20140306

required. Consideration has been given to the potential for significant effects on these sensitive areas and, this is set out under the appropriate headings below.

1.7 APPLICABLE THRESHOLDS AND CRITERIA

- 1.7.1 When a proposed development is of a type described in Schedule 2 and not sited in a sensitive area as defined in the EIA Regulations, the applicable thresholds and criteria for that type of development need to be examined. The NPPG notes that only a very small proportion of Schedule 2 development will require EIA³, taking account of the selection criteria set out in Schedule 3 of the Regulations.
- 1.7.2 In the case of “Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas” falling within category 10(b) of Schedule 2 of the Regulations, such as the proposal subject to this screening request, the EIA regulations define the applicable thresholds and criteria for the proposed type of development (Schedule 2 paragraph 10(b)) as:
- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
 - (ii) The development includes more than 150 dwellings; or
 - (iii) The overall area of the development exceeds 5 hectares.
- 1.7.3 The proposed development is for a leisure centre, comprising sports facilities such as a gym, sports court, swimming pool and family entertainment zones on a 9552sqm site. The proposed development is therefore a Schedule 2 development and the decision as to whether or not an EIA is required rests on whether the proposed development has the potential to result in likely significant environmental effects.

1.8 WHETHER THE DEVELOPMENT PROPOSAL IS A STANDALONE PROJECT

- 1.8.1 For the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, the proposed replacement for the King Alfred Leisure Centre is considered as a standalone development (a single project).
- 1.8.2 The EIA Regulations are designed to ensure that projects likely to have significant effects on the environment are properly assessed. However, they also guard against the practice of “salami slicing,” whereby a larger project is artificially divided into smaller components to avoid triggering EIA thresholds.

³ <http://planningguidance.planningportal.gov.uk/>, section 4, paragraph 018; Reference ID: 4-018-20140306

- 1.8.3 In this case, the leisure centre proposal is being brought forward independently, with no functional, physical, or temporal dependency on any wider masterplan or strategic allocation proposals. As such, it should be assessed on its own merits, and not as a component of a larger cumulative scheme. This approach aligns with case law and guidance which emphasise the need to assess projects based on their actual scope and environmental impact, rather than speculative future intentions.

2 POTENTIAL ENVIRONMENTAL EFFECTS

2.1 MHCLG SELECTION CRITERIA

- 2.1.1 Notwithstanding consideration of the selection criteria in Schedule 3 of the EIA Regulations, the Annex of the MHCLG Planning Practice Guidance on EIA provides guidance on the size and scale of various types of Schedule 2 developments that may result in significant effects on the environment, thus requiring EIA. This is done through the use of indicative thresholds.
- 2.1.2 The MHCLG web-based guidance provides indicative criteria and thresholds in relation to 10(b) infrastructure projects. The criteria states:
- "Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination".*
- 2.1.3 The guidance states that for section 10(b) developments, the following should be considered:
- (1) Physical Scale;
 - (2) Potential Increase in Traffic;
 - (3) Emissions and Noise;
- 2.1.4 The site comprises previously developed land including a public car park and the disused lower ground bowling alley and laser tag area (extending beyond the leisure centre building to the west and is covered by a green roof).
- 2.1.5 The site is 9552sqm in size and it is not considered that its redevelopment would be of significantly greater scale than the previous use, or that the types of impact are of a markedly different nature. Consideration of the potential for significant effects resulting from physical scale (landscape and visual impact), traffic, emissions and noise and contamination are addressed under the relevant heading, but it is not considered that significant effects are likely.
- 2.1.6 The site area exceeds the threshold at 5(a) above; however, the scale of the built development itself will be less than that set out in part 5(c). Part 5(b) is not applicable as the site will not provide any residential dwellings.
- 2.1.7 The indicative thresholds therefore suggest that this is not a development project of a scale that should typically be subject to EIA with reference to Paragraph 018 (Reference ID: 4-018-20170728) of the NPPG which notes that it states that only a very small

proportion of Schedule 2 development will require an Environmental Impact Assessment.

- 2.1.8 It should be noted in the consideration of the potential for significant environmental effects to result from a proposed development that the 2017 EIA Regulations, in recognition of the Court of Appeals decision in [Loader] 2012 EWCA Civ 869 allows mitigation measures that are modest in scope and/or plainly and easily achievable to be taken into account by the local planning authority during screening.
- 2.1.9 The potential for significant effects to result from the proposed development is discussed under the relevant headings below.

Traffic and Transport

- 2.1.10 Using standard TRICS analysis the proposed development is expected to generate approximately 842 two-way vehicle trips per day. A travel survey has been conducted of the existing leisure centre, which informs the Transport Assessment. This indicates a vehicle mode share of 28% for existing visitors to the site. Adjusting the TRICS outputs for this mode share provides a vehicle trip generation of 622 two-way daily trips.
- 2.1.11 In either methodology approach, the proposals are not envisaged to create an uplift in transport movements compared the existing situation on site, as the scheme constitutes a replacement of an existing leisure centre facility and public car park in a like-for-like arrangement.
- 2.1.12 In the same fashion as the existing King Alfred Leisure Centre, potential future traffic attraction of the site is also inherently limited by its location and the restricted local available parking capacity. This is also conducive to encouraging trips by other modes, as demonstrated through the travel survey of the existing leisure centre.
- 2.1.13 The Average Annual Daily Flow (AADF) for the A259, located directly adjacent to the site, was 17,984 in 2020 and was estimated to be approximately 21,840 in 2024 (Department for Transport Count Point 16805 <https://roadtraffic.dft.gov.uk/manualcountpoints/16805>). Whilst DfT data is not publicly available for all road links surrounding the site, this does demonstrate the volume of traffic experienced in the locality.
- 2.1.14 Relevant committed development (if any) that could have a material impact on the transport network will be included within the Transport Assessment.
- 2.1.15 The Institute of Environmental Management and Assessment Guidelines (now Institute of Sustainability and Environmental Professionals ISEP) on the Environmental Assessment of Traffic and Movement (2023) states that an environmental assessment is generally only required where traffic flows increase by 10% in sensitive areas and 30% elsewhere.

- 2.1.16 Likely significant effects from the proposed development can be discounted on this basis, as given the like-for-like replacement, the proposals are not expected to generate traffic impacts at this level. This is not to say there will be no effect from the proposed development but that the effect is unlikely to be significant.
- 2.1.17 Highways safety data (crashmap.co.uk) shown on Figure 1-6 shows the Personal Injury Accident (PIA) data recorded between 2019 and 2023 in the local area around the site including the A259, depicting the latest available 5-years of collision data. This demonstrates that there have been 8 slight collisions within the vicinity of the site, comprising two cycle and two pedestrian casualties. These collisions have occurred at the Kingsway/A2023/Hove Street junction.
- 2.1.18 The junction itself operates along a coastal route with potentially high traffic volumes. The junction is equipped with signalised crossing points with tactile paving and a dedicated cycle lane along Kingsway, which are intended to support safe travel for vulnerable road users. Whilst there have been four slight collisions involving vulnerable road users over the previous 5-year period, there have been zero over the previous 3-year period involving a pedestrian or cyclist. Based on the above, it is not considered that there is an inherent risk associated with the operation of the existing highway network. This will be further addressed within the accompanying Transport Assessment, as part of the standard planning process.
- 2.1.19 Furthermore, the layout of the A259 and the junction with Hove Street will be reworked imminently as part of BHCC's A259 Active Travel Scheme. Liaison is ongoing with BHCC regarding these proposals to ensure that the King Alfred Leisure Centre scheme and the A259 proposals are coordinated and link to each other. This highlights that the existing safety record is not necessarily reflective of the expected A259 characteristics at the time of the development's implementation – however safety and promotion of active travel will be prioritised in future improvements.
- 2.1.20 As the development is not expected to cause a traffic increase, and as the A259 is being improved by BHCC, it is not expected that the proposals would cause any increase in highway safety concerns.
- 2.1.21 Matters to do with access, parking and public transport are standard matters addressed through normal planning practice in consultation with the Local Highways Authority in accordance with set guidelines and as such provided development accords with these standards (which the Applicant is committed to doing and without which the Council would not grant consent in any event) there is no scope for likely significant effects in this regard.

Air Quality

- 2.1.22 The key pollutants affecting human health are nitrogen dioxide (NO₂) and particulate matter of less than 10 microns (PM10). The UK Objectives for NO₂ are 200 µg m⁻³ hourly mean (not to be exceeded more than 18 times a year) and 40 µg m⁻³ annual mean concentrations and for PM10 are: 50 µg m⁻³ 24 hourly mean (not to be exceeded more than 35 times a year) and 40µgm⁻³ annual mean concentrations.

Where air quality exceeds UK Objectives Local Authorities are obligated to declare Air Quality Management Areas (AQMAs) to monitor air quality and produce strategies to seek to bring air quality back within Objective levels.

- 2.1.23 The Brighton and Hove 2025 Air Quality Annual Status Report (June 2025) sets out the evidence of local air up to the end of the 2024 calendar year. In 2024, all air quality standards throughout the city were met, with concentrations continuing below the threshold. Moreover, it was considered that there was no need to declare new areas for air quality management and BHCC have considered revoking some existing Air Quality Management Areas within the City of Brighton & Hove.
- 2.1.24 This site lies outside of any designated Air Quality Management Area. The proposed development is not of a scale and type which is considered to cause any detrimental impacts on air quality in this location.
- 2.1.25 It is acknowledged however that there are proven construction/demolition methodologies are available to minimise dust effects as set out in the Institute of Air Quality Management guidance 'Assessment of dust from demolition and construction 2014'. The IAQM guidance states that following the application of appropriate levels of mitigation to control dust emissions (as set out therein) that residual effects will be reduced to a level that is "not significant". It is expected that a Construction Environmental Management Plan will form part of a condition of any planning consent for the proposed development within which dust mitigation measures form standard practice.
- 2.1.26 On the basis of the above no likely significant air quality effects are predicted to result from the proposed development.

Noise and Vibration

- 2.1.27 The Institute of Environmental Management and Assessment Guidelines on the Environmental Assessment of Traffic and Movement (2023) (now Institute of Sustainability and Environmental Professionals ISEP) state that a change in Basic Noise Level of 1dB can be considered not significant. For a 1dB change to occur, traffic flows need to increase by 25% or decrease by 20%, assuming that road alignment, speed, road surface, gradient and % HGVs remain unchanged.
- 2.1.28 The existing site lies adjacent to an existing leisure centre where there is already an established noise associated with this type of use. It is therefore anticipated that the primary noise matters to be addressed are those related to plant noise, including that from a future development to the east which is set to be residential use. This will be covered within the accompanying Noise Impact Assessment which is considered efficient for addressing these issues.
- 2.1.29 There is the potential for construction activities to generate noise emissions, but standard and proven construction methodologies are available to minimise these temporary effects e.g. BS 5228:2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites. There will be no night-time working permitted and

no working on Sundays. No likely significant noise effects are predicted to result from the proposed development.

Landscape and Visual Impact

- 2.1.30 The site is not located within a National Park, Conservation Area or National Landscape.
- 2.1.31 The site itself comprises an area of hardstanding previously utilised for car parking in association with the King Alfred Leisure Centre. The site is contained by the A259 / Kingsway at its northern boundary and King's Esplanade at its southern boundary.
- 2.1.32 The site lies within an existing built-up area and sits next to an existing leisure centre. The proposals will not lead to any significant landscape and visual impacts.
- 2.1.33 A full Townscape and Visual Impact Assessment (TVIA) will be undertaken to accompany the planning application. It is however considered that significant Townscape and visual effects are unlikely subject to good design controlled through the normal planning process.

Cultural Heritage

- 2.1.34 The site itself does not contain any statutory listed buildings. The closest listed building is the Grade II listed Nos 2-6 (even) including piers and railings (List Entry: 1292549). The site is located directly opposite the heritage asset.
- 2.1.35 The proposals will lie adjacent to the location of the existing leisure centre, and the proposals will be of a reduced floor area compared to the existing leisure centre. It is therefore considered that the development would not result in significant adverse effects on the setting of any heritage assets. It is anticipated that the proposed leisure centre will not be significantly taller in height than the existing King Alfred Centre and it will be designed to also accommodate car parking internally.
- 2.1.36 Additionally, the site is located adjacent to three Conservation Areas including Old Hove, Cliftonville and Pembroke & Princes. There are also three designated assets located approximately 150-200m east of the site, along the A259 and Medina Terrace. These are Grade II listed Victoria Terrace (List Entry: 1187569), Grade II listed Albemarle Mansions including piers and walls returned along road frontage (List Entry: 1187564) and Grade II listed Nos 2-8 including walls, piers and railings fronting road (List Entry: 1298644). There is a locally listed beach shelter, which will be retained and relocated elsewhere as a result of the proposals.
- 2.1.37 Whilst these assets are located within a close proximity to the site, there are a number of tall buildings located near to the site and the assets. It is therefore not considered that the site will have a significant adverse impact on local assets. This will however be covered within the accompanying Heritage Assessment.

- 2.1.38 Moreover, an Archaeological desk-based assessment will be completed to determine any archaeological assets that may trigger a presumption in favour of their physical preservation in situ against the development.
- 2.1.39 Overall, no significant effects on cultural heritage or archaeology are likely to result from the proposed development subject to standard mitigation. An Archaeological desk-based assessment and Heritage Assessment will be submitted with the application. All archaeological works will be agreed with the Local Planning Authority (LPA).

Biodiversity

- 2.1.40 In terms of biodiversity and landscaping, the site comprises generally of low ecological value (buildings and developed land, sealed surfaces), with the exception of an area of 'other neutral' grassland situated on the green roof of the underground bowling alley, between the existing car park and the leisure centre. This is considered a habitat of medium distinctiveness and will need to be offset as part of the biodiversity net gain requirements.
- 2.1.41 The development will be required to deliver the statutory 10% biodiversity net gain on-site, which will involve the enhancement of habitat types.
- 2.1.42 Standard and proven best practice mitigation measures exist to meet the legal tests of the relevant legislation (The Conservation of Habitats and Species Regulations 2017, as amended, and The Wildlife and Countryside Act 1981, as amended), including licensing procedures, reducing the significance and likelihood of effects on species. Suitable alternative habitat for any protected species identified within the site will be included in the proposed development and no likely permanent effect on protected species will result from the proposed development.
- 2.1.43 It is clear that whilst there are ecological matters to be addressed in any forthcoming planning application that the evidence available suggests that significant adverse effects can be concluded as being unlikely.

Water Environment

- 2.1.44 The Environment Agency (EA) online flood-mapping tool shows that the site itself is located within Flood Zone 1 (lowest risk of flooding) despite being on the seafront. Areas immediately south of the site, including parts of King's Esplanade, are located within Flood Zone 3 due to its close proximity to the sea. Areas of surface water flooding are present at the northwestern corner of the site, in the existing car park and on areas along the site's southern boundary. The existing building itself does not lie within an area of surface water flooding.
- 2.1.45 The proposed development will be supported by a Flood Risk and Drainage Assessment to demonstrate that the development is still appropriate given its location and that the development will not be adversely impacted by flooding.

- 2.1.46 The proposed development will include a surface water management scheme which will accord with the various guidance and requirements of the Lead Local Flood Authority (LLFA) as the statutory consultee on surface water management for new proposals.
- 2.1.47 Water quality in terms of both surface and groundwater will be safeguarded during construction through the use of standard and proven mitigation measures within a Construction Environmental Management Plan (CEMP).
- 2.1.48 It is considered that any identified impacts of the proposal can be dealt with through the normal planning process without necessitating an EIA.

Contaminated Land

- 2.1.49 The site will be assessed within an accompanying Contaminated Land Assessment.
- 2.1.50 Whilst there are no publicly available records of contaminated land at the site, a Contaminated Land Assessment was provided as part of the 2007 permission under reference BH2006/03429. It was found that:
1. There were some 'hotspots' of contaminated soils at shallow levels with the occurrence of arsenic, lead, nickel, copper, zinc and sulphate which could potentially impact on human health, plant growth and buried concrete;
 2. Groundwater contamination with cyanide was found on and off-site and phenol was detected up hydraulic gradient; and
 3. Methane and carbon dioxide in low concentrations quantities were detected on-site and were considered to not pose harm at this level.
- 2.1.51 It is important to note that appropriate remediation strategies were put in place following the assessment.
- 2.1.52 It should be noted that standard and proven mitigation exists to address contaminated land risks including:
- through the adoption of appropriate building design (with basic remedial measures i.e. ground gas and vapour membranes), and suitable working practices employed during the construction phase.
 - A clean topsoil cover layer in all soft landscaped areas
 - Suitably resistant below ground water infrastructure be designed in line with the UK Water Industry Research (UKWIR) Guidance for the Selection of Water Supply Pipes to be used in Brownfield Sites (published 2011) guidance document.

- 2.1.53 It is therefore considered that subject to standard industry procedures and appropriately worded conditions that significant effects on the environment are unlikely to occur.

Human Health

- 2.1.54 The potentially significant health impacts of the proposed development are considered to be air quality, noise and ground contamination effects. As identified in this report no likely significant effects are anticipated in this regard. No likely significant human health effects are also therefore envisaged.

Climate Change

- 2.1.55 The proposed development is not of a scale or type considered to result in significant CO₂ or other greenhouse gas emissions, which would compromise national or regional carbon budgets. Changes to Part L (Conservation of fuel and power) of Building Regulations came into force on 15 June 2022 in the form of two new Approved Documents. This sets higher performance targets – CO₂ emissions are reduced by 31% for dwellings and 27% for other buildings – with a new emphasis on low carbon heating systems.
- 2.1.56 The proposed development will be built in accordance with building standards.
- 2.1.57 The nature and type of development proposed does not suggest it will be particularly vulnerable to the predicted effects of climate change. However, all drainage solutions are required to make a 40% allowance for climate change in accordance with Environment Agency Guidance.
- 2.1.58 The site will take into account the aspects provided within the Sustainability Strategy document. The development will seek to achieve BREEAM “excellent” level to reduce its impact on matters surrounding climate change. These measures will be implemented within the design of the scheme to ensure its sustainability.
- 2.1.59 No significant climate change related effects are therefore envisaged.

Major Accidents and Disasters

- 2.1.60 The nature of the development and its location indicate that it is not likely to result in accidents or disasters that would result in significant environmental effects or is vulnerable to accidents and disasters from neighbouring land uses.
- 2.1.61 It is noted that the proposed development does not fall within the scope of EU legislation 2012/18/EU (control of major-accident hazards involving dangerous substances) or Council Directive 2009/71/Euratom (Community framework for the nuclear safety of nuclear installations) as identified in Schedule 4 of the EIA Regulations.

Cumulative Effects

- 2.1.62 The key potential cumulative effects have been considered from developments in close proximity to the site, notably the development of the western lawns and Hove Lagoon area on land west of the site. The wider King Alfred strategic allocation SA1.C.1 area has also been considered.
- 2.1.63 The wider SA1.C.1 area contains this application site as well as the wider allocation area securing the development of a minimum of 400 new residential units.
- 2.1.64 The above developments will provide their own highways mitigation measures to negate the impacts from their respective development particularly along the A259.
- 2.1.65 In respect of the proposed development at the site the majority of the trip generation will reflect the existing movements already taking place generated from uses of the King Alfred Centre. While the cumulative effects on traffic on the highway network cannot be discounted fully any contributions to the effects from the proposed development would be negligible in the wider context of the above development increasing the traffic on the A259. Therefore, significant cumulative effects as the direct result of the proposed development are therefore unlikely.
- 2.1.66 In respect of townscape impact, all these developments could have cumulative landscape and visual effects. These developments have been included within the baseline and have been considered as part of the existing scene but, in terms of visual effects, the potential for some cumulative effects on views, over and above the individual; effect, are likely to be slight and not significant. Similarly, the extent of change in landscape character, in addition to that of the King Alfred leisure centre on its own, would only be slight and not significant.
- 2.1.67 Overall, given the nature and scale of the proposed development and the existing development in close proximity, it is considered that a scheme that is well designed and in keeping with the wider setting of the site will not likely have any adverse cumulative impacts on the heritage assets. Conversely, subject to good design, the scheme offers the potential to improve the quality and characteristics of the existing Conservation Area and neighbouring heritage assets.

3 CONCLUSION

3.1 REQUIREMENT FOR EIA

3.1.1 This report has been prepared on behalf of Brighton and Hove City Council as a formal request for an opinion as to whether the proposed construction of a leisure centre on land adjacent to the existing King Alfred Leisure Centre constitutes a project requiring Environmental Impact Assessment (EIA) in accordance with Regulation 5(4) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017⁴.

3.1.2 This review has worked through the screening process and concluded that:

- The development is not a Schedule 1 development;
- The development is of a type described in Schedule 2;
- The development site is not within a sensitive area;
- The development is above the applicable threshold and is therefore Schedule 2 development;
- The development is not considered likely to have significant environmental effects;
- The development is not an EIA development.

3.1.3 While the decision will rest with the LPA, DHA believes that sufficient information has been provided as part of this screening request to conclude that the proposed development does not require EIA, as it is not considered likely to result in significant environmental effects.

3.2 TIMESCALE

3.2.1 In accordance with Regulation 6(6), the Authority must adopt its Screening Opinion within three weeks of receipt of this request, unless a longer period has been agreed in writing. We look forward to receiving the adopted Screening Opinion within this timescale.

3.2.2 Regulation 5(5) states that all Screening Opinions, including those which indicate that EIA is not required, must:

⁴ Hereafter, all references to Regulations and the "EIA Regulations" refer to this document.

- State the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3;
- If it is determined that the proposed development is not EIA, state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment; and
- Send a copy of the opinion or direction to the person who proposes to carry out the development in question.