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To: [Rampion2](#)
Subject: Rampion 2 Offshore Wind Farm: Deadline 3 Response
Date: 24 April 2024 11:29:27

Brighton & Hove City Council's Response to Written Question HE1.7

The following provides our response to the Examining Authority's (ExA's) request (HE1.7) for Brighton & Hove City Council (BHCC) to 'clarify the assessment outcome of specific heritage assets that are being disputed'. It responds to the Applicant's Deadline 2 submission labelled the 'Applicant's Responses to Brighton and Hove City Council's Deadline 1 Submissions, March 2024 Rev A' (REP2-025).

Because the ExA has specifically requested a response to impacts on heritage assets, we will not respond to the applicant's comments regarding seascape/landscape impact.

By way of background, the area from the Brighton Marina to Fourth Avenue contains seven conservation areas and a significant number of listed buildings, including some of the most prominent in the city. These include Madeira Terrace (including Madeira Walk, lift tower and related buildings, Grade II*), the bandstand, the Volks Electric Railway (Grade II), the Palace Pier (Grade II*), the West Pier (Grade I), and the Peace Statue (Edward VII Memorial Monument, Grade II), along with numerous kiosks, railings and shelters, not to mention the grand residential properties fronting King's Road (Royal Crescent, Sussex Square, Arundel House, Lewes Crescent, Marine Square, Brunswick Terrace, Brunswick Square etc.) and the Kemp Town Enclosures (a Grade I Registered Park and Garden). All of these protected heritage features have the sea within their setting, so any change to the seascape will affect their historic setting.

In response to the applicant's paragraph 5.4 (p17) regarding how impacts on heritage have been reduced, we are pleased with the work the applicant has done to reduce the impact of the scheme, including reducing its spatial extent, spread, and the number of turbines. However, this does not mean the final scheme is acceptable, and it does not respond in itself to the issues we have raised about the impact on the seascape as viewed from the City's coast or on the setting of its heritage features.

We acknowledge that the applicant has assessed the impact of change within the setting of heritage assets. We do not, however, agree that there would be no significant residual effects on the heritage assets in EIA terms.

The applicant's own assessment highlights the importance of the seascape to the heritage features along the coast, and notes that Rampion 1 'slightly detracts' from the setting. Despite this, they conclude that Rampion 2 would have 'no significant residual effects' due (primarily) to distance. We disagree with this conclusion.

Specifically, we disagree with the applicant's conclusions regard the East Cliff Conservation Area including Madeira Terrace, Madeira Walk, as set out in section 5.33 of Appendix 25.8 of the Environmental Statement (ES). As set out in our Local Impact Report, the Madeira Terrace is of particular importance to the city and the seafront, with the seascape setting forming an integral part. The ES highlights the importance of the sea to its setting as it "*evokes traditional seafront promenading, which represents the key aspect of the terrace's historical and architectural interest*", and that "*Views of the seascape from the terrace illustrate the historical relationship between the asset and the sea, providing the key positive contribution of its setting to its historic interest*" (paragraph 5.33.5).

The 'Reasons for Designation' of the Grade II* listed Madeira Terrace, Madeira Walk note that *"it is comparable in function and design to seaside piers such as the adjacent Palace Pier"* and that it has group value with *"other seaside structures and buildings including the adjacent Palace Pier and Royal Crescent, both listed at Grade II*."* The seafront location is therefore very much integral to the designation of this heritage feature.

With this in mind, we disagree with the applicant's conclusions, set out at paragraph 25.10.85 of the ES in relation to East Cliff Conservation Area, including Grade II* Listed Madeira Terrace, Madeira Walk: *"The sense created in these views of a historic link with the sea central to Brighton's past development would not be substantially degraded by the presence of the array, owing to distance and visual separation. This results in a **Low** magnitude of change to assets of **High** heritage significance (sensitivity), resulting in a **Moderate adverse** residual effect. Due to the distance to the WTGs, they would be seen to be over the horizon and so this would be **Not Significant**."*

We do not consider that there would be 'minor and/or short-term changes' to the setting of the Madeira Terrace in particular, or that these would "not affect the key characteristics and in which the historical context remains substantially intact." (ES table 25-25 regarding methodology for establishing the magnitude of change). We consider the change to the key characteristics of the assets' setting, namely the open horizon and seascape, would be such that it would adversely affect the importance of the numerous heritage features along the coast, giving rise to lasting harm to the significance of the assets but allowing their historic interest to be appreciated – a medium magnitude of change. Users would still be able to experience views out to sea so the historic interest can be appreciated (as per the applicant's comment in response to paragraph 5.14) but the views would be diminished, and given the 34 year lifespan of the construction and operational stages, long term lasting harm would be caused. While this is 'temporary', in reality it would impact a generation so would, we consider, be 'long lasting'.

It is our view that this would result in a major (significant) magnitude of change rather than the 'moderate adverse residual effect' cited.

Crucially, we do not agree with the conclusion that *"due to the distance to the WTGs, they would be seen to be over the horizon so this would be Not Significant"* (paragraph 25.10.85 regarding East Cliff Conservation Area, including Grade II* Listed Madeira Terrace, Madeira Walk). We note that the reference to the WTGs being 'over the horizon' is contrary to the visualisations presented in photomontages (particularly viewpoint 8) but also contrary to the applicant's reference to Rampion 1 which they note 'appear in long views' and 'on the horizon'.

The WTGs would not be 'over the horizon' when viewed from the East Cliff Conservation Area or Madeira Terrace. The WTGs would harm the setting of these assets, resulting in a major (significant) magnitude of change which is offset to some degree by distance, such that the impact is major/moderate.

The setting is noted in the ES as negatively contributing towards its interests, notably its state of disrepair, lack of access due to disrepair, and the presence of Rampion 1 wind turbines which appear in long views, *"slightly detracting from its historic interest due to some alteration of its relationship with the seascape; however, their small scale on the horizon results in a minor alteration."* (paragraph 5.33.6).

The poor state of repair of the Terraces is noted and the need for restoration works has been highlighted in our Local Impact Report as an opportunity to compensate for the harm to the setting caused by Rampion 2.

For the same reasons we disagree with the conclusions regarding the impact on the Grade II Listed Band Stand (paragraphs 25.10.94 – 25.10.97 of the ES). The magnitude of change is assessed as being 'low', resulting in a moderate adverse residual effect but because the WTGs would 'be seen to be over the horizon' the impact would be 'not significant'. Again we consider there would be a major (significant) magnitude of change resulting in a major/moderate adverse impact taking into account the distance.

Regards,

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