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Date: 24 August 2023
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Dear Madam/Sir

Proposed Application by Rampion Extension Development Limited for an Order Granting Development Consent for the scheme Rampion 2 Offshore Wind Farm – EN010117

I write to provide an officer response on behalf of Brighton & Hove City Council (BHCC) regarding the adequacy of Rampion Extension Development Limited's (RED's) consultation during the Pre-application stage leading up to the submission of their application for a Development Consent Order.

BHCC is not a host authority in that none of the physical works will take place within the city's jurisdiction, but it is a neighbouring authority. As the windfarm is directly off the south coast of the city it will be subject to some of the most direct and significant long term visual impacts of the proposed expansion.

BHCC is satisfied that RED has complied with the procedural requirements of Section 42 of the Planning Act 2008 in that we have been consulted at every formal stage.

We are also content that the applicant has complied with sections 47 and 48 of the Planning Act 2008 regarding the duty to consult the local community and to publicise the scheme. Beyond the required consultation regarding the Statement of Community Consultation, a meeting was held with BHCC in November 2020 to discuss the extent and nature of consultation.

However, we are concerned that RED has not complied with Section 49 of the Planning Act 2008 which requires applicants to take account of responses to consultation and publicity. BHCC provided a response to the PEIR on 16 September 2021, setting out concerns that the Seascape, Landscape and Visual Assessment underestimated the impact on Brighton and Hove, particularly the significant heritage areas along the seafront and its more tranquil areas. It also noted that only one viewpoint was sited along the city's seafront, and that was in a busy location between the two piers. It should be noted that the detail of this location was only apparent once the PEIR had been published.

Despite the concerns raised, RED did not then engage with BHCC on the significant issue of visual impact. At one of only three full ETG meetings regarding SLVI, held in June 2022, it became apparent RED had engaged with the South Downs National Park Authority, Natural England and West Sussex County Council, leading to revisions to the scheme. BHCC had not been engaged in this process, despite the scheme's significant visual impact on the city's coast, including heritage assets, and the scheme layout had been finalised.

Concern over the lack of engagement was raised by BHCC at the meeting, both verbally and in writing afterwards. Officers were advised that a response to the concerns raised would be provided but it was not forthcoming, and there was no further engagement on SLVIA issues.

Given this is the case, BHCC does not consider that the Pre-examination consultation undertaken by RED has met the requirements of Section 49 of the Planning Act 2008 notably the need to take account of responses to consultation and publicity.

We are well aware of our status as a neighbouring authority rather than a host authority. We are also well aware of the short-term impact the cable route works will have and the consultation RED have had to undertake to secure an appropriate route. However, the existing windfarm is a significant visual feature off the Brighton & Hove coast, and the enlarged windfarm will increase this visual impact. Therefore, especially knowing RED's track record for engaging with local authorities the city's expectation would be for more engagement and a far more responsive process than has been the case.

Yours sincerely



Jane Moseley
Planning Manager | Development Management – East
Brighton & Hove City Council