



# **LOCAL IMPACT REPORT**

**APPLICATION BY RAMPION EXTENSION DEVELOPMENT  
LTD FOR AN ORDER GRANTING DEVELOPMENT CONSENT  
FOR THE RAMPION 2 OFFSHORE WIND FARM**

**28 February 2024**

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## **1. Introduction**

- 1.1 This is the Local Impact Report (LIR) for Brighton & Hove City Council (BHCC) in response to the application by Rampion Extension Development (RED) Limited for a Development Consent Order relating to the Rampion 2 Offshore Wind Farm, extending the existing Rampion 1 Wind Farm.
- 1.2 The following provides an analysis of the likely impacts of the Rampion 2 scheme on the land within the Brighton & Hove City Council (BHCC) jurisdiction, and assesses those against the policies in the development plan, along with other material considerations as relevant to the City.
- 1.3 The Local Impact Report (LIR) has been prepared taking into account the guidance set out in the Planning Inspectorate's Advice Note One: Local Impact Reports.

## **2. Site Description and Surroundings**

- 2.1 The application site is located some 13km from the coast of the city of Brighton and Hove, to the rear (south) and west of the existing Rampion 1 windfarm site. The existing windfarm sits off the coast south-west of the city and is visible in views from along the city's coast, as well as the hills behind.
- 2.2 The city is the highest population centre by some way that is affected by the existing windfarm and the proposed expansion. Brighton and Hove has a population of some 277,200 residents compared with Shoreham-by-Sea (population 23,670), Worthing (population 111,620), Littlehampton (population 19,070) and Bognor Regis (population 68,410)(2021 Census).
- 2.3 BHCC has some 11km of coastline facing out towards the existing and proposed windfarm. The coastline contains some of the city's most sensitive assets in terms of visual impact including seven of the city's Conservation Areas namely, from west to east: Pembroke and Princes, Brunswick Town, Regency Square, Old Town, Valley Gardens, East Cliff, and Kemp Town.
- 2.4 In addition, the Grade II listed Kemp Town Enclosures Registered Park and Garden is on the seafront, itself incorporating the Grade II\* Listed Madeira Terrace, Madeira Walk, and Lift Tower, along with the Grade II Listed Dukes Mound. There are 30 listed buildings in the seafront area south of the A259 alone, excluding the many listed buildings north of this with views of the sea.
- 2.5 The area from Shoreham to Newhaven, including the coast, forms the Brighton & Lewes Downs designated UNESCO World Biosphere Reserve. It has been designated by UNESCO in recognition of its biodiversity, from the chalk grasslands of the South Downs National Park to the chalk block underpinning the Marine Conservation Zone, but also for "how people live, work and learn sustainably in the area."
- 2.6 The coastal location of Brighton and Hove is central to its character, and views of the sea are key to this for those living in the city, but also those visiting, with tourism forming a major part of the economy. As noted in paragraph 3.116 of City Plan Part 1:

*"The seafront has been, and always will be, the 'shop window' of Brighton & Hove, encompassing a year round hub of leisure and recreation activities for residents and*

*visitors. From the Marina in the east to the city boundary at Shoreham Harbour in the west, the coastline is heavily urbanised and is set against a largely Victorian and Regency townscape. It is considered by English Heritage to be one of the finest urban seafront townscapes in Britain.”*

- 2.7 This acknowledges that the coastline of the city is urban, but also that it is central to residents’ and visitors’ enjoyment of the city, and that it is sensitive, being home to a precious historic townscape.
- 2.8 The coast is important to the City, but the City is clearly important to the Rampion projects, as evidenced by the fact that the windfarm’s visitor centre is located on the city’s seafront (though not secured through the previous DCO), their project team was until recently located here and that the Examinations into both Rampion 1 and 2 have been held here.

### **3. Principle of the Development**

- 3.1 BHCC supports the principle of the Rampion 2 windfarm development, noting the contribution it will make to increasing renewable energy production for the UK and the resultant benefits for climate change. BHCC has a corporate target of becoming carbon neutral by 2030 so the scheme would support that, albeit the energy produced would enter the national grid rather than be of immediate, local benefit.
- 3.2 A number of key strategic objectives set out in City Plan Part 1 (CPP1) support the provision of renewable energy:

*“SO1: Ensure that all major new development in the city supports the regeneration of the city, is located in sustainable locations, provides for the demands that it generates and is supported by the appropriate physical, social and environmental infrastructure.”*

*“SO7 Contribute to a reduction in the ecological footprint of Brighton & Hove and champion the efficient use of natural resources and environmental sustainability.”*

- 3.3 Supporting paragraph 2.3, relating to a ‘sustainable city’, notes that:

*“By 2030 the city will have made significant progress towards becoming a resource-efficient, One Planet, Zero Carbon City and a city that is adapting well to climate change. This will be achieved by:*

- Working towards a reduction in the city’s carbon emissions by 42% by 2020 and a reduction of 80% by 2050 from the 2005 baseline of 5.7 tonnes per person.*
- Maximising opportunities to support major renewable and decentralised energy infrastructure; ...*
- Pioneering the drive towards a low carbon economy with a thriving environmental technology sector to support the development of renewable and low-carbon energy, recycling initiatives and reduced resource consumption.”*

- 3.4 There is, therefore, planning policy support for the development of renewable energy as part of the drive towards a low carbon economy for the city.

- 3.5 While the energy produced by Rampion 2 would go into the national grid rather than directly to local use within Sussex, BHCC acknowledges the overall benefit the scheme would deliver and is supportive of the increased provision of renewable energy.
- 3.6 However, this must be balanced against the impacts of the scheme on the City which we consider have been significantly under-assessed, as set out below.

#### **4. Seascape, Landscape and Visual Impact**

- 4.1 As noted above, BHCC is supportive of the principle of renewable energy, including offshore windfarms. We accept that the production of energy from offshore wind in the vicinity of the city's coastline will result in increased visual impacts, impacts on the landscape along the coast and on the seascape.
- 4.2 We are pleased to note the reduction in impact on the city when compared with the scheme proposed at the PEIR stage (figure 15.98 of the Seascape, Landscape and Visual Impact Assessment (SLVIA)).
- 4.3 However, we consider that the impact on the City has been underassessed, and that partly as a result, the applicant has not engaged with BHCC to mitigate or offset the impacts.
- 4.4 The natural landscape value of the seafront is noted in policy SA1 of City Plan Part 1 which seeks to, among other things set out in detail below, enhance the public realm, and to promote high quality design to complement the natural heritage of the seafront and its historic features. The supporting text (paragraph 3.118) notes:

*"The seafront is one of the unique attractions of the city. It is the city's main public space and provides an important opportunity for the promotion and enhancement of both formal structured club and facilities based activities such as sailing and informal casual recreation such as walking and swimming. It is also the location of two exceptional groups of historic buildings fronting the sea, east of Palace Pier to the Marina and west of the Brighton Centre to Fourth Avenue. This historic 'backcloth' provides for both commercial and residential uses and makes a significant contribution to the setting, heritage and vibrant character of the seafront. The seafront area as a whole varies in its intensity of activity with both lively and tranquil stretches. This variety necessitates a sensitive and qualitative approach in terms of managing future change and development."*

- 4.5 This highlights the uniqueness of the city's seafront, its historic backdrop, and the importance of tranquil areas. We do not consider these factors have been taken into account in the applicant's assessment of the seascape and visual impact on the city, let alone the need for a 'sensitive and qualitative approach' to development affecting it. Rather the applicant has characterised the Brighton and Hove seafront as 'urban' and already affected by Rampion 1, devaluing its baseline and underassessing the impact of Rampion 2.
- 4.6 As stated in both our Relevant Representation and our response to the Adequacy of Consultation, BHCC's opportunities to work with the applicant to mitigate the impact of Rampion 2 on the city have been limited. We provided initial comments at the PEIR stage, but had no input on the iterative layout that has evolved since that date because

of being omitted from crucial meetings, with no follow-up from the applicant when this was highlighted. The applicant is aware of this, as confirmed by email and in virtual meetings but has not responded to requests made since June 2022 to engage.

- 4.7 Throughout the process, and as is evident in the SLVIA, there has been an almost singular focus on the landscape, seascape and visual impact on the nationally designated landscapes, particularly South Downs National Park (SDNP) and the Sussex Heritage Coast. While the impact on these designations is understood, there is also a need to take into account the wider impacts, including on Brighton and Hove. For example paragraph 15.7.23 of the SLVIA refers to 'good design' minimising the impact on the special qualities of these protected areas, echoed at paragraph 15.7.25, 15.7.26, and 15.7.27. There is no mention of mitigating the impact on Brighton and Hove's sensitive coastline. Further, we note in relation to paragraph 15.7.27 that BHCC did not have an opportunity to comment on the revised layout following responses to the PEIR as we were not invited to the April 2022 meeting at which it was discussed before being finalised.
- 4.8 While we appreciate the need to focus on impacts on SDNP, both on shore and offshore, this should not mean that the impact on Brighton and Hove is ignored, or that the views of BHCC are not sought. The City will be significantly affected by Rampion 2, for a period of at least 34 years when construction and operation is included, let alone the decommissioning process beyond, having already been significantly affected by Rampion 1 which is clearly visible all along our 11km of coast, as well as further inland.
- 4.9 As is clear from the photomontages provided, particularly viewpoint 8, Rampion 2 will mean that the horizon, when viewed from Brighton and Hove, is dominated by wind turbines. The seascape and experience of the City's coastline will be significantly changed for a significant period of time. While it would be for a 'temporary' period, thirty years operation after 4 years' construction is a significant temporal impact by any measure, and would be in addition to the impact already experienced as a result of Rampion 1.
- 4.10 Paragraph 15.10.92 of the SLVIA highlights the impact, noting that "*High rise and seafront views, including the coastal residential areas of Hove, Brighton's main seafront near Brighton Pier, Kemp Town and Brighton Marina residential will be defined by open, direct views of the proposed development, in which it will form a prominent element as an addition to the west and east of the existing Rampion 1 wind farm.*" The paragraph notes that Rampion 2 would add an additional lateral spread of 17.6 degrees over the existing Rampion 1 windfarm and confirms that the residual impact on the city would be major/moderate.
- 4.11 However, this impact has been assessed from the single viewpoint (viewpoint 8) along Brighton and Hove's 11km coastline. There are two other viewpoints within Brighton and Hove, both within the less populated areas of the SDNP. Assessment of the impact on the city's urban areas, including the largest population centre along the coast, and the tens of millions of visitors to it is therefore dependent on a single viewpoint.
- 4.12 It is worth noting that we highlighted this in our response to the PEIR submission in which we highlighted that we did not consider the location chosen to be representative of a 'worst case scenario' or Rochdale Envelope approach in terms of the impact on the city, and thus the impact has been underassessed:

*“The Brighton seafront view (Viewpoint 8) has been taken from the Kings Road between the two piers. This is a comparatively low-lying viewpoint and the seafront here is very developed and has a busy commercial and tourism character. As a result, the impact of the offshore array in this viewpoint has been under-assessed.*

*In landscape and seascape terms, a more representative location would be from an elevated position towards the eastern end of Marine Parade. The seafront is much more open and tranquil in this area, and uninterrupted sea views are integral to the way to the way this historic area is experienced, so the magnitude of change arising from the offshore array will likely be greater.”*

4.13 This location was specified by BHCC because of its more open, elevated position, but also because the eastern end of Marine Parade contains the Grade I listed Sussex Square, the Kemptown Enclosures Grade II Listed Registered Park and Garden, the Grade II\* Listed Madeira Terrace, and Grade II Listed Dukes Mound. Views from this location are therefore considered more representative of the ‘worst-case views’ on the seafront, given the elevated position and large number of sensitive receptors in the locale.

4.14 While the scheme has been amended since the PEIR stage, the point raised remains relevant. In BHCC’s view, the impact of the scheme on the city’s coastline has been underestimated because of the location chosen, notably a busy location between two piers – features that extend into the sea, enclosing the view.

4.15 The applicant’s description of the viewpoint reinforces this (SLVIA page 257):

*“The immediate context of the sea view is fundamentally defined by the influence of the pier. Further foreground detail is contributed by the below promenade shops and beach recreational facilities along with the shoreline strip of shingle beach.”*

4.16 This accurately describes the area in which viewpoint 8 is located. It is a busy location enclosed by the (grade II\* listed) Palace Pier and to a lesser extent the (grade I listed) West Pier. This is not the case to the west and east of this point, where there are more tranquil locations less affected by the piers and less enclosed. Naturally, the Horizontal Field of View would be less in this location than it would in other locations at a higher level or one not located between two seaward structures.

4.17 This particular location is also affected by being immediately south of the Brighton Railway Station so on sunnier days accommodates larger numbers of visitors than the rest of the beachfront area.

4.18 The applicant’s response to our request for an additional/replacement viewpoint is set out in Table 15-7 of the SLVIA, noting:

*“The busy commercial / tourist character near to Viewpoint 8 is noted, however the viewpoint is sited at one of the closest sections of the Brighton coast with views to the Proposed Development and is considered to be representative of the ‘worst-case’ effects on views from the settlement, which are described as occurring from wider Brighton seafront. Effects are assessed as being of medium high magnitude in Section 15.10 and are not therefore considered to be underassessed.”*

- 4.19 The viewpoint is not only the closest on the Brighton (and Hove) coast to the Proposed Development but closest of any settlement along the coast, as noted at paragraph 15.15.56 of the SLVIA. As noted at paragraph 15.7.35 of the SLVIA, proximity is crucial to the impact on views and character:

*“The distance between the receptor (e.g. viewpoint or designated landscape) and Rampion 2 is also one of the main parameters that determines the magnitude of change to views and perceived character.”*

- 4.20 It is therefore difficult to understand why the applicant has given so little weight to the impacts on the city or the need to mitigate them, and we would reiterate our conclusion that the impact has been underassessed.

- 4.21 Nonetheless, this (proximity to the windfarm) was not the issue raised in our earlier representation. As clearly identified throughout the SLVIA, horizontal distance is by no means the only factor determining the impact of the scheme on the landscape, seascape or visual receptors.

- 4.22 We would disagree with several characterisations of the coastline set out in the SLVIA including that the seascape experience on crowded beaches is focused on *“beach activities and tourist attractions (rather than enjoyment of seascape character)”* (p326). It is difficult to see how this could be quantified but it is notable that many of those using the beach on busy days sit, walk, swim or paddle looking out to sea. It is also difficult to understand why the characterisation of the cultural/heritage qualities of the seafront does not include reference to the numerous historic features including the Madeira Terraces, Band Stand, railings and beachfront shelters, as well as the grand residences that form the backdrop north of the roadway.

- 4.23 We would also highlight the summary set out in the SLVIA (paragraph 15.15.56) which confirms there would be significant visual impacts along the East Sussex coastline, including Brighton and Hove:

*“Significant visual effects occur principally on views experienced by residents and visitors to the seafront areas of these settlements, due the strong inter-visibility between the low exposed coastline to the offshore elements of Rampion 2 in its expansive seascape context to the south.”*

- 4.24 It continues in the same paragraph that (in summary) despite the distance, the combination of scale contrasted with Rampion 1, and the lateral spread means the impact would be significant, with the additional lateral spread of the new project adding *“approximately 31 – 53 degrees which is considered a relatively wide HFoV as a portion of the 180 degrees available to the observer.”*

- 4.25 The SLVIA also notes in this paragraph that as the project moves west towards Brighton it gets closer to the coast and the magnitude of change increases, which we agree is the case, but strongly disagree with the final sentence in this paragraph:

*“The WTGs will, however, add further offshore elements to the relatively simply composed view of sand/shingle beach, sea and sky, in a large scale seascape context and will introduce elements that are characteristic in the receiving view with a similar form to the Rampion 1 WTGs which are highly visible from this stretch of coastline in existing sea views.”*

- 4.26 The seascape has been affected by Rampion 1, but it is our view that Rampion 2 would have a cumulative impact that increases the effect on views from Brighton and Hove, rather than decreasing it by virtue of the seascape already having been degraded.
- 4.27 We note that the Planning Inspectorate agreed, in response to the Scoping Request, that there is unlikely to be a significant cumulative seascape, landscape and visual effect of the Proposed Development with other windfarms with the exception of Rampion 1 [emphasis added].
- 4.28 The applicant contends that Rampion 1 forms part of the baseline so the cumulative impact alongside Rampion 2 appears to have been dismissed, and Rampion 1 is taken as having essentially despoiled the seascape already. We disagree with this approach, noting the definition of ‘cumulative effects’ given by the applicant as *“Additional changes caused by a Proposed Development in conjunction with other similar developments or as a combined effect of a set of developments, taken together.”* Rampion 1 would be considered a ‘similar development’ and is viewed in combination with the Proposed Development so the cumulative impact must be considered.
- 4.29 Even if it is not considered as a ‘cumulative impact’, the visual impact of the Proposed Development alongside Rampion 1 when viewed from Brighton & Hove’s coastline would be increased visual clutter across an increased horizontal area of seascape, at increased height.
- 4.30 The night time impact would also be increased. Night-time views from Brighton & Hove’s coastline now feature a spread of red lights from Rampion 1. This would be expanded horizontally and vertically with Rampion 2, adding to the impact on the city. It does not appear that this has been assessed in the SLVIA.
- 4.31 In conclusion, we consider that the impact on views from the city of Brighton and Hove and on the seascape has been underassessed in the applicant’s submission due to the single location of the viewpoint, and the assumptions made, as set out above.
- 4.32 This being the case, and given the lack of mitigation available, we ask that should Development Consent be granted, a package of contributions is secured by legal agreement to compensate for the significant harm caused to the City by the Project. The details of the package are set out in further detail below.

## **5. Impact on Heritage Features**

- 5.1 As noted above, the coastline of Brighton and Hove contains seven conservation areas and numerous listed buildings, including many immediately along the promenade that stretches along the seafront and is enjoyed by millions of residents and visitors.
- 5.2 As also noted above, the impact on all of these features was assessed using photomontages produced from a single viewpoint. The viewpoint is at a low elevation in a busy, contained location between the two piers. At the PEIR stage we recommended a location to the east to provide views more representative of the historic features along the coastline, but this was not taken forward. As a result, we consider that the impact on the city’s heritage features has been significantly underassessed.



5.3 Policy CP15 of City Plan Part 1 states that

*“The council will work with partners to promote the city’s heritage and to ensure that the historic environment plays an integral part in the wider social, cultural, economic and environmental future of the city through the following aims:*

- 1. The city’s historic environment will be conserved and enhanced in accordance with its identified significance, giving the greatest weight to designated heritage assets and their settings and prioritising positive action for those assets at risk through, neglect, decay, vacancy or other threats. The council will further ensure that the city’s built heritage guides local distinctiveness for new development in historic areas and heritage settings;*
- 2. Where proposals are promoted for their contribution to mitigating climate change, the public benefit of this will be weighed against any harm which may be caused to the significance of the heritage asset or its setting;...”*

5.4 The public benefit of the scheme in terms of mitigating climate change is not denied and is supported, as previously noted. However, we consider the harm caused to the significance of the many heritage assets along Brighton and Hove’s coastline has been greatly underassessed, and therefore the need for engagement with BHCC and mitigation has been greatly underestimated.

5.5 Policy DM29 of City Plan Part 2 relates to the Setting of Heritage Assets and notes the following:

*“Development within the setting of a heritage asset will be permitted where its impact would not harm the contribution that setting makes to the asset’s significance, by virtue of the development’s siting, footprint, density, scale, massing, design, materials, landscaping or use.*

*In assessing the contribution that setting makes to significance, and the impact of a development on that setting, the council will have particular regard to the following considerations:*

- a) The physical surroundings of the asset, including topography and townscape;*
- b) The asset’s relationship with the Downland landscape, the sea or seafront and with other heritage assets;*
- c) The asset’s historic or cultural associations with its surroundings, including patterns of development and use;*
- d) The importance of any sense of enclosure, seclusion, remoteness or tranquillity;*
- e) The way in which views from, towards, through and across the asset allow its significance to be appreciated;*
- f) Whether the asset is visually dominant and any role it plays as a focal point or landmark; and*
- g) Whether the setting was designed or has informally occurred over time, including the degree of change to the setting that has taken place.*

*Where either substantial harm or less than substantial harm is identified the council will expect the applicant to fully meet the requirements set out in the NPPF, having regard to the significance of the heritage asset/s affected.*

*Opportunities should be taken to enhance the setting of a heritage asset through new development. Where a major development impacts on the settings of multiple heritage assets, the scale of impact should be assessed against the importance of the heritage asset and the degree to which setting contributes to its significance.”*

- 5.6 Rampion 2 would be within the seascape that forms the pivotal setting of the many heritage features along the coast. Its impact would in our view harm the asset's significance by virtue of its siting, footprint, density, scale, and massing, all of which mean it changes the seascape to one with visual clutter far exceeding that of Rampion 1. For the many heritage features along the coast, their seaside location is inherent to and indivisible from their setting. People experiencing these assets do so while experiencing the coastline and views out to sea. Rampion 2 would increase the sense of enclosure (criterion d), change the relationship with the sea and seafront (criterion b), affect the feeling of remoteness and tranquillity (criterion d), particularly along the western and eastern parts of the seafront, and change the way views from the asset allows its setting to be appreciated (criterion e). Examples of these changes are when views are experienced from the Grade II\* Listed Madeira Terraces, from any of the shelters along the promenade, from the Grade II Listed Bandstand, from the many listed dwellings along the front or the Conservation Areas along the front.
- 5.7 The setting of these assets has changed over time (criterion g), including with Rampion 1, but as can be seen from the photomontages in viewpoint 8 (while noting this is not in our view a 'worst case scenario'), the change resulting from Rampion 2 would be significant, and would result in less than substantial harm to the setting of these heritage features.
- 5.8 We query the conclusion that the impact of the offshore works on all heritage features along the coastline, including within Brighton & Hove would be 'not significant'. The justification for this conclusion appears to be the distance from the turbines to the coastline, resulting in 'low' magnitudes of change, a moderate adverse residual effect and a not significant overall impact.
- 5.9 We do not agree that the impact on the numerous heritage features along Brighton and Hove's coastline would be 'not significant'. We acknowledge the distance to the turbines would provide some mitigation, but the photomontages in the SLVIA (viewpoints 7 and 8) which make it clear that the impact is greater than 'not significant'. The existing turbines have already visibly changed the setting of these historic features, and as is apparent in these viewpoints, the increased number and height would exacerbate this impact.
- 5.10 The impact on the Grade II listed bandstand on the seafront (paragraphs 25.10.94 – 25.10.96) is concluded to be 'not significant' by virtue of the fact that "while the seascape views that the asset was designed to take advantage of will be harmed, its historic interest will remain substantially comprehensible". The overall impact is considered to be 'not significant' as the WTGs would be seen to be over the horizon, which is clearly not the case based on the images in viewpoint 7.

- 5.11 Further, it is difficult to understand what ‘substantially comprehensible’ means in this context but the bandstand has open views along the seafront and to the horizon. The way this historic feature is experienced would be adversely affected by the scheme so the impact is considered more accurately to be major/moderate.
- 5.12 The impact on the many features in the eastern part of the seafront have been grouped under “East Cliff Conservation Area, including Grade II\* Listed Madeira Terrace, Madeira Walk”. The conclusion is that because of distance and visual separation there would be a low magnitude of change to these assets with a moderate adverse residual effect and because they would be seen to be over the horizon, a not significant overall impact (paragraph 25.10.85).
- 5.13 One of the key features in the eastern part of the seafront is the Madeira Terrace which notably, the applicant has not assessed separately, despite its scale and the central role it plays in people’s experience of the seafront, both at ground level and at the top of the terrace on Marine Drive. It is 865m long and includes 141 separate arches, a Victorian promenade with raised walkway, access stairs, associated buildings and lift towers. It is cited in the English Heritage listing as *“very rare being the only known, land-based, monumentally-scaled, iron promenade in England, and possibly worldwide; although converted to electric power, the three-stage lift is an early and rare example of a hydraulic, water-powered lift in a seaside location; group value: with other seaside structures and buildings including the adjacent Palace Pier and the Royal Crescent, both listed at Grade II\*.”* The terrace faces out to sea with the cliff behind, with a mid-level walkway above and ramps/stairs connecting the sea level to the walkway, and beyond to Marine Parade.
- 5.14 The importance of Madeira Terrace to the seafront is emphasised in Policy SSA5 of City Plan Part 2 which supports its ‘refurbishment, restoration and revitalisation’ as a key priority for the Council. The aim is to create a ‘seafront for all’ that would reactivate the Grade II\*listed structure that is sensitive to the structure’s unique and intrinsic heritage value. As with all of the historic features along the coast, the Madeira Terrace has a deliberate, designed relationship with the sea which has been underestimated and underassessed in the Heritage assessment. Given the close relationship between the Conservation Areas and Listed Buildings along the Brighton and Hove seafront we consider impact on the setting of these historic features to be less than substantial, the magnitude of change resulting from Rampion 2 to be high, and the resulting significant of the effect to be major adverse.
- 5.15 Again, the conclusion that the WTGs would be ‘over the horizon’ is incorrect, as evidenced in viewpoint 8 where they are clearly visible. It is difficult to reconcile this conclusion with that set out in the SLVIA which identifies a major/moderate impact, noting the existing WTGs are highly visible along the coastline, so a large, more expansive windfarm will be significantly more so.
- 5.16 The blanket conclusion that because of distance, the setting would be unaffected is clearly, demonstrably not the case, given the impact of Rampion 1.
- 5.17 As with the seascape and visual impact, given the lack of mitigation available, we ask that should Development Consent be granted, a package of contributions is secured by legal agreement to compensate for the significant harm caused to the setting of the City’s heritage features by the Project.

## 6. Socio-Economic Impact

6.1 As we did at the PEIR stage, we note the lack of socio-economic benefit the scheme would deliver to Brighton & Hove, despite the city bearing the long-term brunt of the seascape impact, and the visual impact from those using the coast, including its heritage features. The only socio-economic impacts resulting from the scheme are negative as a result of impacts on the significant tourism economy, and recreational activities that are central to Brighton and Hove.

6.2 Policy SA1 of City Plan Part 1 highlights the importance of the seafront to the City, noting:

*“The council will work in partnership to ensure the on-going regeneration and maintenance of the seafront in an integrated and coordinated manner. Proposals should support the year-round sport, leisure and cultural role of the seafront for residents and visitors whilst complementing its outstanding historic setting and natural landscape value. Proposals should ensure a good marine environment, enhance biodiversity in accordance with Biosphere objectives and consider options for small scale renewable energy provision.”*

6.3 The central role of the seafront is highlighted in this policy, as well as its historic setting and natural landscape value, both of which we consider have been underassessed, as noted above.

6.4 Policy CP5 of City Plan Part 1 emphasises the role of culture and tourism to the city, stating:

*“The council will work with partners to maintain and enhance the cultural offer of the city to benefit residents and visitors. It will support the role of the arts, creative industries and sustainable tourism sector in creating a modern and exciting visitor destination with a range of high quality facilities, spaces, events and experiences.”*

6.5 The supporting text (paragraph 4.50) notes that *“Tourism is inextricably linked to the cultural life of the city and the historic built environment and contributes to the prosperity of the local economy and region. Brighton & Hove is one of Britain’s leading and established visitor destinations with an approximate 8m tourist visitors per year and an estimated £732 m visitor spend in 2009.”*

6.6 Tourism is therefore central to the city’s economy, and central to that is the historic built environment. As noted above, we consider the impact of Rampion 2 on views from the coast, and on the setting of the many heritage features forming the backdrop to Brighton and Hove’s seafront, has been underassessed.

6.7 This being the case, the Council is concerned that Rampion 2 could do actual harm to the tourism sector that is so critical to the city’s economy, noting that tourism supports around 17.5% of all employee jobs within the city with £976.4m direct business turnover derived from tourism related expenditure (Source: The Economic Impact of Tourism Study, BHCC 2019). Of the 10.7m people who visited the city on day trips in 2019, 75% visited the seafront. Post-Covid, the city’s visitor economy has begun to recover and it is essential that appropriate mitigation is put in place to minimise negative impacts and support a sector that has suffered significantly

- 6.8 We note that despite our requesting it at PEIR stage, Rampion has not undertaken surveys of attitudes to windfarms since Rampion 1 was built, saying (Table 17-7, p34) that this would only provide more 'ex-ante' evidence – i.e. before Rampion 2 was built.
- 6.9 However, surveys of the attitudes of people living and working in, and visiting Sussex to Rampion 1 would have provided ex-post evidence of attitudes to a windfarm, and even better, a windfarm in this location. It is difficult to understand why this work was not undertaken, but instead limited evidence was extrapolated from other projects.
- 6.10 Even then, the conclusions of the limited evidence is unclear with the applicant noting that ex-ante (post development) survey data is 'subject to bias' depending on people's feelings about windfarms. This justification could relate to any development. It is not, therefore, considered sound reasoning for not undertaking surveys of people's attitude to Rampion 1 has been provided, or any evidence provided that Rampion 2 would not affect Brighton and Hove's tourism economy.
- 6.11 The assessment of impact on the tourism sector provided in the submission is broad brush and limited, lacking detailed evidence of the anticipated impact on Brighton and Hove's tourism sector. We would suggest this is remiss, given the existence of a windfarm immediately off the coast through which both the construction and operational impacts could have been tested.
- 6.12 We note the statement in Chapter 17 that *"the research typically focusses on measuring opinions of what the impacts on the visitor economy could be prior to implementation of the scheme. However, ex-post research suggests that even where there have been negative effects, these often occur in the form of displaced tourism with visitors diverting to neighbouring areas instead"*. This could have a significant negative impact on BHCC, given our heavy reliance on tourism. If tourists are displaced to neighbouring areas that do not have such a cluttered horizon, the negative impact could be significant, and to emphasise, no mitigation has been proposed in this regard. The applicant has not engaged at all with BHCC despite repeated requests during the process.
- 6.13 As noted above in relation to SLVIA, *"High rise and seafront views, including the coastal residential areas of Hove, Brighton's main seafront near Brighton Pier, Kemp Town and Brighton Marina residential will be defined by open, direct views of the proposed development, in which it will form a prominent element as an addition to the west and east of the existing Rampion 1 wind farm"* (SLVIA paragraph 15.10.92)."
- 6.14 We welcome the Outline Skills and Employment Strategy (January 2024) and RED's recent engagement on this in a meeting with officers. We note the inclusion of a 'Case Study' at Chapter 7 regarding the Rampion Visitor Centre on the Brighton seafront but would clarify that neither this or the community fund also referenced are secured by obligation so are voluntary on the operator's part.
- 6.15 Further, the Strategy focuses on West Sussex (notably the statistics cited in chapter 3 and the public health outcomes at figure 5-1 – which includes Wealden and Rother but not Brighton and Hove) and to date is just an outline of potential activities and a commitment to 'explore' and identify initiatives. It lacks any commitment to financial contributions to education or employment within Brighton & Hove. For our purposes it cannot therefore be considered mitigation and we can only conclude that the proposal would have no economic benefit for the city.

6.16 As previously, to secure real economic benefits for Brighton and Hove, we would also ask that should Development Consent be granted, a package of contributions is secured by legal agreement to compensate for the impact on the City.

## 7. Conclusion

7.1 BHCC notes the national benefits of the scheme in terms of the provision of renewable energy and the positive impact this will have on climate change. However, BHCC raises concerns over the significant impact to the seascape when viewed from Brighton and Hove's 11km of coast; the visual impact of the scheme for the millions of residents and visitors enjoying the coastline, and the impact on the setting of the numerous sensitive heritage features intrinsically linked with the coast.

7.2 Policy SA1 of City Plan Part 1, quoted in part previously, states the following:

### *"SA1 - The Seafront*

*The council will work in partnership to ensure the on-going regeneration and maintenance of the seafront in an integrated and coordinated manner.*

*Proposals should support the year-round sport, leisure and cultural role of the seafront for residents and visitors whilst complementing its outstanding historic setting and natural landscape value. Proposals should ensure a good marine environment, enhance biodiversity in accordance with Biosphere objectives and consider options for small scale renewable energy provision.*

*A: Priorities for the whole seafront are to:*

- Enhance and improve the public realm and create a seafront forall; 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...*

*East of Palace Pier to the Marina*

- Deliver the regeneration of Madeira Drive as a centre for sports and family based activities supported by a landscaping and public art strategy which also provides for an improved public realm and the conservation and enhancement of the historic and nature conservation features present in this location;*
- Safeguard the vibrant and important event space at Madeira Drive as this presents a unique location for a mix of cultural, sport and leisure activity to take place; and*

- *Improve beach and seafront access for pedestrians and cycle users, linking with access improvements at the Marina/Black Rock.”*

7.3 This being the case, and taking into account the information set out in our Local Impact Report, we ask that if Development Consent is granted a package of compensatory contributions are secured by legal agreement. These would meet the relevant tests set out in Regulation 122 of the Community Infrastructure Level Regulations 2010 and paragraph 57 of the NPPF 2023, namely that they are:

*“(a) necessary to make the development acceptable in planning terms;*

*(b) directly related to the development; and*

*(c) fairly and reasonably related in scale and kind to the development.”*

7.4 As set out above, the impacts of Rampion 2 on the visual amenity of those living in, working in, and visiting Brighton and Hove would be significant as a result of the impact on the seascape, causing less than substantial harm to the setting of the many historic features on the seafront that form the backdrop to the city and its millions of tourists, with a risk to the tourism economy that has not been adequately quantified by the applicant. There would be no benefits to Brighton and Hove’s residents, other than by the general benefit to the planet of increased renewable energy reducing climate change impacts.

7.5 It is therefore necessary to secure obligations to compensate for these impacts in order to make them acceptable in planning terms. The obligations we have identified would be directly related to the development by virtue of having a positive impact on the city’s seafront, particularly its historic features. We consider them to be fairly and reasonably related in scale and kind to the significant physical scale of the Rampion 2 development and the longevity of its impact, particularly in addition to that experienced by the city already from Rampion 1.

7.6 We are seeking the following obligations, should development consent be granted:

- Contributions towards the Madeira Terrace Restoration:

*Background:*

Madeira Terrace is currently somewhat derelict with large parts shut off to public access since 2012 for safety reasons and all 152 arches closed since 2014. It has been put on the Historic England list of heritage assets at risk, given the lack of funding that has been in place to restore it.

The city council has both sought funding and facilitated crowd funding to begin the work to spearhead the renewal of the first 28 arches (one fifth), a project that has been 4 years in development, with works to start in summer 2024. On completion of this first phase there will be a much needed new public lift to allow transit from the main seafront road, a newly planted green wall and new deck, restored seating and lighting. Just under half a million pounds was raised towards the project through crowdfunding – a testament to how highly residents value the Terrace.

### *Compensation Sought*

There are currently insufficient funds to complete the whole Terrace (a further 124 arches). Whilst further funding continues to be sought, a combined effort of many partners will be the only solution for the sums involved. A contribution from Rampion 2 would present a significant step change. It would enable the planned transformation of this much-loved structure to progress at pace, enhancing the seafront to offset the impact on the seascape and setting of heritage features, including the Terrace itself, that the windfarm would cause. It would allow the city to engage with other funds and potentially further crowdfunding to move to further final stages. It would transform and lift the eastern seafront also delivering major regeneration benefits (and jobs) for the city and the Brighton Marina, located just one kilometre to the east.

The works would contribute to the regeneration of the eastern seafront; rejuvenate the built heritage of this part of the seafront, offsetting the adverse impact of Rampion 2 on the setting of these historic features; encourage seafront access and enjoyment by residents and visitors; and contribute to the positive promotion of Brighton and Hove, to the benefit of the city's tourism economy.

- A package of Community Benefits is also sought to compensate for the impact on the local community's enjoyment of the seafront.
- A Skills and Employment Strategy: detailing the applicant's commitment to providing employment and training that would benefit the people of Brighton and Hove.

7.7 We welcome discussions with the applicant on this basis.