

**Rampion 2 Wind Farm
Category 8: Examination
Documents
Applicant's Responses to
Brighton and Hove City
Council's Deadline 1
Submissions
Date: March 2024
Rev A**

Application Reference: 8.48
Pursuant to: The Infrastructure Planning (Examination
Procedure) Rules 2010, Rule 8(1)(c)(i)
Ecodoc number: 005118964-01



Document revisions

Revision	Date	Status/reason for issue	Author	Checked by	Approved by
A	20/03/2024	Issue for Deadline 2	WSP	RED	RED

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Executive Summary

At Deadline 1 of the Examination for Rampion 2 Offshore Wind Farm Project, Interested Parties were invited to submit Local Impact Reports and Written Representations following Issue Specific Hearing 1 (held 07 to 08 February 2024) into the examination. A total of six Local Impact Reports and Written Representations were received from Local Authorities.

Rampion Extension Development Limited (the 'Applicant') has taken the opportunity to review each of the Local Impact Reports and Written Representations received from Local Authorities, this document provides the Applicant's response to Brighton and Hove City Councils Local Impact Report and Written Representation and has been submitted for Examination Deadline 2.

1. Introduction

1.1 Project Overview

- 1.1.1 Rampion Extension Development Limited (hereafter referred to as 'RED') (the 'Applicant') is developing the Rampion 2 Offshore Wind Farm Project ('Rampion 2') located adjacent to the existing Rampion Offshore Wind Farm Project ('Rampion 1') in the English Channel.
- 1.1.2 Rampion 2 will be located between 13km and 26km from the Sussex Coast in the English Channel and the offshore array area will occupy an area of approximately 160km². A detailed description of the Proposed Development is set out in **Chapter 4: The Proposed Development, Volume 2** of the Environmental Statement (ES) [APP-045], submitted with the Development Consent Order (DCO) Application.

1.2 Purpose of this document

- 1.2.1 Interested Parties were invited to submit Local Impact Reports, Written Representations, and Post-hearing submissions at Deadline 1 (28 February 2024) following Issue Specific Hearing 1 (held 07 to 08 February 2024) to provide further information and to expand on views provided in Relevant Representations previously submitted in accordance with the Examination timetable in the Rule 8 letter [PD-007]. Please see below for a summary of the submissions received at Deadline 2, as categorised by the Planning Inspectorate:
- 6 submissions from Local Planning Authorities;
 - 5 submissions from parish and towns councils and Members of Parliament;
 - 6 representations from prescribed consultees;
 - 28 representations from and on behalf of Affected Parties;
 - 44 representations from members of the public or businesses; and
 - 8 representations from non-prescribed organisations.
- 1.2.2 The Applicant has taken the opportunity to review each of the Local Impact Reports, Written Representations, and Post-hearing submissions received. This document provides the Applicant's responses to Brighton and Hove City Councils Local Impact Report and Written Representation and has been submitted for Examination Deadline 2.

1.3 Structure of the Applicant's Responses

- 1.3.1 For ease of referencing and to facilitate future cross-referencing, the Applicant has included references for the Applicant's responses to the Local Impact Reports, Written Representations, and Post-hearing submissions received from other Interested Parties, as follows:

- Local Authorities (including both host and neighbouring authorities):
 - ▶ Arun District Council (**Applicant's Responses to Arun District Council Deadline 1 Submissions (Document Reference: 8.44)**);
 - ▶ Brighton and Hove City Council (this document: **Applicant's Responses to Brighton and Hove City Council Deadline 1 Submissions (Document Reference: 8.48)**);
 - ▶ Horsham District Council (**Applicant's Responses to Horsham District Council Deadline 1 Submissions (Document Reference: 8.45)**);
 - ▶ Mid Sussex District Council (**Applicant's Responses to Arun District Council Deadline 1 Submissions (Document Reference: 8.46)**);
 - ▶ South Downs National Park Authority (**Applicant's Responses to South Downs National Park Authority Deadline 1 Submissions (Document Reference: 8.47)**); and
 - ▶ West Sussex County Council (**Applicant's Responses to West Sussex County Council Deadline 1 Submissions (Document Reference: 8.43)**).
- Parish Councils and Members of Parliament (**Applicant's Responses to Parish Councils and MP's Written Representations (Document Reference: 8.37)**);
- Prescribed Consultees (as set out in Schedule 1 of the Infrastructure Planning (Application: Prescribed Forms and Procedures) Regulations 2010, noting that Parish Councils are also Prescribed Consultees) (**Applicant's Responses to Prescribed Consultee's Written Representations (Document Reference: 8.49)**);
- Affected Parties (Category 1, 2 and 3 Land Interests as identified in the **Book of Reference [PEPD-014]**) (**Applicant's Responses to Affected Parties' Written Representations (Document Reference: 8.51)**);
- Members of the Public and Businesses (**Applicant's Responses to Members of the Public and Businesses' Written Representations (Document Reference: 8.52)**); and
- Non-Prescribed Consultees (**Applicant's Responses to Non-Prescribed Consultee's Written Representations (Document Reference: 8.53)**).

1.3.2 Each section below includes responses to the submissions received from Mid Sussex District Council. Each response is identified in the relevant table:

- Brighton and Hove City Council's Local Impact Report: **Table 2-1**; and
- Brighton and Hove City Council's Written Representation: **Table 2-2**.

2. Applicant's Response to Brighton and Hove City Council's Local Impact Report and Written Representation

Table 2-1 Applicant's Response to Brighton and Hove City Council's Local Impact Report [REP1-041]

Ref	Local Impact Report comment	Applicant's Response
1. Introduction		
1.1 to 1.3	<p>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.</p> <p>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.</p> <p>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.</p>	The Applicant has no further comments on these paragraphs of Brighton and Hove City Council's Local Impact Report.
2. Site Description and Surroundings		
2.1 to 2.8	<p>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.</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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</p>	The Applicant has no further comments on these paragraphs of Brighton and Hove City Council's Local Impact Report.

Ref	Local Impact Report comment	Applicant's Response
	<p>chalk block underpinning the Marine Conservation Zone, but also for “how people live, work and learn sustainably in the area.”</p> <p>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: <i>“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.”</i></p> <p>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.</p> <p>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.</p>	
3. Principle of the Development		
3.1 to 3.6	<p>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.</p> <p>3.2 A number of key strategic objectives set out in City Plan Part 1 (CPP1) support the provision of renewable energy:</p> <p><i>“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.”</i></p> <p><i>“SO7 Contribute to a reduction in the ecological footprint of Brighton & Hove and champion the efficient use of natural resources and environmental sustainability.”</i></p> <p>3.3 Supporting paragraph 2.3, relating to a ‘sustainable city’, notes that:</p> <p><i>“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:</i></p> <p><i>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.</i></p> <p><i>Maximising opportunities to support major renewable and decentralised energy infrastructure; ...</i></p>	<p>The Applicant welcomes Brighton and Hove City Council’s support to the principle of Rampion 2 and that the Proposed Development will contribute to increasing renewable energy production for the UK and resultant benefits for climate change.</p> <p>The Proposed Development will help meet the urgent need for new renewable energy infrastructure in the UK and supporting the achievement of the UK Government’s climate change commitments and carbon reduction objectives. The Proposed Development type is recognised as being a critical national priority in the revised National Policy Statement (NPS) EN-1 (Department for Energy Security and Net Zero (DESNZ), 2023a) and NPS EN-3 (DESNZ, 2023b), which came into force in January 2024 and are considered to be relevant to the determination of the DCO Application. This additional generating capacity will contribute towards meeting the urgent need for new energy infrastructure in the UK, provide enhanced energy security, support the economic priorities of the UK Government and, critically, make an important contribution to decarbonisation of the UK economy.</p> <p>The Proposed Development will contribute materially towards meeting the urgent national need for renewable electricity, significantly reducing carbon emissions from energy. The assessment set out in Chapter 29: Climate change, Volume 2 of the ES [APP-070] concludes the Proposed Development has a lifetime greenhouse gas (GHG) emissions saving of 35,901 kilotonne carbon dioxide equivalent (ktCO₂e). The Proposed Development will continue to offset greenhouse gas (GHG) emissions until 2050, and therefore make a positive contribution the UK Government target to reach net zero emissions in 2050.</p>

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	<p><i>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.”</i></p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The Applicant acknowledges the strategic objectives of the City Plan Part 1 that support the provision of renewable energy and that the Proposed Development will help achieve these aims. The Applicant has provided individual responses to the specific remaining concerns raised below.</p>
4. Seascape, Landscape and Visual Impact		
4.1	<p>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.</p>	<p>The Applicant welcomes Brighton and Hove City Council's support for the principle of renewable energy, including offshore wind farms and agrees that the production of energy from offshore wind in the vicinity of the city's coastline will inevitably result in increased seascape, landscape, and visual impacts along the coast.</p>
4.2	<p>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)).</p>	<p>The Applicant welcomes recognition from Brighton and Hove City Council that the impact of Rampion 2 has been reduced compared to the scheme proposed at the Preliminary Environmental Information Report (PEIR) stage and agrees that this reduction is clearly illustrated in the comparative wireline in Figure 15.98 [APP-095], which shows the reduced field of view, increased distance offshore and smaller apparent scale of the Rampion 2 wind turbine generators (WTGs) (compared to the Proposed Development in the PEIR).</p>
4.3	<p>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.</p>	<p>The Applicant undertook an extensive programme of consultation and engagement with local people, landowners, and statutory bodies, including Brighton and Hove County Council (BHCC), prior to the submission of the DCO Application and this is set out further in reference 4.8 below. The Applicant notes BHCC's concerns that the residual effect on the City has been underassessed, however it would note that the assessment in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056] and Appendix 15.4: Viewpoint assessment, Volume 4 of the ES [APP-160] identified significant residual effects on views from Brighton seafront (Viewpoint 8), the Rottingdean area close to Brighton (Viewpoint 7) and Hollingbury Hill (Viewpoint 27) (representing elevated areas of the city set back from the coast). The sensitivity and importance of the sea views from Brighton seafront and the contribution of the seascape to the city character and sensation of space within Brighton is recognised and assessed accordingly, as being of high sensitivity and the effect major (in EIA terms) from Viewpoints 7 and 8 at the seafront, dropping to major/moderate from Viewpoint 27 set back from the coast. The Applicant considers that these assessments do not underestimate the visual effects of the Proposed Development.</p>
4.4 to 4.5	<p>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</p>	<p>The Applicant refers Brighton and Hove City Council to Section 26.8 of Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020],</p>

Ref	Local Impact Report comment	Applicant's Response
	<p>high quality design to complement the natural heritage of the seafront and its historic features. The supporting text (paragraph 3.118) notes:</p> <p><i>“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.”</i></p> <p>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.</p>	<p>which outlines the methodology for assessment of effects, in particular the classification of effects which is judged on the relationship of the magnitude of impact to the assessed heritage significance of an asset. Where relevant, the assessment of heritage assets in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] takes the representative views in seascape, landscape and visual impact assessment (SLVIA) Viewpoint 7 and Viewpoint 8 into consideration, alongside all other baseline information provided in Appendix 25.8: Onshore heritage asset baseline report, Volume 4 of the ES [APP-214].</p> <p>As noted above in reference 4.3, the Applicant considers that the high sensitivity of the Brighton seafront has been recognised in the assessment in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]. The assessment for Viewpoint 8 (page 30 – 33) of Appendix 15.4: Viewpoint assessment, Volume 4 of the ES [APP-160] recognises and takes into account that <i>“The promenade provides access for walkers and cyclists to appreciate the sea views, along with other seafront visitor facilities and attractions, including the pier and Brighton Beach itself, forming the focus of activity and interest that are highly valued by residents and tourists visitors”</i>, and that the viewpoint is <i>“located within the Old Town conservation area”</i> with <i>“scenic qualities relating to the content and composition of the visible landscape”</i>. The description of these qualities is however balanced with visual detractors such as <i>“urban development influences and tourism influences and activities which reduce scenic qualities at Brighton seafront”</i>.</p> <p>The need for a sensitive approach has been taken through the design changes made to the design of the Proposed Development between Preliminary Environmental Information Report (PEIR) (published by the Applicant in July 2021 in support of the first statutory consultation) and ES through the design principles described in Section 15.7 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]. Design changes that have reduced impacts on views from Brighton are described below in response in reference 4.7. The impact of Rampion 2 on views from Brighton and Hove has been reduced compared to the Proposed Development outlined at the PEIR stage, particularly through the reduced field of view, increased distance offshore and smaller apparent scale of the Rampion 2 WTGs (compared to the Proposed Development outlined at PEIR) as recognised by Brighton and Hove City Council (see reference 4.2 above).</p>
4.6	<p>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.</p>	<p>The Applicant undertook an extensive programme of consultation and engagement with local people, landowners, and statutory bodies, including Brighton and Hove City Council (BHCC), prior to the submission of the DCO Application. The Consultation Report [APP-027] describes how the Applicant has had regard to this feedback, including the many changes made to the Proposed Development as a result. The table below demonstrates the technical engagement and formal public consultation with BHCC leading up to the Applicant’s DCO Application submission.</p>

Ref	Local Impact Report comment	Applicant's Response		
		Document	Location	Description
		Rampion 2 Consultation Report Application Reference 5.1.	Page 54	Table 3.3: Stakeholder meetings held outside of consultation periods
			Page 56	Table 3.3: Skills and employment strategy discussion
			Page 69	Table 5.2: Local authorities identified under section 43
			Page 72	5.5.3. Draft SoCC sent 5.5.5. Meetings were held with ten of the identified organisations (including B&H) to discuss the draft SoCC
			Page 86	Table 5.7: Stakeholder meetings during the consultation period
			Page 97	6.5. Section 47 consultation – 6.5.4. Draft SoCC sent for comment
Page 280	3.1.6. Stakeholders contacted by email			
Page 287	Media coverage in relevant area			
Page 369	List of bodies consulted potentially affected by offshore proposals			
Page 383	Authorities consulted on the SoCC under section 43(1)			
Page 391	As part of the preparation and finalising of the SoCC, we requested feedback from the following local authorities who are potentially affected by onshore proposals			
Page 417	Notified under section 42 4.2.1. List of section 42 consultees 4.2.3. Regulation 41(1)(b) and 43(1)			
Page 461–463, 467–469	4.4.9. Additional organisations contacted in Brighton & Hove			

Ref	Local Impact Report comment	Applicant's Response	
Rampion 2 Consultation Report – Annex 2 Application Reference 5.1.2.	Page 7	Additional bodies from which feedback was requested	
	Page 26	Additional consultee bodies	
	Page 42	Additional bodies from which feedback was requested	
	Page 79	6.2. Notified under section 42 6.2.1. List of section 42 consultees 6.2.3. Regulation 41(1)(b) and 43(1)	
	Page 134–136, 140–142	6.4.8. Additional organisations contacted in Brighton & Hove	
	Page 146	Neighbouring authorities to those consulted under S47 of the Planning Act 2008	
	Page 607–608	7.2 Notified under section 42. 7.2.1. List of section 42 consultees 7.2.3. Regulation 42(1)(b) and 43(1)	
Rampion 2 Consultation Report – Annex 3 Application Reference 5.1.3.	Page 80–87	11. Responses from consultees in the environmental statement; table 15-7 formal consultation feedback vol 2, cha 15, seascape, landscape and visual impact assessment, multiple themes and responses	
	Page 211–213	Table 17-7 statutory consultation feedback vol 2, chapter 17, socio-economics, multiple themes and responses	
	Page 304–305	Table 25-6 Formal consultation feedback, vol 2, chapter 25, historic environment, first statutory consultation, theme and response	

4.7 to 4.8 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.

The Applicant considers that there has been a necessary focus on the landscape, seascape and visual impact on the nationally designated landscapes, particularly South Downs National Park (SDNP) and its Heritage Coast, in accordance with National Planning Policy, however it considers that it has also taken into account the wider impacts, including on Brighton and Hove.

The design principles described in Section 15.7 of **Chapter 15: Seascape, landscape and visual impact assessment, Volume 2** of the Environmental Statement (ES) **[APP-056]** have contributed to reducing the magnitude of change on views from Brighton seafront (Viewpoint 8) and Rottingdean (Viewpoint 7) from ‘High’ magnitude assessed in the Preliminary Environmental Information Report (PEIR) published as part of the first

Ref	Local Impact Report comment	Applicant's Response
	<p>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.</p>	<p>statutory consultation exercise running from 14 July 2021 to 16 September 2021, to 'Medium-high' magnitude assessed in the ES. The key factors that contribute to this reduction in magnitude of change, which provide mitigation are:</p> <ul style="list-style-type: none"> • Increased distance away from these receptors. The proposed DCO Order Limits (offshore array area) is located 18.4km from Brighton Seafront (Viewpoint 8) compared to 13.8km from the PEIR Assessment Boundary. The vertical height/apparent scale of the Rampion 2 wind turbine generators (WTGs) reduced in views from these receptors at this increased distance offshore; and • Reduced lateral spread of wind turbine generators (WTGs) in the horizontal field of view (HFoV). The spatial extent of the proposed DCO Order Limits (offshore array area) has been reduced both to the east and west of Rampion 1 and this reduction is evident in views from Brighton and Rottingdean. The eastern (Zone 6) array is viewed mainly behind the operational Rampion 1 WTGs, with limited additional eastern spread. <p>Although the Rampion 2 WTGs will be viewed as being larger in scale than the operational Rampion 1 WTGS, there is a better balance in apparent scale of the Rampion 1 and Rampion 2 WTGs, with stark scale comparisons minimised by siting Rampion 2 WTGs further offshore, introducing wind farm separation zones and avoiding the seascape immediately to the east of Rampion 1. The spatial extent of the eastern 'Zone 6 area'¹ has been reduced considerably and as a result, WTGs within the proposed DCO Order Limits are at greater distance from Brighton, as is evident in Figure 15.13: Comparative ZTV, Volume 3 of the ES [APP-088] and in the comparative wirelines from Viewpoint 7 (Figure 15.97, Volume 3 of the ES [APP-095]), Viewpoint 8 (Figure 15.98 [APP-095]), and Viewpoint 27 (Figure 15.105, Volume 3 of the ES [APP-095]). For further information regarding the iterative design and evolution of the Proposed Development, please see Chapter 3: Alternatives, Volume 2 of the ES [APP-044].</p> <p>With regards to opportunities to comment on the design of the Proposed Development, the Applicant notes the response to reference 4.6 (above) and highlight that although the April 2022 Expert Topic Group (ETG) (meeting was a targeted consultation meeting with Natural England and South Downs National Park Authority (SDNPA) to discuss design issues relating specifically to the nationally designated South Downs National Park, Brighton and Hove City Council attended the majority of seascape, landscape and visual impact assessment (SLVIA) ETG meetings, including those held on 15 September 2020, 18 March 2021, 04 November 2021, and 17 June 2022, and were central to those discussions and consultations, along with other stakeholders.</p>
4.9	<p>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'</p>	<p>The seascape and visual effects of Rampion 2 wind turbine generators (WTGs) are assessed in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]. The Applicant notes that significant effects on views experienced by people living and visiting Brighton and Hove have been identified at viewpoints on the Brighton seafront (Viewpoint 8) and elevated areas of the city set back</p>

¹ The area of seabed to the west of the existing Rampion 1 offshore windfarm that has been considered within the Proposed Development in addition to the Zone 6 area.

Ref	Local Impact Report comment	Applicant's Response
	<p>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.</p>	<p>from the coast (Viewpoint 27). The spatial extent of the Rampion 2 array area has been reduced and designed according to a set of SLVIA specific design principles (Section 15.7 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]) which have reduced the magnitude of effects and minimised harm to perceived seascape qualities and views. As described above in reference 4.8, these have contributed to reducing the effect of the Project on views from Brighton and Hove. Opportunities to reduce effects further are limited by the technical, economic, and functional requirements of the Proposed Development to produce renewable energy, as well as other environmental factors as presented in the final array area extent in the Offshore Works Plan [PEPD-004].</p>
4.10	<p>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.</p>	<p>The Applicant has no further comments on this paragraph of Brighton and Hove City Council’s Local Impact Report.</p>
4.11 to 4.12	<p>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.</p> <p>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:</p> <p><i>“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.</i></p> <p><i>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.”</i></p>	<p>The effect of the Proposed Development on views from Brighton and Hove is assessed at three representative viewpoints within the Brighton and Hove boundary - Viewpoint 7 Beacon Hill (Figure 15.32, Volume 3 of the ES [APP-091]), Viewpoint 8 Brighton Seafront (Figure 15.33, Volume 3 of the ES [APP-091]) and Viewpoint 27 Hollingbury Hill Fort (Figure 15.50, Volume 3 of the ES [APP-093]). Although it is noted that Viewpoint 7 and 27 are also within the South Downs National Park (SDNP), viewpoints were intended to represent both the Brighton seafront area (Viewpoint 8), as well as views along the coast over Brighton from the east (Viewpoint 7) and elevated areas of the city set further back from the coastal edge on the edge of the SDNP (Viewpoint 27), to illustrate the range of effects occurring on the setting of the city. The Applicant notes that Brighton and Hove City Council wishes to see a further viewpoint assessed from an elevated position towards the eastern end of Marine Parade. As noted in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] (Table 15.7), detailed consultations were undertaken on the viewpoints selected through the statutory and non-statutory consultations, which brought forward many suggestions from stakeholders regarding the inclusion of certain viewpoint locations for assessment. In total 54 viewpoints (Table 15-14) were agreed with the expert topic group ‘ETG’ and included in the SLVIA, which provide a wealth of representative locations from which to understand the likely significant effects of the Proposed Development.</p> <p>The Applicant notes Brighton and Hove City Council’s concerns that the residual effects on the City have been underassessed, however regardless of the precise siting of the viewpoint at the seafront, it would note the response above in reference 4.3 that the sensitivity and importance of the sea views from Brighton seafront and the contribution of the seascape to the city character and sensation of space within Brighton is recognised and assessed accordingly, as being of high sensitivity and the effect major (in</p>

Ref	Local Impact Report comment	Applicant's Response
4.13	<p>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.</p>	<p>environmental impact assessment (EIA) terms) from Viewpoints 7 and 8 at the seafront. The Applicant considers that these assessments do not underestimate the visual effects of the Proposed Development and the selection of an alternative viewpoint at Marine Parade would not change the assessment outcomes presented in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056].</p> <p>Please see references 4.11 to 4.12 above.</p> <p>The approach to the assessment of effects through change to setting is provided in Section 25.7 in Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020]. Viewpoint (VP) selection has been an iterative process with the seascape, landscape and visual impact assessment (SLVIA) team and informed by engagement with key stakeholders, to ensure that where VPs are selected in the vicinity of heritage assets with settings that are sensitive to change, that these VPs are located to the advantage of illustrating views and supporting the historic environment assessment within the ES.</p> <p>The assessment of effects arising through change to setting has been informed by the baseline set out in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] and Appendix 25.8: Onshore heritage asset baseline report, Volume 4 of the ES [APP-214], which was supported by site visits, including along the Brighton and Hove City Council coastline. Where possible, reference is made to relevant SLVIA Viewpoint figures (Figures 15.26 to 15.79, Volume 3 of the ES [APP-091, APP-092, APP-093, APP-094, APP-095]) within the assessment of effects on heritage assets to provide an illustration of the existing baseline and potential visual change. The SLVIA wireline figures referred to in the assessment (Figures 15.93 to 15.109, Volume 3 of the ES [APP-095]) include visualisations of the worst-case design scenario for the Proposed Development within the view from a specific location. Any selection of alternative viewpoints would not change the assessment outcomes presented in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020].</p>
4.14 to 4.20	<p>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.</p> <p>4.15 The applicant's description of the viewpoint reinforces this (SLVIA page 257): <i>"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."</i></p> <p>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.</p>	<p>Please see responses provided in references 4.7, 4.8, and 4.11 to 4.12 above.</p>

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	<p>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.</p>	
	<p>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: "<i>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.</i>"</p>	
	<p>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."</p>	
	<p>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.</p>	
4.21	<p>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.</p>	<p>The Applicant agrees that horizontal extent/spread is one of many factors determining the visual effects of the Proposed Development. These factors are set out in full in Appendix 15.2: Seascape, Landscape and Visual Impact Assessment methodology, Volume 4 of the Environmental Statement [APP-158].</p>
4.22	<p>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.</p>	<p>The Applicant accepts that the seascape experience can be experienced in a multitude of ways including by people who may be focused on beach activities and tourist attractions (as referred to on page 326 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]) as well as those sit, walk, swim or paddle looking out to sea. Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] (page 326) does acknowledge that "<i>the coast is used as an open space</i>"... "<i>with receptors focused on the seaside and beaches</i>" and the "<i>strong intervisibility and associations between the adjacent low sweeping, open coastline and the seascape of the SCA</i>" is recognised. Brighton's value is also noted (page 323 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]) as "<i>one the largest and most popular coastal resorts with the seafront and Brighton beach being the focus of visitor, recreational use and community value</i>" as are its cultural associations "<i>Brighton's niche as a cosmopolitan cultural centre continues a long tradition</i>" and the "<i>conservation areas covering parts of Brighton's seafront</i>" are recognised as historic features on the coast (page 325 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056]). The effect of the Proposed Development on the setting of conservation areas is assessed in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020].</p>

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4.23 to 4.24	<p>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: <i>“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.”</i></p> <p>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.”</p>	<p>The Applicant has no further comments on these paragraphs of Brighton and Hove City Council's Local Impact Report.</p>
4.25 to 4.26	<p>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: <i>“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.”</i></p> <p>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.</p>	<p>The Applicant considers that the magnitude of change resulting from Rampion 2 is moderated to some degree by the presence of Rampion 1 in the baseline, which is now an established part of the seascape setting / sea views from Brighton seafront. There is already an association between the city and large-scale offshore wind energy development in its setting and sea views from Brighton are no longer uninterrupted due to the presence of Rampion 1. Rampion 2 will introduce further wind turbine generator (WTG) elements with a similar form to those that are already characteristic in the views from these areas of Brighton.</p> <p>The Applicant does however accept that contrasts in the size/apparent scale of the Rampion 2 WTGs compared to the smaller Rampion WTGs contributes to the magnitude of change and significance effects, as reported in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056] and the detailed viewpoint assessment undertaken in Appendix 15.4: Viewpoint Assessment, Volume 4 of the ES [APP-160].</p>
4.27 to 4.28	<p>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 <u>windfarms with the exception of Rampion 1</u> [emphasis added].</p> <p>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.</p>	<p>The assessment in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056] considers the additional effect of Rampion 2 in the context of Rampion 1 in the baseline.</p> <p>In accordance with guidance (Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3), Landscape Institute 2013, paragraph 7.13), existing projects (i.e. Rampion 1) and those which are under construction are included in the seascape, landscape and visual impact assessment (SLVIA) baseline and described as part of the baseline conditions. An assessment of the additional effect of Rampion 2 is therefore undertaken against a baseline that includes the operational Rampion 1 as part of the main assessment in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] Section 15.10 (operation and maintenance phase). This includes assessment of the effect of the Proposed Development against magnitude factors such as its size, scale, spread and landscape context, as well as factors relating to the cumulative effect with operational Rampion 1 wind farm, such as its increase in spread, aesthetic relationship and consistencies of perceived scale and spacing in comparison to the Rampion 1 wind turbine generators (WTGs).</p>

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		<p>In undertaking its assessment with Rampion 1, the Applicant has followed the Planning Inspectorate's Advice Note Seventeen: Cumulative Effects Assessment (The Planning Inspectorate, 2019) relevant to nationally significant infrastructure projects, in particular the note under table 2 which states (emphasis added): <i>"Where other projects are expected to be completed before construction of the proposed NSIP and the effects of those projects are fully determined, effects arising from them should be considered as part of the baseline and may be considered as part of both the construction and operational assessment. The ES should clearly distinguish between projects forming part of the dynamic baseline and those in the CEA."</i></p> <p>It is notable that existing development is not included in Table 2 of Advice Note Seventeen (The Planning Inspectorate, 2019), which sets out a tiered approach to assessing cumulative effects focusing on <u>proposed developments</u> i.e. permitted and submitted applications (Tier 1); projects where a Scoping Report has been submitted (Tier 2) and projects where a Scoping Report has not been submitted (Tier 3).</p> <p>GLVIA3 (Landscape Institute, 2013) (paragraph 7.8) highlights the focus of cumulative effect assessments to consider <u>proposed developments</u> (emphasis added) <i>"Of greater importance for LVIA are the cumulative landscape and visual effects that may result from an individual project that is being assessed interacting with the effects of other proposed developments in the area"</i> and that cumulative effects should then include <i>"potential schemes that are not yet present in the landscape, but are at various stages of the planning process"</i> (paragraph 7.13).</p> <p>NatureScot Guidance on assessing the cumulative landscape and visual impacts (NatureScot, 2021) also states that <i>"The purpose of a Cumulative Landscape and Visual Impact Assessment (CLVIA) is to describe, visually represent and assess the ways in which a proposed wind farm would have additional impacts when considered with other consented or proposed wind farms"</i>.</p> <p>As set out in Section 15.12 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056], there are no consented, application stage or scoping stage offshore wind farms within the SLVIA Study Area (nor within UK waters within approximately 140 km of the array area), therefore it is considered that there is no potential for the Proposed Development (offshore array area) to have cumulative effects with other proposed projects.</p> <p>The assessment of effects undertaken in the main assessment Section 15.10 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the ES [APP-056] therefore encompass the effects of Rampion 2 in combination with existing development (Rampion 1), in line with guidance (Landscape Institute, 2013) and Advice Note Seventeen (The Planning Inspectorate, 2019). This includes guidance in GLVIA3 (Landscape Institute, 2013) (para 7.10), which states that (emphasis added) <i>"In most cases the focus of the cumulative assessment will be on the additional effect of the project in conjunction with other developments of the same type"</i>. It therefore assesses the additional changes and effects caused by Rampion 2 in the context of Rampion 1 in the baseline, not the totality of the effect of Rampion 1 and Rampion 2 taken together. This</p>

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4.29	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.	other potential cumulative assessment method relates to the total effects of a number of developments taken together i.e. <i>"the 'totality' of the cumulative effect of past, present and future proposals"</i> (Landscape Institute, 2013), however this is not commonly assessed in landscape and visual impact assessment (LVIA) due to the likelihood that total levels of effect will not be proportionate to the additional effect contributed by the Proposed Development, with the focus of the approach most commonly taken in cumulative LVIA being on the likely significant effects of the Proposed Development and the need to isolate the contribution of the Proposed Development to the total effects of all development. The visual impact of Rampion 2 arising from factors including the increased field of view and apparent scale of wind turbine generators is assessed in the main assessment Section 15.10 of Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement [APP-056] in the context of the existing Rampion 1 offshore windfarm.
4.30	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.	An assessment of the effects of aviation and navigation night-time lighting of the offshore elements of Rampion 2 is provided in Appendix 15.5: Preliminary assessment of aviation and navigation lighting visual effects, Volume 4 of the Environmental Statement [APP-161] including urban areas outside the South Downs International Dark Skies Reserve.
4.31	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.	Please see the Applicant's response in references 4.7, 4.8, and 4.11 to 4.12 above.
4.32	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.	The NPS sets out the appropriate test for development consent obligations. For the Secretary of State to consider them in the consenting process they must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects. In the present instance the Applicant's assessment has concluded no significant adverse effect on tourism and no obligations are therefore required.
5. Impact on Heritage Features		
5.1	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.	The Applicant has no further comments on this paragraph of Brighton and Hove City Council's Local Impact Report.
5.2	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.	The approach to assessing effects through change to setting is detailed in Section 25.8 in Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020] and Appendix 25.7: Settings assessment scoping report, Volume 4 of the ES [APP-213]. Where relevant, the assessment of heritage assets in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] considers the representative views in seascape, landscape and visual impact assessment (SLVIA) viewpoint photography and photomontages. However, this is in addition to all other baseline

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5.3	<p>5.3 Policy CP15 of City Plan Part 1 states that</p> <p><i>“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:</i></p> <p><i>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;</i></p> <p><i>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;...”</i></p>	<p>information provided in Appendix 25.8: Onshore heritage asset baseline report, Volume 4 of the ES [APP-214], including site visits to assets and the coastline.</p> <p>The policy wording of CP15 is noted, the Applicant has no further comments on this paragraph of Brighton and Hove City Council’s Local Impact Report.</p>
5.4	<p>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.</p>	<p>The Applicant welcomes Brighton and Hove City Council’s representation on the public benefit of the Proposed Development.</p> <p>Please see the Applicant’s response in reference 5.2 above.</p> <p>The spatial extent of the Proposed Development array area has been reduced and designed according to a set of design principles (Section 15.7 of Chapter 15: Seascape, Landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056]), which provide embedded environmental measures addressing visual effects. These measures were established in response to stakeholder comments, including a reduction in the spatial extent of the Rampion 2 array area, its spread and quantity of wind turbine generators within it. Opportunities to reduce effects through further design principles specific to individual heritage assets are limited by the technical, economic, and functional requirements of the Proposed Development to produce renewable energy, as well as other environmental factors as presented in the final array area extent in the Offshore Works Plan [PEPD-004].</p> <p>The refinement process for the offshore array site selection considered has been presented in Section 3.2 of Chapter 3: Alternatives, Volume 2 of the ES [APP-044]. The Applicant has produced and submitted a Seascape, Landscape and Visual Design Principles Clarification Note [REP1-037] (submitted at Deadline 1), which provides further commentary on these design principles.</p>
5.5	<p>5.5 Policy DM29 of City Plan Part 2 relates to the Setting of Heritage Assets and notes the following:</p> <p><i>“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:</i></p>	<p>The policy wording of DM29 is noted, the Applicant has no further comments on this paragraph of Brighton and Hove City Council’s Local Impact Report.</p>

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	<p>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.</p> <p>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.</p> <p>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."</p>	
5.6	<p>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.</p>	<p>Change within the setting of heritage assets scoped into the assessment, including those referred to by Brighton and Hove City Council, have been described and considered within the baseline in Appendix 25.8: Onshore heritage asset baseline report, Volume 4 of the Environmental Statement (ES) [APP-214] and the assessment in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]. The assessment considers what contribution setting makes to the asset's heritage significance, and how changes to the setting affects the overall heritage significance of the asset, as per Historic England guidance listed in Table 25-4 in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] (see the approach to the assessment of effects though change to setting provided in Section 25.8 in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]). The assessment concludes no significant residual effects on these heritage assets, in environmental impact assessment (EIA) terms. Where adverse change of very low to low magnitude has been assessed, this will result in less than substantial harm.</p> <p>The Planning Statement [APP-036] outlines the position with regards the planning balance with regard to the benefits of the Proposed Development and the harm to heritage assets that is identified in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020], as per paragraphs 4.7.66 and 5.4.10 of the Planning Statement [APP-036].</p>
5.7	<p>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.</p>	<p>Please see the Applicant's response in references 5.2, 5.4, and 5.6 above.</p>
5.8	<p>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</p>	<p>The assessment in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020] considers the significance of each heritage asset and the contribution made by its setting, in line with the National Planning Policy Framework</p>

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	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.	(NPPF) and relevant Historic England guidance. The relative proximity of the Proposed Development to a heritage asset, is just one aspect influencing perceptible change within an asset's setting which has the potential to affect the asset's significance. Please see the Applicant's response in references 5.2, 5.4, and 5.6 above.
5.9	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.	Please see the Applicant's response in references 5.2, 5.4, 5.6 and 5.8 above.
5.10	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.	Whilst perception of wind turbine generators (WTGs) approximately 15.4km away will partially change the character of distant seaward views from the asset, the function of the asset, as it was designed, will not be affected with users still able to experience wide and distant views out to sea, whilst views in landward directions remain unchanged as result of the Proposed Development. The architectural interests inherent in the physical structure will remain unchanged by the Proposed Development. The assessment in Chapter 25: Historic environment, Volume 2 of the Environmental Statement [PEPD-020] acknowledges that there will be less than substitution harm to the heritage asset's significance arising from a low magnitude of adverse change.
5.11	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.	Please see the Applicant's response in reference 5.10 above.
5.12	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).	The Applicant has no further comments on this paragraph of Brighton and Hove City Council's Local Impact Report.
5.13	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.	The relevant baseline information supporting the assessment of the Grade II* Listed Madeira Terrace, Madeira Walk (NHLE 1381696) is provided in Section 5.33 of Appendix 25.8: Onshore heritage asset baseline report, Volume 4 of the Environmental Statement (ES) [APP-214]. The description and assessment of change and resulting effect is provided in Section 25.10 of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]. The assessment would not change if the text relevant to Madeira Terrace was separated out into separate sections of the documents.
5.14	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	Please see the Applicant's response in reference 5.13 above.

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	<p>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.</p>	<p>Whilst perception of wind turbine generators (WTGs) approximately 18.2km away will partially change the character of distant seaward views from the asset, Madeira Terrace's <i>deliberate, designed relationship with the sea</i> would still be intact. The function of the asset, as it was designed, will not be affected with users still able to experience wide and distant views out to sea (as far as existing/future restoration plans may permit). The architectural interests inherent in the physical structure will remain unchanged by the Proposed Development. The assessment in Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020] acknowledges that there will be less than substantial harm to the heritage asset's significance arising from a low magnitude of adverse change.</p>
5.15	<p>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.</p>	<p>The scope of seascape, landscape and visual impact assessment (SLVIA) assessment is presented in Chapter 15: Seascape, landscape and visual impact assessment, Volume 2 of the Environmental Statement (ES) [APP-056], which considers a wide range of seascape, landscape and visual effects and has been completed in accordance with relevant guidance for that aspect. The historic environment assessment presented in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] considers the effect on heritage significance of relevant heritage assets. Where relevant, the assessment of heritage assets in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] takes the representative views in SLVIA Viewpoint 8 into consideration, alongside all other baseline information provided in Appendix 25.8: Onshore heritage asset baseline report, Volume 4 of the ES [APP-214].</p>
5.16	<p>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.</p>	<p>Effects through change to setting have been assessed according to methodology set out in the Scoping Report (Rampion Extension Development Limited (RED), 2020). The approach is detailed in Section 25.8 in Chapter 25: Historic environment, Volume 2 of the Environmental Statement (ES) [PEPD-020] and Appendix 25.7: Settings assessment scoping report, Volume 4 of the ES [APP-213]. The methodology which is in line with relevant legislation and policy and includes a narrative description of the extent and nature of any identified effect. The baseline information for those heritage assets scoped into the assessment is provided in Appendix 25.8: Onshore heritage asset baseline report, Volume 4 of the ES [APP-214]. The assessment acknowledges and describes predicted change to the setting of those heritage assets and the resulting effect on their heritage significance (see Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020]). The assessment did not identify any significant effects as a result of changes in the settings of heritage assets as a result of the offshore array.</p> <p>It is unclear what Brighton and Hove City Council means when referring to the impact of Rampion 1. The Applicant confirms that where relevant, Rampion 1 was considered as part of the existing baseline when considering the predicted change to setting and effects on historic environment receptors.</p>
5.17	<p>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.</p>	<p>The design of the Proposed Development has been an iterative process that has sought to limit the potential for indirect effects, wherever possible.</p> <p>The spatial extent of the Proposed Development array area has been reduced and designed according to a set of design principles (Section 15.7 of Chapter 15: Seascape, Landscape and visual impact assessment, Volume 2 of the Environmental Statement</p>

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		<p>(ES) [APP-056]), which provide embedded environmental measures addressing visual effects. These measures were established in response to stakeholder comments, including a reduction in the spatial extent of the Rampion 2 array area, its spread and quantity of wind turbine generators within it. Opportunities to reduce effects through further design principles specific to individual heritage assets are limited by the technical, economic, and functional requirements of the Proposed Development to produce renewable energy, as well as other environmental factors as presented in the final array area extent in the Offshore Works Plan [PEPD-004].</p> <p>The refinement process for the offshore array site selection considered has been presented in Section 3.2 of Chapter 3: Alternatives, Volume 2 of the ES [APP-044]. The Applicant has produced and submitted a Seascape, Landscape and Visual Design Principles Clarification Note [REP1-037] (submitted at Deadline 1), which provides further commentary on these design principles.</p> <p>The Applicant refers Brighton & Hove City Council to Section 26.8 of Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020], which outlines the methodology for assessment of effects, in particular the classification of effects which is judged on the relationship of the magnitude of impact to the assessed heritage significance of an asset. Where relevant, the assessment of heritage assets in Chapter 25: Historic environment, Volume 2 of the ES [PEPD-020] takes the representative views in seascape, landscape and visual impact assessment (SLVIA) alongside all other baseline information provided in Appendix 25.8: Onshore heritage asset baseline report, Volume 4 of the ES [APP-214]. The assessment did not identify any significant effects as a result of changes in the settings of heritage assets as a result of the offshore array. The Applicant invites Brighton & Hove City Council to clarify the assessment outcome of which specific heritage assets are being disputed. Please see the Applicant's response in reference 7.3 below with regards to compensation.</p>
<h2>6. Socio-Economic Impact</h2>		
6.1	<p>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.</p>	<p>Local evidence from the tourism sector Office for National Statistics (ONS) employment data pre, during and post construction of Rampion 1 is presented in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement (ES) [APP-058]. As noted in the assessment this shows continued growth of the sector across Sussex when comparing pre construction to post construction (pre COVID-19 pandemic).</p> <p>Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] details relevant studies and evidence from offshore wind farms in the UK which shows that there has been no evidence of overall negative impact on the tourism economy from the development of offshore wind farms in the UK and there are a number of UK offshore wind farms which are operational that are less than 25km from shore (including Westermost Rough, Humber Gateway, Lincs, Thanet, Kentish Flats Extension, Gwynt y Mor and Rampion 1). This evidence included analysis of tourism employment numbers for Rampion 1 which showed higher levels of tourism and employment across Sussex coastal seaside towns over the period in which Rampion 1 was operational compared to before Rampion 1 began construction.</p>

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		<p>The assessment of the impact on the volume and value of tourism detailed in Sections 17.9, 17.10, and 17.11 of Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] considered the changing public perceptions of offshore wind as evidenced by the UK Governments Public Attitudes Tracker. The assessment within explores the impact on tourism and finds that overall, when all influencing factors are considered, the effect of the Proposed Development on the volume and value of tourism across Sussex is expected to be negligible. While there may be some people with negative perceptions of offshore wind farms who may be deterred from visiting, these are likely to be small in number and could be offset by those who are more likely to visit the area due to the development of offshore wind (see paragraph 17.9.27 of Chapter 17: Socio-economics, Volume 2 of the ES [APP-058]). For example, those visiting the existing Rampion visitor centre or those going on boat trips to the offshore infrastructure of Rampion 2.</p> <p>The Applicant can confirm that none of the baseline conditions data limitations noted in Section 17.5 of Chapter 17: Socio-economics, Volume 2 of the ES [APP-058] would have a material effect on the assessment. These data limitations increase the uncertainty when assessing and quantifying impacts, but not to the extent that they would affect the significance conclusions. For example, the gaps in literature related to tourism effects relate to a lack of ex post studies. Despite this, the literature has strengthened over time. This has improved the confidence and robustness of tourism assessment findings related to offshore wind farms.</p> <p>The assessment on tourism did not find any major / moderate adverse effects. The reference to major / moderate adverse and significant effects is related to of the landscape and visual impact assessment (LVIA) which assesses the visual effects likely to be experienced by people as reported in Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] and Chapter 15: Seascape landscape and visual impact assessment, Volume 2 of the ES [APP-056]. These assessments identified significant visual effects would occur at a limited number of tourist destinations with the effects of the onshore elements of the Proposed Development limited to the construction phase. However, it does not follow that effects on tourism and tourism assets will also be significant.</p>
6.2 to 6.5	<p>6.2 Policy SA1 of City Plan Part 1 highlights the importance of the seafront to the City, noting: <i>“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.”</i></p> <p>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.</p>	<p>The policy wording of SA1 and CP5 is noted, please see the Applicant's response in references 4.7, 4.8, 4.11 to 4.12, 5.2 and 5.4 above.</p>

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	<p>6.4 Policy CP5 of City Plan Part 1 emphasises the role of culture and tourism to the city, stating:</p> <p><i>“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.”</i></p> <p>6.5 The supporting text (paragraph 4.50) notes that <i>“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.”</i></p>	
6.6	<p>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.</p>	<p>The Applicant agrees that tourism is an important sector of the city’s economy. An important aspect of the tourism offer is the beach and Brighton Pier. The sensitivity of tourism was assessed as high Chapter 17: Socio-economics, Volume 2 of the Environmental Statement (ES) [APP-058].</p> <p>Please see the Applicant’s response in references 4.7, 4.8, 4.11 to 4.12, 5.2, 5.4, 6.1 and 6.7.</p>
6.7	<p>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.</p>	<p>As noted in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement (ES) [APP-058], trend based data on the volume and value of tourism economy is available for Brighton and Hove provides a good insight into the impact the construction of the existing Rampion 1 project’s offshore infrastructure has had on the Brighton and Hove economy. Data on the volume and value of the visitor economy for Brighton and Hove shows that:</p> <ul style="list-style-type: none"> • In the two years before offshore construction commenced (2014 and 2015) the average number of visits to Brighton and Hove was 11 million and was 1.79 billion in the UK. Visitor expenditure averaged £866 million per annum in Brighton and Hove and 61.85 billion in GB; • In the three years during offshore construction (2016- 2018) the average number of visits was also 11 million in Brighton and Hove and expenditure also averaged £866 million per annum. In comparison GB visitor numbers fell slightly to an average of 1.78 billion and visitor expenditure rose to £63.37 billion; and • In 2019, the year following full commissioning, (and not impacted by the COVID-19 pandemic) the number of visits to Brighton and Hove rose to 12.3 million and visitor expenditure was £967 million. In comparison GB visitor numbers fell to an average of 1.65 billion and visitor expenditure rose to £67.0 billion. <p>Tourism continued to grow within Brighton and Hove during the period in which Rampion 1 was constructed and operational, and this trend is reflected across other operational wind</p>

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6.8	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.	<p>farms (further information can be found online²). Although there may be concerns that the tourism sector may be harmed, the data from Rampion and other wind farms suggests these concerns will not be the case if Rampion 2 is developed.</p> <p>In addition, consultation with the Head of visit Brighton (see Section 17.3 of Chapter 17: Socio-economics, Volume 2 of the Environmental Statement (ES) [APP-058]) undertaken in December 2021 highlighted that many of the public feel that Rampion enhanced the seafront and that the organisation had seen no evidence of negative impacts from Rampion and that Rampion is generally viewed positively by Visit Brighton. It was also highlighted that tours to the windfarm are a positive component for the tourism economy and the city needs to do more to tell the Rampion story to visitors.</p> <p>The main aim of the tourism assessment is to assess the impact of the wind farm on the volume and value of tourism (driven by the number of people who visit the area). There are a number of well-established reasons why pre-development (ex-ante) surveys have a greater risk of bias, which could result in an overestimate of the impact on visitor numbers including:</p> <ul style="list-style-type: none"> • Responses to hypothetical scenarios may not accurately reflect actual behaviour. People's opinions or intentions can change over time, especially when confronted with the reality of the situation; • Respondents may not have a clear or accurate understanding of what the offshore wind farm will look like, leading to responses based on misconceptions; • Reactions might be driven by their emotional or kneejerk response to change (or their feelings about windfarms) rather than considered opinions or their true intentions; and • There is a risk that the survey sample could be skewed towards people who have strong feelings about wind farms (positive or negative) and are therefore more likely to be willing to take part in a survey. This would mean the sample is not representative of the broader population of visitors. <p>Brighton and Hove City Council appears to suggest that a post-development survey of visitors and their views of Rampion 1 should have been undertaken. However, it is not clear how this would help to understand the impact on visitor numbers. The only way to identify and survey visitors to an area is face-to-face, and on location. Therefore, by definition, the respondents will be people who do not feel strongly enough about Rampion 1 for it to have deterred them from visiting the area. There would have been no way of identifying the visitors who have been deterred from visiting Brighton due to Rampion 1. Therefore, the sample would be skewed towards people who have positive or indifferent feelings towards wind farms.</p>

² RWE, (2022). *Awel y Môr Offshore Wind Farm, Volume 5, Annex 4.2: Seaside Tourism Economics Employment Evidence*. [Online] Available at: https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010112/EN010112-000262-6.5.4.2_AyM_ES_Volume5_Annex4.2%20Seaside%20Employment%20Evidence_vFinal.pdf [Accessed 15 March 2024].

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6.9	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.	<p>A more robust method for assessing the impact on visitor numbers is to use longitudinal data on the number of visitors to Brighton, or the value of their expenditure, before and after the construction of Rampion 1 and compare this to a benchmark (e.g. a regional or national average). This is already included in Chapter 17: Socio-economics, Volume 2 of the Environmental Statement (ES) [APP-058], paragraph 17.9.32 and Graphic 17-5. This shows that the total number of visits to Brighton remained broadly stable during the construction period of Rampion 1 (around 11 million) but declined in Great Britain as a whole. It also shows there was a sharp increase in visitor numbers in Brighton in the year after completion (2019) compared to a further fall in visitor numbers in Great Britain. Data after 2019 were not included because they were significantly affected by the COVID-19 pandemic which led to a large fall in visitor numbers in all areas. Therefore, based on the data available, Brighton has consistently outperformed the national average during the construction and post-commissioning phases, suggesting there has been limited impact on visitors.</p> <p>The independent survey of the Sussex community carried out in 2010 found that 80% of those surveyed felt positive about the prospect of a wind farm off the Sussex coast. The Applicant commissioned a second independent public opinion survey in 2019 after the Rampion turbines had been up and running for 18 months. Populus conducted a survey of 1,000 telephone interviews in May and June 2019 across eight parliamentary constituencies including Brighton Kemptown, Brighton Pavilion and Hove. The level of support for the Rampion Wind Farm had increased to 85% with only 4% opposing the scheme. The survey results also showed that 91% of respondents agreed with the statement that, 'tackling climate change needs to be an urgent priority for governments around the world', with the highest levels of agreement being those based in Brighton Pavilion (97%). The development of offshore wind farms off the UK coast was the energy source respondents were most supportive of, with only 5% opposed.</p> <p>The Applicant commissioned a third independent public opinion survey, which was conducted in October and November 2022. 1,001 people were surveyed across 7 parliamentary constituencies, including Brighton Kemptown, Brighton Pavilion and Hove. 91% of those surveyed support the development of offshore wind farms off the UK coast with just 5% opposed. 82% supported the proposed Rampion 2 Offshore Wind Farm in principle, rising to 86% in support once they had heard about the proposals (turbine numbers and height, location, and power generation). This increases to 91% in support for those surveyed in Brighton Pavilion and Hove (86% in Brighton Kemptown).</p> <p>This latest survey is available in the 'Latest' section on the Rampion 2 website³.</p> <p>In addition, there is evidence that the wind farm and the dedicated Rampion Visitor Centre have become local visitor and tourist attractions. 60% of those surveyed in 2019 said they were likely to visit the Rampion Visitor Centre when it opened. The Rampion Visitor Centre is proving to be a tourist attraction with almost 20,000 visitors a year have been to the Rampion Visitor Centre in 2022 and 2023, since the pandemic restrictions have been</p>

³ Rampion 2 Wind Farm, (2024). *Latest*. [Online] Available at: <https://rampion2.com/latest/> [Accessed 15 March 2024].

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		<p>lifted. All reviews on Trip Advisor offer 5* ratings. To date, the Visitor Centre has facilitated 270 free, curriculum-linked school visits.</p> <p>A number of independent charter boats have diversified their business offering to take visitors out to see the Rampion 1 Wind Farm.</p>
6.10	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.	<p>Please see the Applicant's response in references 6.1, 6.8 and 6.9 above.</p> <p>The assessment on tourism did not find any major / moderate adverse effects. The reference to major / moderate adverse and significant effects is related to of the landscape and visual impact assessment (LVIA) which assesses the visual effects likely to be experienced by people as reported in Chapter 18: Landscape and visual impact, Volume 2 of the ES [APP-059] and Chapter 15: Seascape landscape and visual impact assessment, Volume 2 of the ES [APP-056]. These assessments identified significant visual effects would occur at a limited number of tourist destinations with the effects of the onshore elements of the Proposed Development limited to the construction phase. However, it does not follow that effects on tourism and tourism assets will also be significant.</p>
6.11	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.	Please see the Applicant's response in references 6.8, 6.9, and 6.10 above.
6.12	6.12 We note the statement in Chapter 17 that " <i>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</i> ". 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.	<p>A representative from Brighton and Hove City Council attended all of the seascape, landscape and visual impact assessment (SLVIA) Expert Topic Group meetings to date and were central to those discussions and consultations.</p> <p>Please see the Applicant's response in references 4.6 and 6.10 above.</p>
6.13	6.13 As noted above in relation to SLVIA, " <i>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</i> " (SLVIA paragraph 15.10.92)."	The Applicant has no further comments on this paragraph of Brighton and Hove City Council's Local Impact Report.
6.14	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.	Community benefits are not a legal or Development Consent Order (DCO) requirement and are quite distinct from the consenting process, a point reiterated in the UK Government (Department for Energy Security and Net Zero) response to the consultation on Community Benefits for Electricity Transmission Network Infrastructure (December 2023), which stated:

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6.15	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.	<p><i>“The proposals on community benefits for electricity transmission network infrastructure discussed within this document will remain separate to the planning process. It will not be a material consideration in planning decisions, and not secured through those decisions.”</i></p> <p>That said, Rampion 2 will be a permanent neighbour in the Sussex community and the Applicant intends to develop and implement a community benefits package of proposals. In the second half of 2024 or in early 2025, the Applicant will therefore be consulting key stakeholders and local communities on how a community benefit package could best support Sussex communities. The final package may include a range of initiatives to benefit business, education and residential communities.</p> <p>The outline Skills & Employment Strategy (oSES) [APP-256] documents research and engagement within East Sussex, West Sussex and the City of Brighton and Hove. In the first tranche of nine consultation meetings with stakeholder organisations, The Applicant met with Brighton & Hove City Council, East Sussex County Council and West Sussex County Council, alongside other organisations operating Sussex-wide or nationwide. The research included the identification of existing initiatives across East Sussex, West Sussex and Brighton & Hove.</p> <p>The outline Skills & Employment Strategy (oSES) [APP-256] was intentionally high-level and the Applicant was not in a position to document concrete commitments without further consultation with key skills & employment stakeholder organisations in Sussex. The first tranche of consultation took place between July and October 2023, the results of which have fed into the second iteration of the oSES [PEPD-037], submitted to the Examining Authority (ExA) in January 2024.</p> <p>The purpose of the strategy is not to provide direct financial contributions to local authorities, but to set out some key principles and identify activities that can be developed further with the relevant key consultees (including Brighton and Hove City Council) into a Skills and Employment Strategy that will facilitate positive and meaningful commitments and activities within the area by the Applicant.</p>
6.16	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.	<p>The NPS sets out the appropriate test for development consent obligations. For the Secretary of State to consider them in the consenting process they must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects. In the present instance the Applicant's assessment has concluded no significant adverse effect on tourism and no obligations are therefore required.</p> <p>For further information, please see the Applicant's response in references 7.3 below.</p>
7. Conclusion		
7.1	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 Applicant welcomes Brighton and Hove City Council's support to the principle of Rampion 2 and that the Proposed Development will contribute to increasing renewable energy production for the UK and resultant benefits for climate change.

Ref	Local Impact Report comment	Applicant's Response
	<p>the impact on the setting of the numerous sensitive heritage features intrinsically linked with the coast.</p>	<p>The Applicant has provided a response to Brighton and Hove City Council's seascape, landscape and visual impact assessment (SLVIA), socio-economic, and heritage concerns in references 4.1 to 6.16 above.</p>
7.2	<p>7.2 Policy SA1 of City Plan Part 1, quoted in part previously, states the following:</p> <p>“SA1 - The Seafront</p> <p><i>The council will work in partnership to ensure the on-going regeneration and maintenance of the seafront in an integrated and coordinated manner.</i></p> <p><i>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.</i></p> <p><i>A: Priorities for the whole seafront are to:</i></p> <p><i>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;</i></p> <p><i>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;</i></p> <p><i>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;</i></p> <p><i>Monitor, conserve and expand designated coastal habitats and secure nature conservation enhancements to the marine and coastal environment...</i></p> <p><i>East of Palace Pier to the Marina</i></p> <p><i>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;</i></p> <p><i>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</i></p> <p><i>Improve beach and seafront access for pedestrians and cycle users, linking with access improvements at the Marina/Black Rock.”</i></p>	<p>The policy wording of SA1 is noted, the Applicant has no further comments on this paragraph of Brighton and Hove City Council's Local Impact Report.</p>
7.3	<p>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:</p>	<p>The NPSs confirm that in order for the Secretary of State to consider development consents in the consenting process they must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects. In the present instance the Applicant's assessment has concluded no significant adverse effect on heritage assets and therefore a financial</p>

Ref	Local Impact Report comment	Applicant's Response
	<p><i>“(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.”</i></p>	<p>contribution towards refurbishment of a heritage asset is not considered to offset an identified harm and consequently does not satisfy the policy test. Further the Applicant believes that the residual effects of the proposed development identified in terms of visual impacts are outweighed by the significant scheme benefits, expressed in the Planning Statement [APP-036], and thus compensation is not required to make the proposal acceptable in planning terms.</p>
7.4	<p>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.</p>	<p>Please see the Applicant's response in references 4.3, 4.4 to 4.6, 4.11 to 4.12, 4.7, 4.8, 5.6, 5.14, 5.17, 6.1, and 6.7 above.</p>
7.5 to 7.6	<p>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.</p> <p>7.6 We are seeking the following obligations, should development consent be granted:</p> <ul style="list-style-type: none"> • Contributions towards the Madeira Terrace Restoration: <p>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.</p> <p>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.</p> <p>Compensation Sought</p> <p>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</p>	<p>Please see the Applicant's response in reference 7.3 above.</p>

Ref	Local Impact Report comment	Applicant's Response
7.7	7.7 We welcome discussions with the applicant on this basis.	The Applicant has no further comments on this paragraph of Brighton and Hove City Council's Local Impact Report.

Table 2-2 Applicant's Response to Brighton and Hove City Council's Written Representation [REP1-042]

Ref	Local Impact Report Comment	Applicant's Response
2.1	<p>BHCC notes the Unaccompanied Site Inspections undertaken by the ExA in November, as detailed in document EV1-001.</p> <p>We noted that along the coast, the ExA visited Climping Beach, Bognor Regis Seafront and Seaford Head, but no viewpoints within We would like the ExA to view the seafront of Brighton and Hove from the following locations, to provide better understanding of the issues raised by the Council in relation to the visual impact of the project for those living, working and visiting our the coast, including its heritage features: -</p> <ul style="list-style-type: none"> - Viewpoint 8: Brighton Seafront Promenade (https://maps.app.goo.gl/ibm6yo2TXmj9s1Vm9 - south of Middle Street, Brighton; 350m south-east of the location of the Hearing (Brighton Hilton), noting the open views of the horizon, broken only by the existing Rampion Windfarm. - In front (south) of Marine Square on the southern side of Marine Parade/the A259 (https://maps.app.goo.gl/TXmQ2n7NMmfyt4pc6), noting the elevated views of the seascape and horizon, including the existing Rampion Windfarm, provided from the viewing platform above the Grade II* listed Madeira Terraces (including the lift tower just west of this point), with listed buildings to the north. Also note the intermediate level of the Madeira Terraces which is currently closed due to disrepair but provides views and pedestrian access between Madeira Drive and Marine Parade Level. - On Hove promenade, south of Berriedale Avenue (https://maps.app.goo.gl/TD3GoQtJzE2MGfVi9), noting the more tranquil, open aspect of this part of the Brighton & Hove coastline, providing expansive views along the coast and out to sea, including the existing Rampion Windfarm. 	<p>The Applicant acknowledges the seafront viewpoints recommended by Brighton and Hove City Council.</p>
	<p>All of these locations are publicly accessible. Please let me know if need more details. BHCC does not wish to attend the ASI</p>	

3. References

Department for Energy Security and Net Zero (2023a). *Overarching National Policy Statement for Energy (EN-1)*. [online] Available at: https://assets.publishing.service.gov.uk/media/64252f3b60a35e00120cb158/NPS_EN-1.pdf [Accessed: 12 March 2024].

Department for Energy Security and Net Zero (2023b). *National Policy Statement for Renewable Energy Infrastructure (EN-3)*. [online] Available at: https://assets.publishing.service.gov.uk/media/64252f5f2fa848000cec0f52/NPS_EN-3.pdf [Accessed: 12 March 2024].

Landscape Institute and Institute of Environmental Management and Assessment (IEMA), (2013). *Guidelines for Landscape and Visual Impact Assessment. Third Edition (GLVIA3)*. London; Landscape Institute.

NatureScot (2021). Guidance - Assessing the cumulative landscape and visual impact of onshore wind energy developments. [online] Available at: <https://www.nature.scot/doc/guidance-assessing-cumulative-landscape-and-visual-impact-onshore-wind-energy-developments> [Accessed: 15 March 2024].

Planning Inspectorate (2019). *Nationally Significant Infrastructure Projects - Advice Note Seventeen: cumulative effects assessment relevant to nationally significant infrastructure projects*. [online] Available at: <https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-seventeen-cumulative-effects-assessment-relevant-to-nationally-significant-infrastructure-projects> [Accessed: 15 March 2024].

RWE Renewables UK, (2022). *Awel y Mor Offshore Wind Farm: Environmental Statement Annex 4.2: Seaside Tourism Economics Employment Evidence 2022*. [Online] Available at: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010112/EN010112-000262-6.5.4.2_AyM_ES_Volume5_Annex4.2%20Seaside%20Employment%20Evidence_vFinal.pdf [Accessed 15 March 2024].