

## SCREENING OPINION

### THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

**Applicant:** Brighton & Hove City Council

**Agent:** Lizzie Withall, DHA Planning

**Date Received:** 25/9/25

**Site:** Land at King Alfred Leisure Centre, Kingsway, Hove

**Proposal:** 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).

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This Screening Opinion seeks to establish whether, given the characteristics of the proposed development, its location and its potential impact, the proposal would potentially give rise to significant environmental effects and thus requires Environmental Impact Assessment as set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations').

Guidance for determining whether a proposal is EIA development is provided in the EIA Regulations and the National Planning Practice Guidance (NPPG): Environmental Impact Assessment (revised 13 May 2020).

This screening request has been sought solely in relation to the leisure centre, as a stand-alone scheme. The NPPG guidance advises that each request should be considered on its own merits, however local planning authorities must also have regard to any possible cumulative effects from combined 'existing or approved' development and consider whether it does, effectively, form part of a larger development scheme.

Whilst the leisure centre site can be constructed and delivered separately, it does fall within a wider future development site (the 'King Alfred/RNR site') allocated in the Brighton and Hove City Plan Part One for mixed land uses under Policy SA1. This seeks delivery of mixed uses including a leisure centre and a minimum of 400 residential units. The supporting text to this policy highlights the enabling role the housing will play in delivery of the development, and at para 3.121 states: 'The council recognises that to secure the regeneration of the site to deliver new indoor public wet and dry sports facilities an appropriate mix of uses (of which housing is likely to be the predominant part) will be required'. There are no 'existing or approved' plans for the adjacent site or a timescale for delivery, although it is to be expected to come forward in the medium-term and via another applicant. An illustrative masterplan covering the wider site will be submitted with the leisure centre application showing the intentions for the housing element, with the leisure centre effectively forming the first part of delivery of the wider masterplan.

Given the above, it is considered that the existence of Policy SA1 that links the two adjacent developments is a clear indicator that the two sites are intended to be part of a whole and integrated scheme – rather than as isolated schemes - in the longer term.

It is considered that this weighs in favour of treating them as single project at this stage for EIA screening.

### **Classification of the Proposed Development**

The proposal does not comprise 'Schedule 1 development' (very large scale or sensitive strategic infrastructure development), as defined in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations'), where EIA is always required.

The development proposal then requires consideration as to whether it is 'Schedule 2 development'. The proposal falls within Column One, Part 10 (b) of Schedule 2 of the EIA Regulations relating to 'Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas'. The leisure centre site measures 0.9552 hectares, so is just under the threshold of 1 hectare of urban development set out in column 2 (i) of Part 10 of Schedule 2. When the adjacent housing site is included (to a total area of approximately 1.7 hectares) this threshold is exceeded, and the provision of circa 400 dwellings exceeds the threshold of 150 dwellings in column 2 (ii).

The application site is not located within a 'sensitive area', as defined in regulation 2(1) of the EIA Regulations (namely a Site of Special Scientific Interest, a National Park, a World Heritage site, a scheduled monument, an Area of Outstanding Natural Beauty or a European site).

Given that the thresholds in column 2 of Part 10 of Schedule 2 would be exceeded, it is appropriate that further consideration is given, with reference to Schedule 3 to the EIA Regulations, as to whether the (combined) development would have the potential to result in 'significant environmental effects' which require an EIA.

<b>Characteristics of Development</b>	
Development Area	1.7ha (wider site)
Nature / Scale / Design of Development	A public leisure centre, comprising sports facilities such as a gym, sports hall, 25m swimming pool plus teaching pool, studios, family entertainment zones, cafe and public car park in basement (circa 127 spaces) and associated landscaping. The proposal would be 3 storeys in height. The proposal would be located on the site of an existing surface car park used by the public and part of the existing leisure centre (disused bowling alley and laser tag area). Circa 400 homes (height unknown, likely high density/tall buildings involved), likely to include some car parking and amenity space.

	<b>Likely/Unlikely – briefly describe</b>	<b>Is this likely to result in a significant effect? Yes/No</b>
<b>1. Will the development involve actions that will cause physical changes in the locality (topography, land use, changes in waterbodies etc.)?</b>	<p>The proposed development is set within previously developed brownfield land.</p> <p>The proposed leisure centre use is very similar to the current use/scale/character of development that already exists on site. Whilst there is no current residential use on the site itself, the surrounding area is predominantly residential and the site is within an existing urban context.</p> <p>The proposal would not result in any significant urbanising effects, and the proposed uses are considered to be compatible with their immediate surroundings, so no significant effects are anticipated in this regard.</p>	No significant effects anticipated given proposed urban development within existing urban area.
<b>2. Will the development use natural resources such as land, soil, water, biodiversity, materials, or energy, especially resources that are non-renewable, in short supply or have low capacity to regenerate?</b>	The development of the site would require the use of a range of common natural and man-made construction materials and resources to complete the build and fit out of the scheme and would make use of previously developed land, so the natural resource use is not considered to result in significant environmental impacts either during the construction or operational phases.	No significant effects anticipated given urban environment and scale of project.
<b>3. Will the development involve the use, storage, production of substances or materials that could be harmful to people or the environment?</b>	<p>This is not anticipated to be the case given the type of land uses proposed. This matter would though be addressed through other legislation outside the planning system, including health and safety requirements, and the development would be expected to adopt best practice measures during the demolition, construction and implementation phase.</p> <p>The proposed end use will not involve the handling or processing of substances or technologies that are likely to have a significant impact on the environment.</p> <p>A CEMP and a Site Waste Management Plan requiring details of how waste and other materials will be stored during the demolition / construction would also be conditioned.</p>	No significant effects anticipated, given regulation via health and safety regulations.
<b>4. Will the development produce significant volumes of wastes during construction, operation or decommissioning?</b>	There will be waste produced during the decommissioning phase, construction and operation and of the development, but not significant amounts given the land uses and scale of the project.	No significant impacts anticipated within the meaning of the EIA Regulations with imposition of standard CEMP condition.

	<b>Likely/Unlikely – briefly describe</b>	<b>Is this likely to result in a significant effect? Yes/No</b>
<p><b>5.</b> Will the development give rise to significant noise, vibration, light, dust, odours?</p> <ul style="list-style-type: none"> <li>- during construction</li> <li>- during operation</li> </ul>	<p>During the demolition and construction phases, construction traffic and machinery will generate new sources of noise and vibration. The closest noise sensitive receptors to the site are the residential properties to the north and east of the site.</p> <p>The noise, vibration, light and dust impacts anticipated during construction can be mitigated through imposition of carefully worded CEMP condition.</p> <p>The leisure centre would be similar in scale and nature to existing. The residential use would be a more intensive use of the site but given its scale and location in an established urban area there is not likely to be a significant increase in impacts during the operational period in the meaning of the EIA regulations.</p> <p>Conditions will be applied controlling plant noise/emissions and external lighting.</p>	<p>No significant impacts anticipated within the meaning of the EIA Regulations with the imposition of standard CEMP condition and carefully worded conditions relating to noise transmission and lighting.</p>
<p><b>6.</b> Does the proposal have the potential to release pollutants to air, land, or water?</p>	<p>During the construction phase the key air quality impacts would result from demolition and construction. However, the demolition and construction phase impacts could be controlled by a CEMP, including vehicle routing, which could be secured by planning condition on any future planning consent.</p> <p>Given the similar scale and nature of the proposed leisure centre and car park compared to the existing land use the development is unlikely to result in a significant change in local traffic movements or in the vehicle composition on the local roads, so significant effects from these on air quality are not considered likely. The proposed dwellings are likely to have a degree of car parking but not significant amounts will be required in this sustainable location.</p>	<p>No significant impacts anticipated within the meaning of the EIA Regulations given imposition of standard CEMP and any required conditions eg to mitigate contaminated land.</p>
<p><b>7.</b> Are there areas on or around the location that are already subject to pollution or environmental damage – e.g. where existing environmental standards are exceeded, which could be affected by the project?</p>	<p>No. The site is not close to an Air Quality Management Area (AQMA). The proposal is not anticipated to result in any significant increase in vehicle movements during the construction or operation of the proposal. The proposal is not expected to significantly affect those nearby. There are no other known areas close by subject to pollution or environmental damage.</p>	<p>No significant impacts anticipated within the meaning of the EIA Regulations</p>
<p><b>8.</b> Is there a high risk of major accidents and/or disasters, including those caused by climate change, during construction or operation of the development that could have effects on people or the environment?</p>	<p>Unlikely. Operations do not pose significant risk in terms of major accident or disaster, particularly given standard planning, building control, and health/safety controls.</p>	<p>No significant effects anticipated within the meaning of the EIA Regulations.</p>
<p><b>9.</b> Will the project result in social changes e.g. demography, traditional lifestyles, employment?</p>	<p>Unlikely. No significant changes anticipated given similar scale and nature of the proposals compared to current land use and given the location with an existing residential neighbourhood. Proposal should help promote healthier lifestyles.</p>	<p>No significant effects anticipated within the meaning of the EIA Regulations.</p>

	<b>Likely/Unlikely – briefly describe</b>	<b>Is this likely to result in a significant effect? Yes/No</b>
<b>10.</b> Will the development pose significant risks to human health, for example due to water contamination or air pollution?	Unlikely. No changes anticipated, see also questions 6 and 7 above.	No significant impact anticipated within the meaning of the EIA Regulations.
<b>11.</b> Are there areas on or around the location that are protected under international, national or local legislation for their ecological, landscape, cultural or other value that could be affected by the project?	<p>The site has no formal protection under legislation. The site is prominent and well used and the leisure uses it provides are valued by the local population. The whole of the city's seafront is valued as a cultural and leisure area and the promenade and beach are designated as open space in the City Plan. These will remain unaffected, or enhanced.</p> <p>The site contains a small area of green roof but overall does not provide for significant ecological opportunities. Any future application will provide details on ecology and will be subject to ecology conditions to mitigate and any impacts in this regard and no significant impacts on the environment are anticipated. The sea is not affected by the proposal.</p>	No significant impact anticipated within the meaning of the EIA Regulations.
<b>12.</b> Are there any other areas around the location that are important for their ecology e.g. wetlands, riparian areas, river mouths, mountains, forests, coastal zones, the marine environment, nature reserves and parks that could be affected by the project?	The site is on the seafront and the sea does contribute towards biodiversity, although it has no specific ecological designation in this location (eg is not a SSSI). The site itself is set back from the seafront and the promenade on previously developed land and the proposal will not directly impact the sea environment or vice versa. A CEMP will ensure any impacts during construction are appropriately managed.	No.
<b>13.</b> Are there any areas on or around the location that are used by protected or sensitive species of fauna or flora that could be affected by the project?	None anticipated. Urban environment so possibility of small pockets of protected species/habitat, but unlikely to be affected by project. See also questions 11 and 12 above.	Not significant within the meaning of the EIA Regulations.
<b>14.</b> Are there any inland, coastal, marine or underground waters on or around the location that could be affected by the project?	The adjacent sea/coast will not be directly affected by the development. See also questions 11 and 12 above.	No.
<b>15.</b> Are there any areas or features of high landscape or scenic value on or around the location that could be affected by the project?	Site is on the seafront and is prominent and open. It could involve taller buildings within the housing site. There are no features of 'high' landscape/scenic value however that would be affected in the meaning of the EIA regulations.	No significant effects anticipated given location within an urban environment.
<b>16.</b> Is the project in a location where it is likely to be highly visible to many people?	Yes. The site is prominently located on the city's seafront next to the well used promenade and main A259 road into the city. It would however be viewed within an urban context and the effect of the resultant change within a built up urban context is not considered to be significant.	Yes but impact will not be significant in the meaning of the EIA Regulations.

	<b>Likely/Unlikely – briefly describe</b>	<b>Is this likely to result in a significant effect? Yes/No</b>
<b>17.</b> Are there routes on/around the location that are used by the public for access to recreation or other facilities that could be affected by the project?	The application site is within an urban area, with routes linking to some recreation and other facilities eg the seafront, the promenade and Hove Beach Park, but these are not expected to be disrupted to any degree by the development and linkages likely to be enhanced.	No.
<b>18.</b> Are there any routes on or around location that are susceptible to congestion or cause environmental problems, that could be affected by the project?	The adjacent A259 is a busy main road but is not an AQMA. The promenade is a busy thoroughfare for pedestrians and cyclists. There may be some limited, temporary disruption/congestion if routes are closed/changed during construction. Given the replacement leisure scheme would be similar to the scale and nature of the current land use and given the scale of the housing and that any parking associated with it would be likely limited, no significant impact in terms of congestion or environmental problems are likely to occur. Use of sustainable modes of transport would be encouraged via a Travel Plan condition.	Not within the meaning of the EIA legislation
<b>19.</b> Are there any features of historic or cultural importance on or around the location that could be affected by the project?	<p>Neither the site nor any of the structures on it are statutory listed or within a conservation area.</p> <p>The area to the north of Kingsway, opposite the site, is within the Old Hove Conservation Area. To the west of Hove Street and Hove Street South is the Pembroke and Princes Conservation Area. The area immediately to the east of the site is not in a conservation area, however the boundary of the Cliftonville Conservation Area lies to the east of the petrol station on the corner of St Aubyn's South and Kingsway and to the east of Bath Court. Nos 2-6 (even) St Aubyn's (on the corner with Kingsway and facing the site) are listed Grade II.</p> <p>St Aubyns Mansions to the south-east of the site is locally listed.</p> <p>The proposal will not directly impact heritage assets but will affect their wider setting - and not likely to be to a significant degree given the clear separation of the site from them. Given the overall scale of the proposal the impacts are not likely to be significant within the meaning of the EIA Regulations.</p> <p>A future application will provide a Heritage and Townscape and Visual Impact Assessment which will include verified views and the impact on any heritage assets will be fully assessed.</p> <p>Conditions can be imposed to control materials and detailing to ensure the proposal has an acceptable impact on heritage assets.</p> <p>The proposal is not considered to result in significant environmental effects within the meaning of the EIA legislation.</p>	Not within the meaning of the EIA Regulations.
<b>20.</b> Will there be any loss of Greenfield land?	No. The green roof over the basement facilities will be affected but is not defined as 'greenfield' (ie not previously developed, land.)	No

	<b>Likely/Unlikely – briefly describe</b>	<b>Is this likely to result in a significant effect? Yes/No</b>
<b>21.</b> Are there existing land uses around the location that could be affected by the project?	The site lies within a mixed-use area comprising residential, commercial, and leisure/recreation. The proposed uses replace similar ones and introduce housing, and are compatible with existing uses in the area and no significant impacts are anticipated. The site is separated from adjacent residential uses.	No significant effects anticipated as urban development proposed within existing urban area.
<b>22.</b> Are there areas on or around the location that are densely populated or built-up, that could be affected by the project?	There are residential and employment uses in the vicinity. Impacts on the amenity of neighbouring occupiers will be considered in any future planning application. Given the siting, scale and nature of the proposal, and that it is similar to the current and surrounding land uses, the impact is not considered to be significant, within the meaning of the EIA Regulation	No significant effects anticipated as development proposed within existing urban area.
<b>23.</b> Are there areas on or around the location that are occupied by sensitive land uses e.g. hospitals, schools, community facilities that could be affected by the project?	There are some community facilities on site eg areas of the leisure centre used by the wider community as well as a Community Interest Company in the building. Any future application will need to take into account any impact to such uses and look to replace them in the scheme or justify where relocated to. Overall impact on such uses not deemed to be significant in the meaning of the EIA Regulations.	No.
<b>24.</b> Are there any areas in or near the application site that contain high quality or scarce resources that could be affected by the development, e.g. groundwater resources, forestry, agriculture, tourism, minerals?	The site is located on the city's seafront which is a significant tourist asset. The proposal will not directly affect it and should enhance its setting and function.	Not in the meaning of the EIA Regulations.
<b>25.</b> Is the location susceptible to earthquakes, subsidence, landslides, erosion, flooding, or adverse climatic conditions that could cause the project to present environmental problems?	Whilst adjacent to coast, the site is not identified as a flood risk area from sea flooding (is classified as lowest risk - zone 1) although it will need to be modelled on future climate change within a site-specific flood risk assessment submitted with the application. The adjacent seafront area is subject to on-going coastal protection works that will be unaffected.	No significant impacts anticipated in the meaning of the EIA Regulations.
<b>26.</b> Are there plans for future land uses on or around the site that could be affected by the project?	As set out in this Opinion, there is the adjacent allocated housing site under Policy SA1 which is anticipated in the future to come forward for circa 400 homes. These would not be directly affected by the leisure centre at this stage as it does not physically rely on the adjacent site, but will become part of an integrated scheme in the future.  Whilst the proposal will impact any future masterplan layout of the wider allocation, it will not significantly affect future land uses or prejudice development of that site, and it would be a compatible land use. Any potential cumulative impacts have been assessed as part of this Opinion.	No significant cumulative impacts anticipated within the meaning of the EIA Regulations.

	<b>Likely/Unlikely – briefly describe</b>	<b>Is this likely to result in a significant effect? Yes/No</b>
<b>27.</b> Is there a potential for transboundary impacts?	Unlikely. Site is not near any boundaries (except the sea). The site may be viewed at a very far distance from other coastal authorities, but will be against the backdrop of the city.	No significant effects identified.
<b>28.</b> Will any effects be unusual in the area or particularly complex?	Unlikely. No complex effects anticipated.	No significant effects identified, given controls in place through planning and building control regimes.

### **Conclusion**

This Screening Opinion relates to a replacement leisure centre and public car park in a building of 3 storeys on a site area of 0.9552ha within the built up area of the city. It has been screened in conjunction with the adjacent future housing site for circa 400 dwellings (scale/height/layout unknown) as set out in Policy SA1 (total site area 1.7ha), as they are allocated together and will form an integrated development in the future.

The Screening Request is considered to contain sufficient information to enable an assessment of whether there are likely to be significant environmental effects as a result of the proposal.

The NPPG guidance states “*projects which are described in the first column of Schedule 2 but which do not exceed the relevant thresholds, or meet the criteria in the second column of the Schedule, or are not at least partly in a sensitive area, are not Schedule 2 development.*”

The stand-alone leisure centre proposal is not Schedule 2 development, although it is very close to the 1ha site area threshold in Column 2. In this case, it is considered necessary to screen the proposal in conjunction with the adjacent future housing site, which means the relevant thresholds would be exceeded, and therefore the council has given further consideration to the need for EIA.

Schedule 3 of the EIA Regulations should be considered as part of the screening process and this sets out selection criteria for screening Schedule 2 development. These include factors such as the characteristics of the development, the location of the development, the types and characteristics of the potential impact. This assessment has been undertaken in the table above, which is based on the screening checklist within the guidance.

The guidance states “*Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment.*” It includes ‘[Annex: indicative screening thresholds](#)’ which it states are “*indicative only and are intended to help determine whether significant effects are likely*”. For part 10(b) – urban development projects the Annex notes that

“*EIA 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. Sites which have not previously been intensively developed:*

- (i) area of the scheme is more than 5 hectares; or*
- (ii) it would provide a total of more than 10,000 m<sup>2</sup> of new commercial floorspace; or*
- (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).”*

The ‘key issues to consider’ are identified as “*the physical scale of such developments, potential increase in traffic, emissions and noise*”.

In this case the site is not located within a ‘sensitive area’ as defined in the EIA Regulations or within any relevant local, national or international designations. The site is within the setting of a number of conservation areas and listed buildings but contains no heritage assets. The site

is adjacent to the sea however it is set back from it on previously developed land and will have no direct impact on it. The proposed leisure centre (including car park and plant) would have an approximate floor area of about 10,000sqm but would be on previously developed land and replace facilities of a very similar scale and nature, within an urban context. Whilst introduction of 400 homes would represent a substantial change to the wider site, it would not be at a 'significantly great scale' and the site has been previously developed, and the proposal would be significantly below the 5 hectare/1000 dwelling thresholds for non-previously developed sites.

Therefore, taking into account the criteria in Schedule 3 of the EIA Regulations and NPPG, it is considered that the proposal does not have the potential for significant environmental impact within the meaning of the EIA Regulations.

An Extension of Time was agreed with the applicant to provide the response by 24/10/25.

**Screening Opinion**

In the opinion of the Local Planning Authority, the development **would not** require an Environmental Impact Assessment.

**Signed:**

**Maria Seale**

**Reviewed by:**

**Matthew Gest**

**Planning Manager**

**Planning Manager**

**Date: 23/10/2025**

**Date: 24/10/2025**