

<u>No:</u>	BH2026/00490	<u>Ward:</u>	Central Hove/Westbourne & Poets Corner
<u>App Type:</u>	Full Planning		
<u>Address:</u>	King Alfred Leisure Centre (part) And Public Car Park And Lawn West Of Hove Street South, Kingsway, Hove		
<u>Proposal:</u>	Redevelopment of western part of existing leisure centre and public car park to provide new leisure centre (F2 use) to include: swimming pools, sports hall, gym/fitness suite, childrens soft play, event spaces, cafe and undercroft car park accessed from Hove Street South. Associated hard and soft landscaping, public realm works and highway infrastructure. Relocation of existing seafront shelter. Provision of temporary public car park on part of lawn to west of Hove Street South during construction (2 years).		
<u>Officer:</u>	Maria Seale	<u>Valid Date:</u>	05.03.2026
<u>Con Area:</u>	Pembroke and Princes/adj Old Hove/adj Cliftonville	<u>Expiry Date:</u>	04.06.2026
<u>Listed Building:</u>	Setting of Grade II	<u>EOT:</u>	03.08.2026
<u>Agent:</u>	DHA Planning, Astral Towers, Betts Way, Crawley RH10 9XA		
<u>Applicant:</u>	Brighton & Hove City Council, Hove Town Hall, Norton Road, Hove BN3 3BQ		

1. RECOMMENDATION

- 1.1. That the Committee has taken into consideration and agrees with the reasons for the recommendation set out below and resolves to be **MINDED TO GRANT** planning permission subject to the Secretary of State deciding not to call in the application for determination and subject to the following Conditions and Informatives as set out hereunder:

Conditions:

1. Drawings/Documents:
The development hereby permitted shall be carried out in accordance with the approved drawings listed below.
Reason: For the avoidance of doubt and in the interests of proper planning.

Plan/Document Type	Reference	Version	Date Received

Location Plan	XX-D-A-080010	P2	02.03.2026
Proposed Basement Plan	B1-D-A-089000	P9	02.03.2026
Proposed Site Plan	XX-D-A-080100	P2	02.03.2026
Proposed level 00 (ground) floor plan	00-D-A-080000	P10	02.03.2026
Proposed level 01 (first) floor plan	00-D-081000	P9	02.03.2026
Proposed Hove Street Highways Plan	H-01	P1	02.03.2026
Proposed Kingsway Highways Plan	H-02	P1	02.03.2026
Proposed Level 00 A259 Integration Plan	00-D-A-089003	P10	02.03.2026
Proposed Roof Plan	RF-D-A-082000	P2	02.03.2026
Proposed north and south elevations	XX-D-A-080051	REV P4	12.06.2026
Proposed east and west elevations	XX-D-A-080052	REV P4	12.06.2026
Contextual elevations	XX-D-A-080054		
Proposed facade detail (main pool)	XX-D-A-220004	P1	02.03.2026
Proposed facade detail (entrance)	ZZ-D-A-220001	P1	02.03.2026
Proposed façade detail (soft play)	ZZ-D-A-220009	P1	02.03.2026
Proposed façade detail (café colonnade)	ZZ-D-A-22002	P1	02.03.2026
Proposed sections AA/BB/CC	XX-D-A-080200	P2	02.03.2026
Proposed sections DD/EE/FF	XX-D-A-080201	P2	02.03.2026
Proposed displacement car park sections	XX-D-A-080203	P2	02.03.2026
Proposed plan – splash pad	5104_SK01 (00)		12.06.2026

Phase 2 planting 1 of 2	DR-L-50200	REV C05	01.07.2026
Additional Phase 2 planting	DR-L-50201	P03	01.07.2026
Phase 2 planting 2 of 2	DR-L-50203	C01	01.07.2026
Ecology-demolition mitigation plan	DR-L-6102	P08	01.07.2026
Proposed temporary displacement car park	00-D-A-080102	REV P7	12.06.2026
Ecology note – Harper Environmental	8-6-26		01.07.2026
Landscape Strategy (and associated plans)	DO-L-0012	P08	01.07.2026
Preliminary Ecological Appraisal – Harper Environmental	Issue 02, 24/2/26		02.03.2026
Bat Survey Report- Harper Environmental	Issue 1: 24/2/26		02.03.2026
Flood Risk Assessment - Engenuiti	Rev 02 27/2/26		02.03.2026
Drainage details	KALC-ENG-XX-XX-P3 D-C-3002		08.06.2026
Drainage/pavement plan	KALC-ENG-XX-XX-P1 D-C-4001		08.06.2026
Drainage/pavement details	KALC-ENG-XX-XX-P2 D-C-4101		08.06.2026
Engenuiti Design Note	02429-ENG-XX-XX-TN-0002 dated 8 June 2026	P02	08.06.2026
Construction Environmental Management Plan (and SWMP)			
Environmental Survey & Preliminary Acoustic Design	J-0001-P02 dated 27/02/2026		02.03.2026

2. Time Limit:

The development hereby permitted shall be commenced before the expiration of three years from the date of this permission.

Reason: To ensure that the Local Planning Authority retains the right to review unimplemented permissions.

3. Temporary Car Park Layout Scheme:

Prior to the first use of the temporary car park on the Western Lawn area off Hove Street South hereby permitted, a detailed Temporary Car Park Scheme shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented in full prior to first use and retained for the duration of the temporary car park use. The scheme shall include:

a) Layout and Arrangement

- A scaled layout plan showing the number, size and arrangement of parking spaces (including disabled and motorcycle provision) to including any areas for 'Phase 2' or further potential expansion as shown within the submitted plan (080102-Rev P7)
- Internal access arrangements, circulation routes and turning areas sufficient to allow all vehicles to enter, manoeuvre and exit in forward gear
- Defined pedestrian routes, including safe and legible east–west connectivity where applicable, segregated from vehicular movements where feasible
- Details of the vehicle access

b) Surfacing and Materials

- Details of surfacing materials
- Specification demonstrating the surface is suitable for the intended duration and intensity of use and will prevent debris being carried onto the public highway.

c) Drainage and Runoff Management

- Details of drainage including for surface water and runoff control measures to prevent discharge onto the public highway and to avoid ponding within the site.

d) Lighting (if proposed)

- Details of any temporary lighting to ensure safe operation, designed to minimise glare and impact on neighbouring uses.

e) Management Measures

- Details of signage, markings and operational measures necessary to ensure safe, efficient and legible use of the temporary facility.

The temporary car park shall thereafter be operated in accordance with the approved details for the duration of its use.

Reason: To ensure the temporary car park is designed and operated in a safe, accessible and sustainable manner, to protect highway safety and the amenity of nearby residents and the surrounding area, in accordance with Policies SA1, CP9, CP13 and CP15 of the Brighton & Hove City Plan Part One and Policies DM20, DM40, DM33, DM36, DM26, DM28 and DM29 of the City Plan Part Two.

4. Temporary Car Park Time Limit and Restoration:

The use of the Western Lawn as a temporary displacement public car park hereby permitted (as shown on drawing no. 080102 RevP7 received on 12 June 2026) shall be discontinued from the date of first use of the permanent undercroft car park within the new leisure centre building hereby approved unless another time period is agreed in writing by the Local Planning Authority (LPA) via a planning application on that behalf.

Prior to the date of first use of the permanent undercroft car park within the new leisure centre building, a Scheme of Restoration for works to restore the Western Lawn site shall be submitted to the LPA for written approval. The Scheme of Restoration shall include stopping up of the vehicular access crossover and conversion back to a footway, restoration of grassed lawn areas, provision of new continuous east-west pedestrian pathways through the site creating links joining up pathways in Hove Beach Park to the pavement on Hove Street South, inclusion of soft landscaping and seating, and it shall include a timescale for implementation. The land shall thereafter be restored in accordance with the agreed Scheme of Restoration. Any associated trees or plants which within a period of 5 years from the completion of the Scheme of Restoration die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species unless otherwise agreed in writing by the Local Planning Authority.

In the event the main leisure centre building and car park do not proceed, the displacement car park shall be removed (and the land restored) within a time period and to a restoration scheme to be agreed in writing with the LPA.

Reason: The use hereby approved is not considered suitable as a permanent form of development and is granted exceptionally only during the construction period until the car park is replaced by the permanent development to meet parking demand for the current King Alfred Leisure Centre and the seafront, and to ensure there are not two concurrent car parks operating. The site is located within designated Open Space and the car park would cause harm to the special character and appearance of the Pembroke & Princes Conservation Area and the locally listed Western Lawns. To ensure suitable pedestrian access and linkages are maintained. To comply with policies SA1, CP15, CP16, DM26, DM28, DM29, DM36 and DM33 of the Brighton & Hove City Plan.

5. Temporary Car Park Drainage:

The temporary public car park on the Western Lawn hereby approved shall be constructed in accordance with the submitted drainage details, including lined permeable parking bays/sub-base storage, sealed road aisles falling toward the permeable parking bays, attenuation, flow control and discharge to the combined sewer, as shown on drawing KALC-ENG-XX-XX-D-C-3002_P3, pavement plan KALC-ENG-XX-XX-D-C-4001_P1, pavement details KALC-ENG-XX-XX-D-C-4101_P2, and as described in the Engenuiti Design Note 02429-ENG-XX-XX-TN-0002_P02 dated 8 June 2026, unless otherwise agreed in writing by the Local Planning Authority.

The drainage system shall be installed prior to first use of the temporary displacement car park and shall be retained and maintained for the duration of the temporary use.

No infiltration drainage shall be used within the temporary displacement car park unless otherwise agreed in writing by the Local Planning Authority.

The lined permeable pavement, filter drains, attenuation and associated drainage features serving the temporary displacement car park shall be maintained in accordance with the submitted drainage strategy for the lifetime of the temporary use. The drainage features shall be kept free of silt, debris and obstruction and shall remain operational for the duration of the temporary car park use.

The temporary displacement car park shall be used for light vehicles only and shall not be used by construction traffic, heavy goods vehicles or vehicles exceeding 3.5 tonnes gross vehicle weight.

No vehicle washing, fuelling, repair, servicing or maintenance shall take place within the temporary displacement car park at any time.

Reason: To minimise the risk of pollution to controlled waters and the wider environment, having regard to the presence of made ground, groundwater sensitivity and the coastal setting of the site, in accordance with policies SA1 and CP11 of the Brighton & Hove City Plan Part One, DM40, DM41, DM42 and DM43 of the Brighton & Hove City Plan Part Two and the National Planning Policy Framework.

6. Deemed Biodiversity Gain Plan Condition:

No development (including any demolition, site clearance or enabling works) shall take place until:

- (a) A Biodiversity Gain Plan (BGP) has been prepared in broad accordance with the submitted BNG Assessment, Harper Environmental 2/3/26 and associated Statutory Biodiversity Metric (Oliver Huxley and Stephanie Harper, version 1 2/3/26); and
- (b) The BGP has been submitted to and approved in writing by the Local Planning Authority.

Reason: Based on the information available, this permission will require the approval of a Biodiversity Gain Plan by the local planning authority before development is begun (and before each phase of development where development is phased) because none of the statutory exemptions or transitional arrangements are considered to apply. The effect of paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 is that planning permission granted for the development is deemed to have been granted subject to the condition ("the biodiversity condition"). Also to comply with Policy DM37 of Brighton & Hove City Plan Part 2, Policy SA1, CP10 of the Brighton & Hove City Plan Part One and Supplementary Planning Document SPD11 Nature Conservation and Development.

7. Habitat Management and Monitoring Plan:

No development shall take place until a Habitat Management and Monitoring Plan (HMMP) has been submitted to and approved in writing by the Local Planning Authority. The HMMP shall accord with the approved Biodiversity Gain Plan (BGP) and include:

- i. A non-technical summary
- ii. The roles and responsibilities of the people or organisations delivering the HMMP
- iii. The planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan
- iv. The management measures to maintain habitat in accordance with the approved BGP for a period of 30 years from practical completion (unless otherwise agreed) of the development
- v. The monitoring methodology and frequency in respect of the created or enhanced habitat
- vi. Provision for the identification, agreement and implementation of contingencies and/or remedial actions where the results from monitoring show that the conservation aims and objectives of the HMMP are not being met.

The created/enhanced habitat specified in the approved BGP shall be provided and thereafter managed and maintained in accordance with the approved HMMP. The habitat monitoring shall be submitted to and approved in writing by the Local Planning Authority in accordance with the methodology and frequency specified in the approved Habitat Management and Monitoring Plan.

Reason: To ensure the development delivers biodiversity net gain in accordance with Schedule 7A of the Town and Country Planning Act, Policy DM37 of Brighton & Hove City Plan Part 2, Policy CP10 of the Brighton & Hove City Plan Part One and Supplementary Planning Document SPD11 Nature Conservation and Development.

8. BNG Completion Report:

The development hereby permitted shall not be first used until a Completion Report, evidencing the habitat enhancements set out in the approved Biodiversity

Gain Plan and Habitat Management and Monitoring Plan, has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development delivers biodiversity net gain in accordance with Schedule 7A of the Town and Country Planning Act, Policy DM37 of Brighton & Hove City Plan Part 2, Policy SA1 and CP10 of the Brighton & Hove City Plan Part One and Supplementary Planning Document SPD11 Nature Conservation and Development.

9. CEMP/SWMP:

The demolition, construction and site waste management associated with the development hereby permitted shall be carried out accordance with the submitted Construction Environmental Management Plan (CEMP) and Site Waste Management details. For the avoidance of any doubt, the CEMP shall maintain provision for continuous safe footway and cycle access past the site and along the A259 seafront corridor at all times during construction, with any diversions fully signed and compliant with Inclusive Mobility standards.

Notwithstanding the submitted CEMP, unless otherwise agreed in advance and in writing with the Local Planning Authority, works associated with the construction of the development hereby permitted including all site activity, demolition, deliveries, collections, site set-up, staff arrival and departure, loading and unloading of materials, and all vehicular movements and plant operation shall only be undertaken between the following hours:

- 8am to 6pm Monday to Friday
- 9am to 1pm Saturdays
- No work on Sundays and Bank/Public Holidays

No activity of any kind shall take place outside these hours without the prior written approval of the Local Planning Authority.

Reason: As this matter is fundamental to the protection of amenity, highway safety and managing waste throughout development works and to comply with policies DM20, DM33 and DM40 of Brighton & Hove City Plan Part 2, policy CP8 of the Brighton & Hove City Plan Part One, and WMP3d of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan 2013 and Supplementary Planning Document 03 Construction and Demolition Waste.

10. Continuity of leisure use:

Other than demolition of the former bowling alley and associated ancillary basement areas (as approved under Prior Approval ref BH2025/02951), the existing King Alfred Leisure Centre shall not be removed or its main leisure use stopped until the new leisure facility hereby approved has been implemented and made available for first use for leisure purposes, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the satisfactory quantity, quality and accessibility of compensatory provision which secures the continuity of leisure and community

use, and to accord with policies SA1, SA6, CP17, CP18 and DM9 of the Brighton and Hove City Plan.

11. Land Contamination:

Other than any enabling or temporary car park works, no development hereby permitted shall take place until there has been submitted to and approved in writing by the Local Planning Authority:

- a) a site investigation report documenting the ground conditions of the existing bowling alley.
- b) the results of chemical and gas analysis undertaken on groundwater as identified as required in the Ground Investigation Report (J25367, Rev 2), prepared by Geotechnical & Environmental Associates Limited, dated February 2026 and in accordance with BS 10175:2011+A1:2013.

And if notified in writing by the Local Planning Authority that the results of the testing are such that site remediation is required then:

- c) a detailed scheme for remedial works and/or measures to be undertaken to avoid risk from contaminants and/or gases when the site is developed, and proposals for future maintenance and monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Such a scheme shall include nomination of a competent person to oversee the implementation of the works.

No works (except enabling or temporary car park works) shall take place until the remediation is agreed and the development shall be carried out in accordance with the agreed details.

Reason: To safeguard the health of future occupiers of the site and to comply with policies DM40, DM41 and DM20 of the Brighton & Hove City Plan Part 2.

12. Contamination Discovery:

If during construction (including for the temporary car park phase), contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing by the Local Planning Authority), shall be carried out until a method statement identifying and assessing the risk and proposing remediation measures, together with a programme for such works, shall be submitted to the Local Planning Authority for approval in writing. The remediation measures shall be carried out as approved and in accordance with the approved programme.

Reason: To safeguard the health of future occupiers of the site and to comply with policies DM40, DM41 and DM20 of the Brighton & Hove City Plan Part 2.

13. Flood Risk Mitigation:

- a) The development hereby permitted shall be carried out in accordance with the submitted Flood Risk Assessment (ref KALC-ENG-XX-XX-RP-C-0002 Rev 02, dated February 2026) and the following mitigation measures contained within:

- Finished floor levels of the basement plantroom shall be set no lower than 5.3 metres above Ordnance Datum (AOD)
- Finished floor levels of the basement-level car park shall be set no lower than 5.8 metres above Ordnance Datum (AOD)
- Ground floor finished levels shall be set no lower than 9.2 metres above Ordnance Datum (AOD)
- Raised electrical fittings and equipment in the plant room
- b) Other than any enabling, demolition or temporary car park works, no development hereby permitted shall take place until details of the following flood risk mitigation measures have been submitted to and approved in writing by the Local Planning Authority:
 - measures to prevent groundwater flooding to the proposed basement car park
 - an assessment of the risk of tidal ingress beneath the sea wall, and details of any necessary mitigation measures.

The leisure centre building shall not be first brought into use until the agreed mitigation measures have been fully implemented and the measures shall be retained thereafter throughout the lifetime of the development.

Reason: To reduce the risk of flooding to the proposed development and future occupants, to comply with policies CP11, SA1, DM39, DM40, DM41, DM42, DM43 of the Brighton and Hove City Plan.

14. Drainage Strategy:

No development (except demolition or enabling works) of each respective phase of the development hereby permitted (1. Temporary car park 2. Main leisure centre building) shall take place until a Drainage Strategy detailing the proposed means of foul (and swimming pool) water disposal and surface water drainage has been submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water. The Strategy for each phase shall include details of any Sustainable Drainage Systems including any Green Roofs, details of infiltration testing, an implementation timetable and details of responsibilities and management/maintenance. Each phase of the development shall be carried out in accordance with the approved Drainage Strategy and timetable and shall be maintained as agreed thereafter.

Reason: To ensure adequate foul sewage drainage/treatment and surface water drainage to serve the development prior to the leisure centre development commencing and to comply with policies DM40, DM42 and DM43 of Brighton & Hove City Plan Part 2 and SPD16.

15. Water supply protection:

Other than any enabling, demolition or temporary car park works, no development hereby permitted shall take place until details of the measures to protect/divert the public water supply main have been submitted to and agreed in writing by the Local Planning Authority, in consultation with Southern Water. This shall include details of any tree planting or soft landscaping proposal within 6 metres of the

public water apparatus. The agreed measures shall be implemented as part of the development.

Reason: To ensure water apparatus is appropriately protected, to comply with policies DM40, DM42 and DM43 of Brighton & Hove City Plan Part 2 and SPD16.

16. External Materials/Detailing:

Notwithstanding any details shown on the approved plans, no development above ground floor slab level of any part of the development hereby permitted shall take place (excluding the temporary car park) until samples and/or details of all materials and detailing to be used in the construction of the external surfaces of the development have been submitted to and approved in writing by the Local Planning Authority, including (where applicable):

- a) samples/details of all brick, render, through-coloured glassfibre reinforced concrete, and tiling (including details of the colour of render/paintwork to be used)
- b) samples/details of all cladding to be used
- c) samples/details of all hard surfacing materials
- d) samples/details of the proposed elevational treatments including window/glazing, door, balcony, brise soleil treatments and moulded GRC panels
- e) samples and large-scale details (including how these will be attached/integrated) of the proposed perforated sporting motifs at the base of the north and west elevations
- f) notwithstanding the details shown on the submitted north and west elevations, the use of dark green RAL6028 colour is not accepted for the main north and west facades (cladding) and a revised (paler) colour shall be submitted for written approval
- g) details of signage
- h) samples/details of all other materials to be used externally
- i) details of the weathering properties of all external materials and evidence of their suitability in a marine environment
- j) details/amendments to demonstrate how the cut-out parapet on the north and west elevations will terminate (which may include a potential extension of it)
- k) details to demonstrate whether introduction of wind mitigation measures are possible to achieve a suitable environment to enable the south-east doorway to be used as a general (secondary), rather than occasional, entrance – such as introduction of a wall between the colonnade columns to the south
- l) Details of graffiti prevention/management.

The development shall be carried out in accordance with the approved details.

Reason: To ensure a satisfactory appearance to the development and the setting of nearby heritage assets and to ensure an artistic component within scheme, to comply with policies DM18, DM26, DM28 and DM29 of Brighton & Hove City Plan

Part 2 and SA1, CP5, CP7, CP12, CP13 and CP15 of the Brighton & Hove City Plan Part One.

17. Hard/Soft Landscaping:

Notwithstanding the details within the Landscape Strategy (June 2026) submitted with the application, prior to first use of the leisure centre building hereby permitted, a scheme for landscaping and public realm associated with the development shall be submitted to and approved in writing by the Local Planning Authority. The approved landscaping shall be implemented and maintained in accordance with the approved details in the first planting season after completion or first occupation of the development, whichever is the sooner. The scheme shall include the following:

- a) details of all hard and soft surfacing to include the type, position, design, dimensions and materials and any sustainable drainage system used and details of any green roofs;
- b) a schedule detailing sizes and numbers/densities of all proposed trees/plants and details of tree pit design, use of guards or other protective measures and confirmation of location, species and sizes, nursery stock type, supplier and defect period;
- c) details of all boundary treatments including retaining walls to include type, position, design, dimensions and materials;
- d) details of railings, benches/seating areas, raised planters, raised ventilation structures for car park, external lighting including columns, litter bins, any public art, wind mitigation measures, utility cabinets, and any (collapsible) bollards needed to prevent vehicular access
- e) Details of how the design is accessible and inclusive to different groups
- f) Details of informal play features for children within the public realm
- g) Details of the siting, type and appearance of the public cycle parking including covered store in the eastern public realm
- h) Details of the Hove Street South design and materials including drop-off area and public realm area to south between it and the main promenade
- i) Details of graffiti prevention/management
- j) Details of maintenance/management

Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To enhance the appearance of the development in the interest of the visual amenities of the area and its heritage setting, to be accessible and inclusive, to provide ecological and sustainability benefits, for highway safety, and to comply with policies DM22, DM26, DM28, DM29, DM33 and DM37 of Brighton & Hove City Plan Part 2, and SA1, SA6, CP8, CP10, CP12, CP13 and CP15 of the Brighton & Hove City Plan Part One.

18. Archaeology WSI:

No development, including any demolition or enabling works, shall take place until the applicant has secured the implementation of a programme of archaeological works in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the archaeological and historical interest of the site is safeguarded and recorded to comply with policies DM31 of Brighton & Hove City Plan Part 2, and CP15 of the Brighton & Hove City Plan Part One and the National Planning Policy Framework.

19. Archaeology ASI/PIA:

No respective phase of the development hereby permitted (1. temporary car park and 2. main leisure centre building) shall be brought into use until the archaeological site investigation and post-investigation assessment (including provision for analysis, publication and dissemination of results and archive deposition) for that respective phase has been completed and approved in writing by the Local Planning Authority. The archaeological site investigation and post-investigation assessment shall be undertaken in accordance with the programme set out in the Written Scheme of Investigation approved under the above condition no.18.

Reason: To ensure that the archaeological and historical interest of the site is safeguarded and recorded to comply with policies DM31 of Brighton & Hove City Plan Part 2, and CP15 of the Brighton & Hove City Plan Part One and the National Planning Policy Framework.

20. Biodiversity Mitigation (house sparrow):

No respective phase of the development shall take place (including any demolition, ground works, site clearance) until an Ecological Mitigation Strategy for house sparrow for each phase has been submitted to and approved in writing by the Local Planning Authority. This shall include measures to mitigate impacts to the existing sparrow colony which uses the King Alfred and adjacent car park site and details of the timetable for implementation and aftercare and ongoing monitoring arrangements. The measures shall be implemented as part of the development as per the agreed Strategy. This should be based on and informed by detail in the Preliminary Ecological Appraisal (Harper Environmental, 24/02/2026, Issue 02), Demolition Plan (Colour, 25/06/2026, Revision P08) and any subsequent ecological monitoring as applicable.

Reason: To safeguard these species from the impact of the development and ensure appropriate mitigation and integration of new nature conservation and enhancement features in accordance with Policy DM37 of Brighton & Hove City Plan Part 2, Policy CP10 of the Brighton & Hove City Plan Part One and Supplementary Planning Document SPD11 Nature Conservation and Development.

21. Biodiversity – Compliance with reports:

All ecological measures and/or works should be carried out as part of the development in accordance with the Preliminary Ecological Appraisal (Harper

Environmental, 24/02/2026, Issue 02) and Bat Survey Report (Harper Environmental, 24/02/2026, Issue 1), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

Reason: To ensure that the measures considered necessary as part of the ecological impact assessment are carried out as specified, to protect species and habitats from adverse impacts during construction and to avoid an offence under the Wildlife and Countryside Act 1981, as amended and the Conservation of Habitats and Species Regulations 2017, as amended, and to comply with Policy DM37 of Brighton & Hove City Plan Part 2, Policy CP10 of the Brighton & Hove City Plan Part One and Supplementary Planning Document SPD11 Nature Conservation and Development.

22. CEMP – Biodiversity

No development of each respective phase shall take place (including demolition, ground works, vegetation clearance or any works associated with the temporary car park) until a construction environmental management plan (CEMP: Biodiversity) for each phase, to include details of the protection of retained/created habitat (including those provided as part of the protected species mitigation) and nearby habitats, including coastal areas, has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:

- a) risk assessment of potentially damaging construction activities;
- b) identification of “biodiversity protection zones”;
- c) practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements);
- d) the location and timing of sensitive works to avoid harm to biodiversity features;
- e) the times during construction when specialist ecologists need to be present on site to oversee works;
- f) responsible persons and lines of communication;
- g) the role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person;
- h) use of protective fences, exclusion barriers and warning signs.

The approved CEMP (Biodiversity) shall be adhered to and implemented throughout the construction period in accordance with the approved details.

Reason: To ensure that any adverse environmental and ecological impacts of development activities are mitigated and to comply with Policy DM37 of Brighton & Hove City Plan Part 2 and Policy CP10 of the Brighton & Hove City Plan Part One.

23. Biodiversity Method Statement:

No development shall take place of each respective phase (including any demolition, ground works, site clearance) until a precautionary working method

statement for the protection of terrestrial mammals and bats, and (if applicable) appropriate disposal of any invasive non-native plant species impacted by the works of each phase, has been submitted to and approved in writing by the local planning authority. This should be based on and include the recommendations in the Preliminary Ecological Appraisal (Harper Environmental, 24/02/2026, Issue 02) and Bat Survey Report (Harper Environmental, 24/02/2026, Issue 1). The works shall be carried out in accordance with the approved details.

Reason: To protect species from adverse impacts during construction and to avoid an offence under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017, as amended and to comply with Policy DM37 of Brighton & Hove City Plan Part 2 and Policy CP10 of the Brighton & Hove City Plan Part One.

24. Ecological Design Strategy:

No development of each respective phase shall take place (including any demolition, ground works, site clearance) until an ecological design strategy (EDS) addressing ecological compensation and enhancement, including bird, bat and bee bricks/boxes, soft landscaping of value to wildlife and green roof specifications for each phase, has been submitted to and approved in writing by the local planning authority. Measures should be informed by and in broad accordance with the Preliminary Ecological Appraisal (Harper Environmental, 24/02/2026, Issue 02), Bat Survey Report (Harper Environmental, 24/02/2026, Issue 1) and Demolition Plan (Colour, 25/06/2026, Revision P08). The EDS shall include the following:

- a) purpose and conservation objectives for the proposed works;
- b) review of site potential and constraints;
- c) detailed design(s) and/or working method(s) to achieve stated objectives;
- d) extent and location /area of proposed works on appropriate scale maps and plans;
- e) type and source of materials to be used where appropriate, e.g. native species of local provenance;
- f) timetable for implementation demonstrating that works are aligned with the proposed phasing of development;
- g) persons responsible for implementing the works;
- h) details of initial aftercare and long-term maintenance;
- i) details for monitoring and remedial measures;
- j) details for disposal of any wastes arising from works.

The EDS shall be implemented within the development in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason: To ensure provision of measures considered necessary to compensate for the loss of habitats and enhance the site to provide a net gain for biodiversity as required by Section 40 of the Natural Environment and Rural Communities Act 2006, paragraphs 187 and 193 of the NPPF (December 2024) and to comply with Policy DM37 of Brighton & Hove City Plan Part 2 and Policy CP10 of the Brighton & Hove City Plan Part One.

25. Landscape and Ecological Management Plan

A landscape and ecological management plan (LEMP) for each respective phase shall be submitted to, and approved in writing by, the local planning authority prior to the commencement of each phase of development (including prior to any demolition, ground works, site clearance). The content of the LEMP shall include the following:

- a) description and evaluation of features to be managed;
- b) ecological trends and constraints on site that might influence management;
- c) aims and objectives of management;
- d) appropriate management options for achieving aims and objectives;
- e) prescriptions for management actions, together with a plan of management compartments;
- f) preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);
- g) details of the body or organisation responsible for implementation of the plan;
- h) details of any phasing;
- i) ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plans shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented as part of the development in accordance with the approved details.

Reason: Biological communities are constantly changing and require positive management to maintain their conservation value. The implementation of a LEMP will ensure the long term management of habitats, species and other biodiversity features, to comply with Policy DM37 of Brighton & Hove City Plan Part 2 and Policy CP10 of the Brighton & Hove City Plan Part One.

26. Plant Noise:

No mechanical plant or machinery shall be incorporated within the development until a detailed Plant Noise Impact Assessment has been submitted to and approved in writing by the Local Planning Authority (LPA). The Assessment plan shall include:

- a) Location of plant/machinery, extract fans for kitchen ventilation equipment, and associated equipment
- b) Confirmed acoustic specifications of extract fans including casings, and plant/ machinery incorporated into the development
- c) Identify the nearest sensitive receptor(s) and specify the distance (in metres) from the proposed plant(s)

- d) A comprehensive BS 4142:2014+A1:2019 noise assessment indicating that the rating level of all fixed plant operating concurrently do not exceed a level 5dB below the background levels ascertained in the submitted document, Environmental Survey & Preliminary Acoustic Design for the new King Alfred Leisure Centre, Kingsway, Brighton & Hove, by Willmott Dixon Construction, dated 27th February 2026. In addition, it shall demonstrate there would be no significant adverse impacts from low frequency noise
- e) Details of any noise mitigation measures employed.

Prior to first use of the plant, a Verification Report shall be submitted to and approved by the LPA to confirm compliance with the plant noise limits set out in the agreed Noise Impact Assessment above.

The agreed plant and associated noise mitigation measures shall be implemented before the plant is first brought into use.

Reason: To protect the amenity of local residents and occupiers and users of the wider area, in accordance with policies DM20 and DM40 of Brighton & Hove City Plan Part 2.

27. Acoustic Design:

No development above ground floor slab level of the leisure centre building hereby permitted shall take place until the construction details of the roof, external walls, glazing systems and soundproofing serving the studios/gym and sports hall against the transmission of sound has been submitted to and approved in writing by the Local Planning Authority.

The details provided shall demonstrate that with the building envelope in place, internal operational noise levels do not exceed 55 dB LAeq and the octave-band limits as specified in the Environmental Survey & Preliminary Acoustic Design for the new King Alfred Leisure Centre, Kingsway, Brighton & Hove, by Willmott Dixon Construction, dated 27th February 2026, unless otherwise agreed in writing by the Local Planning Authority.

The approved details shall be implemented prior to first use of the leisure centre building and shall be permanently maintained thereafter.

Reason: To protect the amenity of local residents and occupiers and users of the wider area, in accordance with policies DM20 and DM40 of Brighton & Hove City Plan Part 2.

28. Noise Management Plan:

Prior to first use of the proposed studios/gym, sports hall, cafe or any associated terraces and outdoor facilities, or use of outdoor spaces for events in the public realm associated with the development, a Noise Management Plan shall be submitted to the Local Planning Authority for written approval. The plan shall include:

- Operational policies for noise control for internal and external activities
- Procedures to manage noise on a day-to-day basis and for special one-off events
- A complaint handling plan

- Details of service level agreements
- A commitment to community liaison and communication strategy for nearby residents (including a strategy that would cover any future residents introduced to the immediate east of the site within the Policy SA1 wider masterplan area) to include communication for one-off special events in external areas of public realm
- A review mechanism for the plan

The sports hall, studios/gym or outdoor terrace/event spaces shall not be first brought into use until the Noise Management Plan has been agreed. The measures within the Noise Management Plan shall thereafter be implemented and the facilities used in strict accordance with the noise management plan.

Reason: To protect the amenity of local residents and occupiers and users of the wider area, in accordance with policies DM20 and DM40 of Brighton & Hove City Plan Part 2.

29. Hours of operation:

The leisure centre building and uses within it (excluding the undercroft public car park and access to it hereby permitted shall not be open except between the hours of 06:00 and 23:00 on Mondays to Saturdays and 07:00 and 22:00 on Sundays.

Reason: To safeguard the amenities of nearby occupiers and the locality and to comply with policies DM20 and DM40 of Brighton & Hove City Plan Part 2.

30. Plant odour control:

No cooking facilities or associated ventilation/extraction plant for the leisure centre building shall be first installed until a scheme for the control of fumes, smells and odours and associated sound insulation has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in strict accordance with the approved details prior to the first use of the plant/cooking facilities, and shall thereafter be retained as such.

Reason: To safeguard the amenities of the occupiers of adjoining properties and to ensure a satisfactory external appearance, to comply with policies DM18, DM20, DM26, DM28, DM29, DM40, CP12 and CP15 of Brighton & Hove City Plan.

31. Play details:

Notwithstanding the details of the childrens wet play area within the pool area (Splash Pad) submitted with the application (5104_SK01 Rev00), the leisure centre building shall not be first brought into use until a detailed scheme for children's wet play within the building has been submitted to and approved in writing by the local planning authority. This shall evidence how the designs are accessible and inclusive to different groups. The approved scheme shall be implemented before first use of the leisure centre and retained as such thereafter.

Reason: To ensure a suitable and inclusive mix of uses is included within the scheme, to comply with policies SA1, SA6, CP17, CP18 and DM9 of Brighton & Hove City Plan.

32. Seafront accessibility/enhancement:

The leisure centre building hereby permitted shall not be first brought into use until details of seafront accessibility/leisure enhancement measures to be delivered in the immediate seafront vicinity of the development have been submitted to and approved in writing by the Local Planning Authority. This shall include provision of additional seafront public shower(s) and/or provision of a retractable accessible beach mat for use by wheelchair users, and details of how these will be managed. The agreed measures shall be implemented within 6 months of their formal approval and retained/made available thereafter.

Reason: To ensure the wider seafront has adequate facilities for residents and visitors and improves accessibility for everyone, and to appropriately co-locate facilities adjacent to the leisure/community hub, to comply with policy SA1 and SA6 and CP17 and CP18 of the Brighton and Hove City Plan Part One.

33. External lighting:

Each respective phase of the development hereby permitted (1. temporary car park and 2. main leisure centre) shall not be first brought into use until the following has been submitted to and approved in writing by the Local Planning Authority:

- i. details of external lighting (including for any known signage or artistic component), which shall include details of; levels of luminance, hours of use, predictions of both horizontal illuminance across the site and vertical illuminance affecting immediately adjacent receptors, hours of operation, details of all shields, optics, and column orientations incorporated into the scheme and evidence they have been installed correctly to achieve compliance with luminous intensity limits, horizontal and maximum vertical illuminance values for Zone E4 as indicated in the submitted lighting report (KALC-VZV-XX-XX-RP-E-0001) by Van Zyl & de Villiers Ltd Consulting Engineers and dated 30th January 2026 and specified in the most recent ILP Guidance Notes for the Reduction of Obtrusive Light document, details of hours of operation and details of maintenance.
- ii. evidence that the predicted illuminance levels have been tested by a suitably qualified competent person to ensure that the illuminance levels agreed in part (i) are achieved. Where these levels have not been met, a report shall demonstrate what measures have been taken to reduce the levels to those agreed in part (i).

The external lighting shall be installed, operated and maintained in accordance with the approved details for each respective phase and shall thereafter be retained, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To safeguard the amenities of the occupiers of adjoining properties and in the interest of the character and appearance of the locality and setting of

heritage assets, to comply with policies SA1, CP12, CP15, DM18, DM20, DM26, DM29 and DM40 of Brighton & Hove City Plan.

34. Green roofs:

No development above ground floor slab level of any part of the development hereby permitted shall take place (excluding the temporary car park) until details of the construction of the green living roofs have been submitted to and approved in writing by the Local Planning Authority. The details shall include a cross section, construction method statement, the seed mix, and a maintenance and irrigation programme (which shall include rainwater harvesting unless evidence is provided to demonstrate this is not feasible). The roofs shall then be constructed in accordance with the approved details and shall be retained as such thereafter.

Reason: To ensure that the development contributes to ecological enhancement and sustainability on the site and in accordance with Policy DM37 of Brighton & Hove City Plan Part 2, Policies SA1, CP8 and CP10 of the Brighton & Hove City Plan Part One and Supplementary Planning Document SPD11 Nature Conservation and Development.

35. PV/ASHP:

Prior to first use of the leisure centre development hereby approved, details of the proposed photovoltaic array (PV) and air source heat pumps (ASHP) to be incorporated into the scheme shall be submitted to and approved in writing by the Local Planning Authority. The details shall include appearance, siting, layout, number, output and a section drawing of the roof to show the protrusion and angle of the PV. The PV and ASHP shall be installed within the development in accordance with the approved details prior to the leisure centre first being brought into use and shall thereafter be retained.

Reason: To ensure that the development is sustainable and makes efficient use of energy and materials and has an acceptable appearance, to comply with policies SA1, CP8, CP12 and CP15 of the Brighton & Hove City Plan Part One and DM44, DM26, DM28 and DM29 of the Brighton & Hove City Plan Part Two.

36. Sustainable measures:

Prior to first use of the leisure centre development hereby approved, details of the following sustainable measures shall be submitted to and approved in writing by the Local Planning Authority: proposed mechanical ventilation and associated heat recovery measures, water efficiency measures, ventilation and passive design measures to address solar gain exceedances, details of how circular economy principles will be adopted and implemented in each building layer (skin/shell, superstructure and substructure) which may include a material inventory and reclamation audit, details of LED lighting and smart controls, and details of any irrigation measures (which may include rainwater harvesting or SUDs or rain gardens). The agreed measures and any associated mitigation required shall be installed within the development in accordance with the

approved details prior to the leisure centre first being brought into use and shall be thereafter retained.

Reason: To ensure that the development is sustainable and makes efficient use of energy and materials and has an acceptable appearance, to comply with policies SA1, CP8, CP12 and CP15 of the Brighton & Hove City Plan Part One and DM44, DM46, DM26, DM28 and DM29 of the Brighton & Hove City Plan Part Two.

37. Future DHN connection:

No development of the leisure centre building (except any demolition or enabling works) shall take place until detailed plans and evidence have been submitted to the Local Planning Authority for written approval to demonstrate how the use or future adjacent uses will be able to connect to any future decentralised heat network, should one become available. Evidence should demonstrate the following:

- a) Plant area size and location showing facility for expansion for connection to a future district heat network: to include sufficient physical space to be allotted for installation of heat exchangers and any other equipment required to allow connection;
- b) A route onto and through site: details of any below ground works which will be implemented within the scheme to ensure that appropriate piping routes are available and safeguarded to enable future connections to a heat network, demonstration of where connections will be made, space on site for the pipework connecting the point at which primary piping comes onsite with the on-site heat exchanger/ plant room/energy centre. Proposals must demonstrate a plausible route for heat piping and demonstrate how suitable access could be gained to the piping and that the route is protected throughout all planned phases of development.
- c) Metering: installed to record flow volumes and energy delivered on the primary circuit.

The approved future-proofing measures shall be implemented before first use of the leisure centre building and shall thereafter be retained.

Reason: To ensure the development is future-proofed in the interests of sustainability to comply with policies SA1, CP8 and SA6 of the Brighton & Hove City Plan Part One and DM44, DM45 and DM46 of the Brighton and Hove City Plan Part Two.

38. BREEAM:

Within 6 months of first use/occupation of the leisure centre development hereby permitted a BREEAM Building Research Establishment issued Post Construction Review Certificate confirming that the non-residential development built has achieved a minimum BREEAM New Construction rating of 'Excellent' shall be submitted to, and approved in writing by, the Local Planning Authority.

Reason: To ensure that the development is sustainable and makes efficient use of energy, water and materials and to comply with policies CP8, SA1 and DM44 of the Brighton & Hove City Plan.

39. EPC:

The development hereby approved should achieve a minimum Energy Performance Certificate (EPC) rating 'B' (for non-residential development).

Reason: To improve the energy cost efficiency of existing and new development and help reduce energy costs and enhance sustainability, to comply with policies DM44 of the Brighton & Hove City Plan Part Two and CP8 and SA1 of the Brighton & Hove City Plan Part One.

40. Combustion:

The development hereby permitted shall contain no static combustion unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of sustainability and air quality, to comply with policies SA1, DM20, DM40 and DM41 of the Brighton & Hove City Plan.

41. Seafront Shelter restoration/relocation scheme:

The existing locally listed seafront shelter within the site shall not be moved or relocated until details of a Repair and Restoration Scheme have been submitted to and approved in writing by the Local Planning Authority. This shall include details of:

- its exact relocated siting on the seafront promenade and how this will accommodate cycle and pedestrian routes around it,
- a schedule for its repair and restoration,
- details of any temporary storage off-site and
- a timescale for implementation.

The leisure centre building shall not be first brought into use until the shelter has been relocated and repaired/restored in accordance with the agreed details.

Reason: To mitigate the heritage impact of the development and to secure a heritage benefit within the scheme and enhance the wider seafront, to comply with policies CP15, SA1, DM26, DM28 and DM29 of the Brighton and Hove City Plan.

42. Lighting column restoration scheme:

The new leisure centre building hereby permitted shall not be first brought into use until the 3 existing historic street light columns immediately adjacent to the south of the site (as identified within the submitted Landscape Strategy 0012-P07 June 2026) that are to be retained in situ have been repaired and restored in accordance with a Repair and Restoration Scheme to be agreed in writing prior by the Local Planning Authority. The Scheme shall include a timescale for implementation and the leisure centre building shall not be first brought into use until the historic street light columns have been repaired and restored in accordance with the agreed details.

Reason: To mitigate the heritage impact of the development and to secure a heritage benefit within the scheme and enhance the wider seafront, to comply with policies CP15, SA1, DM26, DM28 and DM29 of the Brighton and Hove City Plan.

43. Refuse/recycling:

The leisure centre building hereby approved shall not be first brought into use until the refuse and recycling storage facilities indicated on the approved plans have been fully implemented and made available for use. These facilities shall thereafter be retained for use at all times.

Reason: To ensure the provision of satisfactory facilities for the storage of refuse and recycling and to comply with Policies DM18 and DM21 of Brighton & Hove City Plan Part 2, policy CP8 and SA1 of the Brighton & Hove City Plan Part One and Policy WMP3e of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan Waste and Minerals Plan.

44. Highway Works:

The leisure centre building and undercroft car park hereby permitted shall not be first brought into use until a Scheme of Highways Works associated with the development have been submitted to and approved in writing by the Local Planning Authority. The Scheme shall include the following as a minimum, unless otherwise agreed in writing by the Local Planning Authority:

A259 interface and servicing:

- Integration with the approved A259 Hove to Portslade Active Travel Scheme
- Provision of a dedicated, clearly delineated A259 servicing area with adjustment/removal of any features that compromise cycle continuity or safety
- Evidence of operation of the kerbside in accordance with the approved Delivery and Servicing Management Plan (DSMP), including booking/controls, peak-time restrictions, and dwell-time limits, together with details of an adaptive-management mechanism for layout adjustments (including, if required, withdrawal of A259 servicing) where any operational impacts persist or the DSMP is breached

Hove Street South works:

- Alterations at A259/Hove Street South
- Carriageway realignment/reconstruction
- Formation of a new southern roundabout (exploring revised siting slightly further south than indicated) and provision of perimeter short-stay stopping zone for drop-off/pick-up including for leisure centre users, taxis and beach activity users (exploring greater drop-off provision),
- Details of enforceable time limits such as Automatic Number Plate Recognition (ANPR) (or equivalent approved system) to manage short-stay and loading bays and strictly enforce maximum dwell times and prevent

misuse, together with associated signing/lining integrated with pedestrian/cycle safety

- Turning provision for service/refuse/emergency vehicles
- Footway widening/reconstruction both sides to Inclusive Mobility standard
- A loading/servicing bay for leisure centre operational and other needs (e.g. for chemical delivery), separately controlled to prevent overlap with short-stay bays if required
- Access controls at King's Esplanade/Hove Lawns (e.g. removable bollards, planters)
- Details of provision for a contingency (pre-agreed within the DSMP) enabling temporary, controlled use of the Hove Street South carriageway for servicing should A259 access be unavailable, signed with appropriate pedestrian/cycle safety measures and details of how this will be managed
- Submission of details of materials for surfaces

Access, boundary and public realm:

- Access arrangements for the undercroft car park
- Evidence of street lighting approvals, drainage approvals; and any statutory undertaker diversions/protection
- Definition of the adopted highway boundary with the seafront/esplanade
- Details of all surfacing materials for the public highway, footways and public realm landscaped areas directly adjacent/interfacing the highway (including surfacing, kerbs, tactile paving, drainage, seating, street furniture)

Walking, cycling and continuity:

- Continuous step-free pedestrian/cycle links between the A259, Hove Street South, the central plaza (eastern public realm) and the seafront (pedestrian only), including temporary measures during construction in accordance with the approved CEMP
- Alignment with Local Transport Note 1/20 - Cycle Infrastructure Design and the councils Local Cycling and Walking Infrastructure Plan (LCWIP)
- Signage and wayfinding:
- Vehicle wayfinding on approach routes to the site to minimise A259 circulating traffic (which may include real-time undercroft occupancy displays)
- Pedestrian/cycle wayfinding to the wider network and nearby bus stops (including on Church Road)

Phasing and closure of temporary car park:

- Details of phasing, including any interim measures.
- For the avoidance of doubt, the only element which shall be outstanding at first use of the main leisure centre building undercroft car park is the final (post-use) treatment of the temporary displacement car park access on Hove Street South. The highway scheme for the temporary car park and Hove Street South shall include details of:

- the closure of the temporary access and reinstatement of the footway/kerbline, including any associated signing/lining changes; or
- where the access is to be retained, a technically approved permanent access arrangement, including the required kerb alignment, crossover/access treatment, surfacing, drainage, visibility/swept paths, pedestrian/cycle safety measures, and any associated signing/lining.
- The applicant shall confirm in writing which option is to be delivered by a date/trigger to be agreed with the Local Planning Authority in consultation with the Local Highway Authority. The approved option shall be completed within 3 months of first use of the new permanent undercroft car park, unless otherwise agreed in writing by the Local Planning Authority.

No respective agreed phase of the development shall be first used until the highway works have been substantially completed in accordance with the approved scheme.

Reason: To ensure safe and inclusive access for all users and protect highway operation and safety, in accordance with policies SA1, CP7, CP9, CP11 and CP13 of City Plan Part One, and DM33 and DM36 of City Plan Part Two.

45. Delivery and Servicing Management Plan:

The leisure centre building and undercroft car park hereby permitted shall not be first brought into use until a Delivery and Servicing Management Plan (DSMP) has been submitted to and approved in writing by the Local Planning Authority. The DSMP shall include details of:

- The types of vehicles expected to serve the development;
- The expected frequency and timing of servicing and delivery activity;
- Management of delivery windows and avoidance of peak traffic periods;
- Management and allocation of chemical delivery windows as part of the Hove Street South arrangement
- Routing of vehicles to and from the site;
- Measures to manage conflict with pedestrian and cycle movements;
- Arrangements for refuse collection including public litter bins within the public realm;
- A contingency strategy demonstrating how all non-refuse servicing can be accommodated from Hove Street and managed;

All servicing and delivery activity shall thereafter be carried out in accordance with the approved DSMP unless a revised Plan is submitted to and approved in writing by the Local Planning Authority. Any updated Plan shall thereafter be implemented and complied with in full.

Reason: To ensure the safe and efficient operation of the development, safeguard highway safety, protect cyclist and pedestrian priority on A259 and Hove Street, in accordance with policies DM20, DM33, DM36 and DM40 of the Brighton & Hove City Plan Part Two and the National Planning Policy Framework.

46. Car Park Layout Plan:

The leisure centre building and undercroft car park hereby permitted shall not be first used until a Car Park Layout Plan for the undercroft car park has been submitted to and approved in writing by the Local Planning Authority. This shall Plan shall include details of the following as a minimum, unless otherwise agreed in writing by the Local Planning Authority:

- a) Cycle parking, motorcycle parking, car parking including disabled parking
- b) Electric vehicle infrastructure (including bicycle)
- c) Servicing and loading arrangements
- d) Internal circulation and turning provision
- e) Markings, signage and management measures
- f) Goods transfer routes reliant on lift access including swept paths/turning for trolleys and carts
- g) Lift location plan with clear opening, lift size/depth, internal headroom and weight rating
- h) Measures for segregation of deliveries from public use
- i) Temporary drop-off area

The approved scheme shall be fully implemented and made available for use prior to the first use of the leisure centre and undercroft car park and shall thereafter be retained for use at all times.

Reason: To ensure the development provides for the needs of all users of the car park and wider site and to comply with policies SA1 and CP9 of the Brighton and Hove City Plan Part One & DM33 and DM36 of City Plan Part Two and SPD14 Parking Standards.

47. Car Park Management Plan:

The leisure centre building and undercroft car park hereby permitted shall not be first used until a Car Park Management Plan for vehicle and any other forms of parking and stopping in the undercroft car park area and Hove Street South drop-off area as shown on the submitted plans has been submitted to and approved in writing by the Local Planning Authority. The Plan shall include the following measures as a minimum, unless otherwise agreed in writing by the Local Planning Authority:

- a) Allocation and management of spaces
- b) Measures to manage dwell time, short stay, and drop-off activity
- c) Access arrangements including lift provision and public access
- d) Controls for any shared-space interaction with servicing vehicles, including enforceable short stay/clearway periods
- e) Allocation of chemical delivery windows as part of the Hove Street South arrangement
- f) Use of Automatic Number Plate Recognition (ANPR) or equivalent time control technology to maintain compliance where appropriate
- g) details of any associated measures as part of the agreed Delivery and servicing management plan, such as time managed delivery measures and segregation from public use

The agreed Plan shall be implemented prior to first use of the leisure centre building and undercroft car park and shall be thereafter maintained and used in accordance with the car park management plan.

Reason: To ensure the development maintains a sustainable transport strategy and to comply with SPD14 Parking Standards and SA1 and CP9 of the Brighton and Hove City Plan Part One and policy DM33 and DM36 of City Plan Part Two.

48. Cycle parking:

The leisure centre building and undercroft car park hereby permitted shall not be first brought into use until details of secure cycle parking facilities for the visitors to the development and staff have been submitted to and approved in writing by the Local Planning Authority. The approved facilities shall be fully implemented and made available for use prior to the first use of the leisure centre building and shall thereafter be retained for use at all times.

Reason: To ensure that satisfactory facilities for the parking of cycles are provided and to encourage travel by means other than private motor vehicles and to comply with policies SA1, CP9, DM33 and DM36 of the Brighton & Hove City Plan.

49. Travel Plan:

The leisure centre building and undercroft car park hereby permitted shall not be first brought into use until a full Travel Plan for the leisure centre has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall generally accord with the submitted Interim Travel Plan (DHA, February 2026) and include:

a) Objectives

- Reduce single-occupancy car trips by staff and visitors;
- Promote and enable active and sustainable travel modes for all site users;
- Support the continued safe operation of the A259 corridor by managing visitor parking demand and associated coach activity.

b) Content Requirements

- Quantified mode share targets for staff and visitors, supported by baseline evidence;
- A costed programme of measures, delivery, monitoring and remedial measures;
- Appointment of a Travel Plan Co-ordinator and details of governance arrangements;
- Confirmation of at least one on-site bicycle maintenance station with tools and pump;
- Confirmation of installation of real-time bus information in the main reception area of the leisure centre
- Confirmation of installation of BikeShare stand(s) within the new landscaped area of public realm

c) Monitoring and reporting framework including:

- Annual user and staff travel surveys at years 1, 3, and 5;
- Car park demand monitoring;
- Monitoring of any coach and bus activity associated with the operation of the development;
- A Remedial Strategy setting out further actions and additional measures to be implemented if mode share targets are not achieved.

The Travel Plan shall be implemented as approved prior to first use of the leisure centre and shall be monitored for a minimum of 5 years, or such period as agreed in writing by the Local Planning Authority. Any remedial measures identified in the approved Travel Plan shall be implemented as triggered by the agreed monitoring results and timetable.

Reason: To manage development-related travel demand, reduce reliance on private car trips and promote safe, active and sustainable forms of travel, and mitigate impacts on the A259, in accordance with Policies CP9, DM33, DM35, SA1 and CP9 of the Brighton and Hove City Plan and the NPPF.

50. Public access:

The areas of public realm hereby permitted, including the landscaped area to the east of the leisure centre building as shown on the submitted plans, shall remain open and available for general public access at all times.

Reason: To ensure the public realm areas are accessible and inclusive at all times for general public use and to ensure satisfactory linkages and connections through the site and surrounding areas for pedestrians and to ensure there is amenity and recreational benefit for the wider public using the site and wider seafront, to comply with policies DM33 of Brighton & Hove City Plan Part 2, and SA1, CP13 and CP9 of the Brighton & Hove City Plan Part One.

51. Crime prevention:

The leisure centre building and undercroft car park shall not be first brought into use until written details/evidence, which could be via Secure By Design or BREEAM certification/credits or other details, has been submitted to and approved in writing by the Local Planning Authority to demonstrate how the scheme shall incorporate crime prevention measures. The agreed measures shall be implemented within the development.

Reason: In the interests of crime prevention, to comply with policies CP12 and CP13 and SA1 and SA6 of the Brighton & Hove City Plan Part One.

Informatives:

1. In accordance with the National Planning Policy Framework and Policy SS1 of the Brighton & Hove City Plan Part One the approach to making a decision on this planning application has been to apply the presumption in favour of sustainable development. The Local Planning Authority seeks to approve planning applications which are for sustainable development where possible.

2. Nesting birds:

The applicant is advised that under Part 1 of the Wildlife and Countryside Act 1981 disturbance to nesting wild birds, their nests and eggs is a criminal offence. The nesting season is normally taken as being from 1st March – 30th September so trees and scrub on the site should be assumed to contain nesting birds between these dates, unless a recent survey has been undertaken by a competent ecologist to show that it is absolutely certain that nesting birds are not present. The developer should take appropriate steps to ensure nesting birds, their nests and eggs are not disturbed and are protected until such time as they have left the nest. The applicant should also be aware that birds do nest outside of the main nesting period and some species (including pigeons, recorded on site) are known to nest year-round, and would still be afforded protection. Planning permission for a development does not provide a defence against prosecution under this Act.

3. Where possible, bee bricks should be placed in a south facing wall in a sunny location at least 1 metre above ground level.

4. Swifts:

Swift bricks/boxes can be placed on any elevation, but ideally under shade-casting eaves. They should be installed in groups of at least three, at a height of approximately 5 metres above ground level, and preferably with a 5m clearance between the host building and other buildings or obstructions. Where possible avoid siting them above windows or doors. Swift bricks should be used unless these are not practical due to the nature of construction, in which case alternative designs of suitable swift boxes should be provided in their place where appropriate.

5. Content of BGP:

The Biodiversity Gain Plan must relate to development for which planning permission is granted, and specify as a minimum the following matters:

- Information about the steps taken or to be taken to minimise the adverse effect of the development on biodiversity
- A completed Metric tool calculation
- The pre-development biodiversity value of the onsite habitat (shown on scaled plans)
- The post-development biodiversity value of the onsite habitat (shown on scaled plans)
- Any registered offsite biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development
- Any biodiversity credits purchased for the development
- Any such other matters as the Secretary of State may by regulations specify including the requirements of Article 37 C of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)

Commencing development which is subject to the biodiversity gain condition without an approved Biodiversity Gain Plan could result in enforcement action for breach of planning control.

6. Highway Works Informative

The applicant is advised that they must enter into a Section 278 Agreement with the Local Highway Authority (LHA) prior to any highway works required by the conditions above commencing on the adopted highway. Work must not commence until a start date has been agreed with Streetworks following technical acceptance of the detailed design by the City Council as LHA. Any necessary Section 278 Agreements should agree and secure the following:

- The approved drawing schedule
- All design, audit, Traffic Regulation Orders (TRO), Road Safety Audits (RSA), implementation, monitoring costs and fees and any commuted sums/bonds shall be met by the developer.
- Inclusion of all required TROs (timed loading, yellow lines/loading blips) together with enforcement infrastructure
- Any required adaptive-management mechanisms enabling LHA-required developer-funded TRO or layout adjustments (including, if required, withdrawal of A259 servicing) where operational impacts persist or the Delivery and Servicing Management Plan (DSMP) is breached
- All designs and works shall accord with Manual for Streets, Local Transport Note 1/20 - Cycle Infrastructure Design and the councils Local Cycling and Walking Infrastructure Plan (LCWIP), Inclusive Mobility, and council standards.
- All associated arrangements for stopping up of the highway such as the east-west dog-leg (Kings Esplanade) at the southern end of Hove Street under s247 TCPA
- All associated RSA's in accordance with GG119 at Stages 1–2 (approved before start on site), Stage 3 (before opening) and Stage 4 (monitoring at 12 and 36 months), with all agreed mitigations implemented
- A 12-month post-opening monitoring plan (covering queueing, lane occupation, cycle priority and junction safety) with pre-agreed triggers and developer-funded remedial measures (including TRO/layout adjustments or, if required, withdrawal of A259 servicing)
- Detailed design will need to achieve technical acceptance prior to commencement of highway works.

7. Delivery & Servicing Management Plan (DSMP)

In preparing and operating the DSMP the LHA expects regard to recognised UK good practice including DfT, TfL, Logistics UK and other respected bodies. The DSMP should set out measures for the centre management that ensures deliveries:

- a) Align with any Section 278 works and associated TRO restrictions (including servicing windows and dwell limits)

- b) Operate a booking system with defined maximum dwell times and an enforcement protocol
- c) Include a routing strategy (maintaining pedestrian and cycleway priority; no reversing onto the public highway; no loading from running lanes)
- d) Provide a contingency plan for periods when the kerbside bay or access is unavailable (e.g. roadworks/events)
- e) Set monitoring KPIs (e.g. delivery counts, dwell times, non compliance events), keep records, and make them available to the LPA/LHA on request
- f) Adopt quiet delivery techniques for early/late operations to protect amenity
- g) Where practicable, require operators to meet recognised fleet safety standards (e.g. FORS or equivalent)
- h) Triggers- see highway works condition
- i) The LHA may seek periodic DSMP review to address operational issues identified through monitoring.

8. Approval in Principle (AIP)

The applicant is advised that this planning permission does not override the need to go through the Highway Authority's Approval in Principle (AIP) process for all necessary works (including temporary works) adjacent to (that is, within 3.66m) and within the highway (including under and over). Nor does it override the need to gain any appropriate highway licences prior to the commencement of any construction works. To avoid delay the applicant must contact the Council's Civil Engineering team (transport.projects@brighton-hove.gov.uk 01273 294570) and Streetworks team (permit.admin@brighton-hove.gov.uk 01273 290729) well in advance of planned start of works.

9. Abnormal Load Notification

The applicant is advised that this planning permission does not override the need to go through the DfT's Abnormal Load Notification process for all proposed abnormal load vehicle movement and gain appropriate licences from the Highway Authority prior to the commencement of any abnormal load vehicle movement. The applicant is further advised that they should contact the Traffic Management Group of the Highway Authority (abnormal.loads@brighton-hove.gov.uk 01273 292183) for further information at their earliest convenience to avoid delay.

10. Disabled Parking

The applicant is advised that the disabled car parking spaces should be designed in accordance with Inclusive Mobility (formerly Department for Transport Traffic Advisory Leaflet 5/95 Parking for Disabled People) and BS8300:2001.26. In combination these two documents require at least a 1.2m clear zone to both sides and roadway end of the bay.

11. Street Design informative

The applicant is advised that for street design guidance they should refer to the Department for Transport's Manual For Streets documents and the Department for Transport's Inclusive Mobility document. Where changes occur, the design is

to include footway, carriageway, landscaping, street lighting and surface water drainage designs, construction methods and materials, dimensions, gradients, levels, radiuses, alignment (horizontal and vertical), general arrangement, and vehicle swept path analysis drawings for a standard size fire engine, large ambulance and standard size waste disposal vehicle. The construction shall be carried out in accordance with the approved Section 278 (of the Highways Act 1980) Agreement. The applicant must contact the Highway Authority by e-mail (s278@brighton-hove.gov.uk) at their earliest convenience to avoid any delay and prior to any works commencing on-site and on the adopted (public) highway. An assigned officer telephone number will be supplied in the e-mail response to provide a point of contact regarding the submission and Section 278 (of the Highways Act 1980) Agreement.

12. Works Adjacent to Highway

The applicant is advised to contact the Council's Streetworks team (permit.admin@brighton-hove.gov.uk 01273 290729) at their earliest convenience to avoid delay and obtain all necessary highway approval from the Highway Authority prior to any works commencing adjacent (at least within 3.66m) to the public highway to be lawful. And should contact the LHA to secure any Stopping Up required for the development.

13. Travel Plan

The applicant should contact the Highway Authority Travel Plan Team for advice and information at their earliest convenience to avoid delay (travelplans@brighton-hove.gov.uk) to agree detailed measures, targets and use of the Council monitoring template. Include meaningful incentives within the Full Travel Plan such as sustainable travel discounts or credits (public transport, bikeshare, car club) for staff and members. Make full use of systems installed under S278 works and explore complementary digital methods (website or membership portal) to share real-time parking availability information to manage demand and reduce unnecessary vehicle circulation on the A259. Ensure the Travel Plan commits to governance measures such as a Bicycle User Group (BUG), engagement campaigns, and integration of feedback from active travel users. Deliver and maintain the costed measures within the agreed Travel Plan Budget, as this will form part of compliance monitoring under the planning condition.

14. Cycle Access and Parking

To ensure a safe and accessible environment for cyclists, new development should aim to:

- a) provide for safe, easy and convenient access for cyclists to/from proposed development; and
- b) where appropriate extend, improve or contribute towards the city's existing network of high quality, convenient and safe cycle routes; and
- c) protect existing and proposed cycle routes unless satisfactory mitigation is provided or provision is made for an alternative alignment; and

- d) provide for sufficient levels of cycle parking facilities in line with SPD14 Parking Standards which must, wherever possible, be universally accessible, under cover, secure, convenient to use, well-lit and as close to the main entrance(s) of the premises as is possible. Short stay visitor cycle parking could be uncovered but must be located close to the building entrance(s) and benefit from high levels of natural surveillance; and
- e) make provision for high quality facilities that will encourage and enable cycling including communal cycle maintenance facilities, staff showers (where possible), lockers and changing facilities

It should be noted that the Highway Authority will not usually approve vertical hanging racks as they are difficult for many people to use and therefore non-compliant with policy and the Equality Act 2010. The scheme should include use of covered, illuminated, secure 'Sheffield' type stands spaced in line with the guidance contained within the Manual for Streets section 8.2.22 and also other proprietary forms of covered, illuminated, secure cycle storage are considered including the mechanised slide-in type cycle store seen in railway stations, the 'lift up door' type cycle store, the metal Police approved 'Secure-By-Design' types of cycle store, the cycle 'bunker' type store and 'two-tier' type systems again seen at railway stations. Whenever possible, provision should be made for tricycles, reclining cycles, cargo bikes and e-bikes.

- 15. The applicant is advised to contact Southern Water to discuss necessary clearance distances for construction works and tree planting from infrastructure, SUDs design and maintenance, a Trade Effluent Consent (if swimming pool produces filter backwash water discharged into foul sewer). The applicant is also reminded of requirements to comply with regulations relating to fats/oil/grease disposal and the need for Section 106 Connection application to connect to public sewer. Southern Water have requested notification of demolition.
- 16. The applicant is advised to ensure they follow best practice with regard to construction in proximity of utility infrastructure and adhere to the recommendations as set out in the letters from UKPN and SGN on the Planning Register in connection with this planning application.

2. SITE LOCATION

- 2.1. The site forms part of an existing leisure centre and public car park on the seafront to the west of the city, within Hove. The site is council owned and is located immediately to the south of the seafront road, the A259 (Kingsway).
- 2.2. The site forms the western part of the wider King Alfred/RNR site (RNR stands for Royal Naval Reserve), which is approximately 1.7 ha in area in total. The application site relates to the western part of the King Alfred which contained a former bowling alley at lower ground floor level with a grassed area above, plus

the public car park (122 spaces) and also the western lawn, west of Hove Street South.

- 2.3. The site is within a mixed area containing mainly residential properties with also some commercial uses along Hove Street to the north and to the east on Kingsway and on the seafront. To the west on the seafront are leisure uses and a new public 'beach' park. The southern part of the western lawn is currently being used by the council as a temporary construction compound for the groyne works (see History section below).
- 2.4. Architectural style varies in the locality though consists largely of Victorian properties or modern blocks of flats. Neither the current King Alfred leisure centre nor any of the structures on it are listed or within a conservation area. The lawned area to the west of the car park and Hove Street South within the current application site is locally listed and within Pembroke Princes Conservation Area (CA). The area to the north of Kingsway, opposite the site, is within the Old Hove CA and to the west of Hove Street and Hove Street South is the Pembroke and Princes CA. The area immediately to the east of the site is not in a conservation area, however the boundary of the Cliftonville CA lies to the east of the Co-op on the corner of St Aubyn's South and Kingsway 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, as is Barford Court. St Aubyn's Mansions to the south-east of the site is locally listed. The wider area also contains listed buildings.
- 2.5. The seafront shelter immediately to the south/west of the King Alfred and the seafront railings are locally listed. There are three historic street light columns within the site that are non-designated heritage assets.

3. RELEVANT APPLICATION HISTORY

- 3.1. **BH2025/02951** Prior approval for demolition of an underground bowling alley. Approved 02.02.2026
- 3.2. **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 04.09.2024
- 3.3. **BH2023/01638** Installation of an external air handling unit to east elevation. Approved 28.07.2023
- 3.4. **BH2015/01044** Replacement of 13no timber framed windows with new UPVC units. Approved 29.07.2015
- 3.5. **BH2012/03882** Installation of new cladding to plant room and adjacent wall to replace existing. Approved 23.01.2013

- 3.6. **BH2006/03429** Mixed use development comprising new public sports centre, 751 residential units (including affordable housing) in two towers and eight other buildings, ground floor commercial uses within classes A1 (retail), A3 (restaurants and cafés) and A4 (drinking establishments), basement car parking, doctors surgery, police office and public toilets. Approved 12.07.2007

4. **RELEVANT PRE-APPLICATION HISTORY**

- 4.1. **PRE2025/00085** Proposed redevelopment of King Alfred Leisure Centre site to comprise a replacement leisure centre, basement parking provision, and hard and soft landscaping. Wider master planning for the King Alfred/RNR Site for residential use. Advice given 19.01.2026. The pre-application proposal was subject to 2 independent Design Review Panels on 20/6/25 and 30/10/25 and an Elected Planning Committee Members Briefing on 6/11/25.
- 4.2. An Environmental Impact Assessment (EIA) Screening Opinion was issued by the Local Planning Authority in September 2025 confirming that the proposed development (cumulatively including the wider illustrative masterplan containing residential development of circa 400 units) would not constitute EIA development.

5. **RELEVANT HISTORY AT OTHER SITES**

- 5.1. Grassed Area East Of Hove Street/South Of Kingsway/KingsEsplanade/Beach
BH2024/02513 Removal of 7no beach groynes and erection of 9no replacement groynes, recharge of the shingle beach, removal of section of promenade railings and replacement with flood wall and installation of construction compound area. Approved 01.08.2025.
- 5.2. Hove Beach Park, Hove Western Lawns and Hove Lagoon, Kingsway
BH2022/02830 Redevelopment of Hove Western Lawns as a Linear Park, incorporating refurbishment of existing and new public leisure and recreation amenities including (east to west): Temporary Events Space; Garden; Bowls; Demolition of existing buildings and Erection of Two-storey Outdoor Sports Hub building (including Bowls Club (Class Use F2), Public Cafe (E) and Public WCs); Garden; Croquet; Sand Sports (F2); Sunken Garden; Padel Tennis (F2); Tennis including new Single-storey Tennis and Padel Tennis Pavilion (E); Garden; Wheeled Sports including Skate Park, Pump Track and Roller Area (F2); relocation of Hove Lagoon Amusements and Public WC improvements at the Big Beach Cafe. New and replacement Hard and Soft Landscaping and Planting, including continuous new accessible and connected route throughout linking all spaces, and associated Public Realm improvements. Approved 15.12.2022

6. APPLICATION DESCRIPTION

6.1. The proposal is to redevelop the western part of the existing King Alfred leisure centre complex (involving the former underground bowling alley and green roof area) and the adjacent public car park to the west of it, to provide new leisure centre of approximately 12,000 sqm of gross external (10,850sqm internal) floorspace over 3 floors comprising 5,630sqm basement car park/plant level, 4,086sqm ground level and 2,288sqm first floor level to include:

- 25 metre 8 lane swimming pool (with moveable floor)
- Learner pool (moveable floor)
- Splash Pad (water play)
- spectator seats
- wet change area
- station gym/fitness suite
- multi-purpose studios
- sports hall
- dry change area
- childrens soft play
- multi-purpose room (party/community)
- cafe
- sunken gallery

6.2. In terms of comparison with the facilities and areas within the current King Alfred building and complex please see the table below for a summary:

Existing	Proposed
Main pool – 25m 6-lane	Main pool – 25m 8- lane (with moveable floor)
Teaching pool 95sqm	Teaching pool - 253sqm (moveable floor)
Leisure water play 180sqm	Splash pad 75sqm
Spectator seating 240 seats	Spectator seating 194 seats
Wet change 210sqm	Wet change 410sqm
Gym 250sqm/31 stations	Gym 680sqm/150 stations
Ancillary gym 180sqm	As above
FitLab Gym 180sqm	Will relocate
N/A	Spinning studio 75sqm
N/A	Multi-purpose studiosx2 (100sqm + 150sqm)
2 x sports halls 1,250sqm	Sports hall 932sqm
Sports change and womens/mens change/sauna 325sqm	Changing 190sqm and Changing Places facility
Ballroom 385sqm	N/A
Multi purpose room 110sqm	Multi purpose room 58sqm

Boxing facilities 295sqm	To be relocated
N/A	Café 260sqm
N/A	Childrens soft play 180sqm
N/A	Sunken gallery
Total 15,865sqm	Total 10,850sqm (incl car park)

- 6.3. A public undercroft car park accessed from Hove Street South with 122 spaces is proposed (including 8 disabled spaces, 4 parent/child spaces plus motorcycle spaces). Associated highway infrastructure is proposed including revised designs for the southern end of Hove Street South (which would be stopped up, along with Kings Esplanade) and provision of a turning area and drop off area. A loading bay would be provided on the A259.
- 6.4. Associated hard and soft landscaping is proposed including a new area of public realm to the east. This would contain an event space/square. Relocation of the existing locally listed seafront shelter is proposed to the south of the new public realm area, on the main seafront promenade.
- 6.5. Provision of temporary public car park on part of lawn to west of Hove Street South during the construction period is proposed (for approximately 2 years), with a total of 107 spaces (including 6 disabled) accessed from Hove Street South. This is shown for potential expansion to create a further 13 spaces, and then a further 21 spaces, plus 6 motorcycle spaces (depending on the timing of the removal of the groynes works compound).
- 6.6. The building would be 3 storeys high including an undercroft level for parking and plant. The main entrance would be to the east, within the new public realm area, with secondary access in the south-east corner (used for events). The design would be contemporary and incorporates flats roofs, and the main materials proposed comprise:
- Glassfibre reinforced concrete (Formparts Ferros finish) with ‘vanilla’ and ‘green’ sandblasted finish, use of concave panel system
 - Anodised aluminium rainscreen cladding (show illustratively in green)
 - Bespoke decorative PPC aluminium brise soleil with colour matched windows, parapet and curtain wall system (shown illustratively as RAL1036 ‘pearl gold’)
 - Perforated sports motifs in metal at the base of north and west elevation
 - Use of external architectural lighting
- 6.7. A design and access statement addendum and amended plans were received during the course of the application to alter the design of the north and western elevations and include refinement of their form/massing, introduce greater articulation and level of active frontage, and to enhance the north-west corner to provide a stronger gateway feature. The public realm designs have also been

simplified, and the relocated seafront shelter is shown on the lower promenade. New images have been provided.

- 6.8. Additional supporting information was also submitted to address other matters raised by consultees including: updated temporary car park layout and associated drainage details, updated ecology and landscaping information, an air quality technical note, a planning statement addendum including updated sustainability information and updated water play details for the splash pad. Updated transport information has also been submitted, updated microclimate information, updated health information and updated sustainability information.

7. REPRESENTATIONS

- 7.1. A total of six hundred and five (606) representations have been received to date, including from The Brighton Society, Dolphins Disabled Swimming Club, Hove Civic Society, Keep and Retrofit the King Alfred Leisure Centre Campaign, King Alfred Community Leisure Hub (One Site One Plan): Save & Expand, The Regency Society, Save Britains Heritage, and Viceroy Lodge Freehold Co. Ltd objecting to the proposal for the following reasons:

Demolition of existing building; should be re-used/refurbished

- Re-use is most sustainable and cost-effective option; policy encourages re-use of resources
- Alternatives to redevelopment should be considered
- A number of people/organisations put forward alternative designs including retention and expansion of existing facility
- Insufficient (and independent) evidence to demonstrate structural condition/cost; no robust comparison between demolition and re-use in terms of carbon saving, financial or delivery implications
- Lack of whole life carbon assessment
- See also heritage and sustainability concerns about demolition below

Amount of sports, leisure and community provision, including childrens water play

- Overall reduction in sports/leisure offer compared to existing, is a downgrade not an enhancement;
- Proposal would have fewer facilities and less flexibility than existing
- Too small to meet demand of future growing population, including from future housing adjacent
- Families not adequately considered/consulted
- Loss of substantial amount of family-orientated leisure offer including childrens water play (lagoon pool, slides, flumes); splash pad too small
- Splash pad and teaching pool (and inflatables) not a genuine replacement
- Lane swimming and gym provision given priority over family recreation; no parent seating close to children's pool

- Insufficient provision for older children and teenagers and opportunities for social interaction or structured activity; will increase social isolation
- Loss of ballroom, crazy golf, boxing club and other recreational uses
- Loss of community uses
- Proposal should be a flagship facility for a major coastal city rather than reducing the leisure water offer
- Disappointment some will need to travel outside city to access same type of facilities at current King Alfred centre
- Proposal results in loss of leisure and community facilities and open space contrary to national policy, Sport England guidance and local policies; does not align with council's sports facilities investment plan or findings of stakeholder engagement
- Question whether the health, participation and community benefits claimed by the scheme have been sufficiently evidenced to justify the conclusions reached within the planning assessment/health impact assessment

Design and impact to heritage

- Concern regarding demolition of existing King Alfred building which has heritage and architectural merit and is part of Hove's identity and contributes to character of the area
- Proposal could re-use existing building and restore it via a heritage-led refurbishment - this has been done very successfully elsewhere (eg Saltdean Lido)
- Poor design, detailing and elevational treatment; is uninspiring, bland and too utilitarian, boxy etc and could be perceived as a generic commercial or retail development
- Design not of sufficient quality for this prominent landmark site; is a missed opportunity/lack of ambition; requires a more confident, bolder and imaginative response and greater civic presence to create a building of regional or national significance
- Too much emphasis on operational efficiency at expense of good design and place-making
- North and west elevations in particular are less successful and of insufficient quality
- Scale/mass/height/visual dominance of the proposal excessive for its seafront setting and is out of keeping with character and appearance of its surroundings
- Proposal will erode openness of seafront, interrupt important coastal views and adversely affect the skyline
- Overdevelopment of the site
- Concerns about cumulative visual impact with future residential towers
- Proposal fails to adequately respect or reflect Art Deco heritage of existing structure

- Significant adverse impact to setting of heritage assets including conservation areas; harm to heritage must be given great weight as per NPPF
- Concern about design of public realm
- More time for design development needed
- Archaeological impacts unknown

Masterplan - housing and use of public land

- Proposal cannot be appropriately considered in isolation from wider masterplan for housing
- Cumulative impact with future housing should be properly assessed now; site should not be developed in a piecemeal manner; is premature
- The future residential development is driving the scheme rather than community benefit; leaves less of site for leisure centre
- Question whether public land is being appropriately used; private interests are being prioritised over community needs
- Concern about scale, height and density of future housing; is an overdevelopment
- Concern about long-term transformation of seafront
- Concern about future pressure on schools, healthcare facilities, roads and community infrastructure

Accessibility, inclusion and equality

- Proposals are not fully inclusive; do not satisfactorily cater for disabled users including disabled children, older residents or people with mobility difficulties
- Proposal would not meet the councils accessibility objectives or its wider equality duties
- Question whether the pool facilities are suitably accessible; why stepped access and not level or ramp, reliance on one single pool pod/lift insufficient
- Concern about removal of existing disabled parking provision and its temporary relocation during construction and extent of new disabled parking proposed
- Disabled users could face longer and more difficult/less convenient journeys to access the facility

Residential amenity

- Insufficient assessment undertaken of impacts to residential amenity
- Adverse impact to neighbouring residents and to quality of life
- Loss of outlook and sea view
- Loss of daylight and sunlight; overshadowing
- Loss of privacy
- Too close to boundary
- Adverse microclimate impact; wind and air quality
- Will lead to more noise, activity and general disturbance both during construction and operation

- Environmental health restrictions on hours of construction will lead to longer build time than presented

Traffic, parking and infrastructure

- Transport Assessment is not robust; does not provide comprehensive traffic modelling to demonstrate scheme will operate safely and effectively
- Concerns about vehicle routing and turning movements
- Will lead to traffic congestion; road network not capable of accommodating additional traffic generated by development
- Lack of parking provision and loss of existing spaces; will lead to overspill parking pressure on local streets
- Road safety issues associated with vehicle movements and access issues
- Limited information about stopping up of Esplanade proposed and implications for future access arrangement
- Lack of information about wider access to surrounding area, including Hove Beach Park
- Concern temporary arrangements and construction impacts not adequately assessed
- Lack of information about how the public will access and move through/around site during construction
- Further technical information require before decision can be made

Additional environmental sustainability and climate considerations

- Re-use of existing building is more sustainable and lower carbon option
- Environmental benefits claimed do not sufficiently outweigh the demolition impact
- Proposal should have greater consideration of innovative sustainability measures and long-term climate resilience
- Compliance with national flood risk policy dependent on mitigation being implemented

Ecology, biodiversity and green infrastructure

- Adverse impact on existing habitats and biodiversity
- Adverse impact to existing hedgerows used by sparrows and other wildlife
- Loss of green areas
- Adverse impact to wildlife from construction
- Request that more habitat be retained where possible
- Biodiversity considerations should be given greater weight in the planning process

Flood risk, coastal conditions and long-term resilience

- Concerns about flood risk, drainage and climate change adaptation
- Question whether sufficient consideration has been given to long-term resilience given exposed coastal location
- Concern about wind effects

- Question of building materials are appropriate for harsh marine environment and future maintenance requirements
- Concern about potential overheating/glare

Financial viability, business case and value for money

- Question whether sufficient consideration has been given to alternative delivery and funding mechanisms before pursuing current approach (eg concession agreements, long leases, development partnerships or third-party operational models); see other successful examples in the country
- Question of proposal represents good value for money especially if leisure offer is reduced; alternatives including refurbishment are better value and achieve similar outcomes
- Concern about escalating and significant construction costs and long-term implications for council and public; need to reduce long-term borrowing and transfer elements of operational and delivery risk
- Ability of income from scheme to offset financial commitment required for its delivery is uncertain
- Questions raised about funding sources and the business case for the scheme

Consultation, transparency and decision-making processes

- Dissatisfaction with consultation process and scheme development; not transparent; cabinet reports rely on high-level assertions that are not evidenced
- Previous concerns and points raised about scheme not influenced evolution of scheme; decisions made before consultation ended; childrens offer was not explained; younger people under represented in consultation/engagement
- Difficulty accessing documents, understanding plans/participating in consultation
- Relationship between leisure centre and wider redevelopment plans not clearly explained; more information about future phases needed
- Proposal does not comply with Environmental Impact Assessment requirements or heritage consent procedures
- Proposal has real risk of significant environmental effects therefore a full Environmental Impact Assessment and cumulative impact assessment are necessary in order to properly understand the environmental, visual and community impacts of the wider proposals.
- Concern that information and evidence provided in support of application is not robust, has inconsistencies and is insufficient; limited information about alternatives considered

Other

- Detrimental affect on property value

- 7.2. **A petition of 1,917 signatures** has been submitted from 'One site, One Plan' which supports the principle that the proposed King Alfred Leisure Centre and the associated residential development should be presented and assessed together as a single masterplan ("One Site, One Plan"), enabling the public and decision-makers to properly understand the cumulative environmental, visual, transport and community impacts of the redevelopment.
- 7.3. A total of **forty-nine (49) representations** of support have been received on the following grounds:

Modern fit for purpose facility/will encourage health lifestyles

- Proposal provides a significant opportunity to provide an improved and modern fit for purpose leisure centre
- Overall mix of leisure and other uses will create an attractive destination for both residents and visitors (including those who don't use current facility); will be well used for swimming, rehabilitation and fitness on a regular basis, in facilities more in line with modern leisure expectations
- Gym and fitness suite would be a significantly larger and improved offer over the existing
- Important investment in leisure, public health and wellbeing is welcomed; will benefit locals, visitors and meet the needs of future generations
- Will support healthier lifestyles, community wellbeing and social inclusion and tackle health inequalities; will be more accessible/inclusive
- Proposal involved extensive engagement with user groups

Sustainability

- Scheme provides opportunity to deliver a more energy-efficient and sustainable building equipped to meet modern environmental standards; welcome provision of renewables such as PVs and ASHPs
- Scheme makes effective use of the site; provision of underground parking is supported
- Cycle parking provision welcomed, site well served by cycle routes

Shortcomings of existing building/retrofitting not appropriate

- Retrofitting building the wrong approach, status quo is not a realistic option and restricts opportunities; major investment needed; new build solution provides greater certainty and reliability of long-term performance, operational efficiency and future maintenance and accessibility
- A new modern facility would be more accessible and better suited to needs of wider range of users; is more welcoming and will be better experience
- Existing structure requires replacement has reached end of life – is deteriorating, contains ageing infrastructure, operational issues, lift failures, inconsistent pool conditions, safety concerns, hygiene concerns and accessibility limitations

- Acknowledgement of valuable role existing King Alfred played in supporting disabled swimmers and recognises the building suffers shortcomings; proposal provides opportunity to improve
- Refurbishment alone may not fully resolve many of the existing buildings structural and operational limitations; redevelopment is long overdue and is urgent
- Retrofit approach would result in lengthy closures and ongoing disruption to users

Good design/enhancement of seafront

- Scheme is well designed, attractive, stylish and contemporary; creates visually improved landmark compared to existing
- Public realm proposals and inclusion of generous green spaces are attractive and an enhancement to seafront
- Will help revitalise this area of seafront

Housing

- Future housing provision welcomed given the need

- 7.4. A total of **nineteen (19)** representations of 'general' comment (neither solely supporting/objecting) have been received (which cover the grounds outlined in the sections above)

Full details of all representations are publicly available on the Planning Register.

8. CONSULTATIONS

Internal:

8.1. **Air Quality:** No objection

An Air Quality Assessment and further Clarification Note has been submitted. The submitted information concludes that the proposed development is not expected to introduce sensitive receptors into an area of poor air quality (air quality at the site is relatively clean compared to most urban areas in the UK & Europe), nor is it anticipated to result in any significant adverse effects on local air quality, including adjacent to the local road network.

- 8.2. The overall assessment methodology and conclusions of the submitted information are robust. The site is considered to be suitable, in air quality terms, for its proposed end use. The proposal includes several transport-related measures through promotion of sustainable modes (Travel Plan) and there is the adjacent A259 Active Travel Scheme, plus a proposal for EV charging infrastructure – these are an appropriate package of mitigation measures to minimise any potential air quality impacts associated with the proposed development's operation.

- 8.3. Conditions recommended to ensure no static combustion, space/connection to any future district heating schemes, inclusion of air or ground source heat pumps, use of compliant vehicles during construction if possible and inclusion of electric charging infrastructure for cars and e-bikes.
- 8.4. **Environmental Health:** Approve subject to conditions.
The submission includes a Construction Environmental Management Plan (CEMP), an Environmental Survey & Preliminary Acoustic Design report, a Ventilation and Extraction Statement, a Ground Investigation Report and a Lighting Report.
- Noise- construction stage
- 8.5. The CEMP includes details of how the developer will mitigate the impact of construction noise, vibration, dust and obtrusive light, and a plan for community engagement and a complaint handling procedure. Details of monitoring locations for noise, vibration and dust will need to be provided as predicted levels are unknown and a plan to manage any exceedances is not included. There should be no noisy work/activities except between 8am-6pm on weekdays and 9am-1pm on Saturdays.
- Noise- operational stage
- 8.6. The submitted reports give an indication of likely impact of the new centre (and associated plant) on existing sensitive receptors. It demonstrates that the background levels at the closest receptors would not be exceeded. The building envelope will be designed to prevent any undue noise breakout. Conditions can seek further detail/mitigation as required.
- Odour
- 8.7. The submitted documents demonstrate the odour control proposed for the kitchen will be adequate for low-risk cooking activity (eg pre-heating). The exhaust would be more than 20 metres from residential uses, which is welcomed. If the cooking type changes over time and results in an identified nuisance, the Environmental Projection Team can review and secure further mitigation as required.
- Contaminated Land
- 8.8. The submitted documents identify the site contamination risk rating as low to moderate. Contaminant concentrations are found to be below commercial screening values and no asbestos was detected. Localised elevated PAHs and lead were noted, as well as hydrocarbon odour at one borehole. Recommended that workers protected and watching brief maintained throughout. Further groundwater testing recommended and ascertain what measures might be required to contain mobilisation of contamination if it exists. A pile risk assessment and specific soakaway design may be required to protect the underlying aquifer and groundwater – the Environment Agency should be consulted. Standard contaminated land condition recommended (with discovery strategy condition only to apply to temporary car park).

Lighting

- 8.9. The submitted reports identify the proposal as falling in the E4 zone with pre-curfew and post-curfew levels of 25 and 5 lux respectively, and contains details of controls to minimise obtrusive lighting. The applicant will have to demonstrate that illuminance limits can achieve stricter Zone 3 requirements to reduce the likelihood of the proposed lighting adversely impacting amenity.

Temporary Car Park

- 8.10. The additional drainage information and proposed design, with a lined permeable pavement/sub-base storage system and geo-cellular attenuation, is acceptable. Permeable asphalt for bays over a modified sub-base with impermeable membrane would adequately prevent infiltration to ground. No infiltration is proposed as no deep borehole soakaways proposed. No petrol/oil interceptors are required. There will be controlled sewer discharge on Hove Street. Only light vehicles should use the car park.

Conditions

- 8.11. Conditions are therefore recommend to cover the following:
- Revised CEMP
 - Noise from plant/machinery and post completion testing
 - Design specification for studios and sports hall
 - Noise Management Plan
 - Contaminated land
 - Discovery Strategy
 - Lighting Impact Assessment
 - Temporary car park implemented with drainage details and light vehicles only

- 8.12. **Heritage:** Comment

Original scheme prior to amendments:

Summary:

The proposal is considered to result in less than substantial harm (lowest end of the scale) to Pembroke and Princes CA and Old Hove CA and Para 215 of the NPPF is relevant in considering this harm, and Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposal will also result in a low level of harm to the significance of the locally listed Western Lawns, St Aubyns Mansions and potentially the seafront shelter. Para 216 of the NPPF is relevant in considering this harm.

Main Comment:

- 8.13. There is a number of heritage assets in the vicinity of the site which have potential to be impacted by the development including 3 conservation areas: Pembroke & Princes CA (partially within the site), Old Hove CA and Cliftonville CA. There are nearby listed buildings including Grade II 2-6 St Aubyns and 157 Kingsway (Barford Court). There locally listed assets – Western Lawns and seafront shelter

(within the site), seafront railings and St Aubyns Mansions. There are 3 non-designated historic street light columns. There are other heritage assets in the wider surroundings but these are unlikely to be impacted by the proposal due to distance from the site, limited visibility and intervening development.

- 8.14. The submitted Heritage Statement identifies the assets above and concludes there will be no harm caused. The site is considered to make a neutral contribution to the settings of Cliftonville CA, Barford Court and 2-6 St Aubyns. The site forms part of the wider seafront setting of these assets, but due in part to the distance between the site and the assets and existing built form, the proposal is not considered to detract from the ability to experience their significance.
- 8.15. The site for the temporary car park on the Western Lawns is locally listed and within the Pembroke & Princes CA and has historic and evidential interest, townscape interest and makes an important contribution to the significance, character and appearance of the Pembroke and Princes CA. The temporary loss of part of the Western Lawns is considered to be harmful even though the harm is limited to a 2 year period. The harm, although temporary, is less than substantial and at the lowest end of the scale. Once the car park ceases and the area is restored, the harm would be removed.
- 8.16. The Character Statement for the Old Hove CA notes 'There are good views up Vallance Road to Church Rd and down Vallance Gardens towards the sea, although the view is truncated by the King Alfred buildings'. The development would see removal of the small building terminating the view from Vallance Road looking south towards the seafront, which is beneficial as it partially opens up the view. However, the new building will introduce new massing and detract from the view and could result in a degree of harm to the CA's significance - the harm is less than substantial and at the lowest end of the scale.
- 8.17. The locally listed St Aubyns Mansions form a visual focal point along Hove seafront and there are views from the west where its architectural interest can be appreciated, although these views are partially curtailed by the existing leisure centre. The proposal would remove the partial open sky silhouette of the Mansions and undermines the appreciation of it. The proposal would therefore harm the significance of the Mansions through change in its setting.
- 8.18. Retention of the historic street light columns in situ is supported and repair and restoration (secured by condition) would be a heritage benefit. Repair/restoration of seafront railings would also be a benefit. The Heritage Statement says the locally listed seafront shelter will remain in situ but its relocation is discussed in other documents. It appears the shelter is not in its original position but has been there since 1909. Its location at the seafront is a key aspect of its setting and significance and it should remain on the promenade, not within the new public realm as that would not best preserve its significance. A schedule for the repair

and restoration of the shelter can be secured by condition to secure the heritage benefits of this.

- 8.19. Notwithstanding the impacts identified, the design of the proposal is not considered to enhance the streetscene along Kingsway. There is the opportunity to create a new building which celebrates its seafront location and the unique character and distinctiveness of Hove. The north-west corner in particular is not sympathetic to the streetscape or setting of heritage assets. Its blocky form and lack of articulation or active frontage mean it is not an attractive addition to Kingsway- it is recommended the design and massing of this element be revisited.

Amended scheme:

- 8.20. In summary, the heritage impacts identified in the comments above remain unchanged (other than the impact from the relocation of the shelter), and recommendations regarding the securing of repairs and restoration of the lighting columns and shelter remain relevant.
- 8.21. The additional photo viewpoints reinforce the comments stated above with regard to impacts to 2-6 St Aubyns and views down Vallance Gardens. The revised design of the north and west elevations is an improvement and go some way to reduce the visual impact of its massing. However, large elements of the building remain green/dark green in colour (shown illustratively), and this is not considered appropriate. Whilst dark green features in the seaside railings and historic shelters, it is not a prominent building colour and is not found covering large areas. It is recommended that the proposed green colour is reconsidered.
- 8.22. It is now proposed to relocate the historic shelter closer to the seafront to enable a more open aspect to the south of the landscaped area beside the proposed building. This location is considered appropriate for the shelter (which has been moved historically) as it retains its relationship with the seafront. Its relocation will not result in harm to its significance.
- 8.23. **Net Zero:** Comment
Original Comments:
The NPPF requires development to support the transition to a low carbon future, and encourages the reuse of existing resources and supports renewable and low carbon energy and associated infrastructure. Relevant key City Plan policies include DM18, DM44, DM45, DM46, CP8, SA1 and those in the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan. Policy CP8 seeks to minimise environmental impacts and promote efficient use of resources.
- 8.24. The proposal meets Policy CP8 with regard to emissions relative to Part L of Building Regulations and BREEAM 'excellent' standard (which should be conditioned). An EPC rating of 'A' is expected, and at least 'B' should be conditioned in line with policy. The proposed use of air source heat pumps

(ASHP) and photovoltaic panels (PVs) strongly support compliance with policies DM44 and CP8. LED lighting will also optimise operational energy efficiency. Applicant is encouraged to target further BREEAM credits to prevent slippage and also should ensure designs are future proofed, so they are compatible with any potential future heat network.

- 8.25. A mixed-mode ventilation approach is proposed – further information is required to demonstrate that thermal comfort will be maintained. Details aligned to BREEAM water credits have been submitted including measures to reduce water use associated with pool operation, such as pool covers, microfiltration systems and reuse of backwash water, which are welcomed and support compliance with Policy CP8. Rainwater harvesting could be a potential additional measure however further information required. The inclusion of a green roof is welcomed and supported, particularly for its potential to enhance biodiversity and contribute to urban cooling by mitigating overheating. Further detail about the proposed irrigation strategy should be sought.
- 8.26. It is welcomed that the Site Waste Management Plan (SWMP) demonstrates an understanding of circular economy principles, including application of the waste hierarchy and commitments to waste reduction, reuse, and the use of recycled content. The Construction Environmental Management Plan (CEMP) partly covers this but further information is required. The applicant is encouraged to outline circular economy principles, commission an audit for feasibility of on and off-siter material re-use and prepare a material inventory. The applicant has provided additional information relating to circular economy principles, including a commitment to the reuse of structural steel, with an estimated reused steel rate of approximately 35%. This is welcomed and demonstrates positive consideration of material efficiency.
- 8.27. The National Planning Policy Framework (NPPF) encourages the reuse of existing resources, including the conversion of existing buildings where practicable, recognising the potential sustainability benefits associated with retaining embodied carbon. In addition, paragraph 2.143 of DM18 states “Development proposals should...take into account the principles of the circular economy to minimise the use of new materials, avoid waste and support high recycling rates through consideration of innovative building design, designing for adaptability, flexibility and re-use.” The Planning Addendum provides a detailed explanation of the decision-making process, including a comprehensive options appraisal considering refurbishment, redevelopment and alternative sites. This demonstrates that refurbishment of the current facility was assessed and discounted due to constraints relating to lifespan, performance and deliverability. This indicates that re-use was not considered practicable. A clear strategic and operational case for redevelopment has therefore been established. While redevelopment is expected to improve operational performance, and the design and access statement sets out how embodied carbon was minimised, the information submitted does not include a quantified estimate of whole life carbon

impacts, including the balance between embodied and operational emissions. Such an assessment is not a specific policy requirement, however, and although it is recognised as industry best practice and can provide a useful evidence base to demonstrate how the proposal minimises emissions over its lifetime, it is not considered necessary under the relevant planning policy. The applicant is encouraged to consider undertaking this to further support the sustainability case for the development.

- 8.28. Conditions recommended to cover BREEAM 'Excellent' standard, EPC rating of B, incorporation of low and zero carbon technologies (PV array, ASHP, DHW and use of LED lighting), details of green roof and SWMP.

Further comments following receipt of further information:

- 8.29. The information regarding solar overheating and thermal comfort of the pool area is satisfactory; separate air feed is provided for gains caused by spectator occupancy. Rainwater harvesting is not proposed but could be addressed via condition and justified if not included. Circular economy information is satisfactory and ensures longevity and consideration of aggregates. A whole life carbon assessment of the proposal has been provided, which is useful and is encouraging. It does not cover operational carbon or for the alternative, discounted, case where the existing building is refurbished.

- 8.30. **Planning Policy:** Support Principle of Sports Facility

The King Alfred site is a strategic allocation within CPP1 Policy SA1 'The Seafront'. This policy seeks the redevelopment of the site whilst ensuring the replacement of indoor public wet and dry sports facilities. Ancillary retail and café/restaurant uses are also acceptable as part of a mixed use scheme. Policy CP17 'Sports Provision' supports the replacement and enhancement of the sports provision currently provided at King Alfred to help to ensure Brighton & Hove provides the type and quality of facilities expected from a regional urban centre. The principle of developing the site with a new leisure centre and pool is therefore strongly supported.

- 8.31. The submitted Statement of Community Involvement demonstrates that the community and local stakeholders helped shape the proposals for the site. Policy CP18 'Healthy City' requires a Health Impact Assessment (HIA) on all strategic developments in the city. This proposal involves a reduction in overall indoor sports floorspace over the wider site; however, the submitted HIA reports that the scheme increases sports capacity and quality of provision; and is expected to increase participation in physical activity, support preventative health outcomes and help reduce inequalities in access to sport and recreation. The Council's Public Health Team will provide further comments on the HIA, and comments of the Council's Sports Facilities Team will also be relevant in terms of considering whether the scheme demonstrates an enhancement and more effective use of the space.

Future Residential Development

- 8.32. 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. The SA1 allocation includes the provision of a minimum of 400 residential units. Brighton & Hove has a very high standard method housing need figure which it is required to seek to meet through the emerging City Plan. There are few large strategic development sites in the city, and it is important the development potential of those that are available are maximised in line with CPP2 Policy DM19 'Maximising Development Potential'. Future residential development on the remainder of the site should be considered in the design of the leisure centre to ensure that the development potential of that part of the site is not compromised. It is noted that the application includes an indicative masterplan addressing this issue.

Design and Heritage

- 8.33. Policies CP12, SA1 and DM39, and SPD17, are relevant with regard to design, sustainability and the coastal zone. It is welcomed that materials suitable for its maritime location, layout, landscaping access and movement are considerations which have been set out in the Design and Access Statement which includes an Indicative Masterplan. In terms of heritage, the site is in the vicinity of 3 Conservation Areas and a number of listed buildings, and the impact of development on heritage assets needs to be considered. A Heritage Assessment has been submitted with the application and the Heritage Team and Archaeologist will comment in this regard.

Flood Risk and Sustainable Drainage

- 8.34. This site is adjacent to the Seafront and Promenade. Policy SA1 c) requires the provision of appropriate flood protection and mitigation measures in accordance with CP11 'Flood Risk'; and SA1 e) states the development must connect to the sewerage system off-site at the nearest point of adequate capacity. Policy DM43 'Sustainable Drainage' and additional guidance within SPD16 require the design and layout of all buildings and the development of car parking and hardstanding to incorporate appropriate SuDS. A site-specific flood risk assessment (FRA) has been submitted which concludes that further sequential and exception tests are not required for this application. The FRA recommends a number of mitigation measures for tidal, sewer and surface water flooding. Comments should be sought from the Lead Local Flood Authority.

Transport and travel

- 8.35. Policy SA1 d) seeks the provision of sustainable means of transport to and from the King Alfred/RNR site while demonstrating good linkages for pedestrians and cyclists. New development should incorporate measures to support sustainable and active forms of transport in accordance with policies CP9 'Sustainable Transport' and DM33 'Safe, Sustainable and Active Travel'. Parking provision for cycles and cars should be in accordance with SPD14 Parking Standards for New

Development and policy DM36 'Parking and Servicing'. Comments from the Council's Transport Team should be sought in this regard.

Nature Conservation and Green Infrastructure

- 8.36. Policies CP10, DM22, DM37 and DM39 are relevant. Policy SA1 b) seeks high quality, integrated and attractive landscaping and public realm which promotes biodiversity in accordance with Biosphere objectives. It is noted that the Biodiversity Net Gain (BNG) Assessment states that a landscaping scheme has been developed with a twin focus on biodiversity and resilience to the harsh coastal environment and related climate change projections. This assessment also states that planting of small shrubs and trees will be carried out. A Bat Survey has also been submitted. The mandatory requirement to provide 10% BNG has been introduced through the Environment Act 2011 and relevant regulations. Biodiversity Net Gain documents have been submitted to support the planning application. Further comments will be required from the County Ecologist and the Council's Arboricultural team.

Sustainability

- 8.37. Policy CP8 'Sustainable Buildings' sets out that the council seeks all new development to incorporate sustainable design features to avoid expansion of the city's ecological footprint, help deliver the principles of the One Planet approach, radical reductions in greenhouse gas emissions, particularly CO2 emissions, and mitigate against and adapt to climate change. It requires non-residential development to achieve BREEAM 'Excellent' for major development. SPD08 also applies. The summary of the BREEAM pre-assessment review is excellent, which is welcomed. Policy DM44 'Energy Efficiency and Renewables' require newbuild non-residential development to achieve a minimum Energy Performance Certificate (EPC) rating 'B'. The submitted energy statement is required to provide details of the building fabric efficiency and low and zero carbon energy technologies used including the size/capacity of the systems and the estimated CO2 savings that will be achieved. Views of the Council's Net Zero Team should be sought.

Contamination and Amenity

- 8.38. Policies DM20 Protection of Amenity and DM40 Protection of the Environment and Health – Pollution and Nuisance apply. Comments from the Council's Environmental Health Team should be sought in regard to the application scheme and associated documents including Land Contamination; Environmental Survey and Acoustic Design; External Lighting; Construction Environmental Management Plan.

Waste

- 8.39. Development will need to take account of policies in the Waste & Minerals Plan including Policy RM0 Sustainable use of aggregates, which requires developers to minimise the amount of aggregates and prioritise the use of recycled and secondary aggregates in place of primary materials wherever possible as part of

consideration of the sustainable use of aggregates. WMP 3d Minimising Waste During Construction, Demolition and Excavation also applies. A Construction Environmental Management Plan has been submitted. The case officer should verify this is adequate and meets policy requirements in relation to minimising waste - a Site Waste Management Plan should be secured by condition to help meet this policy requirement. Policy WMP3e of the WMP requires proposals for new development to identify the location and provision of facilities intended to allow for the efficient management of waste, e.g., location of bin stores and recycling facilities

Public Art

- 8.40. To comply with planning policies CP5, CP7, CP13 and DM18, and PAN10, an artistic component should be provided within this major and prominent scheme. In accordance with the adopted Developer Contributions Technical Guidance this should equate to a minimum cost of £65,000.

8.41. **Public Health:** Comment

Key policies and strategies applicable include: Brighton & Hove City Plan, in particular policies CP18, SA6 and SA1; Physical activity in Brighton & Hove 2022 and JSNA Joint Strategic Needs Assessment (JSNA); Health Counts 2024 Report by Brighton and Hove City Council – Infogram; Let's Get Moving; LTP5 and LCWIP; Public Health Annual Report on healthy weight; Annual Report of the Director of Public Health 2024 - Whole City Healthy Weight; Food Strategy Action Plan-2025-2030; Age and Dementia Survey Report 2024 to 2025.

- 8.42. We welcome the Developer completing a comprehensive HIA in alignment to the Council's HIA Framework and guidance, and in accordance with City Plan Policy. The Developer has responded against the criteria for Healthy Housing, Active Lifestyles and Safe and Vibrant Neighbourhoods outlining an approach and associated mitigation.

- 8.43. It is understood that animating parts of the leisure centre will attract visitors and users however, it is unclear how the new leisure centre will be designed and built to ensure that targeted populations are able to easily access the site and its facilities, removing barriers to participation and addressing inequalities. Further information is required. There is reference to community engagement having taken place to inform the design process however it would be helpful to understand whether there will be continued engagement throughout the design and build planned. It is important to ensure that less active groups identified are equitably engaged with and their feedback harnessed to strengthen the accessibility and inclusivity of the development. Planning conditions should seek to ensure inclusive and accessible considerations have been incorporated into the detailed design.

8.44. **Seafront Team:** Support

The scheme is welcomed and strongly supported and represents a major opportunity to reinforce the long-term vision for this part of the seafront and a high-quality destination for sport, leisure and community use that serves both local residents and visitors across the city. The proposal complements Hove Beach Park and strengthens the city's sports and leisure offer and the potential to deliver long-lasting benefits through high-quality public realm, inclusive design and robust coastal resilience. With careful attention to movement, materials, wind, safety and the location of key elements such as the shelter, the redeveloped King Alfred Leisure Centre can become a landmark destination and a valued asset for Hove and the wider city.

- 8.45. The proposal fits well with the council's strategic ambition for a cohesive, active and inclusive seafront. The site is a key transition point between Hove seafront and Hove Beach Park and can be a significant civic anchor. It would complement outdoor sports and play a vital role in encouraging healthy lifestyles and reinforces the seafront's role as a place for wellbeing, recreation and social interaction.
- 8.46. The proposed public realm around the building is strong and well-considered; it would act as a gateway to the seafront and allow physical and visual permeability. Stepped and ramped elements will need to anticipate that skateboarders/BMX riders may be attracted and need to be durable. Use of the areas as event spaces would link the site to wider programmed and unprogrammed seafront events. Soft planting should be realistic and appropriate to its coastal location. Robust material specification for the building and public realm will be critical. The scheme demonstrates good consideration of safety and management
- 8.47. The proposed historic seafront shelter should be relocated in a less constrained position on the promenade, not within the new eastern public realm. Its final position would need to take account of pedestrian flows.
- 8.48. **Sports Facilities: Support**
Summary:
The proposal broadly meets the criteria set out in the council's Sports strategies and policy documents, which the Sports Facilities team aim to deliver. As such the application is supported subject to feedback from other consultees, with caveat of the window in the north elevation.

Main Comment:
- 8.49. Relevant council strategies and policies include: City Plan policies particularly CP17 and CP18; Sports Facilities Plan 2012-22 & Sports Facilities Investment Plan 2021-2031 (SFIP); Physical Activity & Sports Strategy 2024-2034 'Lets get Moving'; and Brighton & Hove Health and Wellbeing Strategy 2019-2030.
- 8.50. The provision of a new West Hub to replace the King Alfred Leisure Centre was a key recommendation of the SFIP. The SFIP was developed to provide leisure

facilities that are relevant and based on evidence and need, informed by public stakeholder consultation and a review of local, regional and national strategies. As a result, the proposal broadly meets these core objectives.

- 8.51. One of the principles of the SFIP is to improve the financial viability, long term sustainability and accessibility of sports facilities in the city and the replacement of an ageing, inefficient and operationally uneconomical building is achieved through this application.
- 8.52. Many of the facilities proposed in the SFIP have been incorporated into the final designs of the proposal. There are some areas where the proposals either do not quite fully meet or exceed the recommendations in the SFIP. It is clear where there have been alterations to the features mentioned in the SFIP, these are primarily due constraints of the site and budget. Swim England have provided a letter of support.
- 8.53. The application proposal also meets the objectives of other related strategies and City Plan policies CP17, CP18 and DM9. It meets the aims of the Council Plan (2023-27) for a 'fair and inclusive city', 'a healthy city where people can thrive' and 'a city to be proud of'. The proposal would help support the 5 key areas of focus of the 'Lets Get Moving' strategy including Active People, Active Communities and Active Environments. The City Plan values the contribution sport and physical activity makes to the city and identifies this site as one of a number for development of future sports provisions. The City Plan recognises that despite good progress in recent years, sport and recreation facilities are still inadequate for a city of the size and regional importance of Brighton & Hove. The Sports Facilities Plan 2021-22 clearly identifies weakness in the city's facility provision and public consultation exercises have prioritised facility development as a major issue for sport in the city.
- 8.54. Concern is expressed about the introduction of a window in the north elevation due to the effect of glare/light into the sports hall and blinds would be insufficient and susceptible to damage and dust/dirt accumulation.
- 8.55. **Sustainable Drainage: Comment**
Parts of the site are indicated as being at risk of surface water flooding and where below ground assets are at risk of groundwater flooding. Although site identified as Flood Zone 1 it is very close to coast. Therefore a Flood Risk Assessment (FRA) was submitted.
- 8.56. The FRA is robust and its recommendations should be implemented. Further drainage details and mitigation measures if required should be secured via condition.
- 8.57. **Sustainable Transport (Local Highway Authority): Acceptable subject to conditions**

In transport terms, Policy SA1 places particular emphasis on ensuring inclusive access to the seafront, securing sustainable means of travel to and from the site, and demonstrating good pedestrian and cycle connectivity. The policy also identifies the A259 (Kingsway) corridor as a key location for improvements to sustainable transport infrastructure, public transport, pedestrian and cycle routes and crossing opportunities, in order to reduce severance and support modal shift.

- 8.58. The application is supported by a comprehensive Transport Assessment (TA), Interim Travel Plan, Access & Maintenance Strategy, Design and Access Statement, Equality Impact Assessment, Delivery and Servicing Management Plan and updated Transport Note. The methodology used for the TA, and its conclusions, are considered robust. While the proposed leisure centre represents a reduction in overall floorspace when compared to the existing facility, the submitted TA identifies that the modernised layout, enhanced facilities and operational efficiencies are expected to result in an intensification of use and increased visitor throughput, however, the traffic impact of the proposal remains small compared to background flows. The proposal would not result in a material deterioration in highway operation or give rise to severe residual impact, consistent with local guidance and the NPPF.
- 8.59. The forecast pedestrian movement can be satisfactorily accommodated and would benefit from the A259 Active Travel scheme. Inclusive access principles for walking and cycling have been established and are supported by the submitted EqIA. The public realm works including plaza to the east of the new building are welcomed in principle. The levels are challenging and the design incorporates step-free access. Detailed design matters, including route gradients, surfaces and legibility, shall be secured through the highway works and landscaping conditions, to ensure it is fully inclusive and free of clutter. It will be important that the clarity /legibility of pedestrian routes for mobility and/or visually impaired users. The applicant has confirmed that Participative Inclusive Design (PID) processes will be carried forward into the detailed design stage. Full public access should be secured via condition.
- 8.60. The development benefits from direct adjacency to the A259 Active Travel Scheme and the wider cycle network. Cycle links are broadly acceptable. Until A259 Active Travel Scheme works are in place the current arrangement should remain, including during construction (secured in the CEMP). The site is served by bus stops on A259 but this is not a principal public transport corridor, with majority of frequent and higher patronage bus services operating to the north along Church Rd (some 500m). The accessibility of the site is therefore somewhat constrained and bus mode share is currently quite low (7%). Measures to promote and improve public transport and sustainable transport options should be sought via a full Travel Plan. Improvements to wayfinding from Church Rd bus stops and provision of real-time information in new centre should be secured.

- 8.61. The TA includes details of how the scheme would overlap with forthcoming A259 works. Servicing will take place from the A259 and associated highway works are proposed. Given the loading bay sited close to the Hove Street junction, this will need to be 'monitored and managed' via the s278 process. Hove Street South can be a fallback alternative if required, and a Delivery and Servicing Management Plan should be secured via condition. Emergency access is retained via Hove Street South and turning facilities demonstrated on the plans. In addition, all arrangements for kerbside access from the A259 shall be subject to post-occupation monitoring and RSA Stage 4 review, with Traffic Regulation Orders managed through the Section 278 detailed design process. A level crossing point over the cycle lane is proposed and needs clear definition. Use of bus stand for coach parking will need monitoring via the Travel Plan. The drop-off on Hove Street South is acceptable and details including enforcement to be secured via condition. The TA has taken into account the forthcoming banned left turn for westbound traffic on the A259 approved as part of Active Travel Scheme and has demonstrated an acceptable impact. There is no evidence base or requirement within this application to justify amending or reinstating the left-turn movement.
- 8.62. The overall parking provision, including the temporary car park and subsequent reprovision of public parking in the undercroft car park remain acceptable in principle. There are no directly applicable maximums set out in SPD14, but the quantum and strategy have been assessed and are considered appropriate for the scale and nature of the continued use. The provision of disabled parking has been addressed through the updated submission, and the Local Highway Authority is satisfied that the required level of provision can be achieved. Cycle and motorcycle parking provision is acceptable in principle. Details of both the temporary and undercroft car park should be subject to detailed design and operational controls through layout and management conditions.

Recommend conditions including:

- Construction Environmental Management Plan (CEMP)
- Delivery and Servicing Management Plan (DSMP)
- Highway Works Scheme (Section 278)
- Detailed Car Park Layout
- Car Park Management Plan
- Cycle Parking Scheme
- Full Travel Plan (including monitoring and review)
- Public Access / Plaza Access
- Landscaping (plaza design)
- Temporary Car Park Detailed Design and Management

8.63. **Tourism and Leisure:** Support.

To sustain and grow the city's visitor economy it is essential the city continues to innovate and invest in the portfolio of leisure assets to appeal to both residents and visitors. Sports and physical activity significantly contribute to the quality of

life and the economy. The leisure centre would provide for year-round healthy lifestyles and facilitates inclusion for all, and should be supported.

8.64. **Urban Design:**

Original scheme – amendments required

The proposal is located on a prominent site on the seafront, and will deliver an important facility for the city, and it requires a high-quality civic design which responds well to its context and function. The proposal presents some clear benefits related to updated and replaced leisure centre infrastructure and facilities, and would deliver redeveloped land to increase the provision of public realm in the area of the city, which is welcomed.

8.65. The design of the scheme requires improvement and revisions are sought. In particular, the Sports Hall facades (north and west) are not sufficiently activated and there is a significant need for activation/articulation of building, in particular the north-west corner to ensure a welcoming gateway. There needs to be more of a balance between functional interior spaces and external appearance. Need to explore window for sports hall- there are successful examples of this, look at integral shutters. Explore different facade treatments, lighting, framing of sky, public art elements, planting. Seek improved CGIs.

8.66. The landscape design requires further discussion it is somewhat compressed at the southern end, it could be simplified. It needs to be inclusive design. The level changes are not ideal but recognised this is due to car park ceiling height and constraints of the site. Seafront shelter in new public space not convincing and adds clutter and obscure views – applicant is exploring relocation on lower promenade.

8.67. The indicative masterplan does not account for all constraints (e.g. heritage and seafront views) so the footprint placement, scale and massing may not be deliverable as shown. Further work will be needed to ensure a well-considered and connected masterplan. SPD17 identifies the site as suitable for tall buildings in principle. Ideally the leisure centre would have more civic stature so not dominated by future housing.

8.68. Servicing requires careful consideration. Ideally refuse would be to the west not north. Further information about dealing with solar gain should be provided. All materials need to be marine grade and robust.

Updated scheme (June 2026): No objection subject to condition

8.69. There is no objection to the revised scale/mass/appearance of the sports hall; this addresses some of the key urban design issues and recommendations. The most significant design improvement relates to the sports hall facade design facing Kingsway (north elevation) and Hove Street (West elevation) and its formation as a SW 'gateway' corner as shown within the townscape and heritage impact views 3, 4 & 5. The amended sports hall facade is now sufficiently

activated and positively formed, subject to recommended detailed design-related planning conditions. The façade composition is now significantly improved with ground floor sporting motifs / images and up-lighting - and the cut-out parapet sections with balustrade and aprons - all of which work well by providing multiple framing of the sky and visual breakup of the monolithic mass. These key amendments both compensate for the lack of fenestration and will animate the sports hall's crown providing visual depth to the building. This parapet design also helps to give the LC building in some sense a pavilion-esque character despite the lack of terracing found elsewhere on the south coast in enduring public buildings.

- 8.70. Given the lack of clerestory fenestration, the proposed dark green undulating metal cladding continues to present as visually heavy; a lighter colour that responds to its context and King Alfred identity is strongly recommended. The use of dark green metal cladding material works in the street scene when used for landscape furniture and contrasts well with the lighter tones of building masses across the city (e.g., systems such as drainage goods and other fenestration components) and of course patinated green copper roofing materials - but it does not (generally) form a positive appearance if used as the main cladding material. The use of metal cladding in dark heavy tones is less successful than compared to other materials such as mathematical tiles (Old Steine and Jubilee Library). The specification of the metal cladding should be selected from a marine anodised aluminium colour palette. It would be helpful to add a condition to explore or provide flexibility to extend the cut-out parapet – as it currently appears somewhat incomplete – terminating abruptly.
- 8.71. The Design Review Panel and previous urban design advice has sought to promote a pavilion building design with external terracing as is successfully demonstrated at the De La Warr Pavilion in Bexhill, Saltdean Lido, and the recently completed Hove Beach Park Bowls pavilion, to the west. It is assumed that budget limitations preclude the pavilion typology. In absence of sufficient budget, it should be confirmed that the building design and construction would allow for future upward extension(s).
- 8.72. The current S/E entrance shown in plans is designated for back of house or occasional event use (only) - but this should be revised to function as a general entrance. Microclimate conditions can be mitigated by design as demonstrated elsewhere across the seafront.
- 8.73. As previously raised, if time and budget allow, the car parking strategy should ideally be revised to resolve landscape and inclusive design issues identified in previous urban design advice. To justify and rationalise the proposed design (or change thereof) an inclusive accessibility design audit with local group(s) is encouraged to inform the final landscape design. Seek improvements/amendments to landscape design and accessibility via condition.

External

- 8.74. **County Archaeologist:** Approve subject to conditions
The site is not within an Archaeological Notification Area but lies within an area of known prehistoric potential. The application is supported by an Archaeological Desk-Based Assessment, which provides a clear assessment of the site's archaeological potential, established from appropriate sources, and we concur with the conclusions of the ADBA.
- 8.75. The site has high potential for post-medieval and modern periods, low to moderate potential for prehistoric and medieval periods and low potential for Romano-British and Anglo-Saxon periods. The ADBA also highlights the proximity of Head deposits and potential to preserve evidence for prehistoric land use and evidence related to development of Hove village. Works to the west identified deposits that may be related to the Brighton-Norton raise beach; these have potential to contain significant evidence for past climate change, landscape evolution and human interaction.
- 8.76. Conditions required to secure a programme of archaeological works in accordance with an agreed written scheme of investigation (confirmed for all phases).
- 8.77. **Conservation Advisory Group (CAG):** Objection (original scheme)
The proposal fails to realise the exceptional architectural opportunity presented by this landmark seafront site and would cause harm to the character and appearance of adjoining conservation areas, the setting of designated and non-designated heritage assets, and important seafront views.
- 8.78. The design is considered architecturally unambitious and insufficiently responsive to its highly sensitive heritage context. The scheme prioritises functional requirements but lacks the quality, character and distinctiveness expected of such a significant waterfront location.
- 8.79. The building's scale, massing and appearance are considered inappropriate for this prominent seafront location. The proposal would have an overly dominant presence within the townscape and would cause harm to the character and appearance of adjoining conservation areas, the setting of nearby heritage assets and the wider Hove seafront. Concern about lack of verified view from Grade II Listed St Aubyns.
- 8.80. Kingsway frontage fails to enhance one of the city's principal gateway routes and north-western corner appears overly bulky and insufficiently articulated. Similar concerns arise in key views towards the sea from Vallance Road and Hove Street. Proposal will also harm views of St Aubyns Mansions. The temporary car park introduces an incongruous use which is harmful, only mitigated by its temporary nature.

- 8.81. The scheme should secure repair and restoration of important non-designated assets- lighting columns, shelter and railings. The shelter should remain in current position as has group value with other assets.
- 8.82. Not including the remaining existing King Alfred building is a piecemeal approach and a more comprehensive approach should be taken. SA1 policy could be met via a range of approaches including refurbishment and remodelling. Although not listed or in a CA the current building forms part of setting of several heritage assets and itself is a non-designated heritage assets of modest significance. Its demolition should therefore be justified on its own planning and heritage merits rather than assumed from the site allocation policy.
- 8.83. Individually the identified impacts amount to less than substantial harm, cumulatively however they result in significant adverse effects on the historic environment. While the provision of modern leisure facilities is supported in principle, the public benefits advanced in support of the scheme are insufficient to outweigh the identified heritage and townscape harm.
- 8.84. **County Ecologist:** Approval recommended subject to conditions
Summary:
The information provided with the application is satisfactory and enables a determination that whilst the proposed development is likely to have an impact on biodiversity, those impacts can be mitigated through the application of planning conditions and informatives.
- 8.85. The ecological assessment and associated recommendations are supported. The application helps provide additional certainty that compensation measures for house sparrow will be delivered, both within the site and in offsite areas nearby, and that ongoing monitoring of breeding birds is underway.
- 8.86. Appropriate ecological mitigation, compensation and enhancement should be provided, in line with the ecological reports and with further detail required by condition. Prior to determination, significant onsite Biodiversity Net Gain (BNG) should be confirmed for the purposes of any planning obligations. Where significant onsite BNG applies, monitoring and management will be required at condition discharge stage, alongside the Biodiversity Gain Plan (BGP).

Main comment:

Construction:

- 8.87. As per the submitted Preliminary Ecological Appraisal (PEA, Harper Environmental, Issue 02, 24/02/2026), a construction environmental management plan (CEMP) for biodiversity should be secured via condition to specifically reference ecological measures, including to the coastal area.

Bats:

- 8.88. The recommendations in the Bat Survey Report (Harper Environmental, 24/02/2026), including for precautionary measures during removal of roost features, are supported and can be secured by condition.

Birds:

- 8.89. The site is identified as being important for breeding birds, in particular house sparrow. The PEA states that the works required for this application would remove at least 10 of the known house sparrow nest sites and 98% of the site's foraging resource. Given the limited availability of alternative habitat locally, it is necessary to compensate for the loss of resource (including for foraging) prior to removal. The level of detail provided in the ecological reports, and the consideration that has been given to the provision of various features, is welcomed.
- 8.90. To provide assurance of the feasibility to mitigate and compensate for impacts, further information has been provided, including an Ecology – Demolition Mitigation Plan (Colour, 25/06/2026, Revision P08), Verification of Mitigation Strategy for House Sparrow to June 2026 (Harper Environmental, 08/06/2026), updated landscaping information and a letter to confirm the council's commitment (as landowner) to delivery of the ecological mitigation measures in full and to future monitoring. Ongoing ecological monitoring is taking place, including of breeding birds and the habitat mitigation, which is welcomed and results should further inform the final requirements.
- 8.91. The submitted Demolition Plan includes measures for house sparrow and is largely supported, subject to timing of compensatory habitat, which can be conditioned. As per the PEA, to avoid an offence, the bird nesting habitat should only be removed where it has been confirmed by a suitably qualified ecologist (SQE) that breeding birds are not present, immediately prior to removal/works. Therefore, in terms of project timeframes, we recommend that there is flexibility to allow for this. A breeding bird informative should be attached to any grant of permission.
- 8.92. As part of the compensatory nesting provision (alongside boxes placed on various buildings etc.), a pedestal nesting box is proposed, listed as either a 16 or 32 chamber model. It is recommended the applicant continues to liaise with their ecologist and ornithologist on this and the suitability for the colony, location etc. The compensatory habitat provided ahead of works should be appropriately protected, particularly as some of the mitigation areas are in close proximity to the works (e.g. north of the temporary car park). This detail can be provided via condition, including within a CEMP.

Other Protected and Notable Species:

- 8.93. The recommendations in the PEA are supported and should be implemented. These can be secured via the CEMP/Biodiversity Method Statement and compliance condition.

Biodiversity Net Gain (BNG) and Ecological Enhancements:

- 8.94. A Biodiversity Net Gain Assessment (BNG Assessment, Harper Environmental, 02/03/2026) and associated Statutory Biodiversity Metric (Oliver Huxley and Stephanie Harper, version 1, 02/03/2026) and condition assessment sheets have been submitted. These state that the proposals will result in a -29.97% (-1.06 unit) loss in area habitat units. To achieve 10% net gain and meet the trading rules it is stated that units will be purchased from an offsite provider. Whilst opportunities onsite should first be maximised, the use of offsite units is considered acceptable in this instance. Full details, including final post-development habitats and confirmation of offsite units, will be required through the mandatory condition.
- 8.95. It is noted that the condition assessment for the biodiverse green roof suggests good condition, whereas the Metric states moderate. Whilst taking a precautionary approach to condition can be supported, it is recommended targeting good condition for the biodiverse green roof wherever feasible. This would also increase the gain achieved onsite. Targeting native coastal habitat species, suitable for the area, is supported; final design should be secured via condition. It is advised that priority should be given to ensuring the landscaped area (to north of temporary car park) is as intended for house sparrow.
- 8.96. Medium distinctiveness habitats are proposed (including trees and biodiverse green roof), which could be considered 'significant onsite' BNG in line with national guidance. The management and monitoring of 'significant onsite' BNG should be secured by condition or legal agreement for a minimum 30-year period and Habitat Management and Monitoring Plan (HMMP) will be required for relevant habitats. For any habitats not considered significant (as well as other species measures), it is recommended that they are still secured via other means, such as through a Landscape and Ecological Management Plan (LEMP) condition.
- 8.97. Overall, the compensation and enhancement recommendations detailed in the ecological reports are welcomed and should be implemented. The currently submitted landscaping plans include native species and species of recognised value to wildlife, which is supported. Opportunities to maximise both on and offsite opportunities are recommended where ever feasible. It is noted that a pond and associated planting is proposed, as part of the freshwater provision (including for birds), this is supported. Final details of ecological enhancements and ongoing management and monitoring should be secured via condition, within an Ecological Design Strategy (EDS) and LEMP or similar.
- 8.98. **Environment Agency:** No objection subject to condition.
Condition required to secure flood risk mitigation measures as per submitted Flood Risk Assessment, to ensure NPPF requirements are met. Recommend use

of flood resistant and resilience measures. Condition required for surface water details. Identify where an Environmental Permit may be required.

8.99. **Scotia Gas Networks:** Comment

Remind of need to check location of all pipelines, not just SGN assets. Good construction practice recommended to protect plant and equipment.

8.100. **Southern Gas Networks (SGN):** Comment

Although there is a high pressure gas pipeline in the vicinity it will not be affected by the proposal. If proposal changes, good construction practice recommended to protect plant and equipment.

8.101. **Southern Water:** Comment

There is sufficient available capacity in the SW network to support this proposal. Clearance distances for construction works and tree planting from infrastructure. SW compliant SUDs design recommended. If swimming pool produces filter backwash water discharged into foul sewer, a Trade Effluent Consent required.

8.102. Conditions recommended to protect water apparatus and protect/divert public water supply main, and requiring details of means of foul/surface water drainage. The applicant reminded of requirements to comply with regulations relating to fats/oil/grease disposal. Notification of demolition and need for Section 106 Connection application to connect to public sewer would be required.

8.103. **Sport England:** No objection

Proposal is considered to meet with SE's Planning for Sport Guidance and para 104 of the NPPF.

8.104. The reduction in floorspace compared to the current King Alfred is acknowledged but SE supports the enhancement of facilities that are fit for purpose. It should be conditioned that the new facility would need to be replaced prior to the existing facility being removed, so there is continuity of use. The councils Sports Facilities Investment Plan 2021-2031 acknowledges the need to replace the existing King Alfred, which meets with SE's objective to provide new facilities which met an identified need in the community. The proposal has considered each of the spaces and how they will be delivered to meet community needs and maximise on the space delivered.

8.105. **Sussex Police Community Safety:** Comment

A number of crime prevention measures are recommended, including alarms, CCTV, secure cycle parking design and suitably low landscaping. Recommend further advice sought about securing undercroft car park including any EV chargers. Recommend consultation with licensing team if alcohol sought for cafe. Hours of use require consideration to manage potential noise/disturbance. Measures required to prevent crime during construction period.

8.106. **UK Power Networks: Comment**

Recommend good practice for development within proximity of substations to protect infrastructure, and recommend compliance with Part Wall legislation.

Full details of all consultee comments are publicly available on the Planning Register.

9. MATERIAL CONSIDERATIONS

9.1. In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, this decision has been taken having regard to the policies and proposals in the National Planning Policy Framework, the Development Plan, and all other material planning considerations identified in the "Considerations and Assessment" section of the report.

9.2. The development plan is:

- Brighton & Hove City Plan Part One (adopted March 2016);
- Brighton & Hove City Plan Part Two (adopted October 2022);
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (adopted February 2013, updated October 2024);
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (adopted February 2017);
- Shoreham Harbour JAAP (adopted October 2019)

10. RELEVANT POLICIES & GUIDANCE

The National Planning Policy Framework (NPPF)

Brighton & Hove City Plan Part One:

SS1	Presumption in Favour of Sustainable Development
CP1	Housing delivery
CP5	Culture and Tourism
CP7	Infrastructure and Developer Contributions
CP8	Sustainable buildings
CP9	Sustainable transport
CP10	Biodiversity
CP11	Flood risk
CP12	Urban design
CP13	Public streets and spaces
CP14	Housing Density
CP15	Heritage
CP16	Open Space
CP17	Sports Provision
CP18	Healthy City

SA1	The Seafront
SA6	Sustainable Neighbourhoods

Brighton & Hove City Plan Part Two:

DM1	Housing Quality, Choice and Mix
DM9	Community Facilities
DM15	Seafront Uses
DM18	High quality design and places
DM19	Maximising development potential
DM20	Protection of Amenity
DM22	Landscape Design and Trees
DM26	Conservation Areas
DM29	The Setting of Heritage Assets
DM31	Archaeological Interest
DM33	Safe, sustainable and active travel
DM35	Travel Plans and Transport Assessments
DM36	Parking and servicing
DM37	Green Infrastructure and Nature Conservation
DM39	Development on the Seafront
DM40	Protection of the Environment and Health - Pollution and Nuisance
DM41	Polluted sites, hazardous substances & land stability
DM42	Protecting the Water Environment
DM43	Sustainable Drainage
DM44	Energy Efficiency and Renewables
DM46	Heating and cooling network infrastructure

Supplementary Planning Documents:

SPGBH10	King Alfred/RNR Site: Planning Brief (2002)
SPD03	Construction & Demolition Waste
SPD11	Nature Conservation & Development
SPD14	Parking Standards
SPD16	Sustainable Drainage
SPD17	Urban Design Framework

Other Relevant Corporate Strategies:

BHCC Sports Facilities Plan 2012-22 & Sports Facilities Investment Plan 2021-2031 (SFIP)
 BHCC Physical Activity & Sport Strategy 2024 - 2034 – ‘Lets Get Moving’.
 Brighton & Hove Health and Wellbeing Strategy 2019-2030

11. CONSIDERATIONS & ASSESSMENT

- 11.1. The main considerations relating to the determination of this application are the principle of the development and the uses proposed, the wider masterplan including future housing delivery, sports and health, tourism, design and the

impact upon the character and appearance of the surrounding townscape and heritage assets, archaeology, public realm/landscaping, impact on neighbouring residential amenity, accessibility/inclusivity, microclimate, sustainability, biodiversity/ecology, transport/highways implications, flood risk/drainage and land contamination considerations, air quality and public art.

Principle of the Development:

Planning Policy Background:

- 11.2. The key policy for this site is SA1 (The Seafront) of adopted Brighton & Hove City Plan Part 1 (March 2016). SA1 sets out priorities for the whole seafront:
- Enhance and improve the public realm and create a seafront for all; to ensure the seafront has adequate facilities for residents and visitors (including public toilets, waste disposal facilities, seating, signage, lighting and opportunities for shelter and shade) and continue to improve access to the beach and shoreline and ensure the seafront is accessible to everyone;
 - Promote high quality architecture, urban design and public art which complements the natural heritage of the seafront and preserves and enhances the character and appearance of the Conservation Areas, and the historic squares and lawns that adjoin the seafront;
 - Secure improvements to sustainable transport infrastructure along the A259, including a rapid/ express bus-based services (see CP9) and improve air and noise quality, pedestrian and cycle routes and crossing opportunities in order to achieve a modal shift and thereby reduce the impact of traffic;
 - Monitor, conserve and expand designated coastal habitats and secure nature conservation enhancements to the marine and coastal environment;
 - Work in partnership with Defra, the Environment Agency, Natural England and Southern Water to continue to maintain coastal defences and to ensure appropriate waste water treatment infrastructure.
 - Development will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and to either connect where a suitable system is in place (or would be at the time of construction) or design systems so that they are compatible with future connection to a network
- 11.3. Part C of Policy SA1 is a strategic development allocation specific to the (wider) King Alfred site and it seeks to:
- 'secure the redevelopment of the King Alfred/ RNR site to ensure 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. Provision of a minimum 400 residential units.'***
- 11.4. The vision for the site as set out in the policy is as follows:
- 'A new indoor public wet and dry sports facility which provides for both the local Hove communities and wider mix of facilities in the city within a high quality and sustainably designed building which has an appropriate relationship to the setting of nearby heritage assets, the character of the***

seafront and strategic views. A development which incorporates active ground floor uses and high quality landscaping and public realm and improves connectivity between Kingsway and the seafront. A development which provides for appropriate flood/drainage/sewage infrastructure and good sustainable transport links. A development that accords with the council's sports and development briefs for the site.'

- 11.5. Supporting text 3.121 to Policy SA1 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. The overall development of the site needs to be of high quality which is sustainable and which positively enhances the seafront and surrounding area.*
- 11.6. Policy CP17 (Sports Provision) of the City Plan seeks to facilitate the council's aspiration to increase participation in sports and physical activity, and to safeguard, expand, enhance and promote access to Brighton & Hove's sports services, facilities and spaces. Part 1 of CP17 states support for the delivery of the replacement and enhancement of sports provision currently provided at the King Alfred centre. Policy CP18 seeks to support development that promotes healthy lifestyles and reduces health inequalities. Policy DM9 (Community Facilities) seeks to grant development of community uses in appropriate locations and seeks to resist the loss of existing community uses.
- 11.7. Policy DM15 relates to commercial and leisure uses on the seafront and Policy DM39 (Development on the Seafront) is also relevant and states proposals should have regard to coastal defences and flooding matters.
- 11.8. In terms of the housing delivery that forms part of the wider SA1 allocation (that does not form part of the current application), Policy CP1 of the Brighton & Hove City Plan Part One sets a minimum housing provision target of 13,200 new homes for the city up to 2030. However, on 24 March 2021 the City Plan Part One reached five years since adoption. National planning policy states that where strategic policies are more than five years old, local housing need calculated using the Government's standard method should be used in place of the local plan housing requirement. The local housing need figure for Brighton & Hove using the standard method is 2,487 homes per year. A 20% buffer is then applied to this figure to reflect the most recent Housing Delivery Test measurement (published in December 2024) for the council being less than 85%. The council's most recent housing land supply position is published in the SHLAA Update 2025 which shows a five-year housing supply shortfall of 10,442. This is equivalent to just 1.5 years of housing supply.
- 11.9. As the council is currently unable to demonstrate a five-year housing land supply, increased weight should be given to housing delivery when considering the planning balance in the determination of planning applications, in line with the

presumption in favour of sustainable development set out in paragraph 11 of the NPPF. Whilst the housing development is not part of this current application, the policy allocation of the wider site and wider masterplan is a consideration, to ensure the leisure centre can be delivered successfully alongside a future high-density housing scheme and deliver much-needed homes for the city.

- 11.10. Supplementary Planning Guidance SPGBH10 King Alfred/RNR Site: Planning Brief was adopted some time ago (2002) but is also a material planning consideration. It provides guidance about the site context and basic principles applicable to development of the site, which have been largely been taken forward into Policy SA1. The SPG identified the poor condition of the existing King Alfred building at that time.
- 11.11. Supplementary Planning Document SPD17: Urban Design Framework is a key material consideration. At section 1.2 it contains a link to the Urban Characterisation Study which contains information about the surrounding Hove neighbourhoods. SPD17 states the King Alfred strategic allocation is unique in that it is the only part of the seafront to have some development right up to the seafront's edge. This affords opportunities for different taller 'landmark' development form, potentially creating a prominent and distinctive 'endstop' to Hove's Western Lawns. It indicates that development of over 15 storeys in height may be acceptable.
- 11.12. Other key City Plan policies and guidance are discussed in relevant sections of this report below.

Other Relevant Council Strategies

- 11.13. The council's Sports Facilities Investment Plan 2021-2031 (SFIP) is a material planning consideration and Policy SA1 states that development should accord with the council's sports and development briefs for this site. It holds only limited weight in the planning balance, however, as it is not a planning document or part of the Development Plan. The SFIP was approved by Policy & Resources Committee in July 2021 and is the strategic plan for improving the city's sports facilities. This plan was developed through a comprehensive process, including a strategic analysis and assessment of the need for indoor sports provision and the opportunities for improvement across the city.
- 11.14. The delivery of a new 'West Hub' for the city to replace the existing King Alfred Leisure Centre is one of the key recommendations of the SFIP. The SFIP seeks a large 'hub' facility west of the city to serve the identified needs comprising a mix of wet and dry leisure facilities including: a 25mx8-lane competition pool, a smaller training/teaching pool, some element of leisure water-dependent on the site, 350 spectator seats for regional swimming competitions, a 8 court sports hall, minimum 100 station gym, interactive cycling studio, two studios - 100m2 each, on-site parking and ancillary facilities including cafe and potentially TAG Active, soft play or climbing (subject to site constraints and business case), size

equalling to approximately 9000 to 10000m² excluding parking. Other hubs and locations with the city are also identified within the SFIP for improved facilities to meet the city's needs as a whole.

- 11.15. See also comments from consultees such as Sports Facilities and Public Health which outline further council strategies which encourage physical activity and wellbeing, such as the Council Plan 2023-2027, the Physical Activity & Sports Strategy 2024-2034 'Lets get Moving' and the Brighton & Hove Health and Wellbeing Strategy 2019-2030.

Cabinet background

- 11.16. In terms of background to the current proposal, the proposals were discussed at the council's Cabinet on 18 July 2024. The Cabinet report outlined that the requirement to replace the King Alfred with a new facility has been recognised for over 30 years. The decision was made to deliver the new 'West Hub' facility to replace the King Alfred Leisure Centre on the current site. The decision was made following consideration of a comprehensive options appraisal which included:
- Refurbishment of the existing leisure centre
 - Delivery of a new centre on the existing site
 - Delivery of a new centre on an alternative site.
- 11.17. The detailed assessment included a review of viability, deliverability, planning policy considerations, operational requirements and community preferences.
- 11.18. The refurbishment option identified a necessary expenditure of £13.98 million and the building lifespan would be limited to 10 years. It identified the drawbacks and operational constraints of the original design of the building and that it does not meet current Sport England guidance for modern facilities. It was not deemed good value for money.
- 11.19. An alternative site was considered which performed favourably in certain economic assessments but it was discounted for a number of reasons: planning policy - it was designated as a Local Green Space (whereas the existing site is allocated for leisure/housing use under policy SA1); it was subject to legal constraints including a restrictive covenant which introduced risk to delivery; public consultation identified a clear preference for retaining leisure at the existing King Alfred site, with higher usage levels expected.

Assessment

- 11.20. There is currently a leisure centre on part of the site, and this land use would continue with the new proposal. The principle of replacing the sports and leisure uses at the site with new facilities is established via Policy SA1 as can be seen above, and there is an identified need for such a facility here in the council's Sports Facilities Investment Plan (SFIP). The proposal is also supported by Policies CP17, CP18, SA6 and DM9 and council strategies which encourage physical activity and wellbeing. The site's situation adjacent to the Hove Beach

Park reinforces the long-term vision for this part of the seafront as a destination for sport, leisure and community use that serves both local residents and visitors to the city. The proposal would contribute to continued regeneration of the area and to tourism (policy CP5). Key internal and external consultees support the proposal. The principle of developing the site with a new leisure centre and pool is therefore strongly supported.

- 11.21. A number of representations have expressed concern that the proposal will result in demolition of the current building and that refurbishment should be pursued. There are, however, significant barriers to achieving this successfully as outlined, and there is considered to be no justification to require retention of the building or refuse planning permission on these grounds. See also Heritage and Sustainability sections in this regard. Whilst the business case is not strictly a material planning consideration, it can be seen above that alternatives were comprehensively assessed and that delivery of a new facility, as opposed to refurbishment or re-modelling of the existing, was a compelling option. Replacement of the King Alfred was a key recommendation of the Sports Facilities Investment Plan and meets the key aims of the Plan – the improvement of the financial viability, long term sustainability and accessibility of sports facilities in the city. It is recognised that this may require the replacement of ageing, inefficient and operationally uneconomical buildings when required.
- 11.22. In terms of the uses proposed within the scheme, these will largely replace those contained within the current building, and it is considered that overall and on balance, the proposal would comply with planning policies CP17, CP18, DM9 and SA1 which seek to retain/enhance such sports/leisure/community facilities and promote healthy lifestyles. The proposal would include a broad range of different facilities, which is welcomed.
- 11.23. As set out above, the SFIP outlines the type of facilities the ‘West Hub’ for the city should aim to deliver, and this is based on need, informed by public and stakeholder consultation and a review of local, regional and national strategies, and thus has a robust and sound evidence base. See below for a summary of how the proposal compares to the existing King Alfred Leisure Centre and the SFIP:

<u>Existing</u>	<u>Sports Facilities Investment Plan (SFIP)</u>	<u>Proposed</u>
<u>Main pool – 25m 6-lane</u>	<u>25m 8-lane competition pool</u>	<u>Main pool – 25m 8-lane (with moveable floor)</u>

<u>Teaching pool 95sqm</u>	<u>Smaller teaching pool</u>	<u>Teaching pool - 253sqm (moveable floor)</u>
<u>Leisure water play 180sqm</u>	<u>Some element of leisure water dependent on size of the site</u>	<u>Splash pad 75sqm</u>
<u>Spectator seating 240 seats</u>	<u>350 spectator seats</u>	<u>Spectator seating 194 seats</u>
<u>Wet change 210sqm</u>	<u>N/A</u>	<u>Wet change 410sqm</u>
<u>Gym 250sqm/31 stations</u>	<u>100 station gym</u>	<u>Gym 680sqm/150 stations</u>
<u>Ancillary gym 180sqm</u>	<u>As above</u>	<u>As above</u>
<u>FitLab Gym 180sqm</u>	<u>As above</u>	<u>Will relocate</u>
<u>N/A</u>	<u>Interactive cycling studio</u>	<u>Spinning studio 75sqm</u>
<u>N/A</u>	<u>2 studios 100sqm each</u>	<u>Multi-purpose studiosx2 (100sqm + 150sqm)</u>
<u>2 x sports halls 1,250sqm</u>	<u>8-court sports hall</u>	<u>Sports hall 932sqm (6-court with flexible layout)</u>
<u>Sports change and womens/mens change/sauna 325sqm</u>	<u>N/A</u>	<u>Changing 190sqm</u>
<u>Ballroom 385sqm</u>	<u>N/A</u>	<u>N/A</u>
<u>Multi purpose room 110sqm</u>	<u>N/A</u>	<u>Multi purpose room 58sqm</u>
<u>Boxing facilities 295sqm</u>	<u>N/A</u>	<u>To be relocated</u>
<u>N/A</u>	<u>cafe</u>	<u>Café 260sqm</u>

<u>N/A</u>	<u>Soft play or TAG or Climbing</u>	<u>Childrens soft play 180sqm</u>
<u>N/A</u>	<u>N/A</u>	<u>Sunken gallery</u>
<u>Total 15,865sqm</u>	<u>Total 9,00010,000sqm exc car parking</u>	<u>Total 10,850sqm (incl car park)</u>

- 11.24. The application proposal is considered to largely provide the facilities sought for the 'West Hub', and whilst the SFIP is not a planning document, this is welcomed. It is acknowledged the overall floorspace (excluding car park) is smaller than the 9,000-10,000sqm sought (the proposal being 6,374sqm), and would also be reduced compared to the existing King Alfred, it would however be more efficiently used and certain key facilities would be larger and enhanced e.g. the gym would be 3x larger and contain 5x greater number of gym stations and the main pool would have 8, rather than 6 lanes, and the teaching pool would be 235sqm rather than 92sqm. The current building is not in good condition and is used ineffectively and contains extensive areas of poorly used or unusable space, therefore a rightward floorspace comparison cannot be made. The facilities would have the benefit of being modern and fit for purpose and of a good quality standard, and the floorspace would be more efficiently used, and therefore the overall offer is considered to be acceptable. Policy SA1 does not prescribe a minimum floorspace for the replacement facility. The main thrust of Policy CP17 is to facilitate the council's aspiration to promote access to sports and physical activity, which this proposal would do. The Sports Facilities team consider the mix and scale of uses to broadly meet the SFIP and support the proposal, as do the Planning Policy team.
- 11.25. A significant number of representations have been received citing concerns about the amount of children's facilities, and swimming/wet play in particular. As set out above, the proposal is considered to broadly meet the SFIP and planning policy relating to sports/leisure facilities. In terms of overall swimming, the 8 lane main pool proposed (plus additional moveable floor) represents an enhancement for all ages over the current 6 lanes. In terms of leisure water, the SFIP seeks 'some element of leisure water - dependent on size of site' and thus is not prescriptive. Whilst the proposals do not replace current facilities like for like, a separate and improved teaching pool with movable floor is proposed. The current leisure water of 180sqm would be reduced to a 'splash pad' for younger children of 75sqm, however this is still of an appropriate and usable scale and could include a slide and other play features. It would make effective use of the site, and final details would be secured via condition to ensure it is fully accessible and inclusive. The pools could also be used for inflatable sessions. In addition, the centre will contain a soft play area for children. The public realm designs will also incorporate informal play features for children. Therefore, on balance, it is considered that the proposals will be sufficiently inclusive of children and meet the SFIP strategy for

this part of the city and comply with planning policy, which seeks to ensure developments are inclusive and promote sport/leisure for all.

- 11.26. The proposals provide for sports and gym facilities and also multi-use community/studio rooms which would go some way to compensate for some of the current uses in the King Alfred that would not be directly replaced, such as the My Helm CIC community use, the Brighton & Hove Amateur Boxing Club and FitLab Hove. It is understood those tenants have been made aware of their temporary status here for some time, and the council will work separately with them to find alternative premises within the city if this is possible. The application estimates that the proposed number of employees would be similar to the current facility overall. The inclusion of the multi-use rooms and cafe would provide a welcomed mixed offer and would help attract non-leisure users to the building and seafront also. Overall, it is considered that the significant wider public benefits of the scheme and delivery of a new modern leisure centre facility with a broad mix of uses would outweigh the limited loss of some existing uses.
- 11.27. The submitted Statement of Community Involvement demonstrates that the community and local stakeholders helped shape the proposals for the site, which is welcomed. Policy CP18 'Healthy City' requires a Health Impact Assessment (HIA) on all strategic developments in the city and this has been submitted. It states that the scheme would increase sports capacity and quality of provision; and is expected to increase participation in physical activity, support preventative health outcomes and help reduce inequalities in access to sport and recreation. The Council's Public Health Team welcome the HIA, which is considered comprehensive and in line with council guidance, and they wish to see continued inclusive community engagement through to the detailed design stage.
- 11.28. Uses within the current building would not be affected until the new centre is ready, thus ensuring continuity of provision – which will be conditioned to comply with para 104 of the NPPF, as sought by Sport England.
- 11.29. The proposed undercroft car park would replace a current public car park of a similar scale, location and function, and would meet the travel demands of both the new leisure centre and the wider seafront. There is therefore no objection in principle to this land use. The proposed use of the Western Lawn as a car park during construction would represent a policy conflict given it is a designated and protected Open Space (Policy CP16), as well as being locally listed and within a Conservation Area. Given the use is proposed for a temporary period only (approx. 2 years), however, and will facilitate continued use of the current leisure centre and serve the seafront, it is considered that an exceptional case can be made to support the proposal. A condition will ensure the lawn is restored and accessible thereafter. See also Transport section for consideration of parking.

- 11.30. The incorporation of substantial areas of public realm and landscaping would meet the requirements of policy SA1 (and CP13 and DM22) and are welcomed and given significant weight. See also Public Realm section below.
- 11.31. Some representations received have raised concerns about why the leisure centre proposals have been submitted separately from the future housing site. In terms of the wider masterplan, Policy SA1 recognises that to secure the regeneration of the site to deliver new sports facilities an appropriate mix of uses (of which housing is likely to be the predominant part) will be required. The SA1 allocation includes the provision of a minimum of 400 residential units, and thus the principle of a mixed-use site including housing is established. An illustrative masterplan was therefore submitted with the application to show how the leisure centre development could potentially work with the remainder of the allocated site and wider area and deliver the much-needed housing for the city (see also comments about the masterplan in the General Design section below).
- 11.32. It is good planning practice for a masterplan to be included in such scenarios, however, this can be illustrative and cover high level principles only and does not need to form part of the formal application proposals for the site at this stage. There is no statutory planning requirement for the total allocated site to be submitted at the same time as part of one single planning application. The illustrative masterplan contains sufficient information to enable a high-level assessment to be made and is considered broadly acceptable. It should be noted that the council's Environmental Impact Assessment Screening Opinion undertaken prior to the planning application did screen the whole site as one strategic allocation, and it considered potential cumulative environmental impacts of both developments (leisure and housing). This concluded that, in principle, the site would not give rise to likely significant environmental effects (in the meaning of the EIA Regulations) and hence EIA is not required. The potential cumulative impacts of a leisure centre and circa 400 units here was also a consideration when the site was deemed appropriate to go forward as a formal mixed-use allocation in the City Plan. If an application for future housing development is submitted, it will be for that proposal to further test the masterplan and evolve it and demonstrate appropriate cumulative impacts with any extant proposals on a more detailed basis at application stage.
- 11.33. The proposals are considered to deliver a modern fit for purpose leisure facility for the city, in line with the city's needs. The proposal is considered to deliver the aspirations of planning policy and corporate health and wellbeing strategies and would provide greater and improved access to facilities. Whilst there are some gaps in terms of provision compared to the SFIP and when comparing gross floorspace figures with the existing King Alfred facility, the proposal are considered acceptable overall. The Sports Facilities team confirm that the proposed development broadly meets the SFIP criteria and support the proposal. Sport England raises no objection to the proposal and Swim England are

supportive. In addition, the Planning Policy, Seafront, Tourism and Leisure and Public Health teams are all supportive of the principle of the development.

Design and Impact to Setting of Heritage Assets:

General Design

- 11.34. Key City Plan policies relating to general design and public realm are CP12 (Urban Design), CP13 (Public Streets and Spaces), DM18 (High Quality Design and Places), DM19 (Maximising Development Potential) and DM22 (Landscape Design and Trees). In addition, Policy SA1 expects high-quality architecture, urban design and public art on the seafront, and the vision for this site seeks a high quality of design and sustainability which preserves and where possible enhances the setting of heritage assets, the character of the seafront and strategic views, and provides for active ground floor uses and high quality, integrated and attractive landscaping and public realm.
- 11.35. The site is in highly prominent location and will provide a new public building for not just the local area but also the wider city, and the proposal will be a landmark destination along the seafront. The site requires a building of high quality design and appropriate civic presence. The Local Planning Authority has worked closely with the applicant as part of an iterative design process to ensure the vision for this site is achieved. The scheme has been subject to a detailed pre-application process which has involved input from 2 independent Design Review Panels (DRPs) and expert consultees. Local stakeholders have also influenced the design and layout.
- 11.36. A comprehensive Design and Access Statement (DAS) has been submitted with the application which demonstrates how the design has been carefully considered, and how it has evolved in response to feedback. The application contains a Townscape Assessment and other supporting design documents. A Heritage Assessment has also been submitted (see section below for heritage considerations). The DAS analyses the site within its wider context, and seeks to work with the established urban grain and view corridors, topography and microclimate. The design has been planned carefully to take account of future housing that may be developed to the east and an illustrative masterplan has been included. The DAS identified an opportunity to deliver a building which respects the underlying order of Hove's character alongside distinctive civic and seafront 'eccentricity' and boldness. The DAS identifies 4 design prompts from the locality - formal order, arch at the base, moments of eccentricity and connection with water.
- 11.37. The character and appearance of the locality is varied, with a mixture of historic buildings, modern blocks of flats and open lawns/parks and the main seafront promenade. The site is allocated for a major redevelopment scheme and is considered suitable in principle for a substantial building. A bold contemporary approach, including use of colour, is welcomed to provide interest and 'fun', and the underlying design approach identified in the DAS is appropriate. The building

is not overly tall but has sufficient civic presence. The different masses of the building have been successfully broken up and the main entrance is clearly legible and is of an appropriate and distinctive design.

- 11.38. Given its siting, it is important to ensure the design of the building sufficiently activates and provides visual interest on all elevations. It is acknowledged this is challenging for a 360-degree building, but it is considered the scheme (as amended) successfully achieves this. The amendments received during the application process to the north and west elevations in particular represent significant improvements. The introduction of sport motifs, a high level window and raised parapet proposed are all key features that are necessary to enliven the elevations. The comments of the Sports Facilities Team with regard to the sports hall window are noted, however, it is considered to be a critical feature and there are ways to manage this, for example through use of integrated shutters when blackout conditions are required. The north-west corner of the building has been raised and provides an attractive gateway feature from the west.
- 11.39. Whilst some recommendations of the DRP and Urban Designer have not been taken up due to constraints and project brief, for example introduction of outdoor terraces and a secondary southern entrance to make the most of the seafront situation, on balance these are not critical elements needed to make the development acceptable. It is noted that the doorway to the south-east can be used for occasional events and when weather conditions allow, which is welcomed and exploration of further wind mitigation measures here to allow for greater use is recommended via condition. The southern and western elevations to the pool area do not afford direct views into the water area as would ideally be sought as the height of the pool is partly constrained by land levels, however, they are suitably animated and do allow views out. Inclusion of integrated seating areas (as on the present building) next to the promenade is welcomed.
- 11.40. The proposed materials including use of concrete and metal are considered to be of good quality and robust enough for the marine environment. The application contains an Access and Maintenance Strategy which provides further assurance. The use of dark green metal cladding (as shown illustratively) is not supported as this gives a rather heavy appearance and accentuates the massing of the building and is not characteristic of the locality in such large areas (see also Heritage section below). Final details of materials and the colour and weathering properties can be secured via condition. External lighting (and future signage) will be an important feature and help provide civic presence, and this will be conditioned.
- 11.41. With regard to the wider masterplan for the site, this was produced at the request of officers and the DRP to enable assessment of how the proposal would work coherently with future housing development and deliver the aims of the Policy SA1 strategic allocation. The DAS provides an overall site strategy and considers high level strategic movement across the site and connection to the surroundings, land levels, view corridors and public realm. Whilst this is high level and illustrative

only, at this stage this is considered sufficient, and it does provide assurance that future proposals can work successfully with the leisure centre proposals and the wider context. The new public realm to the east of the leisure centre would provide sufficient separation between the centre and future housing. The masterplan provides sufficient degree of assurance that a high density scheme could be achieved to deliver a significant number of homes in line with the policy, noting that tall buildings are appropriate in principle in this location (SPD17). There are few large strategic development sites in the city, and it is important the development potential of those that are available are maximised in line with Policy DM19, to help meet the pressing housing need for the city.

- 11.42. The masterplan demonstrates the site has potential to deliver the aims of Policy SA1 successfully. Certain assumptions within the illustrative masterplan as submitted will however require more detailed/further testing and adjustment, for example the footprint/building lines, scale and massing, as highlighted by the Urban Designer. More testing within the wider townscape and heritage setting would be required. Testing of impact on the amenity of existing and prospective residents would also be required. The final designs, layout and heights of future development on that site may be different than that shown indicatively. Consideration of such matters would be part of a separate pre-application and application process for that site in due course. Any future scheme that comes forward will have to have due regard to the layouts, land levels, connections (and microclimate) of the leisure centre scheme, and the wider context, should the current application be approved.

Heritage

- 11.43. When considering whether to grant planning permission for development within the setting of heritage assets including listed buildings and conservation areas, the council has a statutory duty to pay special attention to the desirability of preserving or enhancing the special character or appearance of the building/setting. Case law has held that the desirability of preserving the character or appearance of heritage assets or their setting must be given "considerable importance and weight".
- 11.44. The NPPF at para 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Impacts on the significance of non-designated assets should also be taken into account (para 216).
- 11.45. The heritage policies of the City Plan are relevant considerations, in particular policies CP15 (Heritage), DM26 (Conservation Areas), DM28 (Locally Listed Assets) and DM29 (The Setting of Heritage Assets). These seek to ensure development proposals within heritage assets or their setting preserve or enhance the distinctive and special architectural or historic character and appearance of the heritage asset.

- 11.46. As set out in the 'Site Location' section of this report, the current King Alfred building is not listed or located within a Conservation Area (CA). The site is however within the setting of several designated heritage assets (CAs and listed buildings) and non-designated heritage assets. The application site includes a lawned area to the west of the car park and Hove Street South which is locally listed and within the Pembroke Princes CA, and the site also contains a locality listed seafront shelter.
- 11.47. Whilst full demolition of the current King Alfred building is not formally proposed as part of this application, this is the future plan once the current scheme is delivered (see Masterplan section above). Representations have been received which consider the building to have heritage merit and local importance and wish it to be retained and refurbished if possible. Successful examples of restoration such as Saltdean Lido are cited. The concerns of CAG and others with regard to heritage impact are acknowledged, however, Historic England confirmed on 20th January 2026 that the current building does not have special architectural or historic interest in the national context to be formally listed, and thus the building does not benefit from any statutory protection (unlike the Lido). It also does not meet the lower threshold of being locally listed. Partial demolition (of the underground bowling alley) has already been granted prior approval (see History section) and again is partly duplicated in the current proposal. As set out in heritage and other documents with the application, the building is a modern and much altered addition within its historic context. It is not considered to make a positive contribution to the wider townscape of the area or its heritage setting. Its loss cannot therefore be resisted on heritage grounds.
- 11.48. In terms of impact of the new proposals, the application contains a Heritage Assessment and Townscape assessment which considers all relevant heritage assets and tests key viewpoints, and concludes there will be no harm caused. The council's Heritage advisor has duly assessed the information and does identify some (limited) harm – see Heritage comments in Consultations section above for full details.
- 11.49. The proposal would have a neutral impact on the Cliftonville CA and grade II listed Barford Court and 2-6 St Aubyns due to distance and existing built form. The introduction of a temporary car park on the Western Lawn would cause 'less than substantial' harm (at the lowest end of the scale) to the Pembroke and Princes CA and its locally listed status, however its harm would be mitigated in due course as it would only be temporary for the construction period (approximately 2 years), with the land thereafter restored (as secured via condition). The new building will introduce new built form and massing into the view looking south from Vallance Road/Vallance Gardens and the Old Hove CA, and will detract from the view, however the harm caused is identified as 'less than substantial and at the lowest end of the scale'. Removal of an existing small building at the site at the end of Vallance Gardens also helps open up the view and is a minor benefit. The

proposal would harm the significance of locally listed St Aubyns Mansion through change within its setting.

- 11.50. Concerns about the heritage impacts of the general design of the original scheme and its blocky form, massing and articulation (and dark green colour) were also raised by the council's Heritage advisor and have been considered to have been satisfactorily addressed with the amended north and western elevations. The amended design and its distinctly modern and detailed elevations, together with gateway focal point on the north-west corner, provide a building of sufficient quality and interest within its historic setting. The darker green colour is shown illustratively only, and the Heritage Advisor and Urban Designer request this colour is re-considered, and the final colour will therefore be subject to condition to secure a more appropriate (lighter) colour.
- 11.51. The existing locally listed seafront shelter requires relocation given its current position directly adjoining the new leisure centre building and thus is not compatible with the development. This current location would not appear to be original and its proposed relocation on the lower promenade is historically appropriate and would not cause harm to its significance. South of the new eastern public realm would maintain a relationship with the development and provide a focal point. Repair and restoration of the shelter and the non-designated historic lamp columns which directly adjoin the site would be a welcomed heritage benefit, and would also benefit the wider seafront, in accordance with policy SA1. Details can be secured via condition. It is not considered that restoration of the seafront railings (as has been raised by some consultees) can be justified as an additional heritage benefit given these are not an integral or necessary requirement of the development, or located directly adjacent. These railings would also be maintained in due course as part of the wider Seafront Maintenance Plan.
- 11.52. The site is part of a strategic allocation for a major development and if effective use of the land is to be made to deliver the aspirations of Policy SA1 then a degree of impact to its historic context is to be expected. It is considered that the scheme has been sympathetically designed and sited to limit the impacts wherever possible. Overall, it can be seen the scheme results in only limited harm to heritage assets at the lowest end of the scale, and it is considered that the heritage benefits identified, together with the substantial wider public benefits of a leisure centre and associated public realm enhancement and regeneration for the city, would significantly outweigh that harm. The proposal would therefore accord with the NPPF and relevant policies.

Accessibility and inclusivity

- 11.53. The council has a statutory duty to consider equalities and accessibility under the Equality Act 2010, and general design policies including CP12 and CP13 seek to ensure development and public realm is inclusive, adaptable and accessible. Policy SA1 expects development on the seafront to deliver the key priorities for the whole seafront including the creation of a seafront for all; ensuring the

seafront has adequate facilities for residents and visitors and continues to improve access to the beach and shoreline and ensures the seafront is accessible to everyone.

- 11.54. An Equality Impact Assessment and Health Impact Assessment have been submitted with the application, and are considered robust and satisfactorily demonstrate the development would be accessible and inclusive. Access to the site is sloped from the main highway on the A259. Level access can be achieved from the public car parking area and all floors would be accessible from the lift. Public realm designs are shown as accessible with a mix of steps and ramps, with final detail to be secured via condition. Disabled parking spaces are proposed in the undercroft (and temporary) car park, enhancing those that currently exist. The internal layout of the centre would be fully accessible, will have flush thresholds, will include a Changing Places toilet facility and accessible changing/showering facilities. Both the pools would have gradual walk-in steps, moveable floors and a pool pod (which allows for independent autonomous entry) to aid access. The final design of the children's splash pad is to be secured via condition to ensure it is fully accessible and inclusive. See also public realm and transport sections below.
- 11.55. Seafront accessibility improvements are sought via condition to comply with the specific aim of Policy SA1 which seeks to 'improve access to the beach and shoreline and ensure the seafront is accessible to everyone'. This could include provision of an accessible mat to enable wheelchair users access to the shoreline or provision of additional public showers (as the nearest showers are at Babble or east at Hove Lawns). These measures would enhance the usability and accessibility of the wider seafront through complementary facilities to the leisure centre and Hove Beach Park and would provide the site with a clear link to swimming and the seafront and would promote wider leisure/health/fitness for all here.

Public Realm

- 11.56. As stated, Policy SA1 seeks enhanced and improved public realm and creation of a seafront for all. For the King Alfred site, SA1 specifically seeks high-quality landscaping and public realm that improves connectivity between Kingsway and the seafront, and good sustainable transport links. In addition, Policies CP13 and DM22 are relevant, and these seeks to ensure appropriate landscaping and public realm is provided within development.
- 11.57. A Landscape Strategy has been submitted with the application. The scheme includes a number of areas of new and enhanced public realm, which is welcomed and aligns with the key aims of Policy SA1, and other relevant policies. The scheme would deliver a significant public benefit and new routes through the site and greater connectivity with the seafront. The leisure use and associated public realm would effectively form an extension of the Hove Beach Park

recreational area, and would provide a significantly regenerated and enhanced locality overall.

- 11.58. The provision of the new public realm to the east of the new building aligns with a north-south viewing corridor to the seafront from Vallance Gardens, in line with the character and urban grain of the wider area. This new public realm would provide an appropriate civic setting to the leisure centre and will incorporate hard and soft landscaping, suitable for a marine environment. It would also contain seating, lighting, cycle parking, informal play and areas for cafe seating and outdoor event space, which is welcomed and would help enliven the area for residents and visitors. The area is considered to be of appropriate scale to provide sufficient 'breathing space' and setting between the leisure centre and any future development on the wider site to the east, measuring on average 26/27 metres wide (and 21/23m opposite the main entrance at its narrowest point and 36m at its widest point).
- 11.59. The design of this area has evolved and been simplified following comments from the Design Panel and Urban Designer, and is considered to be of good quality design. The comments of the Urban Designer with regard to ideally lowering the car park to achieve less level change across the public realm are noted, however, there are recognised and significant site constraints and it is considered that the scheme accommodates the change in land levels successfully. The designs incorporate ramps as well as stairs and would be fully accessible. The application demonstrates that appropriate wind comfort can be achieved within it for users and it includes wind screens where needed (see also Amenity section below). Final details of the public realm areas, including of their design and materials, is to be secured via condition. Following consultee feedback, the relocated existing seafront shelter which was originally proposed here has been relocated onto the main lower promenade (see Heritage section above), which helps de-clutter the space and enhance sea views.
- 11.60. The proposals for Hove Street South are welcomed and would provide enhanced public realm and overall setting. The layout is quite informal and includes soft landscaping, and it would improve the pedestrian experience over the current vehicular dominated experience. The road would be stopped up to provide access to the car park only and a drop off area, with a new area of public realm to the south with seating and planting. Good quality materials would be used and can be secured via condition. The area could be used for small events. The microclimate would be acceptable for its intended use. A condition is recommended to ensure the western lawn area would be restored after it is no longer needed as a temporary car park, and pathways included within it to provide linkages through to Hove Beach Park (as shown indicatively in the Landscape Strategy). Final design and surfacing materials of this Hove Street South area will be considered alongside the highways team as part of s278 works, and will be secured via condition. The detailed design stage will explore moving the

roundabout slightly further south and allowing greater drop-off provision, and details of planters, collapsible bollards etc.

- 11.61. The Urban Designer and Local Highway Authority raise no objection overall to the public realm proposals, subject to detailed design secured via conditions. The proposals are considered to accord with relevant policies and deliver the vision with Policy SA1.

Public Art

- 11.62. The incorporation of a range of sporting motifs along the base of the north and western elevations of the development is considered to constitute an attractive and appropriate artistic component within the scheme. These would form an integral part of the scheme and be made of perforated metal and would be illuminated, and they would help enliven the facades and give a clear sporting identity to the building. It is considered this would meet the requirements of Policy CP13, SA1 and other relevant policies/guidance, and is proportionate to the scale/type of development. The public realm to the east of the building may also include artistic components, and this would come forward as part of final designs secured via condition. The public realm areas would be suitable for holding artistic events, which is welcomed.

Impact on Amenity:

- 11.63. Policy DM20 of the City Plan states that planning permission for any development or change of use will not be granted where it would cause unacceptable loss of amenity to the proposed, existing and/or adjacent users, residents, occupiers or where it is liable to be detrimental to human health. Policy DM40 seeks to ensure proposals will not give rise nor be subject to material nuisance and/or pollution that would cause unacceptable harm to health, safety, quality of life, amenity, biodiversity and/or the environment (including air, land, water and built form).
- 11.64. The proposal is for a relatively low (3-storey) building within its context, and the site does not directly adjoin residential properties, with the nearest being blocks of flats located to the north across the Kingsway dual carriageway, or further to the west along St Aubyns. Therefore, in terms of the immediate impact the proposal would have, this would be limited and not significant given the sufficient distance to neighbours. There would be no undue loss of privacy or outlook. Loss of views are not material planning consideration.
- 11.65. In terms of any potential impacts that may arise from the operation of the proposed leisure centre, it should be recognised it would replace a current leisure facility and car park in a similar location. The principle of the land use for leisure is accepted in this location. The building will be constructed to modern standards, and conditions can satisfactorily ensure any potential impacts are suitably mitigated to protect amenity: restrictions on hours of use, a requirement for a noise management plan (including for outside areas), incorporation of noise minimising measures for gym and sports hall, a plant noise scheme and a lighting

scheme. The council's Environmental Health team raise no objection to the proposal on this basis.

- 11.66. These controls would also ensure any potential impacts to future housing introduced to the west are appropriately mitigated. Housing and leisure centre land uses are compatible in principle, and whilst the relationship between the leisure centre and future housing would be closer, the impacts in terms of privacy and outlook would be appropriate and could be further mitigated if required within future designs. Sufficient separation distance would be maintained between the leisure centre and any future housing.
- 11.67. A Wind Microclimate Assessment has been submitted and this concludes that long term wind comfort conditions within the site will be suitable for their intended use. The site is clearly exposed given its seafront location however the proposals are considered to mitigate this appropriately for the intended uses, including the main public realm areas and main entrance. The proposed development is identified as having a net beneficial impact on the pre-existing wind safety risks due to strong winds to the north-east and south-west of the site. New and greater wind impacts at the north-west corner of the site are identified which would be mitigated via hard and soft landscaping. Conditions in the south-east corner are also identified as being windier than the target condition for an entrance in the winter months, however, this is not the primary entrance and would be used for occasional events only or in clement weather. The methodology used (digital wind tunnel), mitigation proposed and conclusions reached are considered robust. Any future housing proposals to the west would have to also duly demonstrate they can provide a satisfactory microclimate as part of their designs in due course.
- 11.68. In terms of potential impact during the construction period, the Environmental Health team have confirmed that the submitted Construction Environmental Management Plan (CEMP) would provide sufficient protection to any nearby occupiers or users, subject to some updates which have since been incorporated/conditioned. The CEMP would control hours of construction, noisy works, dust mitigation etc, and would be secured via condition.

Highways and Sustainable Transport:

- 11.69. The NPPF seeks to ensure that development promotes and prioritises sustainable transport modes taking account of the vision for a site, the type of development and its location. It seeks to ensure that safe and suitable access to development sites can be achieved for all users and that the design of streets, parking areas, other transport elements and the content of associated standards reflect current national guidance. Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, should be appropriately mitigated to an acceptable degree through a vision-led approach. At para 116, the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable

impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe.

- 11.70. City Plan policies CP9, DM33 and DM36 echo NPPF considerations. Policy SA1 states development on the seafront should secure improvements to sustainable transport infrastructure along the A259 and improve air and noise quality, pedestrian and cycle routes and crossing opportunities in order to achieve a modal shift and thereby reduce the impact of traffic. For the King Alfred site, Policy SA1 seeks to ensure development provides for sustainable means of transport to and from the site and demonstrate good linkages for pedestrians and cyclists. Adopted SPD14 provides guidance on parking standards sought for different types of land uses.
- 11.71. The council's A259 Hove to Portslade Active Travel Scheme on the public highway is a material consideration as this was recently formally approved by the council and is to progress this autumn, and involves the stretch of the A259 road directly north of the site. The key measures secured as part of this scheme include: a separated two-way cycle lane, new pavements and bus stops, safer, better aligned crossings and junctions, removal of left-turn at Hove Street South, provision of new loading bays and disabled parking bays.
- 11.72. The application contains a number of transport-related documents in support of the proposal, including a comprehensive Transport Assessment (TA), transport notes, interim Travel Plan, Access and Maintenance strategy, Delivery and Servicing Management Plan, Equality Impact assessment and Construction Environmental Management Plan (CEMP). The Local Highway Authority (LHA) have assessed the information and considers it to be robust. They raise no objection to the proposal, subject to conditions, as discussed below.
- 11.73. In terms of demand for travel and impact to the public highway, it should be recognised the proposal would replace a similar leisure facility and car park. The TA robustly demonstrates that when the forecast development traffic is applied, the resulting residual traffic increases on the A259 and Hove Street would be modest in both absolute and percentage terms, and well below the council's thresholds that would normally indicate the potential for significant operational impact on the highway network. The modest increase is attributed to demand from a new and more attractive facility, rather than total expected usage. Accordingly, the LHA consider that the proposal would not result in a material deterioration in highway operation, nor would it give rise to a severe residual cumulative impact on the local network. They do not consider it would give rise to undue overspill parking risk and in addition, Travel Plan measures will promote use of alternative modes. The TA demonstrates there would be no predicted road safety issues. A number of highway works are proposed within the TA around Hove Street and the A259, and these are considered acceptable subject to condition of their detail. The designs are considered to be safe in principle and are accompanied by a Stage 1 Road Safety Audit (RSA) to demonstrate this.

Final detailed design will be subject to the separate Section 278 regime and further RSAs as well.

- 11.74. In terms of pedestrians and accessibility, the TA demonstrates that pedestrian trips are predicted to be predominantly local, and the site is well-located to take advantage of current routes. The proposal incorporates step-free access and a lift is proposed within the car park. Access around the site would be maintained during construction. The approach to accessibility is welcomed by the LHA. The introduction of new public realm such as the eastern 'plaza' and Hove Street South works would provide for much greater priority and provision for pedestrians than at present. Wayfinding improvements in the wider area, and final public realm design can be secured via condition. The scheme will be able to take advantage of the general accessibility improvements that will be delivered as part of the forthcoming of the A259 Active Travel scheme. Highway works conditions can ensure final designs are safe and accessible. See also Public Realm and Access and Inclusivity sections.
- 11.75. With regards to cycles, the site benefits from being directly on the National Cycle Route 2 and the forthcoming A259 Active Travel Scheme. The LHA confirm the links between the cycleway and on-site cycle parking are acceptable, subject to condition. Continuity of the cycle route would be maintained during construction, and is referenced within the CEMP and will be conditioned. The development proposes 90 cycle parking spaces overall – a mix of visitor and staff spaces, which exceeds SPD14 standards, and is welcomed. The type of cycle storage proposed is considered to be acceptable and accords with Policy DM33 and would be close to the main entrance. The LHA raise no objection, subject to a condition to secure final design and numbers. A Beryl Bike Share stand is shown to the north of the new public realm, which is welcomed, and can be secured via the Travel Plan.
- 11.76. The TA and Interim Travel Plan (ITP) identify that bus travel currently represents a low proportion of trips to the existing King Alfred – recent surveys show 7% visitors and 29% staff. The site is served by bus stops directly adjacent on the A259 (700 route). The principal bus routes are located on Church Road to the north and are considered to be an acceptable distance away (approx. 500m). This is the situation with the current leisure centre, and the location scores reasonably highly for public transport accessibility based on DfT Connectivity Scores - Band B (Band A being the highest). The proposal is considered to improve the situation as the proposed Travel Plan measures will promote greater use of public transport overall, as set out in the ITP. This will include new wayfinding from Church Road and provide real-time bus time information within the reception of the leisure centre. The LHA consider this to be proportionate and acceptable. The LHA consider that, overall, the ITP Framework submitted with the application to be appropriate and capable of supporting transport objectives, subject to further development and monitoring - this would be secured via condition.

- 11.77. With regards to on-going monitoring and resources associated with delivery of the Travel Plan, it is recommended that the Corporate Director for the project, i.e. the applicant, enters into a Memo of Understanding with the Local Planning Authority (LPA) to agree that monitoring fees of £7,820 be made available to the LPA. 11.73 In regard to car parking provision, SPD14 seeks to secure maximum (general) parking standards for the city and minimum disabled and other standards, and provides a guide on quantum for different types of development. 122 spaces are proposed within the undercroft car park (the same as the current car park), which is considered acceptable and proportionate to the type and scale of development proposed. The car park would be accessible via a public lift and would allow for accessible routes directly to the seafront and leisure uses. There are 6 disabled spaces in the current car park and these will be replaced within the new undercroft car park with a further 2 spaces to give a total of 8, which is considered appropriate to serve the public car park/swimming pool demand. 4 parent/child spaces would be provided, and an area for temporary drop-off. The final quanta and layout can be secured via condition. The LHA considers the access and the general layout of the undercroft car park to be acceptable and recommends that final detail and management be secured via condition. It should be noted the A259 scheme would also include 25 additional spaces within the vicinity of the site .
- 11.78. In line with council guidance and to future-proof the scheme, EV charging infrastructure will be provided within the undercroft car park – cabling only at this stage due to fire safety constraints within basements. In addition, the EV chargers within the current car park will be replaced within the forthcoming A259 scheme, which is welcomed so there will be no loss of full provision overall.
- 11.79. The LHA accept the principle of a temporary car park on the Western Lawn as a necessary short-term intervention during construction. Conditions are recommended to secure final detail of the access, layout, surfacing etc. Whilst it would initially represent a reduction of spaces compared to existing (107), it would still contain a substantial and appropriate number to serve the current King Alfred and seafront (including a replacement 6 disabled spaces). It also has potential for further expansion to create a further 34 spaces, depending on the timing of the removal of the current groynes works compound (likely to be early 2027).
- 11.80. There is no objection in principle to the stopping up, i.e. removal, of the southern part of Hove Street South and Kings Esplanade (and associated loss of 18 parking spaces, 12 general/6 disabled), given the development would make more effective use of the site, and in view of the wider public benefits of the scheme overall. Vehicular access to these areas will no longer be required as the new undercroft car park would be accessed further north. In addition, the A259 Scheme will include 25 additional car parking spaces (including 2 disabled) and a number of disabled bays have been relocated to St Aubyns.

- 11.81. The TA demonstrates that the overall scale of additional servicing and delivery demand created by the new centre compared to existing would be modest. Servicing currently takes place off the public highway within the site. The LHA raise no objection to the proposed delivery and servicing strategy to use A259 Kingsway and Hove Street, subject to a condition to secure further details. Servicing on the A259 is accepted on a monitored and managed basis, provide that robust controls, monitoring and a fallback use of Hove Street, is secured. The introduction of a new dedicated drop-off area at the bottom of Hove Street South is welcomed, and would allow people using the leisure centre or seafront to drop-off for a short period. Details of this area, including final siting of the roundabout/public realm, exact level of drop-off area and enforcement measures is sought via condition. The condition requires the final designs to explore moving the siting of the roundabout slightly further south and to explore provision of additional drop-off areas. A Fire Strategy report has been submitted which indicates appropriate access and turning provision for emergency vehicles. Such matters would also be covered and secured via Building Regulations.
- 11.82. The King Alfred proposal has taken due account of the A259 scheme and the TA and submitted drawings satisfactorily show how both proposals will be compatible. The proposal will significantly benefit from these sustainable transport enhancements directly adjacent. The A259 scheme includes a banned left turn for vehicles and was duly assessed and considered with the current leisure centre and public car park here; the junction was designed to improve safety for cyclists and pedestrians and not impact the junction capacity. Prioritising sustainable transport modes and safety is in line with national and local transport policy. The proposed new leisure centre would not generate significantly greater traffic compared to the existing and the LHA confirm that the new route would be appropriately signed and identified on GPS systems in advance, and the highway impact would be acceptable - as set out in the TA.
- 11.83. The submitted Construction Environmental Management Plan (CEMP) is considered broadly acceptable and will ensure that disruption to the highway network is minimised during the course of the construction process; it will be secured via condition.
- 11.84. In view of the above therefore, the LHA considers the transport impact to be acceptable. Subject to condition, the proposal would not result in a significant or severe residual impact on the public highway and the scheme would promote use of sustainable modes of transport, in line with national and local policy and guidance.

Sustainability

- 11.85. Part 14 of the NPPF at para 161 states that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to shape places in ways that contribute to radical reductions in

greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

- 11.86. City Plan Policies CP8, DM43, DM44 and DM45 all seek to ensure developments incorporate sustainable design features to avoid expansion of the city's ecological footprint, help deliver the principles of the One Planet approach, radical reductions in greenhouse gas emissions, particularly CO2 emissions, and mitigate against and adapt to climate change.
- 11.87. Policy SA1 states proposals on the seafront should ensure a good marine environment, enhance biodiversity in accordance with Biosphere objectives and consider options for small scale renewable energy provision. It goes on to state that development will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and to either connect where a suitable system is in place (or would be at the time of construction) or design systems so that they are compatible with future connection to a network. Part C of SA1 (King Alfred) seeks to achieve a high quality of design and sustainability.
- 11.88. An Energy Statement, Pre-BREEAM Assessment, Sustainability Checklist and further related information has been submitted to address queries raised by the Net Zero Team.
- 11.89. The proposed development would make very efficient use of previously developed land in a sustainable location with good access to public transport and local amenities, which is strongly encouraged by planning policy. The proposal would replace the current King Alfred leisure centre, and whilst its full demolition is not a formal part of this application, it is planned as part of the wider redevelopment plan for this allocated site. As noted in this report, the concerns expressed within some representations about demolition and sustainability are acknowledged, however, the principle of demolition is accepted. The options for re-use have been comprehensively assessed and discounted, as set out in the Cabinet report of 18/7/24. The Net Zero team confirm that a clear strategic and operational case for redevelopment has been established. The application includes a whole life carbon assessment which contains useful and encouraging additional information, however, this is not a necessary policy requirement. It can be seen below that the scheme would contain many welcomed measures to minimise embodied carbon and would deliver a highly sustainable building, and this is given significant weight.
- 11.90. The proposal would provide for a new modern and fit for purpose facility, which is welcomed. BREEAM 'excellent' standard is being targeted, which is welcomed and complies with Policy CP8 and is given significant weight and demonstrates a robust approach to sustainability. The proposal contains low and zero carbon technologies including photovoltaics and air source heat pumps, which is

welcomed. A fabric first approach to the construction is proposed, use of mechanical ventilation heat recovery, use of materials with low embodied energy including timber from sustainable sources, use of passive design (and use of brise soleil for shading) and natural daylight where possible and use of green roofs. The plant room would be future proofed to connect to any future heat network. A Site Waste Management Plan is part of the scheme, which is welcomed. Sustainable Drainage Systems (SUDs) will be incorporated where possible and are addressed within the recommended landscaping and drainage conditions. All these measures are supported by the Net Zero team and will be secured via condition. Conditions can also secure further details regarding thermal comfort, rainwater harvesting feasibility and the circular economy.

- 11.91. It can therefore be seen that the proposal would deliver significant sustainable benefits and accords with national and local policy.

Ecology and Biodiversity

- 11.92. The council has a statutory duty under the Natural Environment and Rural Communities Act 2006 (as amended by the Environment Act 2021) to consider and further the conservation of biodiversity. Section 14 of the 2021 Act requires all (qualifying) development to provide for a minimum of 10% biodiversity Net Gain (BNG). The NPPF and City Plan policies CP10 and DM37 seek to ensure that developments avoid adverse impacts and seek to both conserve and enhance biodiversity and geodiversity features. Proposals liable to affect green infrastructure and nature conservation features either directly or indirectly must be supported by an appropriate and detailed site investigation/ assessment and accord with provisions set out in the mitigation hierarchy. Adopted SPD11 provides further guidance as to how to appropriately meet policy requirements.
- 11.93. The application contains a number of specialist ecological reports in support of the proposals, including a Preliminary Ecological Appraisal (PEA) a Bat Survey, a Sparrow Mitigation Strategy, A BNG Assessment and associated statutory BNG Metric. The County Ecologist has duly assessed the information and considers it to be robust. They raise no objection in principle to the development, subject to the imposition of a comprehensive set of conditions to secure mitigation, compensation and enhancement of biodiversity – in compliance with the recommendations of the reports.
- 11.94. The site has been identified as containing wildlife habitats, including the area of green roof and the lawn, and the site also currently contains bird nesting sites/boxes. The site is identified as being important for breeding birds, in particular the house sparrow. The proposal therefore includes details of how development (and construction) impacts to all species using the site will be mitigated and enhanced, including provision of compensatory foraging habitats, a pond and nesting opportunities, some of which would be within the western lawn and Hove Beach Park areas. A biodiverse green roof is proposed within the scheme, which is welcomed, along with soft landscaping within the new public

realm. With regard to bats, precautionary measures during removal of roost features is supported and secured via condition. Conditions can also secure: compliance with submitted reports, a Construction Environmental Management Plan for Biodiversity, a Biodiversity Method Statement, an Ecological Mitigation Strategy for the House Sparrow and an Ecological Design Strategy.

- 11.95. With regard to Biodiversity Net Gain (BNG), the submitted Metric confirms the proposals would result in a –29.97% (-1.06 unit) loss in area habitat units, and to achieve the necessary 10% net gain some off-site units would need to be purchased. This is considered an acceptable approach, and the scheme does demonstrate that the inclusion of on-site units have been maximised where possible, which is welcomed. The final BNG proposal would be subject to the statutory Biodiversity Gain Plan condition.
- 11.96. Medium distinctiveness habitats are proposed (including ‘other neutral grassland’, trees and biodiverse green roof), which could be considered ‘significant onsite’ BNG in line with national guidance. The necessary management and monitoring of these would be secured by a Habitat Management and Monitoring Plan (HMMP) for relevant habitats. For any habitats not considered significant (as well as other species measures), it is recommended that they are secured via other means, through a Landscape and Ecological Management Plan (LEMP) condition.
- 11.97. With regards to securing the resources for the required on-going monitoring of the BNG for 30 years, it is recommended that the Corporate Director for the project, i.e. the applicant, enters into a Memo of Understanding with the Local Planning Authority (LPA) to agree that monitoring fees of £6,643.68 be made available to the LPA.
- 11.98. The County Ecologist raises no objection to the proposal and, overall, it is considered the proposed development would satisfactorily mitigate ecological impact and presents an opportunity to improve biodiversity and habitat opportunities for the site, in accordance with National and Local Planning Policy.

Flood Risk, Drainage and Land Contamination

- 11.99. City Plan policies DM40 (Protection of the Environment and Health – Pollution and Nuisance), DM41 (Polluted sites, hazardous substances & land stability), DM42 Protecting the Water Environment and DM43 (Sustainable Drainage) are all relevant to assessment of the proposal and seek to ensure developments demonstrate they would not prejudice health, safety, natural capital and the quality of the city’s environment and water.
- 11.100. The site is identified as Flood Zone 1 (the lowest risk) however it is very close to the coast. Therefore, a Flood Risk Assessment (FRA) was requested and has been submitted. In addition, a Drainage Strategy and Land Contamination report have been submitted.

11.101. Specialist consultees (Southern Water, Environment Agency and the council's Lead Flood Risk Engineer) have confirmed all reports to be robust and they concur with the conclusions. Land contamination risks are identified as being low to moderate but can be appropriately remediated if required. Parts of the site are indicated as being at risk of surface water flooding and where below ground, assets are at risk of groundwater flooding, however this can be appropriately mitigated. Consultees raise no objection to the proposal provided the mitigation and measures set out within the reports are implemented within the scheme. Conditions can secure the necessary measures, and will ensure compliance with relevant policies.

Other Planning Matters

Air Quality

11.102. City Plan Policy DM40 is relevant, and it states planning applications should provide, when appropriate, an Air Quality Impact Assessment to consider both the exposure of future and existing occupants to air pollution, and, the effect of the development on air quality. Air quality improvements and/or mitigation must be included wherever possible and have a positive impact, where practicable, on air quality when located within or close to an Air Quality Management Area and not worsen the problem. It seeks to mitigate the impacts of emissions from any associated transport, flues, fixed plant, and heat and power systems.

11.103. The development would replace an existing leisure centre with the same land use, and as set out above, the principle of this in this location is established via Policy SA1. The application contains an Air Quality Assessment which concludes that the proposed development is not expected to introduce sensitive receptors into an area of poor air quality, nor is it anticipated to result in any significant adverse effects on air quality, including to the adjacent local road network. The council's Air Quality officer considers the assessment to be robust and concurs with the conclusion that the site is suitable for its intended use. They raise no objection to the development, subject to conditions to promote air quality, including securing EV charging infrastructure, no static combustion on site, future-proofing plant for connection to district heat network and incorporation of air source heat pumps. On this basis, the development is considered to be in accordance with policy DM40.

Archaeology

11.104. The site is not currently located within a designated Archaeological Notification Area but lies within an area of known prehistoric potential. Compliance with the NPPF and City Plan Policy DM31 is therefore relevant.

11.105. The application contains an Archaeological Desk-Based Assessment (ABDA), which the County Archaeologist confirms provides a clear assessment of the site's archaeological potential, established from appropriate sources, and they concur with its conclusions. The site is identified as having high potential for post-

medieval and modern periods, low to moderate potential for prehistoric and medieval periods and low potential for Romano-British and Anglo-Saxon periods. The ADBA also highlights the proximity of Head deposits and potential to preserve evidence for prehistoric land use and evidence related to development of Hove village. Works to the west identified deposits that may be related to the Brighton-Norton raise beach; these have potential to contain significant evidence for past climate change, landscape evolution and human interaction.

- 11.106. Therefore, in order to ensure the archaeological and historical interest of the site is appropriately safeguarded and recorded, the County Archaeologist recommends conditions to secure a programme of archaeological works in accordance with an agreed written scheme of investigation. On this basis, the development would be considered to comply with the NPPF and Policy DM31.

Crime Prevention

- 11.107. Crime prevention is a material planning consideration and this is addressed in the NPPF and City Plan Policies CP12 and SA6. These policies seek to ensure developments including new public realm incorporate design features which deter crime or disorder and the fear of crime.
- 11.108. Sussex Police raise no objection to the proposal and recommend number of measures are incorporated into the scheme. A condition is therefore recommended to secure a scheme for crime prevention measures, and conditions regarding public realm design and lighting would also address this matter.

The Town and Country Planning (Consultation) (England) Direction 2024

- 11.109. Under the Direction above, the Local Planning Authority (LPA) is required to consult the Secretary of State (SoS) of their intention to grant permission for certain types and locations of development, including where all the following apply as set out in part 5 of the Direction:
- The development is on land which is edge of town centre or out-of-centre
 - Is not in accordance with one or more provisions of the development plan in force in relation to the area in which the development is to be carried out
 - Consists of a building where the floorspace to be created is 5,000sqm or more
- 11.110. In the case of the application and its location, a leisure centre is a defined 'main town centre' land use, the scheme has a 12,000sqm floor area measured externally and its location is just outside the 300m distance threshold to the nearest primary shopping area boundary (Church Road- see City Plan Policies CP4 and DM12), being approximately 350 metres away at its closet point. Whilst the development is partly within a site allocated for leisure use (Policy SA1) and is considered to comply with the policies of the Development Plan when taken as a whole, the inclusion of the temporary car park on the Western Lawns conflicts with Policy CP16 of the Development Plan (albeit only for a temporary period) as

this a designated Open Space. Therefore, it is recommended that the LPA consult the SoS (if the Planning Committee resolution is the grant the development). The development would not meet the thresholds or criteria for other types of development set out in the Direction.

- 11.111. The SoS has 21 days in which to decide whether to issue a direction under Section 77 of the Town and Country Planning Act 1990 and 'call in' the application for their determination. The recommendation set out in this report is therefore 'minded to grant' permission subject the SoS not calling in the application for determination.

Other Matters Raised in Representations

- 11.112. Loss of view (for example of the sea) is not a material planning consideration, however the impact on immediate outlook/sense of enclosure has been fully considered - see Amenity section above. Loss of property value is not a material consideration.
- 11.113. The representations regarding the business case for the proposal and value for money are noted, however, this is not a material planning consideration - see also background section with regard to the case for the redevelopment and Cabinet decisions. Concerns about consultation processes are noted. The applicant carried out comprehensive pre-application consultation, includes at early stages, with the community and stakeholders, as set out in the submitted Statement of Community Involvement (SCI), which is considered to be in line with the guidance within the councils adopted SCI.

12. SUMMARY & CONCLUSION

- 12.1. The redevelopment of this important strategic site for delivery of a modern, sustainable and fit for purpose leisure centre, including pools, is welcomed and is given significant planning weight. The proposal accords with City Plan Policies and site-specific policy SA1, which seeks replacement wet and dry leisure facilities here and which promote provision and enhancement of sports and leisure facilities to meet the city's needs.
- 12.2. The replacement of the current outdated and inefficient King Alfred building which is reaching the end of its life has been established and justified, and whilst there is some public support for its retention, this cannot be justified on planning grounds.
- 12.3. The concerns expressed in representations with regard to the level and type of facilities including those for children within the scheme has been considered, however, the mix and type of uses proposed is acceptable in planning policy terms overall and would broadly meet the council's Sports Facilities Investment

Plan. The proposal would include satisfactory and inclusive facilities for children's play.

- 12.4. Overall, despite reduced floorspace and reduced/different provision compared the existing King Alfred and the SFIP, on balance it is considered the modern and fit for purpose proposals would be acceptable and would deliver enhanced and accessible leisure facilities and promote healthy lifestyles, in line with planning policy and the aims of council sports, health and wellbeing strategies.
- 12.5. Some concerns have been expressed in representations about future housing proposals. The application is solely for the leisure centre; the site forms just part of the wider policy SA1 allocation, which seeks to provide circa 400 homes alongside. There are no current development proposals for that part of the site, and this does not need to form part of the current application at this stage. The application does include an illustrative masterplan to demonstrate that the leisure centre has the potential to work successfully with any future high-density housing scheme – housing provision is given significant weight, given the city's supply position, as per the NPPF.
- 12.6. The design of the proposal has had input from the independent Design Review Panel and the council's urban designer and has evolved positively. The proposal is carefully considered and is of good quality. The building and public realm would have civic presence and introduce a new landmark for the city, appropriate for this important and prominent site. There would be less than substantial harm to surrounding heritage assets caused (at the lowest end of the scale) through introduction of a building on this open site, and this is significantly outweighed by the heritage and public benefits, in line with NPPF requirements. The car park proposed on the Western Lawn would be only temporary during construction and is needed to continue to serve the current facility and seafront. The lawn would thereafter be restored, thus mitigating impacts to the open space. The introduction of new public realm areas is a significant benefit of the scheme and would provide an enhanced environment and linkages, and the proposal would continue the regeneration of the wider area and seafront, in accordance with Policy SA1.
- 12.7. The proposals would have an acceptable amenity impact on neighbours, subject to conditions, given the location. The proposals would not result in significant traffic or parking impacts and the development would satisfactorily meet demand for travel and promote use of sustainable modes. The highways designs and car park layouts proposed are safe and inclusive, subject to detailed design. Pedestrian and cycle access would be preserved or enhanced.
- 12.8. The proposal would incorporate a number of sustainable measures, which is welcomed and would meet BREEAM 'excellent' standard, in line with policy. Ecological impacts can be appropriately mitigated and the scheme would provide for biodiversity enhancement and statutory BNG. The proposals would

appropriately mitigate any risk from flooding and land contamination, as secured by condition.

- 12.9. Key internal and external consultees raise no objection to the proposals, subject to imposition of conditions to secure appropriate detail, mitigation etc.
- 12.10. As set in this report, the proposal would deliver numerous benefits for locals, the wider city and visitors and this is given significant planning weight. The development would broadly accord with the council's sports and development briefs for the site. The proposals are considered to meet the planning policy requirements for this site, as set out in Policy SA1, and the policies of the Development Plan taken as a whole. Approval is therefore recommended (subject to no 'call in' by the Secretary of State).

13. EQUALITIES

- 13.1. Section 149(1) of the Equality Act 2010 provides:
 - 1) A public authority must, in the exercise of its functions, have due regard to the need to—
 - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 13.2. Officers considered the information provided by the applicant, together with the responses from consultees (and any representations made by third parties) and determined that the proposal would not give rise to unacceptable material impact on individuals or identifiable groups with protected characteristics. See also Accessibility and Inclusivity and Transport sections above.