

Rampion Wind Farm: Brighton & Hove City Council Representation

Brighton & Hove City Council has already submitted a detailed Local Impact Report, which sets out technical information related to the anticipated positive, negative and neutral effects of the scheme on the city. This representation does not duplicate the detailed technical commentary contained in the LIR, and should be read in conjunction with it.

The City Council supports the principle of the wind farm. With the production capacity of up to 7000MW of renewable wind energy, saving nearly 1 million tonnes of CO2 emissions per year, and the ability to provide power for the equivalent of 450,000 homes, the proposal positively contributes to Brighton & Hove's 'One Planet City' aim of using one planet's worth of resources rather than the current equivalent use of three and a half. Development of renewable energy and associated infrastructure is supported by paragraph 93 of the National Planning Policy Framework (NPPF), and the economic and environmental benefits of the development are considered to contribute towards the achievement of sustainable development as set out in NPPF paragraph 7.

BHCC considers that the scheme could have a number of positive economic impacts for the city. The operations and maintenance base in Newhaven, although outside the council's administrative area, will benefit the economy of the wider city region. It will enhance the port's future and is also positive for the Greater Brighton City Deal bid. There will be economic benefits from contractors eating, drinking and staying in the city over the next 25 years. This is estimated to result in modest direct job creation of approximately 65-85 jobs.

An estimate of 700 local sub-contractors could be involved in the construction phase of the scheme. This is a significant number and would provide a positive impact to the economy of the city region.

However BHCC has also identified areas of concern over certain aspects of the development which will require mitigation and/or a precautionary approach requiring further discussion and agreement with relevant bodies reflected in the final layout and design. These are set out in detail in the Local Impact Report, with the most pertinent summarised below.

Although the Offshore Array is not located within or immediately adjoining the city boundary, due to its size and the nature of its offshore location this proposal is considered to have a material visible and potential audible impact upon the city in general and the seafront in particular. There has not been sufficient information presented at this

design stage that definitively states that the noise impact from the off-shore activities will not be audible to shoreline receptors. It is suggested that all potential noise impacts are subject to further information and monitoring within a Development Consent Order (DCO) obligation. It is imperative that the developer provides the appropriate audible data before development commences to provide further details for reassurance that the cumulative impact of these off shore turbines and substations is not likely to be a problem. If such issues were not raised; once the turbines were built and operational there is little, if any, going back and additionally, there would be little if any mitigation measures that may be applied to lessen any impact. If further data shows there would be an unacceptable audible impact with the current scheme at design stage, the developer should be obliged to include the appropriate mitigation at design stage wherever possible, or at the earliest possibility, thereby enabling a successful scheme in terms of noise.

Development out to sea, where currently there is none, may be perceived by some to bring a detrimental sense of enclosure to the seascape. Given the importance of the seafront to the tourist appeal of Brighton & Hove, the City Council urges that the developer is required to support a new eco-tourism / eco-education schemes through appropriate DCO obligations to enable the proposal to be a positive new offer for seafront visitors and investors. This would seek to offset any perceived negative effect on the appeal of the seafront caused by the development. Options should be explored to provide a visitor / interpretation / education centre with potential links with the city's proposed i360 seafront observation tower as the best place to view the array.

Chapter 19 of the Environmental Statement at 19.9.10 notes "that there will be an increase in vessel movements (particularly during construction phases of the project), which will impact coastal human receptors. This will be particularly noticeable in the ports." If Shoreham port was the proposed hub for construction activities, an assessment should be made of the impact of potentially 24/7 working and vessels departing to supporting a continuous workload. This might also include HGV deliveries to the area concerned for both raw materials and personnel, which could cause traffic, noise and air quality impacts within Brighton & Hove. The construction period is noted to be approximately 3 years. It is noted from the text that this could well be 24/7/365 and as such strong control measures need to be in place to minimise any impacts.

The submitted application document 6.4 'Non-technical summary', paragraph NTS.7.2 states 'Due regard will also be given to other national, regional and local planning policy documents as part of the

decision-making process'. However, it is noted that the submitted application document '6.1.4 ES Section 4 – Planning Policy' does not give regard to or include consideration of the Brighton & Hove Local Plan 2005 or the emerging Brighton & Hove City Plan Part 1 as part of the application process. Although it is recognised that no part of the proposed wind farm works would be physically located inside the administrative area of Brighton & Hove, it is considered by BHCC that both these development plans as well as other documents and strategies produced by BHCC and partners should be included as material considerations when considering this application due to the effect of the Offshore Array upon the city and in the situation where the offshore development is not subject to a development plan that would usually be expected to be considered with regard to all relevant aspects at a local level.

