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Dear Ben

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED) – REQUEST FOR AN EIA SCREENING OPINION

Savills (UK) Limited, on behalf of Brighton & Hove City Council (BHCC), intend to submit a planning application for the phased redevelopment of land at Hodshrove Lane, Moulsecoomb (the site), to provide up to 240 residential dwellings, community floorspace, small-scale retail and associated public open space, external sports/leisure space and associated infrastructure.

Prior to the submission of the planning application, we formally request the Planning Authority's Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environment Impact Assessment) (EIA) Regulations 2017 (the EIA Regulations).

In accordance with Regulation 6(2) please find enclosed:

- A description of the development, including the physical characteristics and location of the development.
- A description of the aspects of the environment likely to be significantly affected by the development.
- Where information is available, a description of any likely significant effects of the proposed development on the environment.
- A plan sufficient to identify the land.

Description of the Site and Proposed Development

The Site

The site is approximately 4.54 hectares (ha) in size and is located off Hodshrove Lane, Moulsecoomb, Brighton. It is centred on National Grid Reference 533267 E, 107289 N. A site location plan is appended to this letter (Figure A).

The site broadly comprises of two linking parcels of land which are located to the north and south of Hodshrove Lane.

The parcel located to the north of Hodshrove Lane is bounded by Hodshrove Lane to the south, Hodshrove Road and existing residential dwellings to the east, Moulsecoomb Way to the north, and existing residential to the west. This area of the site contains three existing buildings:

- Hillview Contact Centre, previously occupied by Good News Brighton. This is currently let on a short term lease basis to a local community group. This lease is due to expire in the near future and the group will be relocated elsewhere in the area. It is currently Use Class D1. The only vehicular and pedestrian access to this portion of the site is via Hodshrove Lane to the south. The building is set back from the access, with a small area of hardstanding in front of the building to provide car parking (circa 4-5 spaces). The remainder of this area comprises landscaping with some mature trees dotted along the perimeter. Low metal fencing encloses the majority of the area.
- Moulsecoomb Community Leisure Centre, with vehicular access via Moulsecoomb Way and pedestrian access via Hodsgrove Lane. The building is set back from Moulsecoomb Way, with car parking to the east of the building (circa 60 spaces). The remainder of this area comprises landscaping with perimeter trees.
- Moulsecoomb Health Centre with vehicular and pedestrian access via Hodsgrove Lane. Playing fields are located to the north of the building with trees around the perimeter.

The remainder of the site is located to the south of Hodshrove Lane. This area is bounded by Hodshrove Lane to the north, Hodshrove Road and existing residential dwellings to the east, existing residential to the south and Moulsecoomb Primary School to the west. It currently comprises the following buildings:

- Moulsecoomb Hub North
- Moulsecoomb Hub South
- 67 Centre Youth Centre
- Moulsecoomb Boxing Club
- Moulsecoomb Surestart (Children and Family Centre)

The Moulsecoomb Hub buildings are currently used as social worker premises. These will be relocated elsewhere in the city for redevelopment to take place. The existing Children and Family Centre will remain in situ. The 67 centre is an existing youth centre which will be relocated into the new proposed community hub (see proposed development section below). There is also an existing Multi-Use Games Area (MUGA), to the east of 67 Centre.

The remainder of the southern part of the site comprises of hardstanding primarily used for car parking, and hard and soft landscaping. The main vehicular accesses to the southern part of the site are from Hodshrove Lane to the north and Hillside to the south.

The site is situated in a suburban area predominantly consisting of residential uses. Within the immediate surrounds there are also some educational, leisure, commercial and recreational uses.

The site does not contain any heritage statutory designations and it is not located within an archaeological priority area, however part of the site is located in an Archaeological Notification Area as defined in the City Plan. The closest listed building is Moulsecoomb Place (Grade II listed, reference 1381668), which is located circa 650m to the south-west of the Site. It does not contain any designated buried heritage assets (such as scheduled monuments).

The site does not contain any ecological statutory designations but is located within the Brighton & Lewes Downs Biosphere Reserve (a non-statutory designation). The Environment Agency (EA) Flood Map for Planning (FMfP) shows the site is located within Flood Zone 1 (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding).

The surrounding area contains several statutory designated sites, principally, and located closest to the site, is the South Downs National Park, located approximately 250m from the site at the nearest point. The National Park is located to the East, West and North of the site.

Stanmer Park is located approximately 860m north of the site and is a grade II registered park and Garden and a Local Nature Reserve (non-statutory designation). An area called Castle Hill is located approximately 3km east of the site. This is designated as a Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI), and national nature reserve.

Proposed Development

The proposed development involves the demolition of the majority of existing buildings on site (Boxing Club and Children's Centre to be retained) and provision of residential dwellings, new community uses, small-scale retail and associated public open space, external sports/leisure space and associated infrastructure.

For the purposes of EIA Screening the proposed development comprises:

- **Residential units** – Up to 240 dwellings
- **Non-residential floorspace** – 3,000sqm of community floorspace (including GP surgery, pharmacy, library, youth and adult education and café) and 80 sqm of retail floorspace
- **Expected max building heights** – new buildings between three and eight storeys

An Illustrative Site Layout Plan is provided in Figure 1 (also appended as Figure B) based upon the current emerging design. Whilst changes to the layout may occur prior to submission of the Planning Application, the overall scale of development will remain within the above quantum.

Although the Leisure Centre and Health Centre are included in the red line area, these buildings and the existing uses will be retained.

The primary accesses to the site are expected to be via the existing accesses off Hodshrove Lane. However, an additional access will be available off Hodshrove Lane where the existing MUGA is located. Emergency vehicles will also be able to access the site from the south off Hillside.

The residential units will be delivered in several blocks across the site. The main non-residential floorspace (community and retail) will be situated around the existing Moulsecomb Hub South buildings and 67 Centre under the current emerging designs. A community "Hub" will be located approximately with the centre of the site (comprising GP surgery, pharmacy, library, youth and adult education and café). A play park, Skate Park and 3G sport pitches are also proposed. The Children and Family Centre and Boxing Club will be retained within the proposed development.

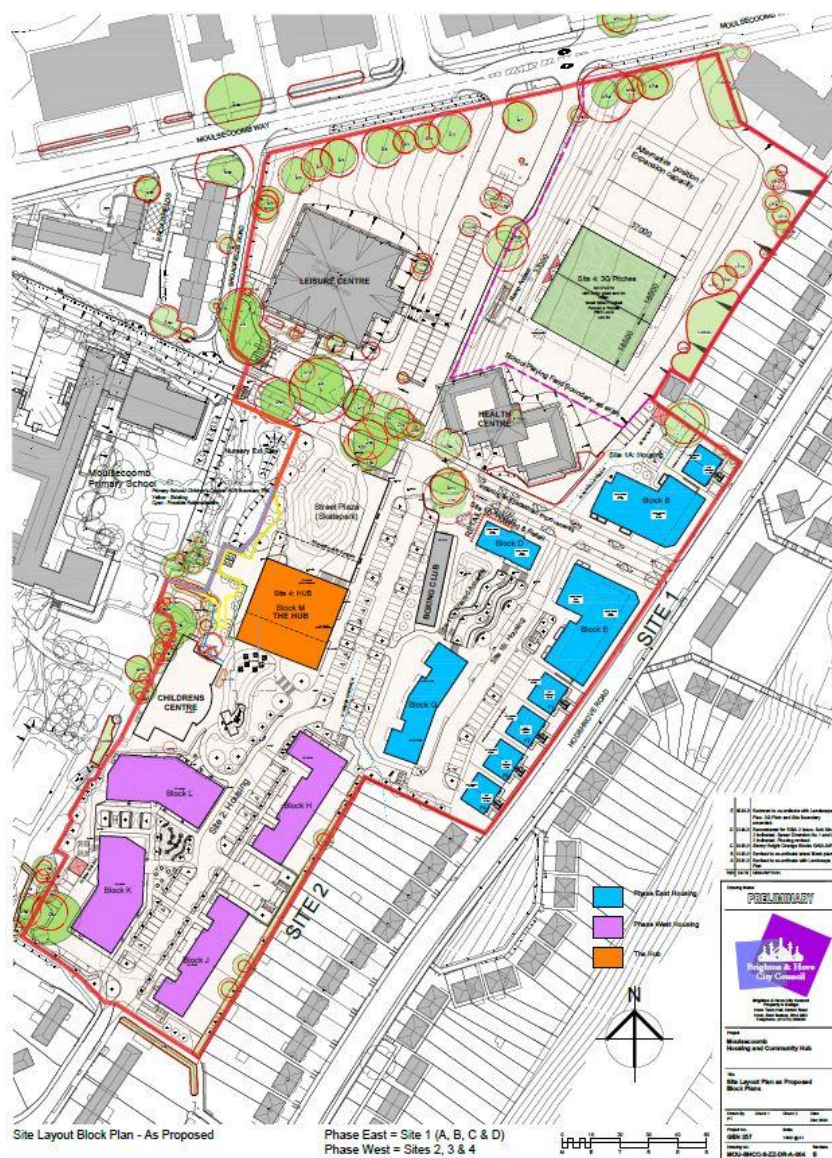
The proposed development will include areas of landscaping and green infrastructure. Where possible, existing features, such as trees around the boundary of the site, will be retained. The introduction of new landscaping will include both recreational areas such as pocket parks and terrace gardens, and also amenity and buffer planting within and around the boundary of the site. The ecological value of the site may be enhanced through

proposed features such as wildflower turf, ecological buffer planting and formal native hedgerows. The exact nature of the landscaping will be confirmed within the landscaping strategy to be submitted with the planning application.

The proposed development will be brought forward in phases. It is currently envisaged that Phase 1 would include the western and southern area of the site and include the demolition of Moulsecocomb Hub South and North (following relocation of Social Services off site) and construction the community “Hub” building and further residential blocks and all associated car parking and landscaping, including the play park, skate park and 3G pitches.

Phase 2 involves the development of the north east section of the site, including the demolition of the former Hillview Contact Centre to the north of Hodshrove Lane. The first residential blocks would be constructed alongside the associated soft landscaping, car parking and internal roads.

Figure 1: Illustrative Site Layout



EIA Screening Process

Development that falls within Schedule 1 of the EIA Regulations always requires EIA and is referred to as ‘Schedule 1 development’. Development listed in Schedule 2 that is located in a ‘sensitive area’ (as set out in Regulation 2(1)), or exceeds one of the relevant criteria or thresholds given in Schedule 2 is referred to as ‘Schedule 2 development’. Not all ‘Schedule 2 development’ will require an EIA, only the developments likely to have significant environmental effects due to its size, location or nature. Development that requires EIA is referred to as ‘EIA development’.

As set out in the below table, the proposed scheme is not Schedule 1 development, but falls within the description in Schedule 2 Part 10(b) ‘Urban Development Projects’. The proposed development is not located within a sensitive area but would exceed the relevant criteria in Schedule 2 of 1ha of non-dwellinghouse development, the development also includes more than 150 dwellings. Therefore, the proposed development would constitute EIA development if it is likely to result in significant environmental effects.

The Planning Practice Guidance (PPG) provides indicative thresholds to assist in the determination of whether a project is likely to have significant environmental effects. For urban development such as this, these indicative thresholds state that “*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*”. Preliminary site investigations indicate the risk of ground contamination within the site is moderate to low and the proposed development is similar in nature and scale to the existing site.

Applying the PPG ‘indicative criteria and thresholds’ for Schedule 2 Part 10 (b) projects, consideration must also be given to whether the proposed development would have significant urbanising effects in a previously non-urbanised area. On the basis that the site is currently developed land and is situated within an urban area, the delivery of the proposed development is not considered to result in any significant urbanising effects and would not result in an overall change in the character of the area.

The site is not located within a ‘sensitive area’ and there are no sensitive areas within the immediate surrounds. Given the nature of the proposed development and the existing character of the site, significant effects are not considered likely.

Therefore, given the site is not located within a sensitive area (as defined by the EIA regulations) and, for the reasons described below, significant effects are not considered likely, the proposed development is not considered to constitute EIA development. This is in line with relevant EIA guidance provided in the PPG which states that “*only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment*” (Paragraph: 018 Reference ID: 4-018-20170728). The assessment and consideration of environmental matters related to the proposed development can be appropriately addressed through the planning application process.

Application Thresholds	
i. Does the Proposed Development fall within Schedule 1 (Y/N)?	No
ii. If yes, what is the applicable description?	N/A

If yes, the proposed development automatically requires EIA

iii. Does the proposed development fall within Schedule 2 (Y/N)?	Yes
iv. If yes, what is the applicable description?	10(b) Urban Development Project
v. Is any part of the proposed development to be carried out in a defined Sensitive Area (see Regulation 2(1))	No.
vi. What is the applicable threshold/criteria in Schedule 2?	The development includes more than 150 dwellings; or 1ha of non-residential development; or the overall area of the development exceeds 5ha.
vii. Does the proposed development meet/exceed the applicable threshold (Y/N)?	Yes, the proposed development includes more than 1ha of urban development which is not dwellinghouse development; and more than 150 dwellings.
If yes to (iii) and then (v) or (vii) the proposed development will require EIA if it is <u>likely</u> to have significant effects on the environment.	

Possible effects on the environment

The following information has been prepared with reference to the selection criteria for screening Schedule 2 development, provided in Schedule 3 of the EIA Regulations:

1. Characteristics of development (a) – (g) (of the Regulations)
2. Location of development (a) – (c) (of the Regulations)
3. Characteristics of the potential impact (a) – (h) (of the Regulations)

Features of the proposed development and any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment have been identified as per the PPG guidance at Paragraph 023 Reference ID: 4-023-20170728.

The applicant has a good understanding of the possible environmental effects of the proposed development and, as such, the illustrative layout of the proposed development includes inherent environmental mitigation to respond to the constraints and potential impacts on and off site.

In the absence of inherent and additional mitigation and in advance of any judgments of the significance of individual effects, the possible environmental effects of the proposals are considered to be:

- Visual impacts and overshadowing – local impacts on surrounding human receptors through the comprehensive redevelopment of the site.
- Air quality – from emissions and dust generated during the construction phases and emissions resulting from the operation of the proposed development.
- Noise and vibration – from the construction and operational phases of the proposed development.

- Landscape and visual effects – near and far-field views of the buildings from South Downs National Park, the road network, public open space, public rights of way, residential properties and effects on the settings of heritage assets.
- Hydrology and flood risk – The risk of flooding caused by the development and the management of flood risk both within the Site and beyond its boundaries.
- Social and environmental effects – including the creation of new employment during construction and operational phases, and introduction of residential receptors into the site.
- Transport – the traffic movements associated with the proposed development on the local road network as a result of the construction and operational phases.
- Biodiversity and ecology – the effects on existing biodiversity and ecology from the redevelopment of the site and introduction of green space and landscaping.
- Risks to human health – the risk of accidents or disasters resulting from the construction and operational phases of the proposed development.
- Cultural heritage – the effects of the proposals on the setting of nearby heritage assets and non-designated heritage assets.

1. Characteristics of development

a) The size and design of the whole development	<p>The proposed development will include up to 240 residential dwellings, set within a predominately residential area. In addition to this, circa 3,000sqm of community uses will be provided and 80sqm of small-scale retail. Preliminary layouts of the proposed development seek to provide a sustainable development which maximises the potential of the site, provides the required upgrades to the existing community buildings on site and minimises the impact on the surrounding area and sensitive receptors. The new mixed-use development is expected to range from three to eight storeys. The taller buildings on site will be higher than the existing buildings, however, with the implementation of the landscaping strategy and the surrounding built form, which will offer screening from some surrounding locations, the increased height of some of the buildings is not considered to give rise to any significant environmental effects. Many of the proposed buildings will be of a similar height to the existing, and therefore are not considered to result in any new or different environmental effects as a result of their size.</p> <p>There are large areas of built form and hardstanding (associated with carking and amenity space) within the site currently. Whilst the proposed layout and massing will change as a result of the proposed development, the overall footprint and character of development is not considered to result in any significant urbanising effects above the existing baseline and therefore would not give rise to any new or significant impacts and effects. Furthermore, large areas of landscaping will be incorporated into the design to enhance the amenity and biodiversity value within site.</p> <p>Within the emerging design, proposed residential blocks are situated along the boundaries to the site which border existing residential properties. The proposed community uses are situated in areas to the north and west of the site which border existing community uses such as the leisure centre and Moulsecoomb Primary School. As such, the proposed uses are of a similar nature and considered to be compatible to their immediate surrounds.</p>
b) The cumulation with other existing development and/or approved development	<p>In respect of potential cumulative effects with other development, PPG advises that <i>“each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development”</i> (ID 4-024-201740728).</p> <p>Consideration has been given as to whether there is potential for likely significant effects to occur through the combination of the proposed development with other existing or approved developments. Given the constraints of the surrounding area (within a 5km radius of the site), in particular the South Downs National Park which is located to the north, west and east of the site, development is heavily constrained and the majority of approved schemes are small in scale. To the south, within Brighton town centre and the nearby suburbs, the built up nature of the area also constrains development potential. As such approved schemes to the south are medium to small in scale and are typically below 10 residential units. Therefore, it is not considered that these are of a scale that would give rise to significant cumulative environmental effects. There are no large</p>

	<p>scale committed developments (for example above 50 units) which may cause cumulative environmental effects alongside the proposed development within the surrounding area.</p> <p>Taking the above into account alongside the considerations presented in this table, given the scale and nature of the proposed development and the location and type of consented schemes in the vicinity, significant cumulative effects are not considered likely to result.</p> <p>The potential for significant cumulative effects caused by the combination of a number of impacts on a particular receptor (taking into consideration impacts at both the construction and operational phases), which, acting together, may cause a greater significant impact collectively than individually, has also been considered. Based upon the considerations presented within this table and with the implementation of standard mitigation measures, significant cumulative effects related to the overall combined impacts are considered to be unlikely.</p>
<p>c) The use of natural resources, in particular land, soil, water and biodiversity</p>	<p>Redevelopment 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. Consideration of the potential impacts from the use of these resources is presented below. As the site is previously developed land, it is considered a suitable platform for development, and no major physical changes in the topography will be required.</p> <p>Water</p> <p>During the construction phase, certain activities consume water, including some common mitigation measures used to control potential construction impacts, such as dust dampening. However, taking into account the scale and nature of the proposed development, significant effects related to water consumption are not considered likely. During the operational phase, water will be consumed on the site associated with both the day-to-day activities of the existing and proposed community and commercial uses, and the residential occupants of the new dwellings. The closest groundwater abstraction licences are recorded to lie 734m and 860m to the south of the site. As above, the scale and nature of the proposed development is such that it is considered unlikely to result in significant pressure on the local and regional water resource and, therefore, significant effects are not likely to occur. Any commercial water usage during the operational phase is considered to be comparable to the current water requirements under its existing usage.</p> <p>Biodiversity</p> <p>A Preliminary Ecological Appraisal (PEA) for the Site was undertaken in order to ascertain the current baseline, both in terms of the habitats present and also opportunities for protected and notable species. The PEA comprised an extended phase 1 habitat survey and a preliminary bat roost assessment (PBRA) of the site was undertaken in September 2020. The PEA</p>

additionally comprised a desk study including a review of third-party data sources and biological records within 1km, requested from Sussex Biodiversity Record Centre (SxBRC).

No habitat of principle importance (HPI) or ancient woodland listed on Natural England's priority habitat inventory were identified on Site. Two parcels of ancient woodland and 65 parcels of HPI, comprising lowland calcareous grassland and deciduous woodland, were identified within the zone of influence. However, these protected and notable habitats are not considered likely to be impacted by the proposed development due to the distance from the site.

The site is located within a largely urban environment but is considered to have some biodiversity value due to the potential for protected and/or notable species, specifically roosting, foraging and commuting bats, reptiles, breeding birds and European hedgehogs. The proposed development includes the loss of some ecological features currently present on site, specifically some buildings, scattered trees, scrub, poor semi-improved grassland and a species-rich hedgerow with trees.

However, the emerging design of the proposed development will incorporate embedded mitigation through the provision of significant landscaping areas which will reduce the impact on biodiversity to ensure that significant adverse effects will be avoided both during the construction and operational phases. Existing vegetation will be retained where possible and a sensitive lighting strategy will be implemented. The areas of landscaping throughout the site will also offer ecological benefits and potential. It is therefore considered that the development proposals would not lead to significant effects in terms of biodiversity resource.

Soil and Minerals

The site is within a built up urban environment and, with reference to MAGIC.gov.uk, is not designated as Best and Most Versatile Agricultural Land. Therefore, the proposed development will not have a significant effect related to soils or the availability of agricultural land. The site has not been identified or allocated for mineral extraction and is not situated within a mineral safeguarding area. Furthermore, if any minerals were present it would not be feasible to extract these given the size and location of the site, therefore the proposed development will not sterilise this resource or have a significant impact on the region's mineral provisions.

Use of Materials

As with any modern development project, through the careful selection of materials, and construction methods and best practice, the consumption of materials and energy during construction and operation will be minimised. Overall, given the scale and nature of the proposed development, it is considered unlikely that the proposed development will result in significant environmental effects related to the use of natural resources, and materials will be sustainably sourced where possible.

<p>d) The production of waste</p>	<p>Construction Demolition and Excavation (CD&E)</p> <p>During the enabling works (including demolition) and construction phase, waste will be generated on-site with the highest quantities of waste typically generated during earthworks. Some of the materials that are brought to the site could also end up as waste due to over-ordering or damage. Given the sufficient availability of waste infrastructure/facilities to manage the CD&E waste types, it is unlikely that there will be any significant impacts on the local waste infrastructure as a result of the waste generated during these activities from the proposed development. Furthermore, best practice will be followed with regards to the handling and management of waste during the construction and measures to minimise waste arisings will be implemented as far as reasonably possible, complying with the waste hierarchy through the methods of segregation, reuse and recycling whenever possible. This can be controlled and implemented through a Construction Environmental Management Plan (CEMP), to be secured via planning condition.</p> <p>Operational waste</p> <p>The new residential units, and community/commercial uses of the proposed development will result in the generation of household, commercial and industrial waste (HI&C). It is anticipated that operational waste will mainly comprise household and commercial waste and recyclable material. Due to the sufficient capacity available within BHCC’s HI&C waste facilities, it is expected that HI&C waste arisings will be managed within BHCC. Therefore, the potential effects of HI&C waste arisings during the operational phase on local waste infrastructure is not considered to be significant.</p>
<p>e) Pollution and nuisances</p>	<p>Traffic</p> <p>The site’s previous use includes community spaces which is in line with the proposed mixed community spaces. It is reasonable to consider this as a like-for-like replacement in terms of transport impact. In addition, the proposed uses would potentially service a more local demand considering one of the previous uses included a contacts centre which would likely have attracted a greater number of car-based trips from a wider catchment area compared with the proposed scheme.</p> <p>Therefore the additional transport impact on the site would arise from the residential units. This level of increase of travel demand is not likely to be significant to an extent that the additional vehicle and non-vehicle trips could not be accommodated on the existing transport network. Some localised improvements may be likely and a contribution in accordance with BHCC Policy CP7 would be expected.</p> <p>There are many amenities within walking and cycling distance from the site. Future occupants of the dwellings will be able to access shopping, health and community facilities, and some education facilities, in the vicinity of the site, in fact many of these key services form part of the proposals, such as the GP surgery, nursery and community facilities. The site is alongside the</p>

'Key Public Transport Corridor Area' as defined by the BHCC document SPD14 which is considered to be well served by public transport.

A travel plan for both the commercial and residential elements will set out a variety of measures and initiatives targeted at the different user groups in order to promote sustainable transport, to enhance travel by foot, cycle and public transport, and minimise single occupancy car use. The Travel Plans would be monitored over 5 years which is also likely to be a condition of planning consent, along with a Construction Management Plan in accordance with BHCC policy.

It is considered that the Transport Assessment, Travel Plan and associated parking and construction management plans would be adequate to assess the transport related impacts of the proposed development and that any impacts will be minor and unlikely to result in significant adverse effects.

Noise

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 Moulsecoomb Primary school which is located adjacent to the western boundary, and the residential properties to the east and south of the site. Through the use of standard best practice measures the effects of any construction noise and vibration would be minimised and compliance with relevant environmental protection legislation will be met. These measures will be detailed within a CEMP and secured via planning condition. Construction impacts will also only be temporary in nature a therefore significant effects are considered unlikely.

During operation the noise generation from the site will remain broadly unchanged from the existing baseline given the same similar uses will be present on site. As a multi-use community building and residential housing, the projected operational sound sources are relatively small.

Longer term and operationally, it is anticipated that the operation of the rooftop hub plant would be the principle sound source as this will feed the various building uses. As external sound sources, possibly the multi-use games areas and the skate park might generate some sounds, although these will be intermittent and managed. Some vehicle movements will be associated with the proposed development during operation, however, as mentioned above, traffic generation is not considered to increase to a significant degree. As such, any changes in road traffic noise and vibration levels is likely to be minimal. It is therefore considered unlikely that effects related to noise and vibration will be significant.

Air Quality

The site is not within an Air Quality Management Area (AQMA) (although note that several AQMA's have been declared within the Brighton and Hove authority boundary). The key considerations for air quality relate to impacts on existing receptors due

to emissions associated with demolition of the existing buildings and subsequent construction and operation of the proposed development. The other key consideration is the suitability of the site for its proposed use.

The main impact on air quality during the operation phase of the development is considered to arise from vehicle emissions. Other uses associated with proposed development are not considered to give rise air quality impacts, and would in any case be consistent with the existing baseline of the site given its current use. Given it is anticipated that the proposed development will not result in a significant change in local traffic movements nor in the vehicle composition on the local roads, significant impact in relation to air quality are not considered likely. Sustainable travel modes will also be promoted within the proposed development through the Travel Plan. Therefore, air quality impacts associated with vehicle movements are not considered to be significant. Furthermore, given that the proposed development will replace the existing hotel with the same use. Overall, it is considered unlikely that the proposed development will result in air quality effects that are deemed significant in EIA terms.

Ground conditions

During the construction phase of the proposed development, there will be a requirement for foundations to ensure structural integrity. This activity could mobilise any contaminants present, exposing them to potential pathways (e.g. disruption of the water table) from which human health (future site occupiers) and controlled waters (groundwater/surface water bodies) could be affected by contaminated soils and groundwater. Construction workers may have direct contact with the subsoils during construction and, as such, there is a potential for ingestion, inhalation and dermal contact. However, given the previous uses of the site, it is considered that the nature of any potential contaminants are not likely to be unusually complex or hazardous that would pose any significant environmental or health risk.

Standard best practice and mitigation methods (which would be secured through a CEMP) would ensure that potential impacts from the proposed development are fully understood and mitigated to ensure no significant effects arise. Following the demolition of the existing buildings, a Phase II intrusive investigation would ensure this was the case and can be secured through the a planning condition. An EIA is therefore not considered to be necessary as it can be suitably addressed through the planning application process.

Lighting (Including Daylight and Sunlight)

The following potential effects with respect to daylight, sunlight, overshadowing, light pollution and solar glare have been identified:

- Temporary changes to daylight, sunlight, overshadowing & light pollution during the demolition and construction works.

- Changes to the duration and quality of daylight and sunlight, as well as the incidence and duration of overshadowing experienced by surrounding sensitive receptors on completion of the proposed development.
- Increased levels of light pollution from internal and external lighting schemes of the proposed development.

The key sensitive receptors to light and overshadowing impacts are the surrounding residential properties; these are principally located along Hodshrove Road and Hillside.

Although for those residents some reduction in daylight, sunlight and overshadowing may occur. It is expected that any reduction will be minor to moderate in nature but each property will retain acceptable levels of daylight and sunlight. Therefore, it is not considered that significant environmental effects will arise that would warrant an EIA.

Greenhouse Gas Emissions

The proposed development will result in greenhouse gas emissions from activities undertaken throughout its lifecycle. In line with best-practice guidance presented by IEMA, all greenhouse gasses emitted to the atmosphere are considered significant, however the emissions associated with this proposed development are not considered likely to prevent the UK, or the local authority in meeting its current or future carbon emission reduction ambitions.

Opportunities to minimise carbon emissions will primarily be incorporated into the design through:

- adopting best practice working and construction methods, administered and monitored through a detailed CEMP;
- the development and incorporation of an energy strategy towards net zero carbon strategy; and
- targeting a BREEAM 'Excellent' certification for the Community Hub building
- adoption of a services strategy that ensures no new gas connections or gas fired boilers are to be permitted – all heating and hot water generation is to be made by ground source heat pump (residential) and/or air source heat pump (Hub building).

These measures will help to reduce the carbon footprint of the development which aims to achieve a reduction in carbon emissions. Furthermore, the new buildings introduced will be compliant with current policies and standards in relation to energy efficiency and sustainability. These buildings will replace the older buildings currently present on site, therefore over the lifetime of the development it is considered that the carbon footprint will reduce, from that which would occur should the existing buildings operate in the future. Taking into account the above, implementation of suitable mitigation measures and the nature and scale of the proposed development, adverse effects related to greenhouse gas emissions sufficient to warrant an EIA are considered unlikely.

	<p>Wind</p> <p>The proposed development involves buildings up to eight storeys in height. These have the potential to generate strong winds. Through the use of embedded mitigation measures, the tall elements of the proposed development will be designed to ensure that significant effects relating to wind microclimate do not occur, and comfort criteria are met on and off site in relation to the proposed uses.</p>
<p>f) The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge</p>	<p>The Site's location within the UK is such that natural disasters, including those caused by climate change, are not considered to represent a likely risk to the proposed development. For example, it is considered that the likelihood of an earthquake with a magnitude sufficient to cause damage to buildings and/or loss of life occurring and impacting the site is extremely low. The proposed development will be designed in accordance with recognised and accepted best practice in terms of highway design, specification of drainage and current building regulations, to further reduce the susceptibility of the site to major accidents and/or disasters. It is considered that, whilst there is always a potential risk that an accident, fire or natural disaster could result in a significant environmental impact, this risk can be appropriately mitigated through embedded design measures and through compliance with statutory design guidelines. Therefore, significant effects are considered to be unlikely.</p> <p>The nature of the proposed development is such that it is not likely to give rise to a major accident or disaster and it is in line with the current use on site.</p> <p>Climate Change Resilience</p> <p>Aspects of the proposed development, such as the infrastructure and functionality of the building and users will be subject to current and future changing climates. Summers are likely to be increasingly warmer and drier, whilst winters are likely to be warmer and wetter. Opportunities to increase the resilience of the proposed development to climate change will primarily be incorporated into the design through the methods through:</p> <ul style="list-style-type: none"> ▪ Sustainable Urban Drainage Systems. ▪ Material choice and landscaping that reduces the heat island effect and overheating. <p>It is therefore considered that the proposed development will be resilient to future climate scenarios and would not be vulnerable to any significant impacts as a result of climate change.</p>
<p>g) The risks to human health (for example, due to water contamination or air pollution)</p>	<p>Water</p> <p>The site is located within an Environment Agency Source Protection Zone II with regard to the protection of the quality of groundwater that is abstracted for potable supply. The groundworks and construction phase of the proposed development has the potential to interact with ground water, in particular through piling and excavation. However, as stated above, given the previous uses of the site, it is considered that the nature of any potential contaminants are not likely to be unusually complex</p>

	<p>or hazardous that would pose any significant health risk through interaction with the water table. Furthermore, the closest potable groundwater abstraction licences are recorded approximately 1.15km and 1.22km to the north east of the site so are located at a considerable distance from any potential source of contamination from the site. Any piling works will follow best practice and piling design and method will follow an appropriate risk management framework.</p> <p>Noise</p> <p>During the construction, the proposed development will introduce new sources of noise into the environment through vehicle use and machinery. Noise impacts during the construction phase will be reduced through the implementation of standard best practice measures secured through a CEMP, ensure that adjacent residents (highly sensitive receptors) are not exposed to significant levels of noise.</p> <p>Given the nature and scale of the development and proposed uses, noise impacts during the operational phase are not considered likely to be significant. Relevant health and safety regulations regarding noise at work will ensure human receptors working on site are not exposed to unacceptable noise levels. It is expected that site operations will be subject to planning conditions ensuring that operational noise levels comply with relevant guidance.</p> <p>Air Quality</p> <p>During the construction phase of the proposed development, all legislative requirements will be met. As such, construction practices will be suitably managed in accordance with best practice and/or existing management systems to avoid impacts upon health and wellbeing.</p> <p>As previously mentioned, traffic impacts from the development are not considered to be significant, therefore the air quality impacts associated with the proposed development are not considered likely to increase concentration of air pollutants and the impact of the operational development would not be considered significant in terms of health and wellbeing.</p>
<p>2. Location of development</p>	
<p>a) The existing and approved land use</p>	<p>The site currently contains various community and commercial uses. The wider landscape is suburban, interspersed with pockets of green open space and recreational land. The proposed development will be of a similar nature and scale as the existing site. Commercial and community uses will remain on site and therefore the environmental impacts and effects from the operation of the site are not likely to change from the existing baseline to any significant degree. New uses will be introduced to the site through the proposed residential units however, this land use is in keeping with built development in the surrounding area which is dominated by residential development.</p>

<p>b) The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground</p>	<p>In relation to criteria 2 (b) and (c), the site is not subject to any statutory environmental, landscape or heritage designations (with the exception of one Grade II listed building). Consideration is given below to potential environmental impacts by virtue of the site's location. Consideration has also been given to any high quality and scarce resources on and around the site which could be impacted by the development.</p> <p>Townscape and Visual</p> <p>A preliminary landscape and visual appraisal of the site was undertaken in early 2021, including a site visit and a desktop study to identify the key receptors and the potential impacts resulting from the development.</p> <p>The site is located within the Moulsecomb urban area of Brighton and Hove and is occupied by an existing development that would be replaced by the proposed scheme. The townscape around the site includes commercial, education and residential uses located predominantly on the valley floor and on its lower slopes. A major transportation corridor (railway and roads) meanders along the lowest parts of the valley in the vicinity of the site. Hills on both sides of the valley are within the South Downs National Park (SNDP), which is the most sensitive landscape receptor to be considered, and includes important heritage assets and leisure destinations, such as Hollingbury Castle Fort to the north west of the site.</p>
<p>c) The absorption capacity of the natural environment</p>	<p>A preliminary Zone of Theoretical Visibility (ZTV) based on the current proposals has been undertaken to better understand the potential visibility of the proposed development. Whilst most views would be available from the townscape area itself, there are several footpaths within the SNDP that have a potential to receive views of the proposed development. However, many of those views are screened by vegetation of built form and the proposed development would be seen predominantly from the existing urban area. More importantly, the location of the development on the lower slopes of the valley would not result in any significant changes to skylines, as perceived from the SNDP. Also, views towards the SNDP from the urban area are unlikely to be significantly changed as a result of the proposed building heights.</p> <p>Whilst there would be undoubtedly some impact on the townscape character, the change would not be substantial and could be even considered positive if the design is of high quality (to be finalised at a later stage).</p> <p>Whilst the secondary landscape mitigation opportunities are limited due to the nature of the proposals and their topographical and urban context, the primary (embedded) mitigation is possible and includes adjusting development footprint, building heights and the architectural design of the proposals. The development also provides an opportunity for a high quality urban landscape scheme, that could have a beneficial visual impact (or would mitigate potential adverse impacts) on the surrounding townscape and visual receptors.</p>

The proposed development would form part of the existing corridor of built form on the floor of the Moulsecocomb Valley. Located within the existing built-up area, it is unlikely to conflict with any of the key characteristics of the local landscape / townscape and could be well integrated into the character of the SDNP landscape. The broad undeveloped ridges on both sides of the valley would be conserved and would continue to provide a strong landscape setting for the urban area. The proposed development would also conserve the special qualities of the SDNP, including its “breath-taking views”, as identified by the SDNPA.

Therefore, whilst there will be a visual change at some receptors, it is not considered these will be significant in EIA terms.

Archaeology and Built Heritage

The site does not contain any heritage statutory designations and it is not located within an archaeological priority area. The closest listed building is Moulsecocomb Place (Grade II listed, reference 1381668), which is located circa 650m to the south-west of the site. It does not contain any designated buried heritage assets (such as scheduled monuments). Due to the distance from the site; the scale and orientation and the nature, extent and scale of intervening built form, vegetation and topography between the limited surrounding heritage assets and the site, or lack of historical or functional connections between the site and such assets, significant effects are not considered likely.

The planning application will be supported by a Historic Environment Desk-Based Assessment, which will cover all these effects, and would ensure that LPA is able to make a fully informed decision without the need for an EIA.

Ecology

The site is not classified as a statutory or non-statutory designated site. Three statutory designated sites and six non-statutory designated sites were identified within the zone of influence but are not considered likely to be impacted by the proposed development due to the distance from the site and given the absence of habitat to support qualifying species within the site.

The site is located within a largely urban environment but is considered to have some biodiversity value due to the potential for protected and/or notable species, specifically roosting, foraging and commuting bats, reptiles, breeding birds and European hedgehogs. The proposed redevelopment includes the loss of some potentially important ecological features currently present on site, specifically some buildings, scattered trees, scrub, poor semi-improved grassland and a species-rich hedgerow with trees. However, the proposed development will also deliver significant areas of landscaping and potential ecological enhancements. Therefore significant adverse effects are not considered likely.

Furthermore, mitigation and compensation measures will also be included, such as the retention of existing vegetation where possible and implementation of a sensitive lighting strategy which will further reduce and potential adverse ecological impacts.

As such detrimental impacts to ecological receptors such as protected and/or notable species within the zone of influence are not anticipated during the construction and operational phase of the proposed development. A range of enhancements have also been recommended to improve the biodiversity on the site.

Noise

The site is located in an area with several noise sources. The main source of noise is the local road network. Provided that the proposed development is designed to achieve the internal ambient noise levels and sound insulation in accordance with Health Technical Memoranda (HTM) 08-01, British Standard BS 8233, noise and vibration is unlikely to be significant for the site suitability for the proposed use, and for reasonable acoustics conditions of future occupants. With appropriate standard mitigation employed, where necessary, to ensure future amenity, no significant effects are likely. Furthermore, the noise impacts associated with increased road traffic are considered to be minimal and therefore adverse impacts are highly unlikely.

Flood Risk and Drainage

The Environment Agency (EA) Flood Map for Planning (FMfP) shows the site is located within Flood Zone 1 (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding).

A Flood Risk Assessment (FRA) will be undertaken to assess the level of flood risk posed to and from the proposed development during its operational phase. The assessment will be compliant with national and local guidance, including the NPPF and the PPG. The drainage strategy will be designed to accommodate the 1 in 100 year plus climate change event and the discharge rate must be restricted to greenfield runoff. With the implementation of appropriate and established mitigation measures to be set out in the drainage strategy, this will ensure that no on site property flooding or increased off site flood risk will occur for events up to 1 in 100 year event, including allowance for climate change. Therefore, significant effects in relation to hydrology and flood risk are not considered likely.

Socio-Economics

There are likely to be some short term employment benefits during the construction period, as well as long term employment opportunities during the operational phase arising from the proposed net additional non-residential floor space. Furthermore, direct and indirect jobs will be created from the residential use, which are likely to be beneficial in the local context.

The proposed development will deliver additional homes to assist in meeting the housing requirements for Brighton & Hove and will also deliver community benefits for the future occupants of the site and the existing surrounding residential properties. Furthermore, the proposed development will also involve the expansion of health facilities on site which will offer community benefits through the co-location with wider community facilities.

	Given the scale of the proposed development, it is not considered to result in any significant pressure on local services and the applicant would expect that an appropriate financial contribution could be secured, where applicable, through the City Community Infrastructure Levy (CIL), to address any additional needs. As such, significant effects are not likely to occur.
3. Types and characteristics of the potential impact	
a) The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);	The magnitude and spatial extent of the impact will be local in nature, both geographically and in terms of population that could potentially be affected. The site is currently developed and the proposed development will be of a similar scale to the existing baseline. Therefore, the site is considered to have the capacity to accommodate the level of development proposed.
b) The nature of the impact;	As discussed above, the site and proposed development are such that significant effects are unlikely to result. The proposed development is of a scale that the local highway network can sustain and mitigation and safeguarding measures mean that no significant ecological or other impacts are likely to occur. The site is currently developed, therefore the nature of the impact is not considered to change to a significant degree from the existing baseline.
c) The transboundary nature of the impact;	Impacts are unlikely to be transboundary, given the scale and nature of the development proposed. There is a potential for future occupants to travel from outside of the borough to the site for work, as well as from the site during work activities, however, notable effects on the local highway network are not anticipated.
d) The intensity and complexity of the impact;	The overall impact of the proposed development is predicted to be of a normal intensity and complexity for a scheme of this size and nature. As discussed above, any anticipated developmental effects can be managed effectively through the common mitigation measures.
e) The probability of the impact;	All of the potential impacts and their probability are understood and predictable. With the relevant mitigation measures discussed above, none of the potential impacts are considered likely to result in significant effects.
f) The expected onset, duration, frequency and	The potential for temporary impacts to arise during the construction phase of the project have been outlined above. However, these will be minimised through adherence to best working practices. The duration and reversibility of some proposed impacts, particularly in relation to landscape, would be considered permanent (but not significant) as the proposed development is

<p>reversibility of the impact;</p>	<p>intended to be a high quality, sustainable, long term construction and there is no expectation with regards to decommissioning. However, the magnitude of some of the impacts will reduce as planting and mitigation measures become established around the site. Once the development is operational, some impacts will be permanent, given the expected life span of the proposed development. However, these impacts are not considered significant in the context of other land uses in the immediate area. The magnitude of some impacts will reduce over time as the planting scheme matures.</p>
<p>g) The cumulation of the impact with the impact of other existing and/or approved development;</p>	<p>The possibility of cumulative impacts has been considered in association with selection criteria 1(b).</p>
<p>h) The possibility of effectively reducing the impact</p>	<p>As no significant effects are considered likely to arise, consideration of the probability of effectively reducing impacts is not determinative in this case. Nevertheless, as discussed above, the potential impacts associated with the proposed development can be mitigated through the use of best practice construction methods and the implementation of typical mitigation measures (details of which can be found in the technical assessments submitted with the planning application). During the construction phase, such measures would be controlled through a CEMP. The Transport Assessment, ecological surveys, Flood Risk Assessment and other technical reports, which will accompany the Planning Application, will identify appropriate mitigation measures for operational impacts that can be secured as part of the application submission, subsequent planning conditions and legal agreements. Whilst potential impacts have been identified, the nature of these are such that these are not considered likely to be significant, therefore would not trigger EIA and would be suitably addressed through the planning application.</p>

Conclusions

The proposed development does not qualify as a Schedule 1 development and is not located wholly, or partly, within a 'sensitive area' as defined in Regulation 2(1). However, it does fall within the description of 'Infrastructure Projects (b) Urban Development Projects' within the first column of Schedule 2 of the Regulations and exceeds the thresholds in the second column, as the proposal includes more than 1ha of urban development which is not dwellinghouse development, and over 150 dwellinghouses.

To determine whether the proposed development comprises EIA development, it is necessary for the local planning authority to consider whether it is likely to have significant effects on the environment, taking account of the selection criteria in Schedule 3 of the Regulations.

Our assessment concludes that the characteristics and location of the development are unlikely to give rise to significant environmental effects, alone, or in accumulation with other developments. The proposed development will primarily consist of the same uses in both nature and scale as the current baseline conditions. Therefore, the potential environmental impacts from the development are considered to be of similar nature to those already present and experienced by the surrounding environment and would not result in a new or different effects that would warrant the need for EIA. Whilst the new residential dwellings proposed represent a new use on the site itself, they are entirely consistent with the surrounding environment and therefore do not introduce any new sensitive receptors into the wider area. Furthermore, the number of proposed residential dwellings would not result in a significant urbanising effect.

Additionally, as set out in this letter, with the implementation of suitable design alongside mitigation and avoidance measures, drainage design, landscaping and best practice construction methods, it is considered that significant environmental effects are unlikely to arise and therefore the proposal would not constitute EIA Development for the purposes of the EIA Regulations.

We request that, in accordance with the EIA Regulations, Brighton & Hove City Council provides a formal EIA Screening Opinion within the requisite three weeks.

As outlined in this letter, the Planning Application for the proposed development will be supported by a series of technical assessments and reports that will ensure environmental factors are suitably addressed and taken into account through the planning application process.

Please do not hesitate to contact me should you require additional information prior to forming the Screening Opinion.

Yours sincerely



Peter Warren
Savills Planning and EIA

Enc.

Figure A – Site Boundary
Figure B – Illustrative Site Layout Plan