

# Unrestricted Document Pack

APOLOGIES Committee Services  
Tel. 01621 875791

DIRECTOR OF STRATEGY,  
PERFORMANCE AND  
GOVERNANCE'S OFFICE  
DIRECTOR OF STRATEGY, PERFORMANCE  
AND GOVERNANCE  
Paul Dodson

15 June 2020

Dear Councillor

You are summoned to attend the meeting of the;

## **COUNCIL**

on **TUESDAY 23 JUNE 2020** at 1.00 pm.

Please note that this will be a **remote meeting** – Members to access the meeting via Microsoft Teams. Members of the press and public may listen to the live stream on the Council's website

<https://democracy.maldon.gov.uk/ieListDocuments.aspx?CIId=130&MIId=2138>.

A copy of the agenda is attached.

Yours faithfully



Director of Strategy, Performance and Governance

Please note: Electronic copies of this agenda and its related papers  
are available via the Council's website [www.maldon.gov.uk](http://www.maldon.gov.uk).

THIS PAGE IS INTENTIONALLY BLANK



## **AGENDA COUNCIL**

**TUESDAY 23 JUNE 2020**

---

1. **Chairman's notices**
2. **Apologies for Absence**
3. **Declaration of Interest**

To disclose the existence and nature of any Disclosable Pecuniary Interests, other Pecuniary Interests or Non-Pecuniary Interests relating to items of business on the agenda having regard to paragraphs 6 - 8 inclusive of the Code of Conduct for Members.

(Members are reminded that they are also required to disclose any such interests as soon as they become aware should the need arise throughout the meeting).

4. **Minutes - 28 May 2020** (Pages 7 - 16)

To confirm the Minutes of the council meeting held on 28 May 2020 (copy enclosed).

5. **Public Questions**

To receive questions from members of the public, of which prior notification in writing has been received (no later than noon on the Tuesday prior to the day of the meeting).

Should you wish to submit a question please complete the online form at [www.maldon.gov.uk/publicparticipation](http://www.maldon.gov.uk/publicparticipation).

6. **Chairman's Announcements**
7. **Notice of Motion**

In accordance with notice duly given under Procedure Rule 4, Councillor W Stamp to move the following motion duly seconded by Councillor R H Siddall:

“Maldon District Council has a statutory duty to promote and maintain high standards of conduct by its councillors and co-opted Members - Section 27(2) of The Localism Act 2011 (The Act) requires the council to adopt a Code of Conduct. It is not required in law for MDC to adopt a joint standards committee but it is good practice - and why wouldn't they?

In light of external investigations, I propose the following motions to council:

The motions have been set out separately for ease of voting.

Motion 1

To disband the Joint Standards Committee in its current form and all appointed councillors.

Motion 2

The council waives the overall political control of the authority (political balance) to reconstitute the Joint Standards Committee.

Motion 3

The committee will consist of 8 elected members - four from each political group, plus 2 Parish Council observers (no voting rights) and the Independent Person (no voting rights).

Motion 4

i) The Chairman and Vice-Chairman to be appointed not from the same political group.”

8. **Minutes of Meetings of the Council**

To note that since the last Council, up until Monday 15 June 2020 (Council agenda dispatch) the following Committees have met, and to receive any questions in accordance with Council and Committee Procedure Rule 6 (2).

Minutes NOT finalised for publication:

District Planning Committee	<a href="#">3 June 2020</a>
North Western Area Planning Committee	<a href="#">8 June 2020</a>
South Eastern Area Planning Committee	<a href="#">10 June 2020</a>
Central Area Planning Committee	<a href="#">12 June 2020</a>

9. **Questions in accordance with Procedure Rule 6(3) of which notice has been given**

10. **Bradwell B Project - Stage 1 Consultation** (Pages 17 - 190)

To consider the report of the Director of Strategy, Performance and Governance, (copy enclosed).

11. **Approval to Adopt the Lists of the Local Heritage Assets for Bradwell-on-Sea and Tillingham** (Pages 191 - 244)

To consider the report of the Director of Strategy, Performance and Governance (copy enclosed).

12. **Joint Standards Committee - Parish Councillor Co-Optees** (Pages 245 - 246)

To consider the report of the Monitoring Officers (copy enclosed).



13. **Questions to the Leader of the Council in accordance with Procedure Rule 1 (3)(m)**
14. **Business by reason of special circumstances considered by the Chairman to be urgent**
15. **Exclusion of the Public and Press**

To resolve that under Section 100A (4) of the Local Government Act 1972 the public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A to the Act, and that this satisfies the public interest test.

16. **Leisure Contract** (Pages 247 - 260)

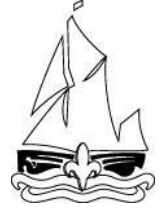
To consider the report of the Director of Service Delivery, (copy enclosed).

### **NOTICES**

#### **Sound Recording of Meeting**

Please note that the Council will be recording and publishing on the Council's website any part of this meeting held in open session. At the start of the meeting an announcement will be made about the recording.

This page is intentionally left blank



**MINUTES of  
COUNCIL  
28 MAY 2020**

---

**PRESENT**

Chairman	Councillor R G Boyce MBE
Vice-Chairman	Councillor Mrs P A Channer, CC
Councillors	E L Bamford, Miss A M Beale, B S Beale MBE, M G Bassenger, M R Edwards, Mrs J L Fleming, A S Fluker, B E Harker, M S Heard, M W Helm, A L Hull, K W Jarvis, K M H Lagan, C Mayes, C Morris, S P Nunn, N G F Shaughnessy, R H Siddall, N J Skeens, W Stamp, Mrs J C Stilts, C Swain, Mrs M E Thompson and Miss S White

**1. CHAIRMAN'S NOTICES**

The Chairman welcomed everyone to this, the first remote meeting of the Maldon District Council, held under new regulations which came into effect on 4 April 2020 in response to the COVID-19 situation. The Chairman then went through some general housekeeping arrangements for the meeting.

A roll call of those Members present was taken.

**2. APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors V J Bell, R P F Dewick, J V Keyes and C P Morley.

It was noted that Councillor K W Jarvis may have to leave the meeting early.

**3. DECLARATION OF INTEREST**

Councillor Mrs P A Channer disclosed a non-pecuniary interest as a Member of Essex County Council specifically in relation to Agenda Item 15 – Provisional Financial Impact of COVID-19 and any other items of business relating to the County Council that may arise during debate.

#### **4. PRESENTATION**

Following a request from the Chairman, the Director of Service Delivery made a presentation which provided an update on the Council's preparation for release from lockdown and how it was supporting local businesses.

Members noted the role of the local authority was to ensure that the public could safely access the high street and shops. The Council was developing a COVID-19 Recovery Framework and a detailed survey of the high street had been carried out. The Director of Service Delivery highlighted how the Government was expecting local authorities to make significant changes to high street road layouts to give more space to cyclists and pedestrians. The presentation outlined the proposals being considered by the Council and the three phases developed for reopening high streets safely.

It was noted that following development of the draft plan the Interim Measures Group would be considering recommendations and Officers would be engaging with Maldon Ward Members and Town Councillors to identify areas where assistance could be provided by the District Council. In addition, the Air Quality Management Plan for Market Hill would be considered by the Council at its meeting on 2 July.

The Chairman advised that there would not be any questions on this presentation and should any Members have any questions that these be directed to the Director of Service Delivery outside of the meeting. He requested that the Director provide Members with a copy of the presentation.

#### **5. MINUTES - 13 FEBRUARY 2020**

**RESOLVED** that the Minutes of the Council meeting held on 13 February 2020 be agreed.

#### **6. MINUTES - 17 MARCH 2020**

In response to a query, the Chairman agreed that the Minutes should refer to this being an extraordinary meeting.

**RESOLVED** that subject to the above amendment the Minutes of the extraordinary Council meeting held on 17 March 2020 be agreed.

#### **7. PUBLIC QUESTIONS**

There were none.

#### **8. CHAIRMAN'S ANNOUNCEMENTS**

On behalf of Members, the Chairman thanked the staff of the Council, for the work they had achieved over the last few weeks against very stringent conditions. He commented that they had done a magnificent job. At this point the Chairman also commended the Council's contractors, particularly Suez who had cleared the waste from the streets of

the District very efficiently and achieved a very good service to the Council and its residents. He referred to the increased tonnage being around 20 / 30%.

## **9. STRATEGY AND RESOURCES COMMITTEE - 20 FEBRUARY 2020**

### **RESOLVED**

- (i) That the Minutes of the Strategy and Resources Committee held on 20 February 2020 be received.

The Council considered the following recommendations brought forward from the Strategy and Resources Committee.

### **Minute 802 – Review of Penalty Charges for Environmental Offences**

### **RESOLVED**

- (ii) That the levels of charge from 1 April 2020 be increased up to the maximum levels permitted under the legislation as set out in Appendix 1 to the Minutes of the Strategy and Resources Committee;
- (iii) That that the team continues to support educational campaigns targeting public awareness of environmental offences.

### **Minute 803 – Pay Policy Statement 2020 / 21**

### **RESOLVED**

- (iv) that the Pay Policy Statement attached as Appendix 2 to the Minutes of the Strategy and Resources Committee be adopted for the financial year 2020 / 21.

### **RESOLVED**

- (v) That subject to the above decisions, the Minutes of the Strategy and Resources Committee held on 20 February 2020 be agreed.

## **10. PERFORMANCE, GOVERNANCE AND AUDIT COMMITTEE - 20 FEBRUARY 2020**

**RESOLVED** that the Minutes of the Performance, Governance and Audit Committee held on 20 February 2020, be received and noted.

## **11. MINUTES OF MEETINGS OF THE COUNCIL**

The Council noted the list of Committees that had met since the last meeting of the Council, up to Wednesday 19 May 2020 for which Minutes had been published.

**12. QUESTIONS IN ACCORDANCE WITH PROCEDURE RULE 6(3) OF WHICH NOTICE HAS BEEN GIVEN**

There were none.

**13. REMOTE COMMITTEE MEETINGS AT MALDON DISTRICT COUNCIL**

The Council considered the report of the Director of Strategy, Performance and Governance seeking Members' review of the procedures and arrangements for remote Committee meetings at Maldon District Council.

It was noted that the COVID-19 Interim Measures Group (COVID-19 Group) had considered a report (attached at Appendix A to the report) and agreed a procedure along with the instatement of remote Council and Committee meetings. A statutory annual meeting of the Council had been scheduled for Thursday 3 September and it was proposed to schedule that all Council and Committee meetings restarted from 5 October 2020.

At this point the Leader of the Council thanked Directors and particularly tier 2 managers for the work they had done in supporting the Directors during the COVID emergency. These thanks were expressed by other Members of the Council. On behalf of all Members of the Council he sent condolences to anyone in the District who had lost a loved one as a result of the health emergency.

The Director of Strategy, Performance and Governance presented the report highlighting:

- the Council's quick and efficient response to the various challenges that had arisen during the COVID emergency, not least new guidance and policies introduced by Central Government, often at short notice, requiring changes to Council policy. It was noted that all decisions made during this period had been made transparently, logged and reported to Members on a weekly basis.
- the reinstatement of remote Council, District Planning Committee and Area Planning Committee (APC) meetings. An amended schedule of remote meetings (Appendix 3 to Appendix A) had been circulated prior to the meeting and now included APCs. The Interim Measures Group would continue to run alongside these remote meetings to enable quick decisions, where required.

The Director of Resources and Director of Service Delivery both outlined additional work that was ongoing, along with the pressures on staffing in response to the health emergency. The Leader reiterated this, commenting on the additional resources required to address any requirements from the Department for Communities and as well as ensure that business continued as usual.

At this point the Leader of the Council introduced Mr Chris Leslie, the new Director of Resources.

The Leader proposed that the recommendations as set out in the report be agreed. This proposal was duly seconded.

In response to questions, the Leader of the Council advised that in respect of the scheduled time and frequency of remote meetings it would be beneficial to carry out a review of remote meetings once the first few had taken place in June. The Leader advised that he would be proposing, at an Interim Measures Group meeting the following day, that meetings of the Corporate Governance Working Group (CGWG) be restarted and its membership be extended to include members of the Independent Group.

Councillor E L Bamford spoke in relation to the three recommendations and sought clarification on the following points:

- to whom Members should ask if they had issues they wanted considered by a Working Group;
- if the Air Quality Management (Market Hill) Working Group would reconvened to consider matters relating to Maldon High Street;
- concern regarding the length of Council meetings if it was having to consider matters previously dealt with by the Strategy & Resources and Performance, Governance and Audit Committees.

Councillor Bamford proposed that all Committees be reinstated as soon as possible preferably by the end of June 2020. She proposed that this action be taken opposed to the recommendations that were detailed in the report.

In response, the Leader provided an update on the Air Quality Management Working Group and how the result of the public consultation the Air Quality Management Action Plan would be reported to the Council on 2 July 2020. The Leader reminded Members of the process put in place by the Council when emergency powers were agreed and outlined the process undertaken when reports were due to be considered by the COVID-19 Group and Member involvement. Although in favour of reinstating all Committees he raised concern in respect of resources available and advised if Members were mindful to reinstate all Committees resources would need to be drawn from another area. He was therefore not able to support the proposal.

A debate ensued.

In accordance with Procedure Rule No. 13 (3) Councillor C Mayes requested a recorded vote.

Councillor Bamford advised that following the information provided by the Leader she wished to amend her previous proposal. She proposed that recommendation (i) be amended to add in where Members were to direct their request for reinstatement of a Working Group. The Leader clarified that this should be the COVID-19 Interim Measures Group.

The Leader then responded to some of the points raised during the debate:

- to start remote meetings of all Committees by the end of June it was necessary to understand how this would be resourced. He referred to the information previously provided by the Directors and in response further information on resources was provided by the Director of Service Delivery;

- a compromise to restarting all Committees by the end of June would be considered this matter at the Council meeting on 23 June, which would allow a review of the new remote meetings currently scheduled, resources required to deal with other Council matters etc.
- he agreed with the comments regarding reinstatement of the Air Quality Management (Market Hill) Working Group and would propose this at the next COVID-19 Group meeting, along with the addition of two Ward Members to the Working Group;
- any changes to the sizes of Committees could not be done until the Statutory Annual meeting of the Council. The Council would consider a report of the Corporate Governance Working Group at its meeting in August which would include a review of remote meetings.

Councillor Bamford further amended her earlier proposition requesting that recommendation (i) include reference to Members should send requests to the COVID-19 Group and in respect of reinstatement of all Committees by the end of June this should be amended to refer to just the Performance, Governance and Audit (PGA) Committee. She advised that in her view reinstatement of the PGA Committee would reduce the work of the COVID-19 Group. At the request of the Chairman, the Lead Legal Specialist and Monitoring Officer provided Members with some further clarification in respect of the proposal from Councillor Bamford and it was noted that the amendments related to recommendations (i) and (iii). The proposal was duly seconded.

The Leader of the Council responded to the proposal reiterating concerns regarding resources and urged Members not to support it but support the original recommendation amended to review remote Committees and reinstate remote meetings for all Committees as soon as practicably possible or no later than the end of July.

It was clarified at this point that all recommendations and proposals referred to related to remote meetings.

The Chairman then put the amendment in the name of Councillor Bamford, duly seconded. He advised that if the amendment failed he would then put forward the suggestion of the Leader of the Council.

In accordance with the request for a recorded vote, the voting for the amendment was as follows:

For the amendment:

Councillors E L Bamford, M G Bassenger, Miss A M Beale, B S Beale, Mrs P A Channer, M R Edwards, Mrs J L Fleming, B E Harker, M S Heard, K W Jarvis, K M H Lagan, C Mayes, S P Nunn, N G F Shaughnessy, R H Siddall, N Skeens, W Stamp, J Stilts, C Swain and Miss S White.

Against the amendment:

Councillors R G Boyce, A S Fluker, M W Helm, A J Hull, and Mrs M E Thompson.

The Chairman declared that the amendment was therefore carried and that the Council now had a substantive motion. The Chairman then put this to the Council for a vote.



In response to a number of comments the Chairman advised that he would allow for the substantive motion to be amended to provide clarification. The Leader of the Council then proposed that recommendation (ii) be amended to include the words, 'with the exception of the Performance, Governance and Audit Committee'. The Lead Legal Specialist and Monitoring Officer advised that this proposal was acceptable as it did not change the substance of the substantive motion but purely provided further clarification. As an aide for Members the recommendations as amended were shown on the screen.

The Chairman then put this to the vote, and following the earlier request for a recorded vote the voting was as follows:

For the recommendation:

Councillors E L Bamford, M G Bassenger, Miss A M Beale, B S Beale, Mrs P A Channer, M R Edwards, Mrs J L Fleming, A S Fluker, B E Harker, M S Heard, M W Helm, A J Hull, K W Jarvis, C Mayes, S P Nunn, N G F Shaughnessy, R H Siddall, N Skeens, W Stamp, J Stilts, C Swain and Miss S White.

Against the recommendation:

Councillors K M H Lagan and Mrs M E Thompson.

Abstention:

Councillor R G Boyce.

It was noted that Councillor C Morris' vote had not been recorded as he had not been present for the earlier vote. This was confirmed by the Lead Legal Specialist and Monitoring Officer.

The Chairman declared that the proposal was therefore agreed.

**RESOLVED**

- (i) That Members advise the COVID-19 Interim Measures Group of any items they would like considered at Working Groups / areas they consider to be urgent business;
- (ii) That Members agree to review remote working arrangements in August 2020, ahead of the Statutory Annual meeting, allowing time to assess the way they work, and that this is based on a report of the Corporate Governance Working Group, with the exception of the Performance, Governance and Audit Committee;
- (iii) That Members review a recommended start date for all Committees remotely from 5 October 2020 with the exception of the Performance, Governance and Audit Committee resuming virtual meetings at the end of June 2020.

Councillor Morris raised a point of order that he had been excluded from the meeting illegally and unconstitutionally. In response the Chairman advised that he would not be accepting this as a point of order.

Councillor K W Jarvis left the meeting and did not return at this point.

**14. QUESTIONS TO THE LEADER OF THE COUNCIL IN ACCORDANCE WITH PROCEDURE RULE 1(3)(M)**

Councillor W Stamp referred to the recent transformation undergone by the Council and the reference by other Members at this meeting to limited staff resource. She asked the Leader of the Council if he agreed with her that at this stage whether the Council had been too harsh by trimming the workforce down so much. In response the Leader of the Council provided detailed information regarding the transformation process, the savings it had delivered and how the process had aided the Council when it had to implement emergency powers in light of the COVID-19 emergency, enabling a seamless transition from the Council buildings to working remotely. He advised that he was happy with the full council transformation and the output it gave, it did make the Council agile and had allowed it to work remotely and as a result would probably change working practices in the future. At this point he commended the Council's staff on the way they were working remotely highlighted the revenues and benefits team.

Councillor K M H Lagan referred to earlier comments from both Directors and the Leader regarding business as usual and how the Council should be working more effectively with the strategies in place and IT investment. He felt that the Council should carry out a complete review once through the current health crisis and highlighted the need for the Council to resume in a face to face capacity to represent the people and deliver the quality of services it needed to deliver, with services like revenues and benefits prioritised. In response, the Leader of the Council thanked Councillor Lagan for the questions and emails he had sent him. The Leader provided the Council with detailed information regarding current working arrangements, including resources and drew attention to how resources had been diverted to deal with paying out the £17m of government grants to local businesses. It was noted that payment of discretionary grants was due to start on Monday 4 June. He explained that if a review was undertaken of the last 8 / 10 weeks performance the Council was ahead of the curve compared with other Councils and should be proud of what had been achieved (particularly by officers). The Leader agreed with Councillor Lagan that there should be a review, but when the time was right. He referred to comments raised by Councillors C Mayes and N Skeens prior to the lockdown and the importance of getting Maldon High Street arrangements in place.

Councillor C Mayes asked the Leader of the Council why (referring to Maldon High Street) the plans outlined in a meeting earlier today by Director of Service Delivery, shared with the public via the Maldon Business Board earlier this week gave the impression that this was a done deal. The Leader of the Council advised that he was unaware that the conversation had taken place with the Maldon Business Board, but highlighted discussions with the Leader of the Opposition and the Interim Measures Board. The Interim Measures Board had discussed, and Directors advised that as the work on Maldon High Street progressed Ward Members would be involved as well as informing and working with Maldon Town Council. The Leader assured Members that the Council was working on this project which was moving extremely quickly, responding as new guidelines emerged, liaising with organisations as appropriate and working to delivery from the grant received.

Councillor Lagan left the meeting at this point and did not return.

## **15. EXCLUSION OF THE PUBLIC AND PRESS**

**RESOLVED** that under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A to the Act, and that this satisfies the public interest test.

At this point the Chairman thanked members of the public for joining the meeting and confirmed that the live stream was now turned off.

In response to a question regarding confidential information, the Chairman reminded Members' that they had to abide by the Members' Code of Conduct.

## **16. PROVISIONAL FINANCIAL IMPACT OF COVID-19**

The Council received the report of the Director of Resources informing Members of the estimated financial impact of the COVID-19 pandemic on the Council.

The report provided detailed information and highlighted key issues along with general fund pressures, central Government support and reserve balances.

The Leader of the Council advised that he had spoken to Officers regarding the recommendation and the large amount of work required to ensure figures were correct and understand what the Council's projections were. He therefore proposed that the recommendation be amended to read "...brought to the meeting of the Council on 16 July 2020'. The Leader highlighted how it was critical for the Council to understand where it was fiscally as a result of the health emergency.

The Director of Resources presented the report and outlined the work that had been undertaken by the Finance team over the last few weeks, which included detailed review of budgets with managers. The report highlighted the most significant items and it was noted that monitoring of these was continuing. The Director drew Members' attention to particular areas of Council business, highlighting where high risk has been identified. Work to quantify the range of financial expenditures was ongoing and it was noted that the revised Medium-Term Financial Statement was currently being prepared.

Members noted that vast resources had been diverted towards dealing with the pandemic crisis and this was likely to continue to some degree for the remainder of the financial year and possibly beyond.

In response to questions raised, the Leader of the Council confirmed that the Council was engaged with the Ministry of Housing Communities and Local Government at all times and highlighted the grants received from the Government but the huge costs to the Council relating to the pandemic.

The Director of Resources responded to a question regarding staff resources and provided indication of where additional resources had been required. In response to a further question regarding the General Fund Reserves, he reported that the final accounts were due to be published shortly.

The Chairman then moved the proposal in the name of the Leader of the Council, duly seconded. Upon a vote being taken this was agreed.

**RESOLVED** that the potential financial impact of COVID-19 be noted and a revised Medium-Term Financial Strategy be brought to the meeting of the Council on 16 July 2020.

There being no further items of business the Chairman closed the meeting at 3.15 pm.

R G BOYCE MBE  
CHAIRMAN



## **REPORT of DIRECTOR OF STRATEGY, PERFORMANCE AND GOVERNANCE**

---

to  
**COUNCIL**  
**23 JUNE 2020**

### **BRADWELL B PROJECT – STAGE 1 CONSULTATION**

#### **1. PURPOSE OF THE REPORT**

- 1.1 To seek endorsement to a recommended response to the Stage 1 Consultation relating to the proposed Bradwell B power station proposals, as set out within the appendices of this report.
- 1.2 The Joint Member Bradwell Board recommends that a joint consultation response (**APPENDIX A**) be provided representing the views of both Maldon District Council and Essex County Council. The Board also endorsed the specific response now recommended to Council. The joint response has also been considered and endorsed by the Council's Bradwell B Power Station Working Group. Accordingly, following collaborative working between each authority, the recommended joint response is before Council for approval.

#### **2. RECOMMENDATIONS**

- (i) That the Council endorses the Officer recommended response to the Stage 1 Consultation, as set in **APPENDIX A (Appendices 1 and 2)** this report, as the Council's response to the consultation; and
- (ii) That the Council endorses that the consultation response be a joint response with Essex County Council.

#### **3. SUMMARY OF KEY ISSUES**

##### **3.1 Background**

- 3.1.1 In 2010 the Government announced that Bradwell was one of eight sites it considered suitable in principle for the siting of a new nuclear power station. Currently CGN and EDF are partnering in the development of the station and have formed a jointly owned company, Bradwell B Power Generation Company Limited (BRB).
- 3.1.2 The development of a new nuclear power station falls within the scope of the 'Nationally Significant Infrastructure Projects' (NSIPs), as set out in the Planning Act 2008. In these instances, the developer applies directly to the Secretary of State for a Development Consent Order (DCO) rather than to the Local Planning Authority for

planning permission. Maldon District Council will be a consultee as part of the DCO process.

3.1.3 The Council considered BRB's consultation on the draft Statement of Community Consultation (SoCC) at its 13 February 2020 meeting and a joint response with Essex County Council was issued on 14 February 2020. BRB published its SoCC on 4 March 2020 and two stages of pre-application consultation were proposed in advance of the submission of the DCO application. The first of these two consultations, known as the Stage 1 Consultation, was also commenced on 4 March 2020.

3.1.4 The Stage 1 Consultation was originally planned to run for twelve weeks from 4 March to 27 May 2020, but following the outbreak of the Coronavirus COVID-19 pandemic public exhibitions were cancelled and the Stage 1 Consultation deadline extended to 1 July 2020. BRB have also introduced supplementary engagement tools to seek to mitigate the loss of public exhibitions.

### 3.2 **The Stage 1 Consultation**

3.2.1 The Stage 1 Consultation published by BRB says that it contains information on its initial proposals and options at this early stage of the nuclear power station proposals, providing the opportunity for all to let BRB know their views on them. The Stage 1 consultation document has been made available to Members and is available to all on the following link: <https://bradwellb.co.uk/consultation-documents/>. The Stage 1 consultation document is 141 pages long and identifies specific questions where feedback is requested. A short summary of the consultation follows below but Members are directed to the BRB consultation for its full content.

3.2.2 The consultation explains that the National Policy Statement for Nuclear Power (NPS EN-6) identifies an urgent need for new nuclear power stations and identifies Bradwell as a potentially suitable site for a new nuclear power station. The Stage 1 Consultation is non-statutory and presents BRB's vision and emerging proposals for the Bradwell B project to enable feedback to be taken into account as proposals develop. This builds on BRB's engagement plans with stakeholders.

3.2.3 The consultation clarifies that there are parts of the proposals are not likely to be influenced by consultation because they are driven by important technical considerations such as safety and efficiency. However, there are many parts of the proposals which will be influenced as a result of responses to the consultation or further technical and environmental studies. The parts of the project which are not likely to be influenced by the consultation are specified as:

- The principle of building a new nuclear power station on land adjacent to the existing Bradwell power station (as a matter of Government policy);
- The approximate siting of the new power station, as shown in the indicative masterplan for the Bradwell B permanent development;
- Technical details including:
  - The use of UK HPR1000 nuclear technology;
  - The proposed deployment of two reactors;
  - The adoption of indirect cooling.

- The principle of the type of the ‘associated development’ needed to support the construction of the Bradwell B power station including:
  - Accommodation for construction workers close to site;
  - Local highway improvements;
  - Marine transport facilities;
  - Temporary park and ride and freight management facilities;

3.2.4 The consultation outlines the Bradwell B project as including the following:

- **The Power Station Permanent Development** - the proposed new nuclear power station on land within the main development site (adjacent to the existing Bradwell station) which will be developed with two UK HPR1000 nuclear reactors, together with associated plant and ancillary structures and features of the power station.
- **Temporary Construction Facilities** - these are temporary facilities required for construction on the main development site and for the duration of the construction period.
- **Off-site Power Station Facilities** - these are permanent facilities away from the main development site, which are essential for the safe operation of the power station.
- **Associated Development** - development on and off-site to support the construction and/or operation of the power station, for example park and ride facilities for construction workers, freight management facilities, temporary worker accommodation and road and junction improvements.

3.2.5 The main development site includes the land that would be occupied by the permanent power station and land required for construction. The main site covers approximately 230 hectares and lies immediately to the south and east of the existing Bradwell power station. The site is next to the Blackwater Estuary on the Dengie Peninsula, approximately 9 miles (15km) east of the town of Maldon and north-east of the village of Bradwell-on-Sea. The consultation indicative main development site plan is reproduced overleaf:



Figure 1: Indicative main development site

- 3.2.6 The power station is proposed to be located on the higher ground to the south-east of the existing Bradwell power station. The consultation says that the proposed layout takes account of the environmental constraints of the site and local area and that the proposed new sea defences around the power station will be designed to withstand flooding from 1 in 10,000 year extreme weather events. It is proposed to use modern low-plume ‘hybrid’ cooling towers with a preference expressed for circular cooling towers with approximate dimensions of 120-165m in diameter at the base and 50-60m high. BRB are also considering creating a new landscape which would provide ecological mitigation and make a positive contribution to biodiversity.
- 3.2.7 The indicative permanent masterplan illustrated in the consultation is reproduced in Figure 2 overleaf:



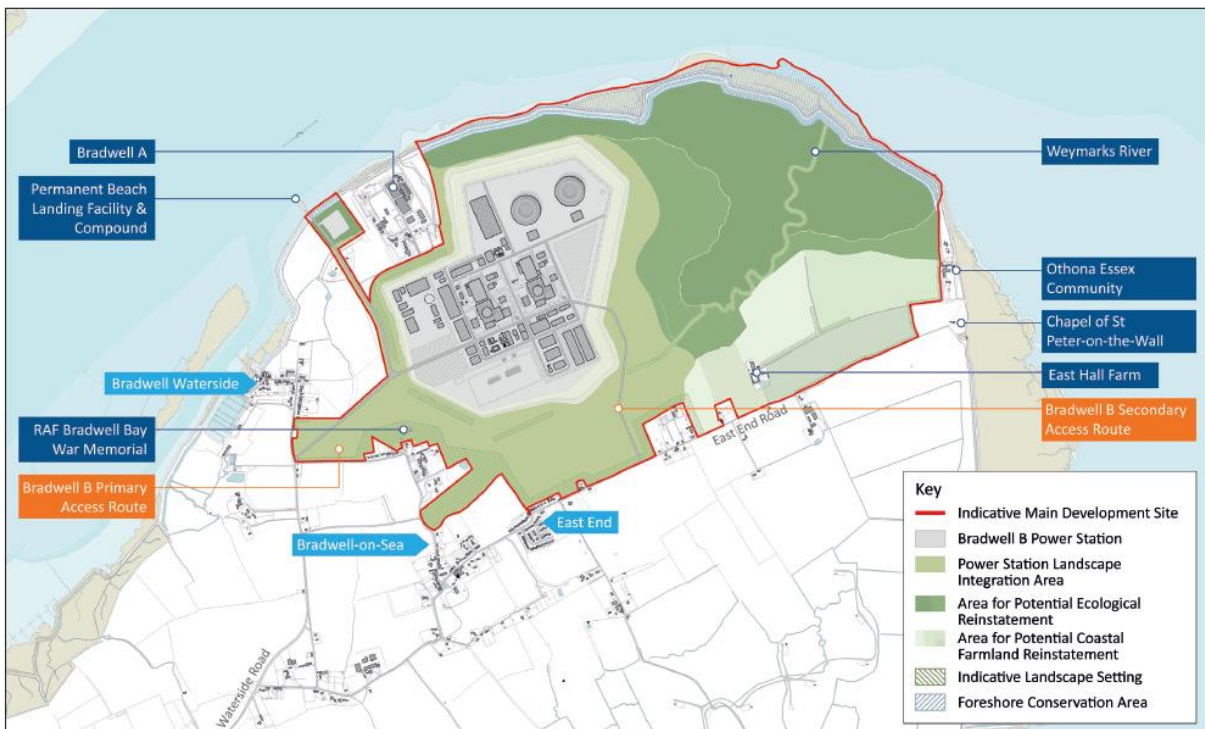


Figure 2: Indicative permanent masterplan.

- 3.2.8 The consultation anticipates that construction of the power station would take between 9 to 12 years to complete. Figure 3 below provides an indicative construction phase masterplan indicating potential beach landing facility locations and the extent of the site required during the construction phase.

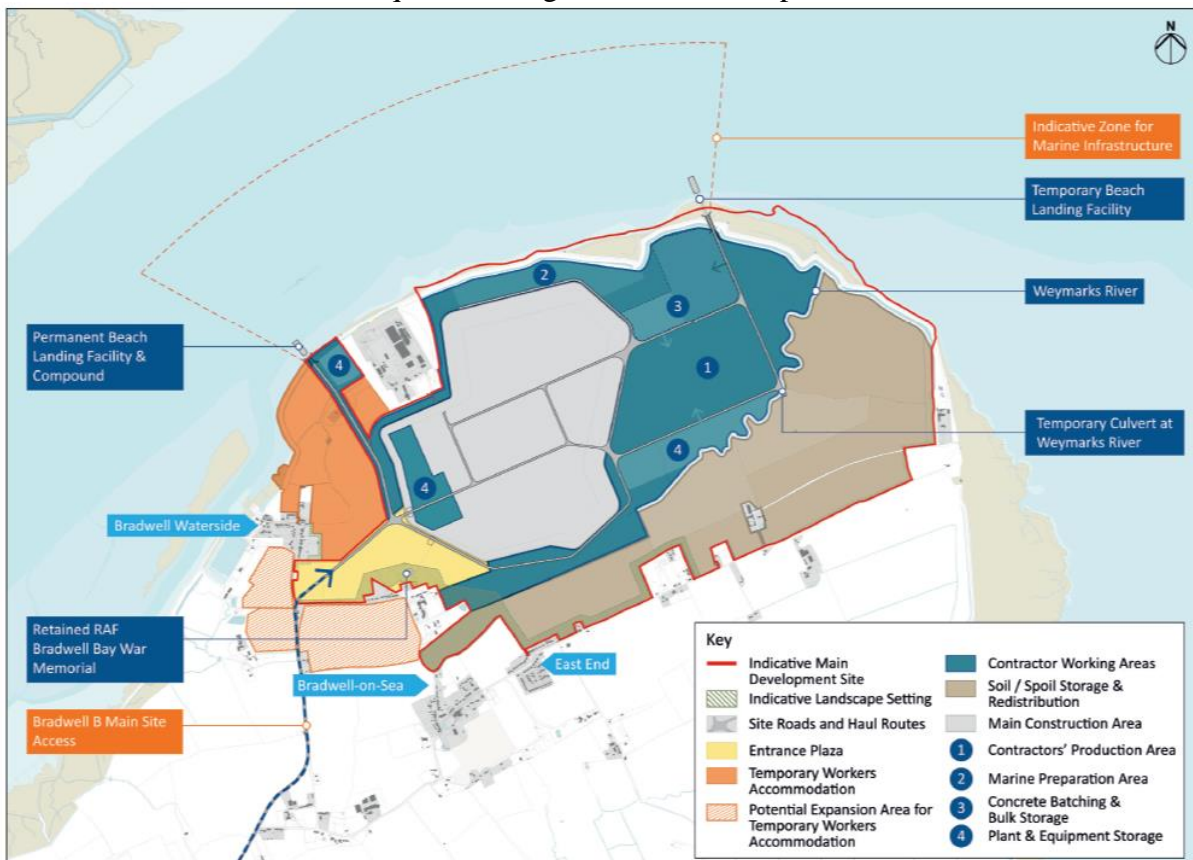


Figure 3: Indicative construction phase masterplan

- 3.2.9 The main development site would also include a connection to a new 400kV substation to be provided by National Grid. The consultation clarified that a new connection will be required to export the electricity generated by the new power station to the National Grid. This will be subject to a separate DCO application and consultation by National Grid Electricity Transmission and is outside of the scope of BRB's Stage 1 Consultation.
- 3.2.10 The consultation identifies the following transport strategy objectives:
- Maximise the use of marine and / or rail transport over road transport for movement of freight, where cost effective and deliverable within the Project timescales;
  - Reducing the distance the construction workforce need to travel and promoting sustainable transport modes;
  - Deliver appropriate demand management measures, where feasible, in preference to highway infrastructure improvements; and
  - Implement highway improvements or other measures to mitigate any residual transport effects of the Project to an acceptable level.
- 3.2.11 The consultation advises that BRB consider that marine transport could make a major contribution to its strategy to minimise the amount of freight transported to the site by road. Marine transport options are considered with the Beach Landing Facility the preferred option.
- 3.2.12 With reference to rail connections the consultation identifies physical constraints with the local branch line to Southminster and identifies that there may be significant capacity constraints, particularly around Shenfield, which limit the availability of new freight paths. BRB says that using rail to transport construction freight via the local branch does not appear to be viable, although requires further discussion with Network Rail to fully understand the constraints associated with the use of the branch line for rail freight and to identify the types and locations of possible rail interventions that could be carried out. The consultation outlines that there is more potential to transport construction workers by rail, subject to provision of 'rail and ride' bus services by the Project at key railway stations, such as at Southminster. BRB will be exploring this fully as part of their transport studies.
- 3.2.13 During construction there could be between 9,100 and 10,600 workers needed on site, of which 3,000 are expected to come from the local area. The consultations states that the initial proposals would achieve a sustainable transport modal split for the Bradwell B construction workers. This would result from the provision of temporary workforce accommodation close to the main development site and through the provision of direct buses and park and ride facilities that will help minimise the daily use of private car by construction workers. A Construction Workforce Travel Plan would be developed in outline.
- 3.2.14 It is proposed to build temporary workforce accommodation close to the main development site to accommodate up to 4,500 of the non-home-based construction workers required for the Bradwell B project. Potential locations for an accommodation campus are shown close to the main construction site.

- 3.2.15 Potential locational options for park and ride sites are identified in the consultation as a series of search areas. Park and ride facilities would play an important role during the construction of the Project, intercepting workforce trips by car reducing the amount of worker traffic on local roads between the park and ride facilities and the main development site and reduce potential environmental effects. Six search areas are identified, with two between Cold Norton and Mayland, a third west of Maldon, and three within the Chelmsford City Council administrative area close to the A414 junction with the A12, west of South Woodham Ferrers and at the junction of the A132 and A130. BRB anticipate needing one large site (20-30ha in size), accommodating around 1,600 spaces, in the search area between Cold Norton and Mayland, and potentially one or more smaller facilities in the other search areas.
- 3.2.16 The consultation advises that the development of the Bradwell B power station would require the movement of substantial volumes of construction materials to the main development site. The total tonnage of construction materials required for the Project is expected to be in excess of 6,000,000 tonnes which would include Abnormal Indivisible Loads (AILs), bulk materials such as aggregate and cement for the manufacture of concrete as well as fill material for raising site levels, steel reinforcement and a range of other materials for example steelwork for the construction of temporary and permanent buildings, utilities, lighting and fencing materials.
- 3.2.17 BRB advise that an essential part of its strategy for the movement of freight is the modal split between marine, rail and road transport modes during construction. Its initial view is that it can deliver at least 50% of bulk construction materials to the main development site by sustainable modes. Initial work indicates that this target could be met by marine transport. Rail could potentially play a role, through delivery of freight to muster ports for onward transit to the main development site by sea. There will still be a requirement for bringing freight to the site by road, and this would necessitate a range of highway improvements, options for which are set out in the consultation. The consultation estimates that there will be between 500-700 two-way HGV movements on average per day during the peak construction period.
- 3.2.18 BRB are proposing to develop one or more freight management facilities for HGV holding areas, to help regulate the timing and flow of vehicles to the Bradwell B site. These could provide parking for approximately 100 -150 HGVs on sites of between 10-15 hectares. The consultation identifies three search areas where freight management facilities could be located. Two of the search areas for the freight management facilities coincide with the park and ride search areas between Cold Norton and Mayland and the other located near the junction of the A130 with the A132 within the Chelmsford City Council administrative area.
- 3.2.19 The consultation considers what interventions may be required to establish an appropriate HGV route between the strategic road network and the main development site during the main construction period. Two strategic routes are considered, or a combination of routes, which are summarised as follows:
- **Route 1:** a route from the A130/A132 junction via the South Woodham Ferrers ring road, Lower Burnham Road, Fambridge Road, the B1018 and Steeple Road to site. Route 1 is principally aligned to the use of the existing highway, with a series of potential bypasses around settlements and sensitive receptors in addition to online highway and junction improvements; and

- **Route 2:** a route from the A130/A132 junction via the South Woodham Ferrers ring road, Lower Burnham Road, the B1010 with a series of alternative off-line section options to link back into the eastern part of the Route 1 near the site. This Strategic Route option would require a combination of on-line highway improvements and new sections of off-line highway alongside junction improvements.

3.2.20 In the first few years of construction, before the park and ride and freight management facilities will be operational, or major highway improvements have been completed, the consultation proposes to use the existing highway network as far as possible alongside improvements to the existing highway and implementation of HGV management measures. An 'in and out routing loop' for HGVs between the strategic road network and the main development site is proposed. This would result in HGVs travelling from the strategic road network to Bradwell via the A12 through Danbury and south of Maldon then to the B1018 to the Cold Norton roundabout on through Latchington, Mayland, Steeple and to the main site and then return the same way until the Cold Norton roundabout turning south to B1012 to South Woodham Ferrers and the A132 to the A130. This approach is designed to minimise the need for two-way HGV movements on the same parts of the local road network.

3.2.21 The road-led approach in the early years proposes a number of road mitigation measures including:

- Freight management strategy to implement several HGV management measures including timing of HGV movements and potential load consolidation;
- On-line physical works within the designated highway boundary to be agreed with ECC such as additional signage, improved signalling at junctions and additional pedestrian crossings through sensitive communities;
- Localised junction and highway works at identified pinch points on the existing highway network which may or may not require targeted third party land outside of the designated highway boundary; and
- Environmental management measures to reduce potential impacts on communities and sensitive receptors, such as residential properties, community facilities, conservation areas and listed buildings.

3.2.22 The consultation advises that once operational, the power station would generate approximately 2.2GW of electricity, enough to power around 4 million homes. It would create approximately 900 permanent jobs, with a further 1,000 jobs during periods of outage for maintenance and refuelling. It should be operational for a minimum of 60 years however spent fuel is likely to be stored on site beyond the operational life of the station.

3.2.23 The consultation says that the Bradwell B Project would deliver lasting socio-economic benefits for this region. The cumulative effect of the increased investment, trade, wages, jobs, skills, productivity and transport improvements, new homes and improved community facilities will together create a step-change in opportunities for local people, businesses and local communities. Construction of the Project would involve significant investment over 7-10 years, creating tens of thousands of jobs during construction as well as up to 1,200 apprenticeships during construction.

During its 60 year operational life the Bradwell B power station would employ a permanent workforce of around 900 people (with an additional 1,000 roles during outages around every 18 months during operation).

3.2.24 The consultation says that to maximise socio-economic benefits, the Bradwell B Project will operate in line with a set of core principles:

- Deliver on NPS aspirations - an effective and efficient infrastructure project, that attracts a high quality workforce and employs local people where possible.
- Deliver economic and social outcomes that help raise aspirations and local opportunities in Essex, increase productivity and promoting social mobility.
- Link skills and training initiatives with the supply chain - promote competency in existing businesses to ready them for supply chain opportunities.

3.2.25 The consultation says that workers could also create demand for community facilities and services such as health and leisure, which will be considered in more detail with stakeholders during 2020. Based on refined estimates of the likely construction workforce, as information becomes available and estimates on where workers are likely to live, the next step will be to work with stakeholders to define and quantify effects on existing communities and services and to develop a strategy that maximises local benefits as well as providing appropriate mitigation.

3.2.26 The consultation says that because of the rural setting of the development, many construction workers are expected to travel from up to 90 minutes for existing residents (home based workers), or within 60 minutes for workers moving to the area to help with the construction (non-home based workers). This 60 minute travel time area includes the towns of Maldon and Chelmsford, and smaller communities across the Dengie Peninsula, from Burnham-on-Crouch and Southminster, to Bradwell-on-Sea itself. Demand for housing from the construction workforce could lead to issues in the local housing market and BRB want to achieve a balance so that a reasonable proportion of housing capacity is used, but without displacing or pricing out local residents.

3.2.27 As BRB has at Hinkley Point C and Sizewell C, it is looking closely at how best to accommodate non-home based workers. Some of the workers expecting to be on the Project for a long time may choose to buy a home in the area. Others who are staying for a shorter time may choose tourist accommodation such as hotels, or caravan parks. Many of them are likely to want to rent a home or rooms in a shared house. The majority of project provided accommodation will need to be close to the main development site and this is intended to be provided within a temporary campus site accommodating around 4,500 worker bed spaces.

3.2.28 On accommodation, BRB priorities will include:

- Refining estimates of the likely construction workforce, including peak numbers, how that builds up over time, and how it breaks down by different trades and skills.
- Updating the gravity model to include new information as it becomes available, including the latest thinking on transport options.

- Using gravity model outputs to refine the mitigation – a campus and other Project-provided accommodation, and also the other ways in which interventions could be made to help the local housing market.
- Work with Maldon District Council, Essex County Council and other local stakeholders to understand the effects on local accommodation, including tourism.

### 3.3 Planning Policy

- 3.3.1 Nationally Significant Infrastructure Project (NSIP) are covered by the Planning Act 2008, which advises the Secretary of State that any decision starts with relevant National Planning Policies. This is different to the legislative basis for planning applications under the Town and Country Planning Act 1990 which starts on the basis that decisions are made in accordance with the development plan.
- 3.3.2 National Policy documents therefore provide the key basis for decision making on planning applications for DCOs for nuclear power station projects. These are the:
- Overarching National Policy Statement for Energy, July 2011 (NPS EN-1); and
  - National Policy Statement for Nuclear Power Generation, July 2011 (NPS EN-6).
- 3.3.3 NPS EN-6 explains that there is an urgent need for new nuclear power stations and that nuclear power forms an important element of the strategy towards achieving a more decarbonised, secure and diversified electricity sector by 2050. NPS EN-6 identifies Bradwell B as one of eight potentially suitable sites for a new nuclear power station in England & Wales before the end of 2025. NPS EN-1 confirms that all planning applications for nuclear power stations should be assessed on the basis that the Government has demonstrated that there is a need for this infrastructure.
- 3.3.4 The Secretary of State must also have regard to other relevant matters, and this would include the Local Development Plan. Where there is a conflict between an NPS and Local development Plan NPS EN-1 makes it clear that the NPS would prevail for the purposes of decision-making.
- 3.3.5 Maldon District Council's Local Development Plan (LDP) was adopted in July 2107. The LDP however has only one policy reference to a new nuclear power station, under Policy D4:
- “The Council will strongly support the principle of the development of a new nuclear power station at Bradwell-on-Sea.”*
- 3.3.6 Paragraph 3.43 of the adopted LDP states:
- “Given the uncertainty of the project, the possibility and impacts of a new nuclear power station in the District will not be considered further at this stage. The situation will be monitored by the Council, and if required local planning policy may be reviewed to consider any future power station proposals.”*
- 3.3.7 The Council has begun work on a Bradwell B Development Plan Document to address development needs potentially arising from the Bradwell B development, but

there are no specific detailed Bradwell B policies to inform the consultation response. Officers have however had regard to relevant national and local planning policies to inform the consultation response.

### 3.4 The Development Consent Order (DCO) Process

- 3.4.1 The project is at Stage 1 pre-application public consultation stage which is the first of a minimum two-stage process of pre-application consultation. After the pre-application consultations BRB will then decide whether to proceed to submit a DCO application to the Planning Inspectorate. After submission, an Examination would then be held by the Planning Inspectorate. At that point, there will be the opportunity for the local authorities and others to raise any unresolved issues through representations to the Planning Inspectorate. Maldon District Council will also be required to submit a Local Impact Report. The Planning Inspectorate would then publish a report with a recommendation to the Secretary State for a decision. It is for the Secretary of State to decide whether to approve or refuse the application. BRB has indicated that they hope to submit its DCO application in 2022.
- 3.4.2 The Stage 1 Consultation acknowledges that some of the proposals are at any early stage of development and that more detailed strategies to address effects of the development will need to be developed. Where possible, BRB state in their Stage 1 consultation document that these will be provided at later stages of the consultation process however, for some more complex areas, the full detail may not be available until the DCO application.
- 3.4.3 Following the Stage 1 consultation, BRB will consider all responses received and use them along with further technical work and environmental studies to inform the development of their plans. BRB will then publish their preferred options in a statutory Stage 2 pre-application consultation. This will identify the land likely to be affected by the proposals, preferred sites for highways improvements, freight management facilities and park and ride sites, and the preferred strategies for Jobs and Skills Strategy and Worker Accommodation. The Stage 2 consultation is expected to be in 2021 although BRB may undertake additional limited, focused stages of further consultation where necessary.
- 3.4.4 Between stages of consultation BRB will be engaging with technical consultees and key stakeholders to progress assessments and to inform the development of its proposals.

### 3.5 The Consultation Response

- 3.5.1 The recommended response to BRB's Stage 1 Consultation is attached at **APPENDIX A** to this report. It comprises a short five-page core response with the following two appendices:
- **Appendix 1** provides topic based comment based upon technical input from officers from both Councils.
  - **Appendix 2** provides direct answers to the key questions BRB asked within the main Stage 1 Consultation document.

- 3.5.2 The Stage 1 Consultations highlights that the construction and operation of a Bradwell B power station could have considerable local, regional and national benefits. It could also have negative impacts. The consultation response seeks to welcome and maximise the benefits from the proposals whilst also seeking to avoid or minimise potential negative impacts.
- 3.5.3 The response seeks to highlight the importance of sustainable development, whilst acknowledging the importance of National Policy Statements and other national and local planning policy. A positive lasting legacy from the development is considered essential if it is to become an example of sustainable development.
- 3.5.4 The response is necessarily high level as the Stage 1 Consultation arrived early in BRB's development of its proposals and the consultation generally lacks supporting evidence or information. The DCO process is based upon evidence, and so the recommended response consistently calls for evidence on baseline assessments and impact assessments and stakeholder discussions to support positive future engagement. More developed strategies are also requested, for example, on transport to support sustainable transport of both freight and people.
- 3.5.5 The consultation response confirms the Council's in principle support for the development and welcomes detailed discussion across a wide range of topics to support the Council's ongoing engagement with the DCO process.

#### **4. CONCLUSION**

- 4.1 The Stage 1 Consultation by BRB has come at an early stage of the Bradwell B power station scheme's development and the DCO process. The consultation is welcomed as an introduction to the emerging proposals and will support future engagement between the Council, and other stakeholders, going forward as more robust strategies, baseline assessments and impact assessments are prepared.
- 4.2 The recommended Council response to the Stage 1 Consultation will provide a firm basis for future pre-application discussions with BRB as the project progresses beyond this early stage of consultation.

#### **5. IMPACT ON STRATEGIC THEMES**

- 5.1 The development of the proposed nuclear power station impacts all of the Council's thematic strategies of Prosperity, Place, and Community and many of the priorities contained within them.

#### **6. IMPLICATIONS**

- (i) **Impact on Customers** – The proposed nuclear power station could have significant benefits and impact on Maldon residents and businesses. The consultation response seeks to maximise the benefits and minimise any adverse impacts.



- (ii) **Impact on Equalities** – It is the responsibility of BRB to satisfy itself that requirements for equality impacts assessments have been undertaken.
- (iii) **Impact on Risk** – The Council risks not being able to influence the development proposals and the significant impacts it will have on its area and local communities if it does not respond to the consultation and engage in the process going forward.
- (iv) **Impact on Resources (financial)** – The response to the consultation has been accommodated within existing resources. Additional financial resources may be required to effectively engage in the process going forward.
- (v) **Impact on Resources (human)** – The response to the consultation has been accommodated by existing officers, albeit impacted by the current coronavirus pandemic. Additional officer resources will be required to effectively engage in the process going forward.
- (vi) **Impact on the Environment** – There are potential environmental benefits from positively engaging in the pre-application consultation with BRB but no significant direct environmental impacts from issuing a consultation response.
- (vii) **Impact on Strengthening Communities** – The Council’s consultation response will support this objective. The Bradwell B proposals could have a significant impact on communities within the District.

**Background Papers:**

BRB Stage 1 Consultation

The Planning Act 2008

Overarching National Policy Statement for Energy, July 2011 (EN-1)

National Policy Statement for Nuclear Power Generation, July 2011 (EN-6)

**Enquiries to:** Paul Dodson, Director of Strategy, Performance and Governance.

This page is intentionally left blank

Joint Response from Essex County Council and Maldon District Council to BRB's  
Bradwell B Stage 1 Consultation

- 1.0 The Councils welcome the opportunity to comment on BRB's initial proposals for a nuclear power station at Bradwell at this early stage of the project. The extraordinary impact of the Coronavirus COVID 19 pandemic must however be acknowledged. It is unfortunate that the Coronavirus pandemic curtailed BRB's planned consultation events and significantly restricted consultees' capacity to engage with the consultation. Whilst BRB extended the consultation period, for most of the consultation period the general public, many consultees, and the host authorities were pre-occupied with the emergency demands of the COVID 19 pandemic. This unprecedented event therefore has diminished the response to the consultation, both in terms of its reach and depth, and BRB are asked to acknowledge this impact and to respond positively to this situation going forward, going above and beyond statutory engagement requirements.
- 2.0 The Bradwell site has been identified as potentially suitable for a new nuclear power station within the National Policy Statement for Nuclear Power Generation (EN-6, July 2011) and the Councils support in principle the development of the power station on the site. The Councils look forward to engaging with BRB on the details of the proposals in advance of additional stages of consultation in advance of the Development Consent Order (DCO) application. Both Councils support the Secretary of State's objective, as referenced in the National Policy Statements, of contributing to the achievement of sustainable development, and having regard to mitigating and adapting to climate change and achieving good design. Delivering sustainable development continues to be at the heart of the planning system and an assessment of all significant economic, social and environmental impacts will be required to inform the development of the proposals.
- 3.0 The Councils recognise the significant scale of the proposed development and its potential importance at a local, regional and national level. The contribution to the nation's energy supplies and the economic opportunities it could afford locally are acknowledged to be positive benefits, as highlighted in the consultation. However, benefits need to be balanced against potential negative impacts that are associated with a project of this magnitude. There are acknowledgeable impacts on the environment, pressures on communities, and wider consequences for other development, transport systems and supporting services that will need to be assessed and appropriate action taken. The Councils will seek to maximise the benefits from the proposals whilst also seeking to avoid or minimise potential negative impacts. Compensatory measures will be sought where appropriate. A positive lasting legacy from the development is considered essential if it is to become an example of sustainable development.
- 4.0 At this early stage of the proposals very little information has been made available by BRB on a wide range of topics, which makes giving robust comments very difficult across the board. The Councils therefore reserve the right to supplement this response in due course. Further information must be urgently provided by BRB so that the Councils and communities can engage fully and in a meaningful way on the development of proposals. The Development Consent Order process needs to be evidence based, with baseline reports and impact assessments available to inform strategic approaches and the development of detailed proposals.

- 5.0 The Councils welcome the potential contribution towards the transition to a low or no carbon economy in support of climate change adaptation and sustainability. Further details of the proposals are requested, in terms of the carbon footprint of the development and the measures proposed that would support the transition of the wider area to become a zero-carbon economy and the provision a positive legacy that reaches beyond the supply of electricity from the power station. There are clear opportunities for the project to be a world class example of low carbon development that is transformational in its approach to development and transport.
- 6.0 The Councils welcome BRB's commitment to good design and in view of the prominent and highly sensitive setting of the power station we would seek an exemplar development of the highest quality, learning from international best practice. The Councils ask that the design principles for the project are revised and informed by the National Infrastructure Commission's design principles <sup>[1]</sup>.
- 7.0 The Councils welcome the economic opportunities that a new power station could bring, especially during the construction and operational phases. It is acknowledged that the economic impacts are both direct and indirect in nature. BRB are asked to engage early with the local authorities and other key stakeholders to provide clear opportunities for local businesses to take advantage of supplying and servicing this project, where possible. The Councils not only welcome BRB's intention to maximise the positive economic effects of the development but also its commitment to understand any potential adverse effects the project could have on the economy and employment, so these can be avoided or mitigated. The potential impacts on tourism is highlighted in the consultation. The potential impact on the local diverse and prosperous economy, not directly connected to the power station proposals, must be fully taken into account and supported through compensatory measures that demonstrate how co-existence can be mutually beneficial.
- 8.0 The Councils welcome BRB's intention to prepare an Employment, Skills and Education Strategy and would welcome detailed discussion on the relationship with the County Council's 'Employment and Skills Principles for Major Projects and Developers' and the range of activities proposed or implemented on similar developments. The Councils are keen to see an independent dedicated Essex Supply Chain Team and Supply Chain Portal set up focussed on supporting local businesses which will benefit from the Supply Chain partnership. Support should also be considered for other sectors of the local economy impacted by the development.
- 9.0 Social or community impacts of the proposals are also critical to the project and the Councils welcome the commitment to maximising social benefits. However, the Stage 1 Consultation does not adequately identify or address potential impacts, both positive or negative. Early discussion on the impacts on local community services and infrastructure, including green infrastructure, community safety, cohesion and integration, is requested with Councils and key stakeholders with clear proposals developed and in place before the Stage 2

<sup>[1]</sup> <https://www.nic.org.uk/wp-content/uploads/NIC-Design-Principles-Final.pdf>

Consultation. Potential social impacts on community safety, health services, wellbeing, social care, educational services, recreational infrastructure, and other community services will need to be addressed in more detail and the Councils would be pleased to facilitate wider discussions on these impacts going forward.

- 10.0 Local housing markets will also be impacted by the proposals and it is considered the Stage 1 Consultation does not adequately address this important issue. The housing impacts of the nuclear power station are not currently covered by the adopted statutory Development Plan. As a result, Maldon District Council (MDC) is progressing a Bradwell B Development Plan Document to identify the additional land use requirements and specific policies arising from direct and indirect growth related to the Bradwell B development. The Stage 1 Consultation provides inadequate evidence of early consideration of these impacts and the Councils welcome detailed discussion on this topic. MDC has commissioned a Local Housing Needs Assessment to update the District's position in respects of housing need, including any conclusions that can be drawn as to how demand for the local housing market area might be affected by Bradwell B's construction and operation. As part of the study MDC will be exploring how predictable the potential adverse impacts on social and affordable housing will be, so that it can engage constructively with BRB from an evidence-led position. Evidence based discussions on potential adverse housing market impacts and potential avoidance, mitigation or reasonable compensation are welcomed in advance of further stages of consultation. The suggestion of considering permanent accommodation as part of the development is acknowledged and the Councils are keen to discuss potential routes to achieve a positive local housing legacy from the project.
- 11.0 The Councils welcome the recognition that the proposed project would impact on an environmentally sensitive area. There are significant ecological, built heritage and landscape constraints to development that the project will need to fully consider at an early stage.
- 12.0 The location of the proposed new nuclear power station adjacent to the Blackwater Estuary and the Essex coast lies in a highly sensitive coastal area. There is the potential for unacceptable ecological impacts arising from the project. The Councils welcome BRB's recognition of the very high ecological importance of the area with international, European and national levels of protection. The commitment to developing an appropriate evidence base is welcomed and supported by the Councils. Ongoing discussions with key stakeholders are also supported and BRB are requested to confirm its commitment to maximise environmental benefits and to achieve biodiversity net gain from the development, in line with the emerging Environment Bill 2020.
- 13.0 The proposed development will have a significant impact on the historic environment which the Councils feel is not adequately acknowledged by the Stage 1 proposals. Ongoing discussions with key stakeholders, including Historic England, is supported and a full programme of investigation and assessment will be required in order to inform the development of a robust strategy of avoidance, mitigation or compensation. Engagement and discussion on the details and nature of the appropriate baseline studies will be welcomed.

- 14.0 The proposed development of the main site is likely to have an adverse visual and landscape impact. The open nature of the area is visually sensitive to new development, which would be visible within views from adjacent areas and further afield. The landscape also offers a sense of historic integrity, resulting from historic field boundaries, comprising of water-filled ditches and remnants of old sea walls. The Councils consider that BRB's proposals are not yet sufficiently informed by a comprehensive landscape assessment of the site's landscape value, qualities and characteristics. The Council's would welcome discussions with BRB on the landscape and visual baseline assessment of the main site and Associated Development sites, together with early consideration of impacts and appropriate avoidance, mitigation and compensation measures, prior to the next stage of consultation.
- 15.0 The Councils welcome the importance BRB place on protecting the amenities of local residents and communities potentially impacted by the proposals. However, at this preliminary stage there is inadequate evidence provided for the Councils to offer anything but to emphasise the acknowledged importance of safeguarding local amenities. A detailed description of existing baseline environmental conditions on the main development site, associated development sites, search areas and preferred strategic transport routes is therefore essential. Further details on potential sources of impacts on sensitive receptors together with an assessment of the potential impacts, with and without avoidance or mitigation of impacts, will be necessary for all phases of the development. Discussion on the details of baseline studies and assessments will be welcomed.
- 16.0 The Councils consider that it is particularly important that the transport implications of the construction, including any early works period, and operational phases are positively and robustly addressed. The Councils welcome BRB's commitment to sustainable transport and the prioritisation of marine and rail transport of construction materials in advance of road transport. However, the Stage 1 Consultation does not adequately define the transport strategy for the development and the Councils request that this is developed urgently.
- 17.0 The transportation networks are constrained, as acknowledged in the Stage 1 Consultation, and discussion with the Councils and other stakeholders is welcomed to understand the details of potential impacts and the measures proposed to avoid and mitigate adverse impacts and to provide a positive transport legacy from the development. It is considered essential that a well-developed integrated transport strategy, covering all aspects of the movement of both people and goods by marine, rail or highway modes, is prepared for the project. Once the strategy has been developed it can provide the framework necessary for the assessment of more specific transport scenarios (marine, rail, and highway), including highway traffic modelling to inform future engagement and discussion on highway proposals. Whilst the well-developed integrated transport strategy must come first, in principle MDC supports highway proposals based upon the Strategic Route 1 (Blue route) within the Maldon District, including consideration of the proposed bypasses.

- 18.0 The Councils note the confirmation that a new connection will be required to export the electricity generated by the new power station to the National Grid. This additional infrastructure, directly related to the proposed power station, could also have significant impacts across a wide area. The Councils therefore ask that BRB work closely with National Grid to align proposals to enable cumulative impacts to be fully assessed and mitigated.
- 19.0 Cumulative impacts will also need to be addressed within the power station project and will need to be identified and assessed within the project. The inter relationships of impacts will also need to be captured and considered to ensure that a comprehensive assessment is undertaken. Tourism, for example, is linked to the quality of the built and natural environment and the amount and quality of accommodation available. The project could impact on these factors and the Councils expect that both direct and indirect impacts will be fully appreciated before firm proposals are made.
- 20.0 The Councils acknowledge that the Stage 1 consultation presents initial thoughts on options for highway routes, temporary accommodation sites, park and ride sites and freight management sites. At this early stage, when there is further preliminary work required to develop a comprehensive transport strategy and collect baseline environmental data, it is not considered appropriate to comment specifically on the proposals for Associated Development. The Councils recognise the need for temporary accommodation and appropriate transport infrastructure to serve the main site and would welcome detailed discussion on these matters prior to further stages of consultation.
- 21.0 It is acknowledged that BRB are committed to an approach of fully understanding baseline conditions before assessing impacts and responses to those impacts. This methodical and evidence-based approach to the project is welcomed and should apply to all significant impacts, not all of which have been covered at this initial stage of the project. The ongoing commitment to engagement with the Councils and other stakeholders is welcomed and supported and is considered critical to the successful progression of the proposals before the Stage 2 Consultation.
- 22.0 Appendix 1 to this response identifies topic specific comments from Council officers that have supported this consultation response. Appendix 2 provides direct responses to the questions highlighted in the full Stage One Consultation Document. The Councils hope that this consultation response will be beneficial to BRB and will support ongoing engagement and discussions on the proposals going forward.

This page is intentionally left blank



**CONTENTS:**

<b>PREFACE</b>	<b>2</b>
<b>1. SUSTAINABILITY: CLIMATE CHANGE</b>	<b>2</b>
<b>2. SUSTAINABILITY: SOCIO-ECONOMIC</b>	<b>5</b>
2.1 Economic / Prosperity	5
2.2 Social / Community	13
2.3 Housing / Accommodation	18
3.1 Environment: Environmental Health	20
3.2 Environment: Ecology	20
3.3 Environment: Historic Environment	25
3.4 Environment: Landscape	32
3.5 Environment: Masterplanning and Design	37
3.6 Environment: Flood Risk	41
3.7 Environment: Minerals and Waste	45
<b>4. SUSTAINABILITY: TRANSPORT</b>	<b>50</b>
<b>List of Abbreviations</b>	<b>62</b>

## PREFACE

The Councils' capacity to fully engage with the Stage 1 Consultation has been impacted by the unprecedented impacts of the Coronavirus COVID 19 pandemic. The officer comments below have been limited by priority commitments to addressing the COVID 19 response, and similar impacts on other organisations and stakeholders that limited the normal level of co-ordination and discussion between colleagues before the comments were provided. Site visits were also cancelled due to home working. Whilst some officers could provide limited input, some officers were unable to provide comments on the Stage 1 Consultation at all due to COVID 19 impacts.

## 1. SUSTAINABILITY: CLIMATE CHANGE

### 1.1 A Zero Carbon Future

The Councils welcome the potential contribution towards the transition to a low or no carbon economy in support of climate change and sustainability. Further details of the proposals are requested, in terms of the carbon footprint of the development and the measures proposed that would support the transition to a zero-carbon economy and the provision a positive legacy that reaches beyond the supply of electricity from the power station. There are clear opportunities for the project to be an example of low carbon development that is transformational in its approach to development and transport.

The UK is bound by the Climate Change Act 2008 to achieve net zero carbon emissions by 2050. This shift to net zero target from the previous target of 80% reductions on a 1990 baseline has brought into sharp focus the need to radically tackle Green House Gases (GHG) across all sectors including the built environment and nuclear development.

ECC has made a commitment to formulate a Climate Action Plan to reduce carbon emissions across the county of Essex. In addition, ECC has inaugurated an independent, cross-party Essex Climate Change Commission with the purpose of:

- Identifying ways in which ECC can mitigate the effects of climate change, improve air quality, reduce waste across Essex and increase the amount of green infrastructure and biodiversity in the County, explore transport modal shift, research energy generation and fully engage with communities around behavioural change.
- Reducing the carbon footprint of both ECC and Essex as a whole – the Commission is expected to recommend an ambitious, but realistic target year to have achieved net zero greenhouse gas emissions.

As the UK transitions into a net zero carbon future, nuclear power stations have been recognised as important in generating the low carbon electricity mix required to power a sustainable UK. However, the scale of such nationally important infrastructure developments do carry an equally large and conflicting carbon footprint in their embodied and operational carbon. The Councils welcome the benefit that nuclear development at Bradwell can have to decarbonising the supply of energy in the UK but is equally concerned to see that material provisions are made in the development proposal that mitigate the carbon emissions generated from the construction and operation of the power station and its associated development.

Adequate provision for reduction and offsetting of carbon emissions, both embedded and operational, need to minimise the development's carbon footprint and mitigate the effects of climate change and with reference to planning principles set out nationally and locally including:

- National Planning Policy Framework, S14, para 148 which states: *"The planning system should support the transition to a low carbon future in a changing climate [...]. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions [...] and support renewable and low carbon energy and associated infrastructure."*
- National Policy Statement for Nuclear Energy (EN-6), taken together with the Overarching National Planning Statement for Energy (EN-1), provides the primary basis for decisions taken by the Infrastructure Planning Commission (IPC) on applications it receives for nuclear power stations (capacity 50MW or more). Specifically, EN-1 5.2.11 states that the IPC should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage.
- Maldon District Local Development Plan policy D1 states that: "All development must [...] make a positive contribution in terms of energy and resource efficiency." Policy D2 states that: All non-residential development should achieve a minimum of BREEAM 'Very Good' rating or be supported by a bespoke assessment that demonstrates appropriate environmental performance results above current Building Regulation requirements; Development should seek to maximise the use of building materials from sustainable sources and apply sustainable construction methods where appropriate; Development will contribute towards making more efficient use or re-use of existing resources and reducing the lifecycle impact of materials used in construction. The Council may require large scale development proposals to be supported by a Site Waste Management Plan;

## 1.2 Minerals Local Plan (2014)

A key approach to reducing the demand for minerals in new developments is through encouraging and supporting aggregate recycling. Policy S4 – Reducing the use of mineral resources, criteria 4, seek to ensure:

*The maximum possible recovery of materials from construction, demolition and excavation wastes produced at development and re-development sites. This will be promoted by on site re-use/recycling at other aggregate recycling facilities in proximity to the site.*

## 1.3 Accommodation Strategy

The emerging accommodation strategy recognises that the relocation of staff onto the site is a major contributor in improving the sustainability of the workforce through reducing transport related emissions. There is also the recognition that a sustainable transport plan will further reduce the impact of the peak workforce for those not living on site and the Councils will want to see in detail the kind of measures that will be adopted to enable the Plan to be effective. We would also highlight the need for the accommodation development itself to ensure it is a net zero carbon accommodation development with high energy efficiency standards, use of on-site renewable energy technology to meet demand and measures to offset any net emissions after measures to maximise efficiency and generation measures have been maximised. This includes all other facilities

associated with the accommodation e.g. canteen, sports facilities, laundrette, shops, street lighting, health centre etc.

There are Building Research Establishment (BRE) guidelines which is recommended to BRB to promote exemplary practice; to encourage the exploration of the most suitable use of local energy generation; to devise a scheme for exploring this and for monitoring carbon use and emissions over the lifetime of the project. Such a scheme should be monitored throughout the life of the development together with adaptation to revisit and improve on the set targets if they are found not to be met.

#### 1.4 Transport

The importance of sustainable transport and the use of rail and water over road during construction and operation is recognised; but requires further detailed investigation. There is a need to be more ambitious through the incorporation of net zero carbon principles into transport, for example, through the electrification of the park and ride and other bus fleets. With the national move away from fossil fuel vehicles and towards electric vehicles, we would encourage efforts towards the use of electric and ultra-low emissions vehicles as far as feasible, highlighting the opportunities for electrification of transport fleet for the movement of the workforce to and from site from the temporary “park and ride” sites and while on site, and the use of ULEVs for the movement of freight and goods. The provision of electric charging infrastructure is necessary along any selected road based “strategic route” and would be a welcomed legacy.

#### 1.5 Main Development Site

We would also encourage the carbon footprint of the development to be considered in both the construction and operational phases through consideration of the use of sustainable materials as well as the impact of supply chains on the carbon footprint of the development. The Councils wish to see a plan to show how carbon is managed, through an agreed Carbon Plan, and how its impact can be lessened. We would encourage further thought into the sustainable use, recycling of materials and the lifecycle impact of materials.

#### 1.6 Emissions Measurement and Mitigation

We recommend the measuring of the carbon footprint of the whole development throughout its life cycle, with the yearly disclosure of this information in aid of pursuing low carbon targets through the Carbon Plan. This is an omission from the proposal which would provide considerable support in monitoring, reducing, mitigating, as well as offsetting carbon emissions associated with the construction and operation of the development. In order to achieve national targets of net zero carbon by 2050, and to reduce the carbon footprint of Essex, the need to decarbonise large infrastructure developments in Essex is significant. Any measuring should be made available yearly and reviewed going forward.

The inclusion of the above suggestions will aid the development in not only attaining national low carbon targets, but also in achieving project aims for whole life sustainability and avoiding adverse environmental effects (Stage One Consultation, paragraph 2.1.13).

*Supported by: Tom Day, Head of Energy and Low Carbon Programme (ECC)*

## 2. SUSTAINABILITY: SOCIO-ECONOMIC

### 2.1 Economic Prosperity

#### 2.1.1 Summary

The Councils welcome Bradwell B's plans around people and jobs, especially the explicit commitment to maximise positive economic effects whilst mitigating against any potential adverse effects the Project could have. The Councils have been in early dialogue with BRB (via the EDF Energy Workforce Development Strategy Team) in order to communicate and align our ambition and that of our existing skills ecosystem and partnerships. We have identified key skills ambitions drawn from various ECC and partner strategies, policies and action plans and mapped these to some potential interventions that could be part of the Bradwell B skills and employment plans, and which would complement and strengthen existing activity.

The construction of the Bradwell B Power station could undoubtedly create tens of thousands of jobs and deliver millions of pounds of investment. However, without careful planning, controls and mitigation, the risk is the short and longer-term economic effects will not be realised or benefit local residents. It is vital that the Project avoids harm to the area's existing business community, does not put future investment in the area at risk, or create displacement and disruption to the current workforce.

We welcome BRB's intention to maximise the positive economic effects and to understand any potential adverse effects the Project could have, so these can be avoided or mitigated (5.1.5 in the Consultation document). The Councils are committed to working with the Project Team to help them achieve these economic benefits and identify the adverse effects. We envisage a collaborative and supportive relationship that will enable BRB to realise such benefits and appropriately mitigate such effects. Including those identified by NPS EN-1 (Section 5.12) and EN-6:

- Sustained economic growth and prosperity in local businesses
- The creation of jobs, training opportunities and skills
- Provision of local services, improvements to local infrastructure and educational facilities
- Effects on tourism, including those caused by environmental, visual and transport impacts and socio-economic effects, and visitor facilities
- The effect of an influx of workers including pressures on local and regional resources and demographic change (also addressed as part of the Community response)

We know that where economic clusters are established, a virtuous circle emerges whereby inter-firm competition promotes innovation and productivity and ultimately means that local companies are able to compete for work. Our strategic aim, therefore, is to ensure that major projects work to bring about skills clusters that support the matching of workers to in-demand career opportunities and companies to communities where the skills exist (or are being trained for) that they need.

We welcome BRBs focus on the importance of creating a local supply chain and the need for a Supply Chain Team, which is also commented upon later. However more information is required regarding the way this will function and, post peak construction, how it will ensure longer-term stability for the businesses involved. It is the Councils' joint expectation that an independent dedicated Essex Supply Chain Team and Supply Chain Portal be created, focussed on supporting local businesses.

The consultation fails to recognise the risk of a short-term boom that cannot enable a sustainable long-term economic legacy for local business and the economy, nor how this will be mitigated. To manage this the Supply Chain Team and Portal should support and enable:

- Maldon District and Essex businesses to win contracts
- Bradwell B to show how it will maximise opportunities for local businesses through its procurement process.
- Local companies to access funded specialist accreditations and/or Health and Safety qualifications that are required to supply new nuclear.
- A legacy to support the post-construction sustainability of local businesses, who have enabled the construction and operation of the Power Station, through training and support.

The Project may have a significant adverse impact on other inward investment and entrepreneurship, especially in non-connected sectors. As local businesses will be affected by the limited availability of staff, land and resources, along with high wages. Failing to support the business community and the area's Sense of Place would result in considerable harm to the (existing and future) diverse and prosperous economy. This, along with other risks, must be managed through measures such as;

- Funding to support the economic development and tourism function of Maldon District Council
- Funding to commission necessary economic planning/studies and to facilitate and expedite strategic projects and objectives.
- Working with partners to build local supply chains from existing and new businesses
- Investment in the local workforce
- A business development grant funding program
- Creation of local incubation or enterprise facilities
- Measures to incentivise the reduction of future out-commuting
- Investment/expansion/creation of new schools and other skills/education facilities
- Commitment to encourage the opportunities for local employment to transfer into higher quality roles at Bradwell B
- Support initiatives to provide future investment and employment in growing sectors, such as green energy and infrastructure
- The provision of significant mitigation measures to address the effects the Project will have on businesses and tourism with regard to increased traffic flows, impact on environment, demands on local temporary and permanent accommodation and harm to the Maldon District "Sense of Place" brand and reputation
- Investment in the local visitor offer and facilities, accessible through sustainable modes, including electrically enabled travel and public transport.
- Investment in opportunities to create/develop and improve further education, apprenticeships and training to ensure a sustainable highly skilled workforce.

The ECC Employment and Skills Principles for Major Projects and Developers' requires that major projects, such as Bradwell B to:

- Cultivate and foster partnerships to develop a flexible and responsive skills system that aids regional and sub-regional business development, which develops industry clusters and skills engines.
- Develop highly-skilled sub-regional talent eco-systems with transferable skills and competence, responsive to current and future jobs; which:

- builds capacity and conditions to enable shared prosperity
- enables innovation, knowledge-driven and digital skills, which increases productivity; aiding wealth, output and opportunity
- Mitigate adverse employment effects, which may arise from a large-scale influx of non-home-based workers, which evidence suggests increases salaries and job competition, leading to higher churn and displacement effects. This crowding out effect raises the cost for all local people, including those not directly employed by the large employers, by increasing demand for property and local services. We would welcome early sight of your 'gravity model' assumptions, methodology and outputs in this regard.
- create the conditions for effective skills devolution by developing and taking forward an integrated whole-system approach to employability and skills.

Comments are provided on particular sections of the Stage 1 Consultation:

### 2.1.2 Approach to Managing Effects - Core Principles (Section 2.1.2)

The Project's core principles, as identified in the consultation document (reference para 5.4.2), complement the ECC's Skills and Employment Principles for Major Projects and Developments. However, we would welcome greater detail about specific actions to complement these principles. To meet our Employment and Skills principles and ambitions, Bradwell B will be expected to:

#### **Link educators, business and people to develop a shared understanding of skills and drive local prosperity**

- Drive strong leadership to enable local anchor institutions/strategic infrastructure projects to invest in and deliver local outreach and engagement to support sub-regional, latent talent pools; enabling future employment and agglomeration spin-out
- Ensure local educational provision aligns with sub-regional employment needs
- Develop and take forward integrated approaches to employability and skills with other agencies.
- Foster educational partnerships to upskill and train highly-skilled workers.

#### **Cultivate skills needed for the future economy supporting productivity, future prosperity and the fourth industrial revolution**

- Invest in lifelong learning, to adapt to changing employment landscapes
- Develop and unlock skills needed for future jobs
- Prioritise knowledge-driven skillsets and higher-level jobs

#### **Develop and enhance sustainable high-value employment opportunities**

- Support access to a highly skilled pool of local labour
- Drive knowledge economy jobs
- Increase the percentage of residents with skills at Level 3 and above
- Further utilise the apprenticeship levy and opportunities for skills devolution to support industry and develop highly-skilled sub-regional talent eco-systems
- Maximise local labour opportunities from regional developments, with career sustainability and lifelong learning at its foundation

#### **Develop world class training and provision**

- Invest in and support the local educational landscape including through primary and secondary, especially in the rural Maldon District where access to higher education may otherwise be limited.

- Develop a culture of education and industry knowledge share and pool of associate lecturers, teachers\ tutors and assessors to drive economic prosperity.
- Invest in new models of skills facilities and equipment which are aligned to employer skills need to support skills for the future and a knowledge-based economy
- Invest in and develop new vocational pathways such as apprenticeships, T-Levels and new models of Work Based Learning

**Ensure a diverse and inclusive workforce**

- Offer targeted opportunities for the hard to reach and those furthest away from the job market to access sustainable employment
- Address workforce gender imbalances and promote a culture of fairness, inclusion and respect for all, through vigorous outreach, local engagement and pro-active measures to break down negative perceptions
- Create localised initiatives addressing the skills needs of specific subregions of Essex, such as addressing: in work poverty, low skills levels, long term unemployment or high levels of individuals Not in Education, Employment or Training (NEET)
- Invest in and work with specific cohorts of residents that are furthest away from the jobs market to promote employability and skills development

**Protect the visitor economy and existing businesses that rely on natural resources**

- Identify and support opportunities for more domestic and international visitors, a greater proportion of overnight trips, and increased spend per visit to mitigate negative impacts on local landscape amenity
- Identify businesses that rely on natural resources and work with them to develop and implement appropriate strategies to mitigate any negative impacts on their activities

### 2.1.3 Proposed Jobs, Skills and Supply Chain Strategy (Section 2.1.3)

#### 2.1.3.1 Employment and skills measures

It is welcomed that the development could enable the creation of significant numbers of skilled employment opportunities in Maldon District Council and the wider economy of Essex both for the project and to support the backfill to local companies. We would like to maximise through the school curriculum, apprenticeships, adult learning, training opportunities etc our residents' preparedness as the workforce for roles in construction and operations as well as auxiliary roles; security, catering, and drivers. We would also like to ensure as many local people as possible can benefit from the Project via sustainable employment. We agree that the Project provides a unique opportunity to help lower youth unemployment and provide them with clear and lasting career pathways for young people, and we welcome BRB's early engagement on this matter.

We particularly welcome the implementation of an Employment, Skills and Education Strategy (ESE) and a Jobs Service focussed on developing a local skills base in Maldon and the wider Essex area that can support the delivery of the Bradwell B Project. We agree that that BRB's ESE Strategy must focus on delivering local initiatives that support local people into work on the project, including both young people and those currently unemployed, along with facilitating programmes to re-train the local workforce. We support the emphasis on ensuring a pipeline of skills training starting with schools to inform and engage students in the opportunities arising from the scheme, and based on the industry leading "Inspire" programme introduced at Hinkley Point C.



As part of our ongoing dialogue with BRB, the Councils will expect SMART objectives to populate the Employment, Skills and Education plan which aim to create an environment where people can gain sustainable employment - including those from education and those who may not normally have access to such opportunities. We welcome Bradwell B's recognition of the importance of working collaboratively within existing structures for skills and education in the region in order to build a stronger infrastructure not only to deliver the Project but to leave an important and lasting legacy. We agree that these engagements must focus on understanding the existing skills and education landscape and then working in collaboration to identify intervention opportunities. As part of our ongoing engagement with EDF's Workforce Development Strategy Team, we have identified examples of some of the potential interventions:

**Support an Integrated Job Shop and Brokerage Service (*Essex Works*)**

- An Information, Advice and Guidance (IAG) and a single point of access for all employment and skills opportunities in Essex across the range of construction programmes.
- A Bradwell B Jobs service integrated with Jobcentre plus and other employment contacts in Essex.
- Tackle specific barriers to training and employment, including basic literacy and numeracy.
- Identify and implement measures to assist local resident labour to find alternative employment once the construction phase is over.
- Sustain and extend the lifecycle of existing one-stop-shop construction skills hubs.
- Use data to monitor skills shortage areas and future skills requirements for the various projects.
- Support and improve local access to jobs and training.
- Maximise local resident participation.
- Integrate new Bradwell B skills and jobs requirements into an update of the Essex Careers Guide 'What's Your Thing'.

**Complement Councils' skills and economic growth plans, especially those targeting specific localities and sectors**

- Target economic interventions that ensure the benefits of growth are experienced more widely, including within economically disadvantaged communities and for new entrants to the labour market. We will seek to work with Bradwell to identify key localities for focussed skills engagement and outreach.
- Link in with ECC's Skills for Growth programme, which will maximise our ability to address skills gaps and support greater inclusion in the labour market. ECC intends to engage with government to secure greater control of the skills system and capital investments in key places in order to better support our productivity objectives, and by working closely with employers to encourage in-work training and progression.
- Help MDC and ECC make Maldon and Essex a destination of choice for local, national and international businesses.
- Support local community centres, schools and libraries to provide outreach facilities.
- "Back to work" schemes for disadvantaged communities.
- Funding for specific ECC and MDC identified projects that target young people and promote training and development opportunities to help maintain social cohesion.
- Promote direct employment and social enterprise contract opportunities for disadvantaged people so that they can gain experience working on small scale community projects related to the project, such as landscaping.
- Bring new employers to the County.
- Develop the capacity of existing employers to deliver.
- Encourage and widen the labour market.

- Support for local businesses where key staff are displaced due to the Bradwell B development, including skills training to increase the pool of people in skills shortage areas.
- Support outreach delivered by voluntary and third sector organisations, including Princes Trust, to promote work with disengaged youth and adults in deprived communities.

**Consider and engage with other major construction projects in Essex in order to ensure that planning for construction skills training, apprenticeships etc – and demand/supply issues – are considered on a strategic and ongoing basis.**

- Projects to consider and engage with should include the Garden Communities and Lower Thames Crossing.
- Other major road projects.

**Champion a schools and education engagement programme**

- Raise awareness of project plans and future skills requirements at the appropriate time of the project cycle.
- Workforce planning for the five phases of the project.
- Engage schools on CEIAG related to the knowledge economy, nuclear skills and high-level skills.
- Engage School Governors to promote Bradwell B as an opportunity.
- Branded study programmes specific to an employer or sector (via employer group)

**Apprenticeships**

- Raise the aspirations of all young people.
- Provide opportunities for adults that are distant from the labour market and help them to re-integrate into work.
- Identify and support aspirational number of pre-apprenticeships, apprenticeships and higher-level qualifications, as well as traineeships.
- Maximise use of levy budgets across the partnership by sharing unused levy from Tier 1 and Tier 2 contractors through to local supply chain.
- Support a portal whereby all construction vacancies are detailed, training listed, and companies can register for Apprenticeship levy transfer.
- Pledged levy and apprenticeship vacancies tied to postcodes with target KPIs for demographics.

**Support regional Higher Education (HE) and Further Education (FE) skills development plans**

Support investment in Essex's infrastructure to:

- Deliver higher level skills to bolster a knowledge economy.
- Improve FE infrastructure to mitigate for increase in skills requirements and displacement.
- Increase supply of level 3 and 4 and beyond to support Bradwell B's requirements and ECC's ambitions.
- Improve FE infrastructure to support availability of STEM skills and construction skills potentially using Institute of Technology (IoT) exemplar.
- Support a tutoring hub and bank of STEM based Associate Lecturers from industry.
- Champion sector experts to enhance learning by providing Training for teaching staff on specialist areas (train the trainer).
- Increase the Knowledge base of residents and local businesses and improve productivity.
- Support expansion of existing HE provision to meet the needs of Bradwell B and ECC's Higher Education growth plans.

**Align ambitions with the North Essex Economic Strategy Group**

- Support measures to enable workforce development.

- Develop productive strategic relationships between influential industrialists, FE & HE, to ensure the advent of centres of excellence across North Essex and in key areas of opportunity.
- Prioritise capital funding projects linked to HE & FE provision in STEM related disciplines and leadership and management linked to improved productivity as part of an agreed strategic approach.
- Support the introduction of a quality kitemark which recognises agreed standards of employment in a business and will be awarded across North Essex. This will include fair pay and conditions, workplace health and wellbeing, skills and development and diversity in the workplace and recruitment.
- Support the FE sector to capitalise on future capital investment opportunities, by actively championing a joint portfolio of strategic planning both in terms of Greater Essex and at a higher level across SELEP, importantly to include the promotion of virtual tuition (the hub and spoke approach).

#### 2.1.3.2 ASEC Fund

The Councils welcome the creation of a flexible Asset Skills Enhancement and Capability (ASEC) Fund to support local skills providers to deliver appropriate training to support Project requirements alongside direct support and provision to local training centres. We expect the ASEC to support Maldon and Essex's Productivity and Prosperity Plans and our ambitions to grow the knowledge sector, technology and the knowledge economy. We also welcome the suggestion of an ECC appointed Regional Skills Coordinator to provide a link between local providers, and supply chain businesses to ensure the Project delivers an effective, joined-up approach on skills. We support BRB's intention to ensure the training sector in Essex, Maldon and the wider region has the capacity to provide major upskilling for local workers and we will assist all efforts to provide advance information on the jobs and skills that will be needed, so that training can be carried out in good time, and the skilled workforce is available when required.

#### 2.1.3.3 Supply chain

The Councils propose the development of an independent dedicated Essex Supply Chain Team and Supply Chain Portal focussed on developing local businesses which will benefit from the Supply Chain partnership. We would expect this portal to enable Essex businesses in winning contracts for the supply of goods and services to deliver the Project. We therefore expect Bradwell B to use the Portal to provide information to partners on:

- How Bradwell B is contacting businesses in Essex to ensure that they are aware of the project/engagement events, and how to register an interest or seek further information.
- The future activities and timeline in relation to supply chain and engagement with local businesses.
- How Bradwell B intends to maximise opportunities for local businesses in Essex through its procurement process.
- How Bradwell B will ensure the maximisation of the local Social Value elements of its supply Chain.
- How local companies can access funded specialist accreditations and/or Health and Safety qualifications that are required to supply new nuclear.
- Calendar of virtual and/or face to face events for supply chain companies. We would encourage Bradwell B to actively engage with the Best Growth Hub which can act as a referral point to businesses for all supply chain-related enquiries and activities.

#### 2.1.4 Effects on tourism, including those caused by environmental impacts and socio-economic effects, and visitor facilities

We are pleased that the consultation recognises the risk to tourism. However, the consultation appears to underestimate the vital part the visitor economy plays in the local economy and Maldon District Sense of Place. Economically tourism accounts for about 15% of economic value and jobs. However, its effects are far wider as it supports visitor attractions, heritage assets, recreational activities, key organised events, and retail, spent in the town centres and villages including restaurants and cafes that rely on the increased and high value trade to survive. Accordingly, any damage to the area's attractiveness for visitors would impact negatively on the food and drink sectors, and the brand and reputation of the District and would be considered an unacceptable risk. Further work is required to identify and assess how any impact on the tourism economy will be managed and mitigated.

To mitigate the significant impact on visitor and tourist facilities; a close working partnership with Maldon District Council, the Maldon Sense of Place Board, Visit Essex and BRB is important. Some opportunity also exists to develop mutually beneficial visitor centres and facilities either at the site or at other visitor/tourism locations.

The area's visitor offer also relies on the availability of its visitor accommodation offer (eg bed and breakfast, camping, caravan and static sites etc) which is in high demand especially during the peak summer months. Any short-term disruptions to this accommodation supply would have lasting effects on repeat visitor numbers. It is vital that this increased demand on certain types of accommodation during the peak construction period does not negatively impact on the visitor numbers and will need to be managed during the construction and operational phases. The Councils seek the provision of legacy benefits through the provision of new and improved existing accommodation alongside create new, sustainable, quality visitor accommodation.

Given the importance of tourism in the area the Councils consider it necessary for BRB to undertake a detailed study to address the concerns as raised above. The Councils are willing to assist in the scoping and commissioning of any study.

#### 2.1.5 The effect of an influx of workers including pressures on local and regional resources and demographic change

From the information submitted it is clear that far more information is required on the approach to managing the effects of the size and distribution of the workforce. While there may be a short-term gross gain in local job numbers, this consultation appears to fail to recognise the level of risk that; without timely and significant investment and mitigation in advance of the construction phase, for example in transport services and infrastructure, the net and longer-term impact may be detrimental to the District's diverse and prosperous economy.

More information is also required in relation to mitigating the effect of increased housing demand and traffic on existing businesses, longer term investment, tourism and sense of place. The consultation indicates that local businesses will benefit from increased demand for services and accommodation, while this may be true for a short period it fails to recognise that a short-term peak in demand may have a negative legacy without significant mitigation. The impacts on environment, landscape and the perception of the area could also escalate the negative consequences without careful management and mitigation.

### 2.1.6 Other economic infrastructure observations

Where technically feasible the project should ensure that any new communications infrastructure should be of high quality to benefit local residents and support economic growth and wellbeing. Ideally, this would be Fibre to the Premises; however, fully operational 5G mobile connectivity may also be accepted as appropriate broadband coverage, if arrangements are made for premises to access this at affordable prices, comparable to a fixed-line fibre broadband service, and this access is fully available at the time of completion of the build.

The project is expected to increase the demand for local business accommodation. Bradwell B is expected to generate 900 post-construction direct jobs. Applying multipliers for the electricity sector, a further 720 indirect jobs and 90 induced jobs can be expected – 810 jobs in total, taking the likely total to 1710 jobs in total during the operational phase of 60 years. Applying the current mix of employment activity in Maldon District and typical employment densities, this would generate demand for some 2,136 sq m of office; 4,183 sq m of industrial; and 7,910 sq m of warehousing floorspace. However, whilst Bradwell B proposals would generate a demand/need for such floorspace to support its ongoing operation, the Maldon Local Plan evidence base suggests that there could be viability issues associated with the delivery of new speculative business accommodation – we would therefore welcome an ongoing discussion with BRB regarding how the scheme could support the delivery of supporting economic floorspace, for example through financial support for the delivery of a new Enterprise Centre at Maldon.

*Supported by: Robert Willis, Economic Infrastructure Manager (ECC); Hassan Shami, Commissioner for Skills Development (ECC); and Jack Ellum, Strategic Theme Lead (MDC)*

## 2.2 Social / Community

The impacts of Bradwell B on communities and their services will be significant. The opportunities and impacts on communities during the construction, operation and decommissioning of the nuclear power station will be a 'once in a lifetime' occurrence. Bradwell B will leave a legacy on existing and future communities and it is therefore critical to consider the wide ranging social and community impacts which include, but are not limited to:

- Community services and infrastructure,
- Community safety,
- Leisure and recreation,
- Health and wellbeing,
- Educational provision (primary, secondary, sixth form and early years and childcare services, and
- Communication to our communities.

The BRB commitment to work in partnership with the Councils and the community to manage the impacts of Bradwell B and maximise the benefits for the community is welcomed. Only by working in partnership will we be able to achieve the best outcomes for existing and future communities.

Whilst it is acknowledged that this is an early Stage 1 consultation, there is some concern that there is no substantive assessment or detail included on the impact that this development proposal will have on communities, including health and wellbeing. The National Planning Policy Framework (NPPF) requires development to enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier foods, allotments,

walking and cycling. These fundamental matters will need to be addressed and the Councils seek early discussions to understand how the project will be assessing and addressing community impacts in this area moving forward.

BRB is required to undertake an Environmental Impact Assessment (EIA) and the Councils' recommend that population and human health elements are considered in the EIA. Given the scale, size and significance of the project and the health and wellbeing impacts that may arise from the proposal, it is recommended that BRB should also undertake a stand-alone Health Impact Assessment (HIA) and BRB should consider how elements of the HIA might support the socio-economic and behavioural elements of this chapter. The biophysical elements of the population and human health chapter should be directed by the relevant technical and scientific environmental scientists and health protection officers within both Public Health England's Centre for Radiation, Chemicals and Environmental Hazards and relevant local authorities.

The Essex Design Guide (2018) includes supplementary guidance regarding the updated Essex Planning Officers' Association Health Impact Assessment guide, which also includes the wider Essex Healthier Places guidance. These provide more in-depth information on what needs to be considered when looking at health, wellbeing, the environment and communities (<https://www.essexdesignguide.co.uk/supplementary-guidance/health-impact-assessments/>)

The Councils recommend that the HIA is a fully participatory assessment incorporating a robust literature review and involves extensive stakeholder community engagement, consistent with the HIA Guide. As part of this, the Councils request that a stakeholder engagement group is set up, facilitated by BRB, to ensure that key health, wellbeing and community stakeholders can be engaged in this process. The Councils can provide a list of suggested stakeholders for this group. In addition, it is recommended that the Public Health England Healthy Places nationally significance infrastructure projects (NSIPs) lead officers are engaged to provide a national strategic public health overview in addition to that provided at a local level.

The community stakeholder engagement group would also help to influence and drive the Bradwell B legacy at a local level with local residents, Parish Councils, stakeholder groups and organisations participating. This group should be integral to moving the project forward and ensuring that local communities are brought into this process. Key local organisations and community groups should be included whilst also linking in to other local boards, such as the Llivewell Group, Maldon Youth Strategy Group, Maldon Sense of Place, Maldon Children's Advisory Board for example.

Due to the complexity and range of potential impacts upon the various communities surrounding the development over the extensive and multiple construction phases, assessments should consider impact at differing community levels. Some of our preliminary thinking which will be refined at the HIA scoping phase will be required to consider the impacts upon the immediate villages within the Dengie Peninsula, such as Bradwell village, the villages adjacent and surrounding Bradwell within the Dengie Peninsula, and the wider sphere of influence in Maldon District and the county of Essex. We would wish to consider the impact on East of England as a region and further but would wish to discuss this with relevant other stakeholders to understand their requirements, especially those concerning socio-economics, economic growth and highway matters.

Any formal recommendations arising from the HIA should relate back to the aims of the HIA from the scoping assessment. Any recommendations should seek to maximise the potential health and well-being benefits as well as minimising unintended consequences that have been identified. The HIA will enable the Councils and BRB to understand how the various development options proposed will impact upon each identified community, health or wellbeing element and what the effect the

impact will be. For some pathways, this is likely to provide multiple options and having this level of detail will enable us to promote the best options for health and wellbeing in existing and proposed communities. For the assessments, we must understand the magnitude, significance and duration of the preferred option's effect and as part of this specifically, the impact on any group that may be impacted by this including those impacted by inequalities including with protected characteristics, those impacted by differences in socio-economic circumstances, those impacted by differences through place/locality and those in excluded and under-served groups. Sensitive receptors sites must also be identified and impacts and effects on these must be considered at the differing community levels as raised above.

Where any community or health effect is identified through the various options proposed, it is the expectation that clear mitigation measures are included within the proposals before preferred proposals are identified. Should positive elements of the proposal be identified, it needs to be demonstrated how these can be maximised and whether they can play a part in legacy arrangements that might be secured. This is especially relevant to socio-economic opportunities such as skills, training and employment as well as housing and other social infrastructure, as examples. Where any negative, unintended consequences are raised, it must be clear how the applicant proposes to either remove, minimise or mitigate against these and the duration of this mitigation.

With regards to any potential legacy funds to be set up, the Councils would wish to discuss how these are allocated with relevant stakeholders, to give an understanding of the project funding, the scale of the project proposed, and the amount of funding necessary. It is envisaged that a local stakeholder engagement group will be important to ensure an appropriate breadth of representation on discussions as to how best funds are allocated.

Extensive public engagement, and the feedback that arises from this, on matters related to health, wellbeing and communities should be included in any HIA so that stakeholders are aware of these and can be involved as appropriate. The role of Parish Councils should also be fully recognised.

At this stage, the Councils wish to highlight a number of community, health and wellbeing issues that should be considered by the BRB as it develops its proposals. This list will expand:

#### **Construction workforce**

- Access to a range of Healthcare and the impacts on commissioned public health services
- Housing and the impact on the need for temporary housing, tourist accommodation and the capacity within the local housing market to accommodate demand including the impact on available affordable housing for local people
- Physical sport and formal and informal activity opportunities
- Mental wellbeing
- Emergency planning
- Skills, training and employment opportunities for local people including supply chain
- Impact on other local and strategic social infrastructure from the workforce not mentioned above
- Community safety implication and demands
- Local community health and voluntary service demands
- Active travel (walking and cycling) and general travel by river, train, bus, car etc.
- Liaison with education providers (service capacity, pupil and childcare, apprenticeship and career opportunities)
- Community integration opportunities preventing severance and isolation.
- Code of conduct agreements

### **Construction phase**

- Impacts on community including impacts on facilities, services and social infrastructure including healthcare and education premises
- Impacts on physical activity opportunities for leisure and recreational use including use of the Blackwater Estuary.
- Severance of Public Rights of Way (footpaths, bridleways and byways), cycle routes and footways physical activity routes and active travel routes including coastal paths (including the emerging England Coastal Path) and routes connecting relevant places of natural beauty and heritage sites
- Creation of active design principles regarding sustainable travel and environmentally friendly travel initiatives, routes and measures to link with and enhance local Green Infrastructure provision.
- Impacts of significant HGV movements, the movement of the construction workforce (including park and ride), potential rail and water transport movements on health and wellbeing including relevant safety issues and environmental concerns including but not limited to noise and air quality
- Impact on the local and strategic road network, the performance of that network and access for local people to key services
- Planning blight
- Impacts on public mental health, including community cohesion and social isolation.
- Community safety both perceived and actual threat
- Impacts on the opportunity for local employment to successfully compete for direct and indirect supply chain opportunities
- Opportunities for training and skills support for local population including apprenticeship schemes and careers engagement for schools
- Impacts on access to appropriate housing on local population (including impacts on affordable housing)

### **Operational**

- Impacts on community including impacts on facilities, services and social infrastructure including healthcare, community and education premises
- Impacts on physical activity opportunities for leisure and recreational use including use of the Blackwater Estuary and potential improvements to local Green Infrastructure.
- Severance of PROW, physical activity routes and active travel routes including coastal paths and relevant places of natural beauty and heritage sites
- Creation of active travel and environmentally friendly travel initiatives, routes and infrastructure, building on and with reference to the Maldon Cycle Action Plan.
- Impacts of HGV, construction workforce, potential rail and water routes on health and wellbeing including relevant safety issues and environmental concerns including noise and air quality
- Impact on road network and access for local people to key services
- Planning blight
- Impacts on public mental health, including community cohesion.
- Community safety both perceived and actual threat
- Impacts on local employment to include direct and indirect supply chain opportunities
- Opportunities for training and skills support for local population including apprenticeship schemes and careers engagement for schools
- Impacts on housing on local population (including impacts on affordable housing)
- Community services and infrastructure impact
- Severance of coastal paths, walking routes and heritage sites and impact on health and wellbeing



### **Decommissioning**

The Councils would wish to have decommissioning considerations included in assessments.

It is stressed that detail information and stakeholder engagement is required to establish the level of community services required to support the needs of the proposals, either temporary or permanent. The need for permanent homes to meet the needs of the operational phase is not currently addressed, as identified in the housing response below, and so community impacts are impossible to assess at this stage. The demographic profile of construction workers and operation workers, as well as potential indirect impacts, is necessary to robustly assess and help inform likely community needs e.g. for additional school places, libraries or health facilities. Detailed discussions based upon relevant evidence will be essential following details of any future demographic profiling.

The impacts arising from Bradwell B on communities and their necessary infrastructure covers a range of inter-related topic matters. For example, the selected option for movement of freight and workers will have a direct impact on matters such as highway capacity, air quality, noise, and road safety along route corridors through villages. It could also lead to the severance of safe walking routes required for sustainable movements to existing schools. The Councils expect avoidance or mitigation of adverse impacts if impacts are significant.

It is a concern that the Stage 1 Consultation makes no reference to the impact on or on the potential benefits to upgrade and enhance the Green Infrastructure and the development's contribution and connectivity to the wider network (including blue infrastructure). The impact on the recreational use of the Blackwater Estuary will also need to be considered. The Councils will welcome details and discussions on this important topic. The Councils recommend consideration is given to the Green Essex Strategy (2020) and the Maldon Green Infrastructure Strategy SPD (2019).

The Green Essex Strategy seeks to take a positive approach to enhance, protect and create an inclusive and integrated network of high-quality green infrastructure in Greater Essex, to create a county-wide understanding of green infrastructure – its functions and values, and to identify opportunities for delivering green infrastructure. The aim is to guide and shape planning and other services through setting principles that can inform plans and strategies, that will enable a coherent approach and partner collaboration in the delivery and long-term management of multi-functional natural assets, which will provide environmental, social and economic benefits.

The proposed discussions on emergency planning are welcomed with safety at the heart of the proposals. It is acknowledged that the Generic Design Assessment Process and the operating approvals from Office for Nuclear Regulation and Environment Agency will separately assess the safety of the site operation and UK HPR1000 nuclear technology.

The Radiation (Emergency Preparedness and Public Information) Regulations (REPPiR) 2019 impose requirements for off-site emergency arrangements relating to Bradwell B following the nuclear operator completing the hazard assessment process. Clarification would be welcomed on BRB's proposals to ensure appropriate off-site emergency plans for the project, including workers during the construction phase (see Stage 1 Consultation, para.2.15).

The Office for Nuclear Regulation (ONR) provides land use planning policy advice. This, in conjunction with REPPiR 2019, confirms that Essex County Council Emergency Planning will only get legally involved once a nuclear operator provides a Consequence Report. At that stage ECC would commence the process of consultation and preparation of Off-site planning with partner agencies.

MDC would welcome clarification from BRB on proposals during the construction and pre- nuclear phase of the project including the following details relevant to emergency planning:

- Proposals to manage an incident on a haul route to the site which may impact upon local residents and business which could result in evacuation or significant disruption to transport in and out of the Dengie peninsular during an incident.
- Any construction process or activity on site which could have off site consequences to local residents and business (including evacuation and maritime pollution arrangements)
- Any construction process, activity or incident involving on-site residential accommodation which could result in the evacuation of the workforce from the site and the proposals to manage and support displaced workers during an emergency
- Details of the proposed timeline for the emergency planning workstream would be welcomed.

*Supported by: Laura Taylor-Green, Head of Wellbeing and Public Health: Healthy Places and People (ECC); Ben Page, Strategic Theme Lead – Community (MDC); Blaise Gammie, School Place Planning Manager (ECC); James Pinnock, Customer Business Development Lead (ECC); Jayne Rogers, Environment Officer (ECC); and Mick Gurden, Emergency Planning and Resilience Consultant, Emergency Planning & Resilience Team (ECC); Richard Holmes, Director of Service Delivery (MDC).*

## 2.3 Housing / Accommodation

The impacts of Bradwell B development would have wide-ranging and long-term impacts on the housing market within the Maldon District and probably beyond. The scale and scope of these impacts will bring challenges as well as opportunities for the area. This will need to be positively planned following a thorough consideration of the potential impacts of the proposals which will be understood once the relevant evidence has been gathered. Such evidence must include a thorough housing market impact assessment to understand the housing needs of the new workforce, both during construction of the station and when operational, and how and where those needs will be located. Future housing needs can then be incorporated into the planning of new transport and community infrastructure.

The Stage 1 Consultation does not adequately evidence or explain the proposals to meet the housing needs of the project and to address the impacts of the proposal. Engagement with BRB will be welcomed to discuss the strategic approach to housing, including meeting the needs of workers during the operation of the power station and housing market impacts during the construction and operational phases. The need for permanent homes to meet the needs of the operational phase is not currently addressed within the Stage 1 consultation.

There are potential housing issues that will need to be addressed, including but not limited to:

- Local housing impacts arising from the construction workforce. Existing residents could be out priced on new build and existing homes for sale leading to pressure being placed on the Local Authority Housing Register. This could place additional pressure on the limited social rented sector.
- Impacts on tourist accommodation that could negatively impact on the availability of temporary accommodation available to support homeless applicants to the Council. There is concern that this would increase placements outside of the local area, which has several disadvantages over local placements.
- The role that permanent housing will be part of the housing strategy for the development together with details on its location, scale, dwelling type, tenure and contribution to a positive local legacy.

- Impacts on the small private rented sector, including effects on the available premises available to the Council to fulfil duties to the homeless.
- The potential for applications from workers to be placed on the Housing Register to access limited local affordable housing provision.
- The potential for homeless approaches arising from loss of employment family breakdown within the workforce community.
- Homeless approaches from worker with family where private landlord has served notice on property (possibly due to selling property). If workers and family have been resident for six months or more they have a Local Connection under the Housing Act and potentially a duty by the local authority to place into temporary accommodation/possibly secure long term permanent housing.
- The measures proposed to avoid, mitigation or compensate for negative impacts or to maximise positive impacts from the housing proposals. Discussion on the opportunities for affordable housing, working with Registered Providers to provide affordable rental homes, will be especially welcomed.

It is acknowledged that paragraph 5.7.25 of the Stage 1 Consultation document provides a brief reference to measures that other large-scale infrastructure projects have used to support local housing markets but we will welcome discussions specific to the Bradwell B proposal. Whilst paragraph 5.5.9 references the potential for a flexible Housing Fund it also does not appear to be specific to a thorough understanding of the Maldon District and surrounding areas. There is a small private sector housing sector within the Maldon District and BRB's expectation that it will only be marginally impacted during the construction peak period will need to be supported by evidence.

Strategic and detailed discussions are requested to inform the baseline assessment and the development of BRB's preferred specific proposals by Stage 2 of the consultation.

Supported by: Damion Ghela, Lead Specialist Community (MDC); John Swords, Senior Housing Specialist (MDC); Matt Leigh, Lead Specialist Place (MDC); Christopher Downes, Housing Growth Lead (ECC).

### 3 SUSTAINABILITY: ENVIRONMENT

#### 3.1 Environment: Environmental Health

There is potential for the proposed development to have a significant impact on environmental health issues. However, there is inadequate information included in the Stage 1 Consultation for an informed view to be provided at this stage. Evidence and assessments are nevertheless expected later in the DCO process and early discussion with the Environmental Health service on assessment methodologies will be welcomed. Pre-application engagements as the proposals develop are also requested.

The proposals for the main site and areas of search for Associated Development are inadequately detailed or too broad for advice to be provided at this stage. It is notable to see that some of the main local environmental impacts (noise and air quality from associated development in particular) have not been acknowledged at this stage. The Air Quality Management Area at Griffin Hill, Danbury, should also have been acknowledged.

A more detailed account of existing baseline environmental conditions on the main development site, associated development sites, search areas and preferred strategic transport routes is considered essential. This will need to be informed through desk-based studies, environmental surveys, new traffic surveys and associated traffic modelling, and site investigations; include the methodologies employed to undertake the environmental impact assessment; the outcomes of any assessments to date; proposed mitigation and potential residual and cumulative effects.

All data collection, assessment methodologies and traffic modelling should be clearly described and justified in the context of relevant national guidance and planning policy. Clear identification of sources of pollution and quantification of adverse effect levels at sensitive human (and ecological) receptors is necessary for all phases of the development.

*Supported by: David Cant, Senior Specialist Environmental Health (MDC).*

#### 3.2 Environment: Ecology

##### 3.2.1 Ecology

The location of Bradwell B adjacent to the Blackwater Estuary and the Essex coast lies in a highly sensitive coastal area. There is potential for unacceptable impacts from the project on:

- Internationally important sites are designated under the Conservation of Habitats and Species Regulations 2017 - Special Protection Areas (SPAs) and Special Areas for Conservation (SAC) and the Ramsar convention on wetlands (Ramsar sites);
- Nationally important sites e.g. Sites of Special Scientific Interest (SSSIs) designated under Wildlife & Countryside Act 1981 as amended and Marine Conservation Zones (MCZs) designated under the Marine and Coastal Access Act 2000
- Non-statutory designated sites eg, Local Wildlife Sites (LoWS)
- European Protected Species listed in the Conservation of Habitats and Species Regulations 2017
- UK protected species listed in Wildlife & Countryside Act 1981 as amended, and

- Priority habitats and species Listed under s41 Natural Environment and Rural Communities (NERC) Act 2006 - to ensure the Secretary of State can fulfil their statutory duty to have regard to conserving biodiversity under s40 NERC Act.

Ecological assessment will therefore need to cover potential impacts on a wide range of habitats and species from internationally important numbers of non-breeding and breeding birds which depend on the inter-tidal zone, marine species such as the native oyster and a range of fish to terrestrial species such as water voles, bats roosting in trees and farmland birds. The likely impacts of development stretch beyond the Main Development site to Associated Development sites and all of these will require the same high level of ecological survey and assessment to inform choices on options.

The submitted documentation has identified a list of designated sites which could be affected including the Blackwater Estuary SPA & Ramsar site, the Essex Coast SAC and the Blackwater, Crouch, Roach and Colne Estuaries Marine Conservation Zones. However it is recognised that an early decision has been made to opt for setting the power station back from the coast (retaining the borrow dyke and all other designated habitat on its seaward side) and not proceeding with direct cooling as set out in the nomination documents for Bradwell and National Policy Statement EN1 Vol II Annex C, and instead to cool the condensers indirectly using cooling towers (reducing the impact on the marine environment, particularly on native oysters or other wildlife). Evidence to support the options considered and the relative environmental impacts is needed.

### 3.2.2 Baseline Information requirements

Section 3 on terrestrial ecology has identified the likely impacts from the Main Development site on features of the ten statutory designated sites close to and within the site e.g. protected species likely to be present and affected by the development. It is noted that the terrestrial interest associated with the main development site includes foraging habitat for wintering dark bellied Brent geese, and the arable fields may also support other wintering waders and wildfowl. The borrow dyke may support water voles and other protected species may be present on the field margins. This baseline assessment needs to be expanded to include the results of a range of ecological surveys, to be agreed on through early stakeholder engagement, in order to ensure a robust starting point for decisions on options and detailed design.

The reference to an Evidence Plan to produce a Shadow Habitats Regulations Assessment (HRA) is welcomed as the Bradwell B project will be required to assess if the proposal is likely to result in an adverse effect on site integrity (either alone or in combination with other plans and projects) for the Habitats (European) sites within scope of the Part One Appropriate Assessment. This will be necessary for the Secretary of State to provide sufficient information for Natural England to consider this before the any Development Consent Order can be approved. It is noted that NPS EN6 Vol II Annexes paragraph C.8.102 states: "...there may be interactions and cumulative effects on biodiversity should both Bradwell and Sizewell C sites be developed. Guidance on the consideration of cumulative effects is in EN-1. For instance, Section 4.2 says that *"the IPC should consider how the accumulation of effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place"*.

It will be essential to assess possible significant adverse effects on nationally important nature conservation sites and further studies will need to be carried out, as part of the Environmental Impact Assessment process, to determine the significance of the effects and the effectiveness of any

mitigation measures. Any key inter-relationships between biodiversity and other sustainability effects will need to be identified particularly in relation to flood risk management and water quality.

The Associated Development sites need to be assessed to an equal level for ecological impacts as woodland and other habitats affected by these, in addition to the Main Development site.

There is no reference to a desktop data search to inform surveys so it is recommended that data searches are sought from both Essex Field Club and Essex Wildlife Trust Biological Records Centre to inform terrestrial and marine ecology surveys for discussion with key stakeholders i.e. before Stage 2 consultation and the Preliminary Ecological Information Report.

The reference to farmland bird species of conservation importance is welcomed as these may use the arable fields on the main development site, including species such as turtle dove, grey partridge and skylark. It is recommended that the scope of surveys should also cover Priority s41 species (both terrestrial and marine) and any Schedule 9 species which could affect the proposal.

The potential impact on all the relevant species and habitats must be effectively assessed and appropriate avoidance, mitigation and compensation identified to minimise adverse impacts on the environment. In delivering new schemes, the Government expects applicants to avoid and mitigate environmental impacts in line with the principles set out in the National Planning Policy Framework (NPPF) and the Government's Planning Practice Guidance (PPG).

The use of nationally agreed guidelines for surveys and that all survey work is to be undertaken in the appropriate season by appropriately qualified ecological consultants is good practice and supported. Survey and assessment should meet the requirements of both Natural England Standing Advice, and the Essex Biodiversity Validation Checklist, using Defra's biodiversity metrics, as well as CIEEM Guidelines for Ecological Impact Assessment (EcIA) 2016.

Surveys should include walkover surveys to inform further surveys on habitats and species, to include Priority habitats and both protected and Priority species, sufficient for the Secretary of State to discharge all associated statutory duties, including NERC s40. This should meet the EcIA definitions of Important Ecological Features of local or greater importance for biodiversity and include terrestrial and marine environments. The assessment of likely ecological impacts needs to inform the evaluation of alternatives and incorporate effective and deliverable mitigation measures to minimise the impacts as well as identify compensation including offsite measures for any residual impacts. There will be seasonal constraints for species surveys so these need to be scheduled carefully to meet the programme timetable.

Ecological assessment needs to cover the entire development area, including all ancillary sites (new highway routes, roads, park and ride and freight compounds, permanent and temporary housing, marking, pylons, new transmission infrastructure on or off site) and any offsite works needing to be secured, and assess potential impacts on the marine, inter-tidal and terrestrial environments.

The work to support early discussions should include identification of statutory designated sites within any evidenced zone of influence (not a generic distance from the site) and non-statutory Priority habitats at least within 1km of the Main or Associated Development route or site. Identification of biological records for protected and Priority species records should inform surveys and assessments of all parts of this development.

### 3.2.3 Approach to landscaping and managing environmental effects

There will be opportunities to enhance parts of the site, in particular by creating Priority habitats such as hedgerows, to improve connectivity across the landscape particularly to mitigate for disconnections caused by road improvements. The ecology chapter of the Environmental Statement (ES) should thoroughly explore all reasonable options to enhance the development for biodiversity including Protected and Priority species to support the Secretary of State in demonstrating the statutory duty to have regard to conserving biodiversity (s41 NERC Act 2006).

As well as the options for mitigation set out in EN-1, the Nuclear Appraisal of Sustainability and HRA, have identified possible mitigation options for Energy projects which include variations to building layout to avoid ecologically sensitive areas and on-site measures to protect habitats and species and to avoid or minimise pollution and the disturbance of wildlife.

It is expected that, during the EIA process, all opportunities to deliver biodiversity enhancements will be explored in consultation with appropriate stakeholders as a mechanism to deliver measurable net gain for biodiversity. BRB are requested to confirm its commitment to achieving Biodiversity Net Gain which is not explicit in the Stage 1 Consultation.

It is noted that NPS EN1 para 5.3.4 states that *“the applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests”* and para 5.3.8 *“In taking decisions, the IPC should ensure that appropriate weight is attached to designated sites of international, national and local importance; protected species; habitats and other species of principal importance (Priority) for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment”*.

For Priority habitats and species, EN1 para 5.3.17 states that these *“...species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and thereby requiring conservation action. The IPC should ensure that these species and habitats are protected from the adverse effects of development by using requirements or planning obligations. The IPC should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits (including need) of the development outweigh that harm. In this context the IPC should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance which it considers may result from a proposed development.”*

In line with para 5.3.18 of the NPS, the applicant should therefore include appropriate mitigation measures as an integral part of the proposed development. In particular, the applicant should demonstrate that:

- during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works;
- during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements;
- habitats will, where practicable, be restored after construction works have finished; and
- opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals.

It is expected that the Bradwell B project maximises opportunities in and around developments in order to ensure that such beneficial features are delivered. A monitoring strategy is also expected

with clear objectives outlined for those significant environmental effects that remain following mitigation.

It is pleasing to see that the ecological principles of respecting the outstanding marine biodiversity of the Blackwater Estuary and protecting the rich biodiversity and ecology of the Dengie Peninsula are both acknowledged as being important to the emerging proposals for the main site. The success of delivering the project to these principles will require a full programme of surveys and assessments and that sufficient information is provided to the statutory consultees in a timely manner to inform their responses to consultations.

#### 3.2.4 Accommodation Options

Ecological impacts are likely to result from disturbance during construction of the workforce accommodation and its temporary, though long-term operation, and decommissioning, as well as loss of foraging habitat along the coast. Areas that may be used by protected wintering wildfowl should particularly be avoided and minimised when considering the potential sites. At this stage, without detailed surveys and assessment, it is considered that Site 3 is likely to be the preferred location from an ecological perspective and Site 1 may be unacceptable.

#### 3.2.5 Transport and associated works

It is noted that the proposed options could affect areas which could potentially be functionally linked land for designated features of statutory designated sites. Priority habitats, including deciduous woodland and hedgerows (loss and severance) are also likely to be affected. In line with the suggested design principles, the mitigation hierarchy should be followed, and opportunities taken to inform decisions on highways improvements, park and ride sites and freight management facilities to avoid and minimise ecological impacts. Compensation will be expected for all losses and biodiversity enhancements to deliver net gain.

The four options set out for marine transport are based on initial considerations and although option 1 Beach Landing Facility (BLF) appears to result in the least environmental impacts, detailed investigations in the coming months will be necessary to inform the choice of options and specific locations. This is necessary to avoid, minimise and compensate for any impacts in the estuary and in the inter-tidal area will before a final choice on options is made, particularly if two BLFs are considered necessary.

The Councils recommend that all the potential transport mitigation options considered should consider how they will be taken to contribute to the creation of coherent and resilient ecological networks as highlighted in the Government's Environment Bill 2020.

#### 3.2.6 Further information required:

It is recommended that integrated and ongoing engagement with key stakeholders on a range of ecological and habitat issues is undertaken at the earliest opportunity during the pre-application period. This is essential to inform and refine the project scope and options before Stage Two Consultation. Consideration of alternatives will be key to all decisions and will be expected. From an ecology point of view, consultation on Environmental Impact Assessment (EIA) scoping will be key to securing the necessary surveys and assessment of likely ecological impacts from the Main site and Associated Development. It is expected that this assessment will need to consider any impacts in combination with other plans and projects, including Sizewell C in Suffolk.



To avoid delays, it is expected that EIA assessments and details of avoidance, mitigation and compensation measures will feed into the early versions and consultation on the Preliminary Environmental Impact Report (PEIR) ahead of the Stage Two consultation. It is considered too late to leave this detail until the full Environmental Statement is submitted as part of the DCO application.

The Councils will need to be involved in discussions on the preparation of an Outline Code of Construction Practice (containing embedded avoidance and mitigation measures) and an Outline Landscape and Ecological Management Plan (LEMP). This needs to be part of the ongoing discussions with key stakeholders rather than leaving this detail until Stage Two consultation.

The EIA documentation will need to clearly set out the details of the environmental avoidance, mitigation, compensation and enhancements plans for the Main site and the Associated Development sites.

Supported by: Sue Hooton, Principal Ecological Consultant (Place Services advising MDC) and Nicky Spurr, Environment Officer (ECC).

### 3.3 Environment: Historic Environment

Bradwell B and its associated infrastructure has the potential to result in adverse impacts on the historic environment, including both designated and non-designated heritage assets. In addition to the physical impact on below-ground archaeological remains the development will also be intrusive within the wider historic landscape, and the settings of multiple heritage assets, resulting in potential harm to their significance.

The *NPS for Energy* (EN1) states that 'All proposals for projects that are subject to the European Environmental Impact Assessment Directive must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project.' The Directive specifically refers to effects on human beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. The Directive requires an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects. The requirements for appropriate assessment are covered under Section 5.8, including that the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to their significance.

The *Annexes to the National Policy Statement for Nuclear Power Generation* (EN-6), D8: Areas of amenity, cultural heritage and landscape value identified 'potential adverse effects on the settings of Othona Roman Fort and St Peter's Chapel, other nearby scheduled monuments, listed buildings and the West Mersea Conservation Area, as well as on buried archaeology of potentially high importance'.

The primary legislation with regard to Scheduled Monuments is provided in the Ancient Monuments and Archaeological Areas Act (AMAA) 1979. In order to be scheduled, a monument should be of 'national importance' (section 1 (3) of the AMAA. The National Planning Policy Framework (NPPF) states that the setting of a designated heritage asset can contribute to its significance. Most of the buildings affected by Bradwell B proposals are listed buildings. Listed buildings are buildings of special architectural and historic interest. In accordance with section 66(1) of the *Planning (Listed*

*Buildings and Conservation Areas) Act 1990*, the Secretary of State must have special regard to the desirability of preserving any affected listed building or its setting or any features of special architectural or historic interest which it possesses. There are also local lists of important heritage assets.

Maldon District Council's Heritage and Conservation Specialist has produced an assessment of impacts on above-ground built heritage assets potentially impacted by Bradwell B, including designated and locally listed buildings within the Maldon District. This full report is attached as Addendum to this Appendix and forms part of this topic-based response.

Whilst the attached report focuses on listed buildings it is probable that each of these buildings will also have associated archaeological deposits which relate to the origins and development of these heritage assets.

The proposal will also impact upon the setting of the Bradwell-on-Sea Conservation Area and the report in Appendix B provides some consideration of potential impacts. Conservation areas are 'areas of special architectural and historic interest, the character and appearance of which it is desirable to preserve and enhance'. Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* requires the Secretary of State to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

In addition to the many above-ground heritage assets that could be affected by the proposals, the location of the proposed power station lies within a highly sensitive area of archaeological significance. It has been identified in the submitted documentation that several heritage assets will be impacted, including the grade I Listed Chapel of St Peter on the Wall and the Scheduled Roman Saxon Shore Fort at Othona, as well as numerous grade II Listed buildings and locally listed buildings. The Councils also raise concern regarding the Scheduled fish-traps within the estuary which although just outside the main site area have the potential to be impacted by sea-borne traffic and changes to tidal processes. There is also concern that BRB have yet to appropriately consider the non-designated heritage assets or the historic landscape which will be impacted by BRB's proposals. In addition to the significance of these assets in their own right, they also contribute to the setting and significance of the designated assets. These will need to be included in BRB's assessment and the Councils expect that Historic England will be making similar recommendations. It also needs to be understood that the impacts of the scheme are not only on individual heritage assets (both designated and non-designated), but also the cumulative impacts of many changes to the historic environment along the length of the Dengie peninsula and beyond.

It is clear that the scheme will involve major landscape disturbance from the very start of the scheme and as such it is essential that the archaeological assessment and field evaluation for the proposed scheme should be completed early in the DCO process so that all of the heritage assets that will be impacted can be identified, and the nature of their significance understood and taken into account as BRB's proposals develop.

As this development will impact on extensive designated and non-designated heritage assets both on land and within the estuary it is essential that heritage meetings are held jointly with local authority advisors and Historic England to ensure the best outcome for the heritage of the area. Other NSIPs (Lower Thames Crossing, Tilbury 2) have all been undertaken in this way which ensures a consistent approach. There needs to be clear communication, early discussion and evaluation of the archaeological deposits and setting assessments to facilitate a robust understanding of the impact that the scheme will have on the historic environment.

The following Historic Environment Research Strategies apply to this area; The Greater Thames Research framework, The East of England Research Framework and Agenda (both the extant versions and the ongoing revisions). Historic Environment Characterisation has been undertaken for the entirety of Maldon District and should be used to inform the development of a historic environment strategy for the scheme.

### 3.3.2 Requirements for the DCO Process

Archaeological assessment needs to cover the entire development area, including all ancillary sites (highways, areas of search for park and ride compounds, housing, marking, pylons) and environmental off-setting. It needs to cover both marine, inter-tidal and terrestrial environments, and the interactions between the three. This work needs to be undertaken as early as possible within the DCO process.

The work to support the DCO process should include:

- *Desk Based Assessment*

Identification of designated and non-designated assets, to include archaeological and built heritage (integrated with the documentary and cartographic assessment)

Assessment of the Historic Environment Record Data

Assessment of the National Monument Record

Assessment of landscape character including identification of historic trees/hedges/ponds

WWII assessment of Bradwell Bay airfield and its surviving assets

- *Aerial photographic and Lidar assessment and rectification*

All available sources (including Google Earth) should be used, to better than 2m accuracy

- *Documentary and cartographic assessment*

Cartographic assessment within the Record Office

Initial assessment by a qualified historian as to the nature, range and potential of the documentary archive available

- *Built heritage assessment*

Designated and non-designated built heritage assets (including WWII structures) and their settings need assessing.

- *Deposit model/geotechnical work*

The Medway channel, alluvial deposits and saltworks, former creeks

Blackwater estuary

Interpretative mapping of landforms (former coastline, cheniers, former islands, sand-banks, palaeochannels, sea defences, etc.

(there is potential for information to be gained if this work is integrated with the overall geotechnical work being undertaken)

The project will require a geoarchaeologist and a Palaeolithic specialist in order to fully integrate the geoarchaeological information, including all past geotechnical work and surveys in the area and forthcoming geotechnical work and surveys. This will have to be a document that is added to as survey work progresses.

- *Geophysics survey – land and water*

All methods, including magnetometer, GPR and side-scanning sonar will need to be considered (potential for information to be gained if this work is integrated with the overall unexploded ordnance surveys being undertaken)

- **Shoreline assessment**

The inter-tidal area will require a walkover and recording exercise after each set of winter storms at a period of low tide

- ***Trial-trenching***

Geoarchaeological test-pits will be excavated within a selection of the trenches to provide transects across the site to refine the Palaeolithic potential of the site. The results are to be integrated back into the deposit model

Trial-trenching at a density of 5% of the area (this is the standard approach used across Essex for this type of work), using 30m trenches on a staggered grid pattern (with some adjustment to target previously identified features). In the area of the airfield trial-trenching maybe the only appropriate method to use.

- ***Tidal flow and erosion survey and its impact on scheduled monuments and archaeological sites on the foreshore***

- ***Setting assessments of heritage assets***

Setting assessments for designated and non-designated heritage assets. This must also be included within the Landscape and Visual Impact Assessment (LVIA)

- ***Integrated conclusions from the above surveys***

To include phased interpretation of the historic landscape, to include the geoarchaeological interpretation as well as the information from the Historic Environment Record (HER), aerial photos, geophysics, trenching and cartographic/documentary evidence.

### 3.3.3 The proposals for Bradwell B, including the BRB approach to landscaping and managing environmental effects.

The proposed development will have a significant impact on the historic environment, a full programme of assessments will be required in order to inform the development of a robust strategy to deal with potential impacts. This might include avoidance, preservation *in situ*, management or restoration of heritage assets, or preservation by record.

The development area and its surroundings are a largely flat, open country with wide views both inland and along the estuary. The Grade I Listed Saxon chapel of St Peter-on-the-Wall and the Scheduled Roman Saxon Shore fort are located on the eastern edge of the area. The inter-relationship between the two nationally important heritage assets and their setting majorly contributes to the significance of these assets. The Roman Saxon Shore Fort was located on the tip of on a ridge of slightly higher ground projecting out through the marshes and guarding the entrance to the Blackwater and the wider Greater Thames Estuary. Saxon Shore forts were heavily defended later Roman military installations. They were all constructed during the third century AD, probably between c.AD 225 and AD 285. They were built to provide protection against the sea-borne Saxon raiders who began to threaten the coast towards the end of the second century AD, and all Saxon Shore forts are situated on or very close to river estuaries or on the coast, between the Wash and the Isle of Wight. The fort is approached by Eastend Road, which follows the line of the original Roman road to the fort. The fort was reused in the 7th century when St Cedd founded a monastery

there as part of his work to convert the then pagan Anglo-Saxon inhabitants of Essex to Christianity. St Peter's Chapel is located in the gateway of the Roman fort and is constructed from reused Roman building materials. It is typical of monasteries founded by missionaries trained in the Irish tradition of Christianity in that it is sited in a remote location, albeit one with excellent sea links. The proposed landscaping will impact on the setting of these nationally important heritage assets by, amongst other things, curtailing views out across the landscape and impinging on historic routeways to it.

The historic field-scape comprises rectilinear sub-axial fields of possible mid -Saxon origin. The road network is also ancient in origin and is noted for its sharp right-angle bends as it fits into the historic field pattern. The Dengie peninsula was bordered by extensive salt-marshes which were largely enclosed in the 18th and 19th centuries. The Southminster-Tillingham gravel ridge is located near the eastern end of the Dengie peninsula. The gravels relate to the former pre-Anglian glaciation course of the River Medway and contain important Pleistocene remains. The ridge reaches a maximum elevation of around 37 metres OD at St. Lawrence and has extensive views out across the marshes to the North Sea.

The historic settlement pattern comprises dispersed settlement along the roads on the top of the ridge. Settlements developed at Southminster, Asheldham, Tillingham and Bradwell all of which have Historic settlement assessments which provide in depth historic environment information for each settlement and associated parish. Throughout the area there are dispersed farmsteads and Halls many of which have their origins in the medieval or early post medieval period. The settlement on the gravel ridge had a close relationship with the reclaimed marsh and marshland to the east with this providing the main sheep grazing area. The gravel ridge has attracted settlement since earliest times, and finds of Neolithic, Bronze Age and Iron Age, material are known from quarrying and other ground disturbance. There is an important concentration of cropmarks following the line of the ridge, the only such examples within the Dengie peninsula, these represent a range of site types of multi-period date. There are a number of probable Roman settlement sites on the site of the proposed power-station and it is possible that some or all of these were contemporary with the Saxon Shore fort.

The edge of the Dengie peninsula is bordered by an extensive area of present and former salt and grazing marsh. The landscape is very flat, in places bisected by old creek tributaries, with wide, open views to the North Sea and eastwards to the North Sea, and inwards to the dryland. Within the marshland the remains of Late Iron Age and Roman salt working sites (Red Hills) are identified as burnt areas visible both from the ground and the air. In the medieval and post medieval period the marshes were a valuable resource, providing pasture for sheep, salt making sites, fisheries and hunting grounds related to the settlements on the gravel ridge above the marshes. Finally, during the Second World War (WWII) defences were built into the sea wall to protect the area from German invasion. The power station site is located on the former WWII Bradwell airfield.

The intertidal zone contains nationally important archaeological sites stretching back to the Neolithic. Extensive surveys have been undertaken over the last two decades assessing the eroding landscape in the inter-tidal zone which has shown occupation of multi-period date. During the Neolithic sea level was still considerably lower than it is today but the sea was much closer to the present coast and in the Blackwater estuary it seems that the present low water mark was roughly the position of high water during the early Neolithic. Large areas of what is now the intertidal zone were still dryland and some of the best evidence of early Neolithic settlement in the East of England comes from the Blackwater estuary. The area is particularly significant for the extent and variety of archaeological remains reflecting the exploitation of coastal resources, it is also important for military defences relating to the wars of the 20th century. Within the estuary a number of very large Middle Saxon fish traps have been identified which comprise a series of surviving timber posts,

visible at very low tides. The largest complex of fish traps, at Collins Creek stretches for about 1km. Three of these sites are now protected as Scheduled Monuments. Saxon burials have been recorded eroding out of the foreshore beside Bradwell A. A range of archaeological sites dating to the post medieval period are located in this area including groups of oyster pits, remains of wrecks and a series of hulks. There is a close and important relationship between the estuary and the Dengie peninsula.

The proposed landscaping works will need to take into consideration the present historic landscape and how this relates to the setting and significance of the associated heritage assets. There is concern that the land-raising proposals would have an adverse impact on the historic landscape, and the setting and significance of heritage assets.

It is pleasing to see that the historic environment is well represented within the initial design principles. However, this will require a full programme of investigation to allow an appropriate understanding of the complex historic environment of the area and how the adverse impacts of the scheme can be avoided, mitigated, or compensated.

With regard to work within the estuary it will be important to understand the impact on tidal processes, including erosion and how these in turn will impact the Scheduled fish-traps and the surviving Neolithic land-surfaces in the inter-tidal area. In addition, Saxon burials have been found washing out of the foreshore beside Bradwell A, and it is anticipated that further burials may be present. An appropriate assessment will need to be put in place to establish both the effects of the proposed changes to the Indicative Zone for Marine Infrastructure and its surrounding area and to establish a baseline as to what heritage assets are present and their significance. It will be important to have joint discussions with Historic England regarding the designated fish traps.

### 3.3.4 Accommodation

There is the potential for surviving below-ground archaeological deposits in the areas of the proposed accommodation developments. These should be assessed and evaluated in order to fully define the impacts of the proposed scheme. Any assessment should include an assessment of the setting of the historic settlements, listed buildings and other heritage assets impacted by the proposal.

#### 3.3.4.1 *Scenario 1 – Land west of the existing Bradwell Power Station site*

This accommodation site will need to be appropriately assessed for impacts on heritage assets and an appropriate mitigation strategy put in place. Any assessment should include an assessment of the setting of the historic settlements, listed buildings and other heritage assets.

#### 3.3.4.2 *Scenario 2 – Land west of the existing Bradwell Power Station site with extension sites*

This accommodation site will need to be appropriately assessed for impacts on heritage assets and an appropriate mitigation strategy put in place. Any assessment should include an assessment of the setting of the historic settlements, listed buildings and other heritage assets.

### 3.3.5 Transport and associated works

The initial proposals will largely impact on the Dengie peninsula. There has been little archaeological fieldwork in this area to date and the soils are not conducive to cropmark formation. However, small scale excavations in advance of development have demonstrated that the area has been settled since the later prehistoric period. The area is characterised by a distinctive co-axial rectilinear field

pattern that is of considerable antiquity and may have its origins in the middle Saxon period, if not before. The field boundaries on the peninsula were historically bordered by elm hedgerows, which were severely affected by Dutch Elm disease, with the loss of standard trees the hedges are now dominated by elm scrub. Historically, settlement was highly dispersed with isolated farms and moated sites. There are a number of church/hall complexes such as those at Purleigh, North Fambridge, Snoreham, Mayland, Althorne and Steeple.

It is notable that in Table 4.1, relating to Park and Ride search areas, the 'Potential for impacts on buried archaeology, which is recognised as a key risk and requires further study' is only referenced for Search Areas 1a and 1b. This constraint is also applicable to the remainder of the Search Areas and should be included accordingly. The constraint should also be reflected in Table 4.2 relating to Freight Management Facility Areas.

#### 3.3.6 Marine transport:

For any works in the estuary area joint meetings with Historic England and the Local Authority representatives will be required to discuss heritage impacts. Early heritage assessment such as side-beam sonar and magnetometer surveys will be required to help define appropriate routes for moving freight by sea. Both the potential for wrecks and the extensive surviving prehistoric land-surfaces, as well as other heritage assets including burials, both within the estuary and in the inter-tidal area will need to be assessed to support the DCO process. A protocol will also need to be put in place to avoid inadvertent impacts by shipping on the Scheduled fish-traps which lie immediately to the east and west of the Indicative Marine Zone.

#### 3.3.7 Road Transport Strategic route 1:

There is potential for surviving below-ground archaeological deposits in the areas of the proposed groundworks. These should be assessed and evaluated in order to fully define the impacts of the proposed scheme. Any assessment should include an assessment of the setting of heritage assets.

#### 3.3.8 Road Transport Strategic route 2:

Strategic Route 2 will require a much larger land-take than Strategic Route 1 and the scale of its impacts will be correspondingly larger. In particular, the construction of an entire new length of road cutting across from Foxhall Road to Bradwell is likely to have a significant impact on below-ground deposits dating from the Palaeolithic period onwards, as well as on the wider historic landscape and its legibility. There is potential for surviving below-ground archaeological deposits in the areas of the proposed groundworks. These should be assessed and evaluated in order to fully define the impacts of the proposed scheme. Any assessment should include an assessment of the setting of heritage assets.

#### 3.3.9 Transport: Freight management facility

There is potential for surviving below-ground archaeological deposits in the areas of the proposed groundworks. These should be assessed and evaluated in order to fully define the impacts of the proposed scheme. Any assessment should include an assessment of the setting of heritage assets.

### 3.3.10 Transport: Park and Ride

There is potential for surviving below-ground archaeological deposits in the areas of the proposed groundworks. These should be assessed and evaluated in order to fully define the impacts of the proposed scheme. Any assessment should include an assessment of the setting of heritage assets.

### 3.3.11 Consultation process

It is recommended that early meetings are held to discuss the impacts on the historic environment, including the historic landscape, involving the Councils' archaeological specialist advisors, local specialist conservation officers and Historic England inspectors. This will facilitate an integrated approach to the management of the heritage response to this major scheme.

*Supported by: Maria Medlycott, Senior Historic Environment Consultant (Place Services advising MDC) and Tim Howson, Specialist – Heritage and Conservation (MDC)*

## 3.4 Environment: Landscape

### 3.4.1 Landscape

Given the site is a predominantly flat, low-lying coastal landscape with wide views both inland and along the estuary, it is likely that the proposal will have a major adverse visual and landscape impact.

The Stage One consultation document states that the "landscape characteristics include large open and mostly arable fields. Where present, hedgerows tend to be small and non-continuous, and provide little screening. A general absence of trees further contributes to the sense of openness, affording panoramic views across the marsh and out to sea" (Para. 3.2.9). Although to the east of the site, this is very apparent, there are wooded clusters/copses and extensive hedgerows and hedgerow trees to the south west and west (i.e. Curds Grove). For this reason, a more comprehensive assessment of the landscape character and existing qualities needs to be undertaken.

The open nature of the area is visually sensitive to new development, which would be visible within views from adjacent character areas. Primarily, the landscape offers a sense of historic integrity, resulting from historic field boundaries, including water-filled ditches and remnants of old sea walls. The main development site primarily falls within the Bradwell Drained Estuarine Marsh Landscape Character Area (LCA) (Braintree, Brentwood, Chelmsford, Maldon And Uttlesford Landscape Character Assessments (2006)). Although referenced in the document, there is little detail provided in terms of its landscape and visual characteristics.

Key characteristics include:

- the sense of huge sky, sound of birds, tranquillity, and panoramic views across the marshland and out to sea.
- restricted access provided by a very few lanes; absence of settlements.
- Bradwell Nuclear Power Station A as a visual landmark.
- St Peter-on-the-Wall church.
- Strong sense of being windswept and desolate.
- Field boundaries comprising water-filled ditches.
- Remnants of the original seawalls, which are still visible as relict landscape features.
- Unimproved grasslands



Given this proposal will bring forth visually intrusive development it is important that where possible, existing landscape characteristics and qualities are conserved and enhanced on-site, and off-site interventions are also explored. For instance, enhancements to declining hedgerows and field boundaries as well the preservation of drained marsh and sinuous ditches. The current document does not provide any of these landscape details and therefore it is expected that a comprehensive landscape assessment of the sites landscape value, qualities and characteristics will be undertaken to fully understand the special qualities this area of the LCA holds, and which should be retained. This should be undertaken to inform proposals as part of the Stage 2 consultation process.

Reference has also not been made to the Landscape Character Assessment of the Essex Shore (2005). In this document the development areas fall within the Dengie Coastlands Landscape Character Area. This large distinctive character area extends from the small remnant of marshland east of Bradwell to the broad tracts of polder several miles in extent between Burnham and the sea. It includes the fringing salt marshes and the broad sweeps of the Dengie Flats and Ray Sand, which at low tide forces all but boats of the shallowest draft well offshore. Generally, settlement in this area is not characteristic of the diverse coastal marshland but scattered established farmsteads instead with private lanes and tracks linking one to another. The boundary between the uniform marshland and the more diverse coastal marshland is generally aligned along the change in soil type from the good quality silts of the uniform marshland, to the harder-to-work clays of the older diverse marshland.

It is agreed that views from across the estuary are an important consideration when discussing visual and landscape impacts of the proposed development. The document states that “the horizontal spread of the development across the peninsula is an important consideration. Siting the permanent development as far to the south and west as possible - close to the existing Bradwell power station buildings - helps to reduce this impact. (Para 3.4.5)”. The Councils concur with this statement but further consideration will be required to ensure the best alignment of buildings having regard to key views, especially considering the size of the cooling towers which offers limited opportunities to use landscape for screening. We understand that ‘architectural composition’ is important, and it is clear the towers will become a prominent feature of the skyline, but it is also important to reduce impacts where possible.

Landscape mitigation is more plausible from viewpoints from the south and south-west. The Council’s concur that there are likely opportunities “to reduce impacts on visual amenity by replicating and extending the increased tree cover which prevails in this area.” However, as the project progresses, the detail of landscape mitigation locations needs to be carefully considered in line with existing and historic field patterns, ditches and tree cover to retain and enhance the green infrastructure network and character of the area

The construction of Bradwell B will have its own landscape and visual impacts, for example the storage of soil and spoil from earth works. These storage areas can be significant in mass and height; therefore, we would recommend that these, along with other construction facilities are shown on visualisations where possible and their impacts fully assessed. In principle, temporary screening that becomes long-term mitigation to alleviate impacts on local residents is welcomed.

As part of the site works, the consultation document states that the Bradwell B station platform will be raised to 7.4m AOD and ground reprofiling around properties will be needed. This is a significant operation, and the likely impacts are major. There are concerns that the area set out for soil and spoil storage may cause fragmentation of habitats and current GI network of the area. Therefore,

opportunities for advanced planting in the early stages of construction should be sought, where practicable. We would also expect all slopes to be gentle with appropriate landscape treatment given the existing landscape character. At present, the section illustration (Figure 3.29) shown in the document are considered inappropriate and we would welcome discussion in advance of the next stage of consultation.

### 3.4.2 Approach to landscaping and managing environmental effects

The Councils require that all the landscaping work referenced in paragraphs 3.5.8-3.5.13 should take into consideration the existing landscape qualities such as the planting palette and habitats present, as well as the historic landscape and how this relates to the setting and significance of impacted heritage assets. The consultation document declares that the vision of Bradwell B is “to take account of its distinctive local landscape and seascape setting as far as possible, whilst also recognising that existing energy infrastructure dominates the skyline from a number of views.” We look forward to seeing proposals for how this can be completed, both on and off site.

The National Planning Statement (NPS) EN-1 Section 5.10 sets out recommendations and requirements in relation to land use including open spaces, green infrastructure and green belt. These include that the mitigation of any adverse effects on Landscape, Green Infrastructure (GI), and other forms of open space. Maldon District Green Infrastructure Strategy Supplementary Planning Document and the Green Essex Strategy 2020 provides guidance regarding the Council's approach to green infrastructure provision in the District. As stated under Policy N3 of the Maldon District Pre-Submission Local Development Plan 2014-2029: “development should not increase existing deficiencies of open space” and therefore, if not to be retained, alternative and improved provision should be provided that retain and enhance existing landscape features and qualities, and are in the “most appropriate and accessible location in the locality for existing and future users.”

The footpath (PRoW 241-15) along the top of the flood embankment that wraps around the main development site has been identified as important, given it is a proposed England Coast Path National Trail (ECP). The section between Burnham-on-Crouch and Maldon covers 62km and passes around the main development site. The project is at stage 4 – Determine, whereby Natural England has consulted upon proposals and submitted a report to the Secretary of State (SoS). An Inspector will make recommendations to the SoS on any objections received. Once the Secretary of State has approved the report, Natural England will start work with ECC on preparing the route for public use and to contact will be made with owners and occupiers of the affected land to discuss the design and location of any new infrastructure. Temporarily closures may be acceptable during construction, however an alternative footpath route that provides a positive substitute during periods of closure will be required. The trail will also be impacted by the proposed sea defences; its envisaged that the new sea defences would need to have a crest level (top) up to 9.8m AOD to protect Bradwell B from flooding over the full lifetime of the plant. Therefore, it's important that consideration is given to the footpath, and the user experience, whether that's through landscape mitigation and/or material treatment. Figure 3.28 of the consultation document identifies different areas within the main development site that will take a different approach to landscaping, following construction of the power station; Permanent development integration area, Landscape restoration and Estuarine marsh restoration. Although briefly defined, there is little detail provided and the analysis process behind the justification and implementation needs further thought as the landscape / planting strategy is key, as it needs to be a balance between responding to the local conditions, with the need to provide an effective visual screening where necessary.

Consideration will also need to be given to the potential impacts on existing Green Infrastructure and future provision.

### 3.4.3 Road Transport

The Councils consider that all potential strategic highway routes, junctions/route improvements and freight management/park and ride areas of search have an adverse environmental and landscape impact. However, at this stage of the project, given the detail provided, it is unclear to what these impacts will be. From a landscape perspective, any new routes and areas of search that are closer to existing settlements and infrastructure will reduce the impact on the wider landscape.

The Stage 1 Consultation document describes the key environmental sensitivities as being “roadside habitat, including deciduous woodland, hedgerow and drainage ditches; highway drainage and the potential for interaction with surface water flow routes and flood plain; roadside residential properties, which may be susceptible to noise and/or visual intrusion; and roadside listed buildings and buried archaeology. (Para. 4.7.53)”. Given the unique landscape character and qualities this landscape provides it is recommended that further detailed landscape studies to be undertaken before either of the as proposed strategic routes are chosen as the preferred option. These are necessary to measure potential impacts, vegetation loss and ensure mitigation and enhancement proposals are appropriate

### 3.4.4 Marine Transport

Early seascape and visual impact assessment studies should be undertaken to understand the extent of the impacts for each option being considered.

### 3.4.5 Accommodation

Of the accommodation locations proposed, location one and two may have less landscape and visual impact than location three but any conclusions cannot be made until full detailed assessments are undertaken. It is important to understand how the sites will be sympathetic to their surroundings and integrate into the existing settlement through layout and design and how the landscape and visual impacts can be mitigated.

Both accommodation scenarios will require access to green spaces and green infrastructure to create a sense of place and for the health and wellbeing of employees and the communities. Localised cycling and walking routes will need to be considered along with how the accommodation will integrate into the existing neighbourhood/community. Importantly, any proposal should integrate and utilise the existing landscape features present, which is why further landscape baseline information is necessary before any formal view can be provided.

### 3.4.6 Further information required:

There is little detail regarding the impact on the existing landscape features present across the main development site and areas of associated development. Therefore, before assessment studies are undertaken, the Councils would expect additional landscape baseline information is collected across all areas of the scheme. This includes; landscape assets such as existing trees, hedgerows, shrub planting, recreational routes and habitat areas as well as characteristics such as topography, scenic quality and landscape typology. Once complete, an appropriate review of the proposed landscape loss, preservation and enhancements can be undertaken, and assessments made.

Once sufficient baseline information has been collected, the Councils would expect to see an Arboricultural survey and impact assessment to give us a greater understanding of the impact on trees and hedgerows that may be impacted on within the local area. This assessment should be undertaken in accordance with BS 5837:2012 Trees in relation to design demolition and construction recommendations and should provide details on trees and shrubs quality, those to be retained and/or removed, the impact on them and any constraints.

A Landscape and Ecological Mitigation Strategy will be required to provide clear details of the design for the whole site (including ecological area, landscape integration area and area surrounding the accommodation), types of planting, management and maintenance and should include Green Infrastructure (GI) where the Environmental Impact Assessment (EIA) indicates potentially significant effects on landscape character, visual amenity, nature designated sites, biodiversity net gain value and health and wellbeing of the community (i.e. access to open spaces, encouraging active travel and recreation and reduce air pollution etc.) that may require mitigation. The EIA, ES and Landscape, ecological and GI strategy(s) will need to clearly set out the details of the environmental mitigation, compensation and enhancements plans for the whole site.

The Landscape and Visual Impact Assessment (LVIA) will need to follow the principles set out on the third edition of "Guidelines for Landscape and Visual Impact Assessment" (GLVIA3). The Councils would expect the assessment methodology to be agreed with the Councils prior to being undertaken. Currently there is a set of viewpoints proposed (Figure 3.25), however, before these can be reviewed, we would expect baseline evidence such as a Zone of Theoretical Visibility (ZTV)/ Zone of Visual Influence (ZVI) to be submitted to truly understand where viewpoints are necessary. Viewpoints can then be chosen and agreed with the Councils before surveys are undertaken. We would also recommend the Councils' landscape consultant(s) attends the surveys with the applicant to review and amend viewpoints, photo angles and locations accordingly. It will be expected that LVIAs are undertaken for all associated developments and infrastructure (such as highways) as these will also have an adverse impact on visual amenity, landscape quality and character. The same methodology and Council review process should be used to ensure consistency and compliance. As stated in the Overarching National Policy Statement for Energy (EN-1) The "assessment should include the effects during construction of the project and the effects of the completed development and its operation on landscape components and landscape character (Para 5.9.6)." The assessment should also "include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on local amenity, and nature conservation (5.9.7).

All visual representation with any submitted Landscape and Visual Impact Assessment (LVIA) should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made.

Due to the indicative location for the main development site and associated development, many residential properties will be adversely impacted, whether that's through a deterioration of visual amenity, increase in noise, light and/or other disturbances. Because of this, as part of the landscape and visual impact assessment we would expect a Residential Visual Amenity Assessment (RVAA) addendum to also be included. The purpose of RVAA is to provide an informed, well-reasoned answer to the question: 'is the effect of the development on Residential Visual Amenity of such nature and / or magnitude that it potentially affects 'living conditions' or Residential Amenity', otherwise known as the Residential Visual Amenity Threshold. In keeping with recommendations in GLVIA3 this should be done using succinct narrative as opposed to a numerical tabular assessment

format. Tables summarising narrative can, however, be very helpful. For further guidance details, please see the Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19 (Landscape Institute, 2019).

Given the scale and magnitude of the proposal, the Councils recommend an Environmental Colour Assessment (ECA) is undertaken. An ECA is an objective process that helps to resolve many of the issues associated with colour selection and specification, especially in the external environment. Its use can also support landscape and visual mitigation. Such mitigation can range from effectively camouflaging or minimising the visual appearance of a building, to emphasising the distinctive character and qualities of a place through architecture, expressed in colour, form and massing. For reference, an example of an effective ECA is the 'Guidance on the selection and use of colour in development' produced by Waygood Colour for Dedham Vale AONB (July 2018). Further assessment details can also be found in the Environmental Colour Assessment Technical Information Note 04/2018 (Landscape Institute, 2019).

*Supported by: Ryan Mills, Senior Landscape Consultant (Place Services advising MDC)*

### 3.5 Environment: Masterplanning and Design

#### 3.5.1 Masterplanning and Design

The Stage 1 Consultation Report sets out a broad approach to design topics. However, the Councils consider that there is a lack of information (and justification) to how some of the approaches have evolved through the report. This is evidenced by assessments against criteria not being presented, development of design principles with little or no back reference, and with assumptions being made around wider development approaches. Design principles provide the key link in demonstrating a clear understanding of the project requirements from both a local and national level, while committing to ongoing reference and review.

The National Infrastructure Commission design principles, which reflect the wider effects and benefits when planning for national infrastructure projects, appear to be directly relevant to this national energy infrastructure scheme.

As stated in the Overarching National Policy Statement for Energy (EN-1), good design is not purely related to the visual appearance of a building but *“should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. (EN-1 para 4.5.1)”*.

The Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Nuclear Power Generation (EN-6) provide clear approaches and expectations regarding “good design”, quality and reference to context and setting. The following comments refer to the National Design Guide around core principles and approaches associated with both infrastructure and quality. At local level and where applicable, the following comments have referenced the Essex Design Guide to provide a context driven approach at a local and community level.

### 3.5.2 Design Principles

The creation of design principles is an important tool that the Stage 1 report can set early in the design process. This will provide constant reference, grounding and focus around the approach and delivery of development.

The Councils consider that the current 13 design principles included within the Stage 1 Consultation cover a range of topics and approaches but consider there is no clear approach to the project vision. Each of the 13 principles included within the Stage 1 report fail to provide any justification of the design principles. At this stage, the Councils would have expected to see a more detailed series of desired outcomes which are measurable, responsive and accountable as the project moves forward.

The National Infrastructure Commission; Climate, People, Place, Value guidance (February 2020) provides a review of approaches and topics around setting design principles around national infrastructure and the Councils request that the BRB project align with this recent and relevant guidance moving forward. The guidance provides a direct and clear method in the creation of flexible and measurable principles while ensuring clear methods in championing design and quality. We would recommend that each of the design principles are clear and to the point, avoiding the need for a long list of principles to be proposed.

The principles should be flexible and not over prescriptive especially where design and other influences will change and amend over the lifespan of a project. There should be a clear drive for innovation in design and a push to improve the quality of life for local communities and workforce.

The overall principles should have measurable outcomes rather than open statements. A clear drive in improving design, environment, climate, quality of life and other factors need to be consistently referenced.

It's clear from the principles proposed that many of these could become measurable outcomes within a wider overarching design principle, in turn reducing the amount of core principles proposed. These should align with national guidance and include value, sustainability, health, wellbeing and climate, which are currently not addressed. These topics can fall across multiple approaches and it is expected to see a continued reference made through the development of design principles.

In summary the Councils consider that further refinement is required in both how the design principles are addressed together with a method establishing how these will be measured, reviewed and improved through the lifetime of the development process.

### 3.5.3 Masterplanning

The consultation report sets out a basic approach to how layout, scale and location/arrangement of the main development site has been considered to date. These are, as expected, high level statements which at this stage in the design process and will require considerable development moving forward. Further work will be required including topographical analysis, site and wider landscape sections and detailed visual assessments. There is a need to fully analyse context for all development before starting the design process and prior to further work progressing regarding design.

The wider masterplanning of associated development is limited at this stage; basic information has been provided within the report to outline the development but further clarification around site

selection, opportunities, impact and a steer on the use of permanent and temporary builds are required. Discussions on masterplanning will be welcomed to explore the relationship between temporary and permanent development and how these can be phased to consider impacts on the communities, landscape and wider considerations. These require coordination and consideration in terms of infrastructure, location, scale and how this translates into the existing communities.

The report outlines that further considerations are required around the final proposed placements of the two cooling towers and this is noted. The current proposals will have a significant impact on key viewpoints, landscape character and wider ecological and heritage considerations. It is clear there will be significant impact on views from Mersea Island and Tollesbury to the north, broken views from existing settlements on the Dengie to the west and south, and from local PROWs. The approach taken to reducing the field of view from the crucial vantage points would be key in reducing the visual impact. The Councils seek early discussions to review the detailed criteria used to inform the initial proposals and to review detailed assessments on visual character impacts moving forward.

The Councils are disappointed that no alternative assessment has been provided for the options in terms of the visual appearance of the cooling towers within the consultation. The impact the plant and towers will have on the surrounding landscape character and communities appears to be based on scale alone. The Councils recommend that further engagement is necessary to consider the form, appearance and setting of the cooling towers. Structures of this size and scale will inevitably be prominent in the flat open landscape and a clear approach is needed to show how this is going to be addressed going forward.

#### 3.5.4 Adaptability, Phasing & Associated Works

Considering the construction timescales and associated works the Councils would have expected further clarity to have been provided around how the built form would respond to the demands and growth of the workforce. At its peak it is expected to see 4500 new bed spaces provided to accommodate workers. The Consultation provides little reference to the phasing of these associated works, their impacts on existing communities, (including how this impact will be mitigated) and the extent of amenities required to accommodate the workforce. A workforce of some 4500 people will have a significant impact on the quality of life for existing residents' infrastructure and services to communities and a clear strategy into how this is managed is necessary moving forward.

Similar to the other impacts of other components of the main development site the construction of 6 storey accommodation blocks will have impacts on hugely significant visual amenity and character of place. The Councils recommend further work is required to see an approach and vision which highlights how accommodation will be phased to scale up to the anticipated peak workforce on site. The potential legacy uses of associated development should also be explored.

#### 3.5.5 Design Process and Tools

The Stage 1 report includes very little or no reference to how championing good design will be led and developed as part of the project. It is considered there are several options the project could explore and put forward to ensure design is at the forefront of discussions and considerations.

The appointment of a design champion will ensure good design is prioritised from Stage 1 consultation. Their role would be to provide a continual review and promotion of design

vision/principles throughout the project, this would include planning but also project management and delivery.

Design Review Panel.

This would provide a robust and independent resource for applications and projects. Their focus is to improve quality of design through independent panel members. Their value in expertise, experience and knowledge can be a great resource for the project and design team. Early engagement and continued referral will see the most beneficial. NPPF, paragraph 129 seeks to ensure that local authorities have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. The Essex Planning Officers Association (EPOA) has appointed Place Services to manage and deliver the Essex Quality Review Panel. results.

Design Champion.

It is considered that a resource such as a Design Champion and/or Design Review Panel are incredibly important to demonstrate a clear drive for quality in design by the applicant. Having a resource which pushes, and tests approaches will hold decision making accountable and achieve high value and high-quality developments.

The Councils consider that the above would be an integral part of the design process in line with planning, a clear approach in design documents should be outlined going forward, enabling various designs to be tested provide for accountable decision making. A commitment to the production of design codes, briefs and guides will allow design principles and visions to be promoted through to detail. Design parameter plans may be appropriate for temporary structures. This level of detail around design, both from an aesthetical, safety, quality and setting approach, is important at every stage.

3.5.6 Further information required:

In order to ensure a clear narrative of the approach to design, the Councils expect to see further information and works presented around the design principles. As outlined within the response, this process is critical around setting expectations and conveying BRB's commitment to the development, quality, community and setting. The Councils will expect to see clear measurable principles covering a set of approaches in line with current guidance and able to push and improve standards and quality of development.

The Councils are disappointed that the Consultation does not provide the background assessment information and criteria used to assess the design development. Even if this would have been presented as an appendix. As outlined above there are several sections within the report that state criteria have been assessed where the current masterplan option has been presented. Given the lack of criteria and justification the Councils would have expected to see the assessment process in more detail to provide constructive feedback. This should be provided to support discussions going forward.

Further clarification on the approach to the cooling towers, in particular around the siting, scale, design and clear approach to either blend or promote.

The Council recommends that Design Codes are used to ensure high quality design for the associated works such as accommodation blocks etc. Codes will be crucial in driving design, materiality, scale and other details expected as part of development.



National Policy Statement NE1 and the Essex Design Guide identifies the use of a Design Review Panel to promote and drive the quality of design. The Councils recommend that BRB provide a clear commitment to this process going forward to demonstrate commitment in quality through design. This can be complemented through the appointment of a design champion to provide the ongoing drive and promotion of quality in design.

It is considered there is a lack of approach to the topics such as sustainability, climate health, wellbeing and value, these appearing entirely missing at this time. Good design adds value, whether it incorporates safety and sustainability or identifies social benefits for existing communities, or adding value to the setting of development, landscape and character. The Councils ask that the design approach be informed by the National Infrastructure Commission design principles.

*Supported by: Chris King, Senior Urban Design Consultant (Place Services advising MDC) and Jackie Longman, Strategic Theme Lead - Place (MDC)*

## 3.6 Environment: Flood Risk

### 3.6.1 Flood Risk

Essex County Council is the Lead Local Flood Authority (LLFA) and provides advice on Sustainable Drainage Systems (SuDS) schemes for major developments. The Environment Agency is also a key organisation in relation to flood risk.

It is expected that sustainable drainage proposals comply with the required standards as set out in the following documents:

- Non-statutory technical standards for sustainable drainage systems
- Essex County Council's adopted Sustainable Drainage Systems Design Guide
- The CIRIA SuDS Manual (C753)
- BS8582 Code of practice for surface water management for development sites.

The LLFA has the following comments in relation to the DCO Stage 1 Consultation:

### 3.6.2 Flood Risk Assessment

The development will need a detailed Flood Risk Assessment which should consider all form of flood risk.

This should include:

- Flooding from the sea or tidal flooding;
- Flooding from land;
- Flooding from groundwater;
- Flooding from sewers; and
- Flooding from reservoirs, canals, and other artificial sources. It should be considered how any flood risk will interact with the development and drainage scheme.

It should be considered how any flood risk will interact with the development and drainage scheme.

### 3.6.3 Run off Destinations

Surface water run-off should be disposed of in line with the discharge hierarchy and should be investigated in the below order:

- Discharge via infiltration
- Discharge to a watercourse
- Discharge to a sewer

If infiltration is proposed, groundwater and infiltration testing in line with the BRE 365 testing procedure and methods found in Chapter 25.3 of The CIRIA SuDS Manual C753 will need to be submitted to show that this is feasible. Any infiltration storage devices should have 1m between the base of the storage device and seasonal high groundwater level. If infiltration is unlikely to be possible at the site due to ground conditions, then the LLFA will still require high level ground investigations to be carried out in order to prove that this is not a viable option.

If discharge to a watercourse or sewer is proposed, it must be ensured that the site discharges at a suitable rate and any appropriate permissions are in place.

Where the discharge is to a watercourse, the outfall should be above the 1 in 100 plus climate change level or alternatively the effect of surcharging of the outfall should be modelled and appropriate mitigation measures should be put in place.

### 3.6.4 Peak Flow

If following the discharge hierarchy infiltration is not found to be feasible on site, discharge from the site should be limited to the Greenfield 1 in 1 year rate.

Alternatively, surface water can be discharged at equivalent Greenfield rates with the inclusion of long-term storage. Information would need to be provided about the values used to calculate this rate and these would be reviewed on submission of any Flood Risk Assessment to inform any Stage 2 Consultation

If discharge is direct to the Blackwater Estuary, then the rate may be less restricted although the impact of such on the coastal environment and its array of ecological designations needs to be proven.

Please also note that the LLFA does not accept a flat rate of 5l/s discharging from the site if the Greenfield 1 in 1 year rate is below 5l/s. Historically 5l/s was applied to an outlet where Qbar was lower than 5l/s, as most devices would require an outlet orifice size smaller than 50mm, which would increase the susceptibility of blockage and failure.

There are now vortex flow control devices which can be designed to a discharge at 1l/s, with 600mm shallow design head and still provide a more than 50mm orifice diameter. Furthermore, it is expected that appropriate measure should be put in place to remove materials that are likely to cause blockage before they reach the flow control device.

### 3.6.5 Storage requirements

It should be demonstrated how surface water up to the 1 in 100 year plus climate change event is managed within the main development site.

The Environment Agency updated their climate change allowance in February 2016 and the LLFA requires the design to be to the upper end allowance (i.e. 40%).

Details regarding the half-drain time of any storage device should also be submitted for review which, in this instance could be demonstrated by the 1 in 30yr +CC RP, followed by the 1 in 10yr RP storm event as necessary.

Detailed calculations considering a range of summer and winter storms should be submitted for storage requirements.

Storage features should be located outside of the 1 in 100 year plus climate change overland exceedance flood level, however where this is not possible it must be demonstrated that the storage feature will be sized appropriately to accommodate surface water from the site, along with any additional flows that may enter.

### 3.6.6 Water Quality

There should be treatment in line with Chapter 26 of the CIRIA SuDS Manual C753 for all areas of the site.

Whether the main development site is considered a medium or low pollutant risk depends on the traffic movements expected on the development. If the development is expected to have, for example, over 300 daily traffic movements then the medium pollution indices should be applied whereas the low pollution indices should be applied if less than 300 daily traffic movements are expected. . Given there will be up to 4500 workers on site during construction and average daily two-way HGV movements at peak of between 500-700, it is likely that the medium pollution indices should be applied.

Considering impact of water pollution, in line with Paragraph 170 of the NPPF, priority should be given to SuDS and all SuDS options should be explored. However, if proprietary features are used, it should be demonstrated how these features will provide sufficient treatment in terms of total suspended solids, hydrocarbons and metals in line with Chapter 26 of the CIRIA SuDS Manual C753.

The LLFA does not consider that trapped gullies and catch pits are appropriate forms of pollution mitigation because of the high risk of remobilisation of pollutants.

### 3.6.7 Residual Flood Risk

It should be ensured that surface water is managed so that there is no flooding in a 1 in 30-year storm event and no internal flooding in a 1 in 100 year, inclusive of climate change storm event. It is acknowledged that the power station itself will be protected to a higher standard. Detail should also be given with regards to exceedance routes above the critical 1 in 100 year, inclusive of climate change storm event, which should be directed away from properties.

### 3.6.8 Maintenance and Adoption

The on-going maintenance of any features will be necessary to ensure that flooding does not occur due to failure of components. A Maintenance Plan should be provided as part of the DCO process detailing the maintenance activities and frequencies as well as who will be maintaining the system. The maintenance of such a system as may be agreed should be managed and maintained in perpetuity on the development site for its lifetime at no cost to the SUDs authority.

### 3.6.9 Additional comments:

The following additional comments to the Stage 1 Consultation are also raised.

Within the report it states:

*3.2.35 Our proposals would retain Weymark's River as the primary drainage feature within the site, although a section of the river would need to be culverted on a temporary basis to provide access for construction vehicles while Bradwell B is being built. All of the other land drains within the main development site, which are classified as 'Ordinary Watercourses', would be backfilled. See Section 3.7 for further information on our proposed construction masterplan.*

Temporary works associated with this development should not increase flood risk and it should also be ensured that water quality is managed.

It is noted that under Section 23 of the Land Drainage act (1991) any proposed structure that impacts on the cross-sectional area of a watercourse first requires Ordinary Watercourse consent to be sought from Essex County Council. This consent is required for both temporary and permanent changes. This consultation states that culverting and backfilling of ditches will be undertaken which both require section 23 consent. Such applications are separate from and are required in addition to the planning process. Please contact [Floods@essex.gov.uk](mailto:Floods@essex.gov.uk).

The LLFA would expect the following documentation to be submitted at DCO stage and be covered in full in an accompanying Environmental Impact Assessment.

- Flood Risk Assessment
- Drainage strategy
- Preliminary ground investigation report, to show potential infiltration viability
- Evidence of third-party agreement to discharge
- Detailed storage calculations
- Detailed drainage network calculations
- Detailed drainage layout including location of features, exceedance routes, finished floor levels, discharge locations and rates
- Full structural, hydraulic and ground investigations, including detailed infiltration testing in line with BRE365, groundwater level

This is not an exhaustive list and other information may need to be submitted alongside the application, depending on the site-specific requirements. We request pre-application consultation on these matters and look forward to stakeholder engagement prior to the development of firm proposals for the main site and associated development.

*Supported by: Richard Horswill, Development and Flood Risk Officer (ECC)*

### 3.7 Environment: Minerals and Waste

#### 3.7.1 Mineral Safeguarding Issues

The proposed development at Bradwell-on-Sea lies within a Mineral Safeguarding Area (MSA) for sand and gravel and is therefore subject to Policy S8 of the Essex Minerals Local Plan 2014 (MLP). The MLP can be viewed on the County Council's website via the following link:

<https://www.essex.gov.uk/minerals-waste-planning-policy/minerals-local-plan>

Policy S8 states “... *Proposals which would unnecessarily sterilise mineral resources or conflict with the effective workings of permitted minerals development or Preferred Mineral site allocation shall be opposed.*”

Policy S8 of the MLP requires that a non-mineral proposal located within an MSA which exceeds defined thresholds must be supported by a Minerals Resource Assessment to establish the existence, or otherwise, of a mineral resource capable of having economic importance. This will ascertain whether there is an opportunity for the prior extraction of that mineral to avoid the sterilisation of the resource, as required by the National Planning Policy Framework (Paragraphs 203 & 204).

Our records show that the area of the proposed development that is located on land designated as an MSA for sand and gravel is approximately 207 hectares. This is shown in Appendix One. This exceeds the 5ha threshold for sand and gravel as set out in Policy S8 of the Essex Minerals Local Plan (MLP). Therefore, a Mineral Resource Assessment (MRA) would be required as part of the planning application.

The scope and level of detail of an MRA will be influenced by the specific characteristics of the site's location and its geology. However, several key requirements can be identified which are likely to satisfy the MPA that the viability and practicality of prior extraction has been suitably assessed in the MRA. For development of the magnitude proposed at Bradwell-on-Sea, it is expected that particular consideration is given in the MRA to the potential to use indigenous material as part of the construction of the facility, or whether it could serve another market.

MRA Section	Matters to Cover
<b>Nature of the Application</b>	Description of proposed development.
	Area of proposed development (text and red line boundary on appropriate scaled map). To include building footprints if known.
	Any previous reference to show mineral may be present (including any Development Plan Allocation).
<b>Nature of the existing mineral</b>	An appraisal of the geology of the site.
	Whether there is any previous relevant site history – this could include any previous mineral assessments and market appraisals, boreholes, site investigations, technical reports and applications to the Minerals Planning Authority for extraction.
	The type and extent of mineral present at the site.
	Depth of deposit and overburden with commentary to include any variations across the site. To be expressed as both actual depths and ratio of overburden to deposit.

	Mineral quality (BSI standard) and how processing may impact on quality. Consideration should be given to the extent to which material available on site would meet the specifications required for construction
	To what extent mineral resources are likely to be sterilised if it is not prior extracted.
<b>Constraints impacting on the practicality of mineral extraction</b>	Contextual information regarding the site and any existing development or designations in close proximity such as ecology designations, landscape character, heritage designations, proximity to existing dwellings, highways infrastructure, proximal waterbodies, hydrology, land stability, utilities present etc. These should be assessed in light of the fact that construction of the non-minerals development would be taking place, should the practicalities of prior extraction be expressed as unviable. It is held that mitigation methods employed as part of the construction of the non-minerals development may be appropriate to allow prior extraction at that locality.
<b>The viability of prior extraction</b>	An assessment of the current and future economic and/or special value of the mineral resource.
	Whether prior extraction is practicable at the site.
	Distance/route to potential market.
	Any evidence of discussions with local operators to confirm the viability of prior extraction.
	Where prior extraction can be undertaken, an assessment of the amount of material that can be extracted and an explanation of how this will be carried out as part of the overall development scheme.
	Any opportunities for incidental extraction as part of the development of the site such as foundations, footings, landscaping, sustainable drainage systems.
	The potential for indigenous material to be used in the construction of the proposed development.

Please note that borehole logs do not have to be commissioned specifically for an MRA where they already exist, but they must be indicative of the site as a whole, taken from within the application boundary and conform to industry standards.

To ensure that a comprehensive assessment is undertaken on a site, it is recommended that:

- a draft borehole location plan is agreed with the County Council as early as possible and preferably as part of pre-application;
- the borehole depths should be the full extent of the mineral to the bedrock;
- borehole analysis must note the depth of the water table; and
- a non-stratified sampling technique is applied. An initial spacing of approximately 100m-150m centre to centre should be considered, with additional locations if required to determine the extent of deposits on site.

The MRA should be prepared using the Pan-European Standard for Reporting of Exploration Results, Mineral Resources and Reserves (PERC) Standard, which was revised and published on 23 May 2013.

### 3.7.2 The Sourcing of Constructing Materials

Notwithstanding the amount of indigenous material that may be able to support construction, given the mineral take of the Bradwell B development, ECC requests that a mineral supply audit is carried out in relation to the proposal. Such a supply audit should consider the approximate volume of mineral required to facilitate the development on a phased basis (ie linked to the phasing as set out in Paragraph 3.7.3 and disaggregated from the approximated 6mt of 'construction materials' required over the project as stated in Paragraph 4.6.1), the broad area(s) where aggregate will likely be supplied from, implications for this demand on local aggregate supply and the impact on any proximal infrastructure that may potentially arise as a consequence of the need to import that aggregate.

The NPPF states at Paragraph 207 that mineral planning authorities need to plan for a steady and adequate supply of aggregates by (inter-alia) taking into account relevant local information. The ability for proximal mineral authorities to accommodate the mineral demand of a local project of the uniqueness of Bradwell B would greatly benefit from the submission of such an aggregate supply audit as described above. These proposals amount to a significant one-off project for the area and the amount of aggregate required to facilitate the construction of the new station, and necessary associated infrastructure, has not been specifically quantified in future demand forecasts within each individual MPA area. Essex County Council has not, for instance, been able to make any specific allowance, qualitative or otherwise, relating to the demand the construction of the facility may have on the county's existing aggregate reserves, although the consultation material highlights that there are a number of existing quarries in the area that are of interest.

It is acknowledged that material would need to come from a wide area and may not be immediately attributable to any one MPA area. It is further acknowledged that market availability will dictate where the mineral is sourced from and therefore any detailed quantification at an administrative level may not be possible. An assessment of the approximate volume of material required and its potential supply areas should however be possible. With regard to the use of mineral on-site, the potential use of borrow pits and the stockpiling of excavated material for eventual backfilling, as set out as part of the Earthworks Strategy, is strongly supported. The MPA explicitly support the use of borrow pits through Policy S6 of the MLP.

Paragraph 3.1.11 of the consultation material states that "We will need to transport significant quantities of construction materials to site to construct the power station" and that sustainable transport options are being considered. In this regard, the Mineral Planning Authority (MPA) note the intention to use beach landing facilities as a means of transporting the 'majority' of sand, aggregate and cement to the site, as set out in Paragraph 3.7.19 and expanded on through the presentation of a number of marine based transport options under Section 3.9. The intention is then restated in Paragraph 4.6.2 as transporting 'at least 50% of bulk construction materials' by sustainable modes, with early work suggesting marine transport could accommodate this stated commitment.

It is further noted that the consultation material recognises the need for technical studies to confirm project needs regards the quality and quantity of aggregate. The MPA welcomes the production of this document.

### 3.7.3 Emerging Design Principles

Whilst the 'Design for efficiency' principle states a need to ensure that 'related construction processes are well connected and streamlined', there is no design principle that explicitly sets out that sustainable construction methods will be employed, both in the sourcing and use of construction materials and in the methods used to manage any waste material arising from the construction of the facility. To ensure a holistic approach to sustainable development, consideration must also be given to these aspects of the development's life cycle.

### 3.7.4 The Earthworks Strategy

As previously noted, the use of borrow pits is supported by the MPA, and this is further recognised in the consultation material at paragraph 3.8.9.

It is however important to note Paragraph 3.8.5, which states that 'Should excess material be generated during construction that cannot sustainably be re-used on-site, it would need to be re-used off site. We are aware of schemes, such as habitat creation being carried out by the RSPB at Wallasea Island, which may provide opportunities to utilise this material.'

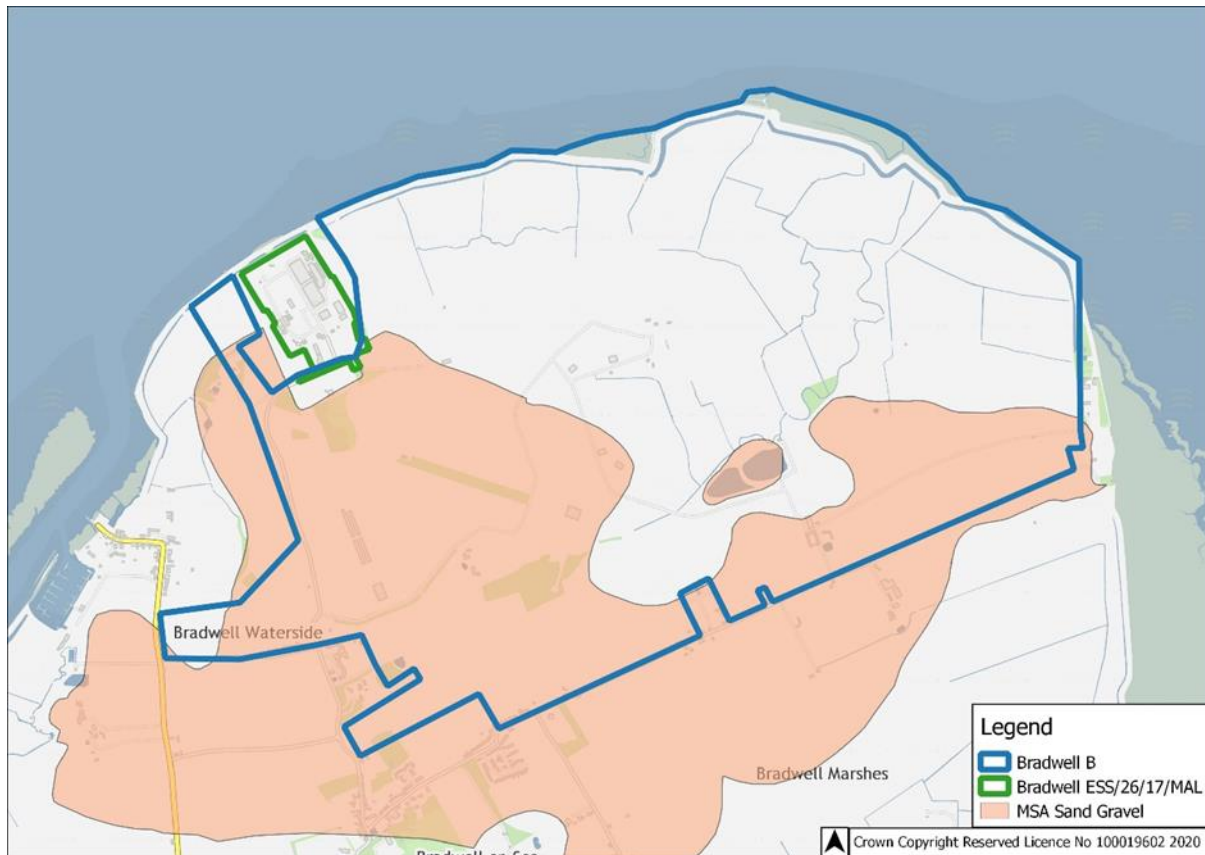
The project at Wallasea Island has been completed and there is currently no planning permission for any further importation of restoration materials. Whilst this doesn't necessarily preclude further importation in the future, there would need to be a change of restoration scheme and the appropriate planning permission in place before further material could be accepted at this site.

### 3.7.5 Waste Matters

As touched on above, the proposed development of Bradwell B is also considered to have potential ramifications for ECC in its role as the Waste Planning Authority for Essex. Any future application for development on this site should contain an audit and associated management strategy for what is likely to be a considerable amount of waste arising from the development, particularly Construction, Demolition and Excavation (CDE) waste. Any such audit and waste management strategy should identify the composition and volumes of waste arising on a phased basis, which aligns with the phased delivery of the proposals, in the context of relevant known and indicative waste management capacity across each delivery phase. Future technical studies carried out to support any emerging project should include a Soil Management Plan and link to a Site Waste Management Plan (SWMP). The SWMP should ensure that unavoidable waste is managed in accordance with the waste hierarchy and other relevant legislative requirements and could detail information on the waste carriers and waste management facilities that would be used. The SWMP should be continually reviewed and updated as proposals progress.



**Appendix One – Relationship between Proposed Development Site and Sand and Gravel Mineral Safeguarding Area**



**Waste Management**

The proposed development has potential impacts on Essex County Council as the Waste Disposal Authority for Essex. The temporary accommodation of high numbers of staff on site and the influx of workers into the local area over an extended period of time during construction has the potential for significant local increases in municipal waste arisings, for collection and disposal. Any future application for development should contain a waste management strategy (in addition to the Site Waste Management Plan [SWMP] detailed in para. 3.7.5) detailing the volume and composition of municipal waste streams expected to be generated as a direct result of the development over the phases of construction. This strategy should ensure all waste is managed in line with the principles of the Resource and Waste Strategy for England and in accordance with all relevant legislation. It should detail how this waste is intended to be managed and consider all implications on the Local Authority Collected Municipal Waste (LACMW) operations and activities.

## 4 Sustainability: Transport

### 4.1 Transport

The Councils consider that the proposed Bradwell B NSIP will have significant impacts on the highway, rail and marine transportation networks, and consequently there is a need for a well-developed and evidenced transport strategy for the project. The Councils consider this is presently not clearly defined or evidenced in the Stage 1 Consultation.

The Councils recommend that further work is necessary to demonstrate that the approach to transportation of both goods and people is driven by a clearly defined transport strategy that integrates all modes of transport and that a range of potential transport scenarios have been examined. The Councils seek additional joint working to progress any transportation strategy

### 4.2 Transport Strategy Structure

A preferred possible structure could include the following:

#### Transport Strategy

- Vision, Outcomes sought
- Scenarios and their testing.
- Favoured approach.
- Measures of success

#### Existing Transport Context

#### Movement of Construction Workforce

- Overall approach - measures to minimise demand and impact linked to the delivery of the strategy
- Quantification of people that need to be moved, when and from where
- Workforce travel plan
- Sustainable modes (walking, cycling, bus, P&R, rail, sea)
- Personal car travel – managing demand

#### Movement of Freight

- Overall approach - measures to minimise demand and impact linked to strategy
- Quantification goods that need to be moved, when and from where
- Transport by sea
- Transport by rail
- Road transport (including freight consolidation etc)

#### Potential Transport interventions (referring back to the strategy)

- Sea
- Rail
- Sustainable modes including a Travel Plan
- Highway

### 4.3 Transport Strategy

The importance of a robust transport strategy cannot be underestimated to support the emerging proposals for Bradwell B. This requirement has been stressed by the transportation and highway authority in the limited engagement to date. It is noted that substantial transport strategy documents are in place for other NSIPs (power station developments), such as Hinkley Point C. Unfortunately, the Stage 1 consultation acknowledges that the transport strategy is emerging and requires further development. The Councils recommend further work is undertaken to identify a clear and integrated transport strategy for the movement of people and freight by highway, rail and seaborne modes, before any comments on specific proposals and mitigation can be provided. Clearly, the specific levels of movement of people and goods between individual modes, will have an impact on the type and scale of mitigation necessary.

The strategy should contain clearly defined outcomes and objectives and evidence that the strategy is driving decision making. The strategy should cover all aspects of transport of people and goods during full period of construction, including during any early work period, to minimise any impacts on transportation networks. The strategy should also consider transport requirements of the site during its operation.

The strategy should define:

- A clear Vision covering how transport will assist in delivering Bradwell B during early works, its construction and operation phases, and provide a transport legacy in the area.
- Clearly defined outcomes and objectives and an explanation of how success will be measured.
- The methodology to test alternative scenarios against the outcomes and objectives of the strategy; and to identify and explain the selection of the preferred strategy.
- The approach and each of the tested scenarios should consider the role of each mode; sea, rail and road land-based travel for both people and goods.
- The strategy will need to consider the quantity (and types of) materials and people requiring transport including variations over time during all phases of construction.
- The strategy should include clear targets for sustainable transport during construction and operational phases, and evidence to support mode share decisions based upon scenario testing.

The Councils have previously sought this information from BRB during early engagement but, to date, it has not been forthcoming.

The transport strategy objectives are identified in section 4.4 but are considered to lack clarity. The Councils require these objectives to be further developed and evidenced into a preferred transport strategy, as discussed above.

Once the preferred strategic approach has been identified it can provide the framework necessary for further assessment of more specific transport options and defining of modelling requirements.

It is important to note that before any meaningful modelling can take place the demand for travel, and the modal approach to the movement of people and goods, needs to be understood so that the appropriate extent and approach to modelling can be agreed. The Councils recommend that further discussions are undertaken to agree the scope and details of further transport modelling necessary once the strategy has been further developed.

The Councils have stressed in previous transport discussions prior to the Stage 1 Consultation that sustainable transport is the preferred choice for movement of goods and people. It will also be

important to consider other transport related matters such as carbon impacts, air quality, noise and impacts on the immediate, district and strategic transport networks in terms of development traffic (sea, rail and road) itself, and its impact on other journeys and uses of the transport networks. Construction of a low carbon power station should be seeking to minimise the carbon impacts of transport and construction.

#### 4.4 Specific comments related to the consultation

Whilst the main feedback on the Stage 1 Consultation relates to the need for a developed transport strategy to be prepared, the Councils also have the following comments.

##### 4.4.1 Working in Partnership with other Transport Authorities and Operators

Bradwell B is of such a scale and will have a far-reaching impact on transportation networks that any future transport strategy will need to involve a number of stakeholders and additional consultation with Highways England; Network Rail, Port and Maritime authorities as well as a number of bus and rail operators. The Councils recommend that a holistic working group is formed to agree the strategy and the overall approach to scenario planning. This way an agreed holistic approach will be arrived at which will help at DCO process moving forward.

ECC has made initial contacts with relevant officers at both Highways England and Network Rail and would be happy to assist with the development of these discussions.

##### 4.4.2 Temporary workforce accommodation:

When the development works begin there will be a large number of contractors employed to undertake the work on Bradwell B and therefore early mitigation work on the local transport network will be necessary. It is therefore logical to provide temporary workforce accommodation on site to minimise daily traffic movements on the network. An accommodation capacity of 4500 of the non-home-based construction workers is proposed, and their impact on the transport network will need to be evidenced, and mitigated, as early as possible. It is very important to understand in this context what would the provision of additional on-site accommodation have to further reduce traffic movements.

##### 4.4.3 The Highway Network

In the absence of any clear transport strategy it is not possible at this moment in time to provide definitive comments on either Strategic Routes 1 and 2, and the specific local mitigation improvements to junctions, bypasses or re-alignment improvements along those routes. The preferred route and necessary highway interventions can only be considered with further clarity through a clear strategy evidenced by the level of movements of goods and people, and the proposed mix of those movements by transport mode. Otherwise, it may lead to over engineered mitigation in specific locations that may not be necessary, and at an additional cost. However, with regards the overall scale of movement of goods and people it is certain that significant stress will be placed on the existing transport networks as consequence of the development. The following provides a high-level indication of existing pressures on the highway network, which will require further consideration within the context of the emerging transport strategy.

#### 4.4.4 The Rural Road Network

The nature of the road network serving the Dengie Peninsular is not considered suitable for the movement of HGV traffic, being windy and narrow in nature preventing turning movements of HGVs. The Councils recommend further detailed discussion is required on specific proposals for the necessary enhancements to accommodate the anticipated traffic movements associated with the Bradwell B proposals to be identified. Previous smaller scale developments involving the construction of onshore wind farms in the vicinity of the site, which used the existing rural highway network, resulted in significant challenges over a twelve-month construction period.

#### 4.4.5 Capacity Constraints on the Road Network: A414

##### 4.4.5.1 A414 - Highway Mitigation Measures

Essex County Council has been proactive in identifying the necessary mitigation along the A414 Chelmsford to Maldon route corridor to accommodate growth identified in the adopted Maldon Local Development Plan (MLP) to 2029. The mitigation sought to minimise any impacts on the strategic highway network around Maldon and along the A414 to the A12 at junction 18. These mitigation measures are described below and include capacity upgrades to existing junctions along the A414 and enhancements to the existing public transport network serving the Maldon and Heybridge area. Whilst these improvements satisfied the Inspector that the Local Plan growth did not have a severe impact on the network, there would still be some additional delays experienced at Eves Corner, Danbury even with the installation of pre-signals to prioritise A414 traffic once growth has been delivered. There were a number of alternative mitigation options considered for the junction, including priority and signalised junction options, which either lead to delays for the minor routes and engineering issues inhibiting HGV movements. In conclusion, the installation of pre-signals was considered the only suitable solution.

Whilst the A414 is considered a strategic route connecting to the A12 it should be emphasised that it passes through the built-up area of Danbury, and delays are often experienced through vehicles taking access into driveways and residential roads. Delays can also occur due to the hilly and windy nature of the road through the centre of Danbury and slow-moving vehicles e.g. refuse vehicles and parked vehicles, and this would be exacerbated by any park and ride or HGV daily movements.

Consequently, the Bradwell B proposals would be likely to add significant pressures along this route and should be incorporated within any future modelling.

##### 4.4.5.2 A414 – Eves Corner in Danbury (AQMA)

An Air Quality Management Area (AQMA) has been designated along the stretch of road between Gay Bowers Lane and Danbury Village Green and adjacent properties, and an Air Quality Action Plan is being prepared. Consequently, the movement of an average daily two-way HGV movements at peak of between 500-700 vehicles would be detrimental to the AQMA, and hence there is support for identifying a new route for HGV movements.

##### 4.4.5.3 A414 – Danbury and Bicknacre

The Chelmsford Infrastructure Delivery Plan (EB018B) identifies the infrastructure required to support the growth proposed in the Local Plan, with reference to the proposed new Bradwell B power station, Bicknacre and on the A414, at Danbury, a route that links Chelmsford and Bradwell B

area. There will be potentially serious implications if, on top of the new housing that is permitted and proposed, the go ahead is given and construction starts on the new power station and the accompanying service traffic starts to operate.

ECC considers that no traffic movements should be directed via the B1418, Maldon Road, through Bicknacre and Danbury, to join the A414. Any traffic should be routed to join the strategic routes as soon as possible which in this case is the A130. There will be potentially serious implications if, on top of the new housing that is permitted and proposed, the go ahead is given and construction starts on the new power station and the accompanying service traffic starts to operate

#### *4.4.5.4 A414 – 4 key junction improvements*

ECC secured funding from the South East Local Economic Partnership (SELEP) Local Growth Fund for the following package of junction improvements along the A414 between Maldon and Chelmsford to accommodate growth in the MLP. Only the improvements at Oak Corner are to be completed and will be funded through s106 contributions from the strategic growth sites in the adopted MLP. In order of priority, the schemes were as follows.

##### **(a)A414 / B1018 Limebrook Way, Maldon**

The widening of Limebrook Way and A414 West approaches to the junction and widening of the A414 North exit arm. Widening provides two entry lanes on all four approaches to the junction. Additional left turn slips for both the A414 eastbound to A414 northbound (the higher priority), and Limebrook Way to A414 westbound have been provided.

##### **(b)A414 / Little Baddow Road / Mayes Lane (Eves Corner), Danbury**

Pre-signals have been installed on the minor approaches (Little Baddow Road and Mayes Lane) to the junction to provide additional capacity and improve peak time traffic operations on the A414. The benefits will be experienced as the growth in Maldon is delivered, and the situation is presently being monitored prior to their operation.

##### **(c)A414 / Well Lane, Danbury**

The approaches to the junction have been resurfaced to improve braking and approaches to junction.

##### **(d)A414 / Spital Road, Maldon**

Widening to provide a dedicated northbound lane at the roundabout and widening of the north and southbound approaches to the junction.

##### **(e)A414 Oak Corner Junction, Maldon**

This junction has been shown to operate above capacity in both peak periods in 2026 with the addition of traffic from proposed developments at Heybridge and South Maldon. The A414 is proposed to be one of the potential main routes for Bradwell B in the early phases and during construction with servicing vehicles, and is the route used by park and ride areas of search (2 and 4), and so capacity will be of utmost concern. Indicative mitigation measures have been identified at the junction, where there is land available for a range of mitigation options. Any option will be subject to

detailed design and safety audit. Mitigation will be funded by pooled s106 contributions from the strategic sites, of which all have planning consent, and most are under construction.

#### 4.4.6 Constraints on the Road Network: A132

##### 4.4.6.1 A132 – Role of the Route

The A132 is the primary route connecting the A130 to the north of South Woodham Ferrers (SWF); and is the main connection between SWF and the Strategic Road Network.

The A132 Burnham Road is the main route connecting the A130 to the north of South Woodham Ferrers to the Strategic Road Network. Whilst the A132 is not directly part of the Strategic Road Network, it plays a significant function as a Main Distributor in the Development Management Hierarchy (ECC Development Management Policy DM2). As such, the route is required to carry traffic efficiently and safely between major centres in the County.

##### 4.4.6.2 A132 – A132 Route Based Strategy (RBS)

Essex Highways is preparing a Route Based Strategy and Integrated Transport Package for SWF and the A132, to consider future demands on the A132 and develop options to increase safety, increase the proportion of trips by sustainable travel modes and support the local economy. Implications of the development and operation of Bradwell B should be given due consideration in regard to HGV movements and other specialist service vehicles along the route.

The A132 and specific key junctions have already been identified as requiring improvements to mitigate the planned development of 1,000 new homes north of SWF in the Chelmsford Local Plan, which has been found 'sound', but not yet adopted by the City Council due to COVID-19. However, with the proposed Bradwell B, and potential vehicle and freight movements, the road condition issues will need to be further investigated and the necessary mitigation to compensate for this development will be required.

##### 4.4.6.3 A132 Access to South Woodham Ferrers Stage 1A Baseline Report (Transport Consultancy March 2018)

Engineering constraints along the A132 route largely relate to the substandard elements of its alignment, although along the widened sections forward visibility is considered to be 'good'. Hayes Leisure Park also has a dedicated local road in parallel to the A132 for entry and egress. On Ferrers Road there is a number of private and business accesses, pedestrian crossings and inline bus stops together with street furniture (such as street lighting and communications units).

In terms of potential widening of the single carriageway for future traffic growth, constraints between Rettendon Turnpike roundabout and A132/Ferrers Road/Burnham Rd/Willow Grove roundabout primarily relate to the railway line to the east; properties and businesses on the west side of the corridor along with electricity pylons, which would only be able to be moved at significant cost.

There are sections of the A132 where widening could be achieved into the verges within the highway boundary, but some sections are limited by other physical constraints such as high embankments populated by trees and heavy vegetation near the railway line. Any changes to verges and associated landscaping will need assessment in terms of its impact on ecology, biodiversity and landscape impact.



The draining culverts also provide a constraint for alignment improvement and the need to provide increased width to these would also require improvements or replacements. Any improvement proposed to change the drainage culverts or the road embankments on approach to the drainage culverts may change the hydraulic arrangement for the streams, particularly during flooding events. Flood studies are likely to be required prior to any improvements are proposed at this location.

#### *4.4.6.4 A132: Strategic Growth Site 7 – North of South Woodham Ferrers*

The Chelmsford Local Plan covers the period 2021 – 2036 and allocates around 1,000 new homes; 1,000 sq. m business space and 1,900 sq. m retail to the north of South Woodham Ferrers.

The site is required to mitigate its impacts on the local and strategic road network, which may include appropriate road and junction highway improvements along Burnham Road (B1012), the roundabout junctions at the B1418, Ferrers Road and Rettendon Turnpike, and the A132 and local junctions between the Town and the A130. Multi-user crossings of the B1012 in South Woodham Ferrers which may include a bridge and/or at grade-controlled crossings are also considered necessary. Work is progressing on site master planning and consideration is being given to the housing having their active frontages front Burnham Road, in order to change the nature of the route, and improve connectivity to the existing town. Whilst this would be sympathetic to reducing the speed limit of the A132/B1012, the highway authority considers it should not enable any direct access from the route. The impact of some 500 – 700 HGV movements a day along this route will have an impact on securing safe crossing points from the new development to the town and its services.

Further consideration will also be required to any traffic movements from the development to the adjoining districts of Basildon, Rochford and Maldon. Any improvements to the existing highway required to mitigate the impact of development will be primarily focussed on junction enhancements, such as to the A132/B1012 Rettendon Turnpike, in order to improve the flow of traffic onto the strategic road network. These should not encourage through-traffic movements to use the local road network through neighbouring settlements such as Runwell and Wickford.

The Preferred Option Strategic and Local Junction Modelling report undertaken to inform the Chelmsford Local Plan identified the following junctions that will need to be mitigated in some form by the developers of SGS7, namely:

- A132/Willow Grove roundabout;
- Burnham Road/B1418 roundabout;
- and Burnham Road/Hullbridge Road junction (now converted into roundabout by Sainsbury's)

Furthermore, junction capacity improvements were also identified as being necessary at the Rettendon and Hawk Hill Roundabouts, linking with the A130.

The modelling also identified the following junction likely to be operating over capacity during at least one of the peak hours up to 2036.

- A130-A132 Runwell Road, South Woodham Ferrers

The following junctions were forecast to be nearing, at or over capacity by 2036, but were not considered for mitigation because of physical constraints at the junctions and the expectation that more people will be working from home, and developers will implement hard and soft measures to provide for and encourage the use of sustainable modes of travel.



- A132 – Burnham Road, South Woodham Ferrers
- B1418 – Burnham Road, South Woodham Ferrers

In light of the planned housing growth set out in the emerging Chelmsford Local Plan and other district's housings allocations, any additional Bradwell B traffic movements will need to be accounted for when considering infrastructure support, and the Councils recommend this is considered as part of the scheme modelling to inform the preferred transport strategy.

#### 4.4.7 Proposed Rapid Transport Link Between Witham and Maldon.

A submission is currently being assessed by the Department of Transport for feasibility work under Restore your Railway Ideas Fund. The location of a new Maldon Terminus and mobility hub is proposed just outside of the park and ride Search Area 4 – north-west of Maldon. This should be expanded to include Elms Farm Park where the proposed Maldon Terminus Mobility Hub is proposed.

Restoration of the Maldon to Witham Branch Line connection has wide ranging socio-economic benefits that align with the emerging Bradwell B Transport Strategy to connect and move people to and from the Bradwell B site via Strategic Routes linking with main road and rail networks and bus, taxi and DART services. Such low carbon travel will align with the ethos of carbon free fuel generation at Bradwell B.

#### 4.4.8 Potential Highway Works for 'Early Years'.

Without the identification of an overarching transport strategy and an understanding of the number and distribution of vehicles for workers and freight, the Councils consider it is difficult to comment on whether the traffic generated by Bradwell B could reasonably be accommodated on the existing highway network within the existing highway boundary or with the potential improvement options identified in the consultation. ECC have serious concerns that this could potentially impact negatively on the local community in terms of the resilience of the existing network during the construction phase, and particularly if construction of the main development site is to commence in advance of any 'up front' mitigation being provided.

The concept of an 'in and out routing loop' is understood but this would still impact heavily on the route between Latchingdon and Bradwell-on-Sea that would be required to accommodate two-way HGV movements. Further concern is highlighted with regards HGV movements along the A414 through Danbury given its hilly and windy nature, and likely impact on the free flow of other highway traffic. The requirement for a Construction Traffic Management Plan (that has the capability of being rigorously enforced) is essential and welcomed by the Councils.

### 4.5 Public Transport

The Stage 1 consultation pays little reference to the current limited number and frequency of passenger transport services in the area, with few peak hour services and poor supporting infrastructure. This impacts on accessibility for those who are dependent on such services and provides little incentive or opportunity to encourage a change from the car to more sustainable modes. The Councils recommend that BRB consider measures that would provide a lasting transport legacy to improve the existing 'transport challenges' in the area and improve its connectivity to other urban areas and key destinations within the district, and beyond.

## 4.6 Rail Network

The Councils recommend further work is undertaken to investigate the opportunities providing by rail for the movement of workers and freight, in order that the impact on the highway network can be minimised and potential legacy benefits assessed. A rail option feasibility study is requested. The following issues highlighted in the consultation are noted, but further discussion and investigation with Network Rail should be undertaken, as referenced in paragraph 4.2.14.

Paragraph 4.2.12 identifies the freight interchanges at Chelmsford and Southminster, with onward movements having to be undertaken by rail. Capacity issues along the A414 and within the urban area of Chelmsford do not lean themselves to additional freight movements. However, further investigation should be undertaken regarding Southminster and potential other new interchanges. Paragraph 4.2.13 acknowledges the route between London and Southminster via Wickford does not form part of Network Rail's "Strategic Freight Network". The consultation infers that detailed investigation has not been undertaken regarding the capability of the branch line in accommodating large freight trains without significant upgrade, including potential engineering reinforcement works, and a new longer passing loop to allow passenger and freight trains to pass each other. These should be further investigated prior to being dismissed as options.

Paragraph 4.2.14 infers that there are significant capacity constraints, particularly around Shenfield, which limit the availability of new freight paths, with limited scope to increase capacity.

Paragraph 4.2.15 considers there may be opportunities to move rail freight to existing interchanges co-located with port facilities, for onward transport to the site by sea.

Paragraph 4.2.16 identifies the potential to transport construction workers to site, subject to provision of 'rail and ride' bus services at key railway stations, such as at Southminster, which is acknowledged to be fully explored as part of future transport studies.

ECC has made initial contacts with relevant officers at Network Rail and would be happy to assist with the development of these discussions.

## 4.7 Proposed Park and Ride Locations

The principle of providing park and ride facilities during the construction phase of the project to intercept workforce trips by car reducing the amount of worker traffic on local roads to the main development site, and reduce potential environmental effects is supported (paragraph 4.5.14). Park and Ride is a concept supported by the highway authority.

In principle, areas of search 2, 3a and 3b are considered to be in locations that could intercept trips given their proximity to the strategic/main highway network, and thereby minimising impact on the local road network. However, these potential locations would result in additional traffic at locations which already experience highway capacity constraints, namely junction 18 A12 (site 2) and Rettendon Turnpike (sites 3a and 3b). Area of Search 2 would result in additional vehicle trips along the A414 which already experiences high levels of vehicle movements and an AQMA has been designated in Danbury. However, movements of park and ride buses would be preferable to private vehicles and so reduce the number of trips. The Councils recommend the route is included as part of the modelling to inform the preferred transport strategy, in order that appropriate mitigation is identified.

Area of Search 4 may encourage further vehicle trips along the B1019 between Hatfield Peverel and Maldon and B1022 between Colchester and Maldon which is not desirable given the distance from the strategic network, namely A12, junction 20B. As previously noted, other Areas of Search are located in close proximity to the strategic highway network. Is it anticipated that this site would serve Maldon and its local area or is it intended to intercept trips from the wider strategic road network?

Areas of Search 1a and 1b are located on the Dengie peninsula and are likely to encourage additional vehicle trips through the Dengie via the rural road network, passing through rural villages. In principle, a preferred strategy is to intercept vehicle as close to the strategic/main road network as is feasible. The Councils recommend all areas of search and their implications on the local and strategic network are incorporated into any future modelling.

In summary, the Councils have the following initial concerns regarding the Areas of Search, which will be informed and refined by additional modelling and the definition of a preferred transport strategy:

- Areas of Search 3a and 3b - the Rettendon Turnpike junction (A130/A132) is presently operating over capacity.
- Area of Search 2 – junction 18 A12, near to the existing Sandon park and ride site already experiences capacity issues, and is already being monitored, at the request of Highways England, regarding the operation of Sandon park and ride.
- Areas of Search 1a and 1b – the impact of vehicle trips from the strategic highway network via the rural network and villages.

#### 4.8 Proposed Freight Management Locations

The Councils have similar initial concerns regarding the Areas of Search for freight management, which should also be informed and refined by the definition of a preferred transport strategy and subsequent modelling.

Area of Search 3, in principle the location of freight management locations in proximity to the strategic/main road network is supported. However, as previously stated there are existing highway capacity issues at the A130/A132 Rettendon Turnpike junction. Concerns also raised over structural integrity of the A132 and road capacity constraints around South Woodham Ferrers. As identified in the Chelmsford Local Plan transportation modelling work.

Areas of Search Options 1 and 2 are both located in the Dengie peninsula and are likely to encourage additional vehicle trips through the Dengie via the rural road network, passing through rural villages. In principle, a preferred strategy is to intercept vehicle as close to the strategic/main road network as is feasible.

#### 4.9 Potential highway works for peak construction – HGV Strategic Routes 1 and 2:

Two strategic HGV route options have been proposed, that could be combined (in part), to move HGVs from the strategic road network to the main development site. At present, and without an overarching transport strategy and evidence to support marine and rail options for freight movement the Councils are not able to comment on the detail provided in the stage one consultation response.

However, the following factors, although not exhaustive, will need to be considered when determining the preferred route choice for freight movements by road:

- Number of residual HGV trips (including PSVs) that cannot be accommodated by marine or rail options.
- Number of residual private car trips.
- Condition of the existing road network and specific structures.
- Location of highway boundary and the ability to carry out necessary road widening.
- Accident data (total number and location).
- Asset Management issues, including whether any new routes would be adopted as public highway or remain as private haul routes? This has an impact on follow on maintenance costs.
- Creating a transport legacy are the new routes to be permanent or dismantled following the construction phase. Would either of the strategic route options provide the routing and infrastructure to serve any future spatial strategy to be identified in the review of the Maldon Local Plan.
- Potential reclassification of the road network through the Dengie Peninsula.
- Planning, environmental and economic impacts.

#### 4.10 Marine Options

The Councils would strongly support the delivering freight to site by sea to be maximised, subject to appropriate consultation and mitigation on the marine environment, as it will help reduce HGV traffic on the local highway network.

The Councils strongly support marine options 1 and 3 on the basis that they have the capability of accommodating a wide range of bulk materials, thereby reducing the impact of HGVs on the highway network.

The Councils would like to understand better the potential of developing these marine options and the evidence that exist as to what constrains the volume of bulk material that can arrive via marine based transport. It is suggested that at least 50% of bulk materials can arrive by marine options but why is this not more? Fundamentally, the Councils need to understand the constraint on marine transport options before entering into detailed discussions regarding any proposed highway transport scenarios and any transport modelling.

#### 4.11 Sustainable Transport

The Councils support references in paragraphs 4.5.30 and 31 to walking and cycling, and in particular:

To maximise the number of workers walking/cycling as part of the accommodation strategy  
The preparation of a Construction Workforce Travel Plan to encourage the use of walking and cycling as far as practicable from the outset.

Any transport strategy will also be required to consider the implications on pedestrians and cyclists in terms of accessibility and safety to park and ride sites, and any strategic route that passes through, or nearby existing villages and existing public rights of way.

The Essex Cycle Strategy and Chelmsford and Maldon Cycle Action Plans are key policy documents that should be referenced in preparing the transport strategy, as they highlight the policy position of encouraging cycling for its health and wellbeing benefits and encouraging more sustainable and affordable travel options. The Action Plans identify the existing network and potential infrastructure improvements.

Infrastructure improvements to support the transition to zero carbon sustainable transport would also be welcomed.

#### 4.12 Highway condition and structures

ECC, as highway authority, has previously provided BRB with current information regarding relevant structures and road condition. However, it is acknowledged that some assessments of structures are dated, and others have not been appropriately assessed. SCANNER is used to assess the condition of the road surface itself but does not cover its underlying layers. The latter is not often assessed, and while any assessment using SCANNER may appear satisfactory, it may not be a true reflection of the impact of traffic on the road condition in some locations.

ECC, as highway authority, acknowledge that there could be between 500-700 daily HGV movements during the construction phase, subject to further development of the transport strategy. It is strongly recommended that additional investigations are undertaken by BRB to consider the impact on the condition of the highway and its relevant structures.

The Councils welcome the acknowledgement of the additional transport related workstreams required to assist with reaching conclusions and informing a Stage 2 consultation, and would welcome the opportunity to engage further with the Bradwell B team

*Supported by: Alastair Southgate, Transport Strategy Lead (ECC) ; Chris Stevenson, Head of Network Development (ECC); Vicky Duff, Network Management Manager (ECC); Hannah Neve, Principal Transportation & Infrastructure Planner (ECC); Matthew Bradley, Strategic Development Manager (North) (ECC); Hilary Gore, Strategic Development Manager (South) (ECC); Liz Burr (ECC); Jo Heynes (ECC); Jackie Longman, Strategic Theme Lead - Place (MDC) Kevin Fraser, Principal Planner (ECC)*

### **List of Abbreviations**

The Councils	Essex County Council and Maldon District Council
ECC	Essex County Council
MDC	Maldon District Council
The Project	The Bradwell B Nuclear Development Project
CGN	China General Nuclear Power Group
EDF	<u>Électricité de France</u>
BRB	CGN and EDF Partnership
DCO	Development Consent Order
SOS	Secretary of State
NSIP	National Strategic Infrastructure Project
NPS	National Policy Statement
NPPF	National Planning Policy Framework
NEET	Not in Education, Employment or Training
ESE	Employment, Skills & Education
IAG	Information, Advice & Guidance
CEIAG	Careers Education Information, Advice & Guidance
HE	Higher Education
FE	Further Education
STEM	Science, Technology, Engineering & Mathematics
ASEC	Asset Skills Enhancement and Capability
HGV	Heavy Goods Vehicle
PROW	Public Rights of Way
REPPiR	The Radiation (Emergency Preparedness and Public Information) Regulations
ONR	Office for Nuclear Regulation
EA	The Environment Agency
MCZ	Marine Conservation Zone
LoWS	Local Wildlife Sites
SPA	Special Protection Area
SAC	Special Area for Conservation

Ramsar Site	A site designated under the Ramsar Convention on Wetlands of International Importance
SSSI	Site of Special Scientific Interest
NERC	Natural Environment and Rural Communities
HRA	Habitats Regulation Assessment
EclA	Ecological Impact Assessment
EIA	Environmental Impact Assessment
PEIR	Preliminary Environmental Impact Assessment
AMAA	Ancient Monuments and Archaeological Areas Act
AOD	Above Ordnance Datum
RVAA	Residential Visual Amenity Assessment
GLVIA	Guidelines for Landscape and Visual Impact Assessment
ZTV	Zone of Theoretical Visibility
ZVI	Zone of Visual Influence
LVIA	Landscape and Visual Impact Assessment
ECA	Environmental Colour Assessment
EPOA	Essex Planning Officers Association
SuDS	Sustainable Drainage System
CIRIA	Construction Industry Research and Information Association
LFFA	Lead Local Flood Authority
RSPB	Royal Society for the Protection of Birds
MPA	Mineral Planning Authority
CDE	Construction, Demolition & Excavation
SMP	Soil Management Plan
SMWP	Site Waste Management Plan
SELEP	South East Local Economic Partnership
MLP	Maldon Local Development Plan
AQMA	Air Quality Management Area

This page is intentionally left blank



Addendum 1 to Appendix 1

# Built-heritage impact assessment of the proposal for a new nuclear power station at Bradwell-on-Sea

April 2020



***Front cover illustrations:*** *Photograph of St Peter's Chapel from the east and, at the bottom, a drawing of Weymark's Farm, by Tim Howson, based on an old photograph.*

This document was produced by Maldon District Council.

It was prepared by Tim Howson IHBC , Specialist –  
Conservation and Heritage

© Maldon District Council

## Contents

1.	Introduction	4
2.	Overview of the historic buildings potentially affected by the proposal and the statutory and policy considerations	5
3.	Assessment of the potential impact on individual historic buildings	10
4.	Conclusion and recommendations	82
5.	Bibliography	85

## 1. Introduction

- 1.1 The Government's National Policy Statement for Nuclear Power Generation (NPS EN-6) (2011) identifies Bradwell-on-Sea as a potentially suitable site for a new nuclear power station. There is an existing nuclear power station in Bradwell-on-Sea, developed between 1957 and 1962 on the northern part of what was Down Hall Farm. The existing power station closed in 2002. At the time of writing, the Bradwell Power Generation Company is publicly consulting on a proposal to develop a new nuclear power station – to be known as 'Bradwell B' – on land adjacent to the existing decommissioned power station (now referred to as 'Bradwell A'). Once the public consultation stages are complete, the Bradwell Power Generation Company intend to apply to the Secretary of State for a Development Consent Order for the construction and operation of Bradwell B together with the associated new roads, park-and-ride and freight facilities.
- 1.2 On the 4<sup>th</sup> of March 2020 the *Bradwell B Stage One Consultation Document* was published. This *Built-Heritage Impact Assessment*, which has been written to inform Maldon District Council's response to the stage one consultation, identifies which historic buildings in the area are likely to be affected by the proposals outlined in the consultation document. It provides a brief assessment of the significance of each of the buildings and the potential degree of harm posed to these buildings' significance. It highlights where there is a need for further information concerning built heritage. Where appropriate, suggestions are made for possible mitigation, although such suggestions do not necessarily imply that concerns may be easily overcome.
- 1.3 In terms of heritage designations, within the parish of Bradwell-on-Sea there are 2 scheduled monuments, 63 listed buildings, 1 conservation area, and numerous non-designated heritage assets. There are also many listed buildings outside of Bradwell-on-Sea, the settings to which could be affected by the proposals for new roads, road junctions, road widening, park-and-ride facilities and freight management facilities associated with the proposed power station. This *Built-Heritage Impact Assessment* is only concerned with 'built heritage'; standing buildings and structures which are either listed, within a conservation area or which qualify as non-designated heritage assets. The report does not address the impact on scheduled monuments and below-ground archaeology.
- 1.4 Section 2 of this document provides an overview of the historic buildings potentially affected, and summarises the statutory and policy considerations pertaining to the different categories of heritage asset. Section 3 provides an

assessment of the impact of the proposed development upon individual historic buildings. Section 4 draws together conclusions and recommendations.

## **2. Overview of historic buildings potentially affected by the proposal and the statutory and policy considerations**

- 2.1 This assessment identifies over fifty historic buildings potentially affected by the proposals set out in the *Bradwell B Stage One Consultation Document*. The buildings within this group are relatively diverse in age and type, but there are common themes, each building reflecting aspects of the history of Bradwell-on-Sea and the Dengie Peninsula. Standing apart from all the other historic buildings in the group – both geographically and historically – is the Chapel of St Peter On The Wall (p.21), believed to have been built c.654 by St Cedd, isolated on the eastern tip of the Dengie peninsula, straddling the site of the western wall of a 3<sup>rd</sup>-Century Saxon Shore Fort. This somewhat unassuming chapel of stone and brick with a clay-tiled roof is one of the oldest churches in Britain. Its exceptional architectural and historic interest is acknowledged by its Grade I listed status; the highest possible grade of listing.
- 2.2 A large number of the buildings potentially affected by the proposals are isolated farmhouses (most grade II listed, but some locally listed), ranging in date from the 15<sup>th</sup>, 16<sup>th</sup>, 17<sup>th</sup>, 18<sup>th</sup> and 19<sup>th</sup> centuries, emphasising the long-held importance of agriculture to the rural economy of Bradwell and the Dengie peninsula. The early-19<sup>th</sup>-century threshing barns at East Hall Farm (p.27), Munkins (p. 34) and Moynes (p.71) were probably built in response to the embargoes imposed on the importation of grain during the period of hostilities from 1799-1815; a situation which caused grain prices to soar, countless grain-processing barns to be erected, and farmers to become wealthy. The Victorian brick shelter sheds at East Hall Farm exemplify the later shift towards cattle farming during the 1860s and 70s (pp. 29-31).
- 2.3 Roughly half of the historic buildings affected are cottages (most grade II listed, but some locally listed) dating from the mid-18<sup>th</sup> century to the early-19<sup>th</sup> century, testament to the boom in population in the late-Georgian period and the need to accommodate a rapid expansion of the labouring workforce. Many of these cottages occupy narrow strips of land alongside the highway; such wasteland becoming available for development following the gradual improvement and narrowing of roads.

- 2.4 Among the youngest of the historic buildings affected are those associated with Bradwell Bay WWII Airfield and the WWII coastal defences. During the Second World War the whole of the parish become a military zone; a significant period in Bradwell's more recent history. Although the WWII buildings are not nationally listed, they have local importance because of the architectural and historic interest. Each of the affected buildings is considered in more detail in Section 3.

### Listed buildings

- 2.3 Most of the buildings affected by the power station proposals are listed buildings. Listed buildings are buildings of special architectural and historic interest. In accordance with section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, the Secretary of State must have special regard to the desirability of preserving any affected listed building or its setting or any features of special architectural or historic interest which it possesses. All of the affected listed buildings are grade II listed except for the Chapel of St Peter On The Wall, which is grade I listed, and Bradwell Lodge, which is grade II\* listed.

### Conservation areas

- 2.4 There is some potential for the proposal to impact upon the setting of the Bradwell-on-Sea Conservation Area. Conservation areas are 'areas of special architectural and historic interest, the character and appearance of which it is desirable to preserve and enhance'. Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* requires the Secretary of State to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

### The National Planning Policy Framework

- 2.5 In July 2018, the Government published the updated National Planning Policy Framework ("NPPF") for England. The guidance contained within Section 16, 'Conserving and enhancing the historic environment', relates to the historic environment, and developments which may have an effect upon it. Heritage Assets are defined in Annex 2 of the NPPF as: 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).' Listed buildings and Conservation Areas are both designated heritage assets.
- 2.6 'Significance' is defined as 'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be

archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. The 'Setting of a heritage asset' is defined as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'

- 2.7 Paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. It emphasises that the weight given to an asset's conservation should be proportionate to its significance, and notes that this great weight should be given irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 2.8 Paragraphs 195 and 196 address the balancing of harm against public benefits. If a balancing exercise is necessary (i.e. if there is any harm to the asset), considerable weight should be applied to the statutory duty where it arises. Proposals that would result in substantial harm or total loss of significance should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss (as per Paragraph 195). Whereas, Paragraph 196 emphasises that where less than substantial harm will arise as a result of a proposed development, this harm should be weighed against the public benefits of a proposal, including securing its optimum viable use.

### **Non-designated heritage assets / locally-listed buildings**

- 2.9 In addition to listed buildings there are many historic buildings which, although they may not meet the criteria for national listing, possess local value because of their architectural and historic interest. The NPPF and Policy D3 of the Maldon LDP refer to such buildings as 'non-designated heritage assets'. These assets are defined in Planning Practice Guidance as those 'identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets'. Planning Practice Guidance encourages Local Planning Authorities to identify 'non-designated heritage assets' against consistent criteria and notes that adding them to a 'local list' is a positive way of improving the 'predictability of the potential for sustainable development'. Maldon District Council is in the process of developing parish lists of local heritage assets based on an adopted selection criteria. One of these lists has recently been prepared for the parish of Bradwell-on-Sea and,

at the time of writing, is out to public consultation: [https://www.maldon.gov.uk/info/20049/heritage\\_and\\_conservation/9675/parish\\_lists\\_of\\_local\\_heritage\\_assets](https://www.maldon.gov.uk/info/20049/heritage_and_conservation/9675/parish_lists_of_local_heritage_assets) . Paragraph 197 of the NPPF requires a balanced judgment for proposals that affect non-designated heritage assets, having regard to the scale of any harm or loss and the significance of the heritage asset.

2.10 The PPG refers to key elements of a building's special architectural or historic interest when assessing harm. If proposed works adversely affect a key element of the heritage asset's special interest, then those works could amount to substantial harm. It is the degree of harm rather than the scale of development that is to be assessed by the decision taker. Substantial harm is stated to be a high test that may not arise in many cases.

2.11 Harm may arise from works to the heritage asset or from development within its setting. Setting is stated to include the surroundings in which a heritage asset is experienced, and may be more extensive than its curtilage. A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

2.12 The Maldon District Local Development Plan (LDP) was approved by the Secretary of State on 21 July 2017. Policy D3 of the LDP concerns conservation and heritage assets and broadly reflects the requirements of the NPPF and the *Planning (Listed Buildings and Conservation Areas) Act 1990*. It states:

*Development proposals that affect a heritage asset (whether designated or non-designated) and / or its setting will be required to:*

*1) Preserve or enhance its special character, appearance, setting – including its streetscape and landscape value - and any features and fabric of architectural or historic interest;*

*2) Be supported by a Heritage Statement which describes the asset's significance in sufficient detail to understand the potential impact of the proposal upon the significance of the heritage asset through the proposed work to it and / of its setting.*

*Development proposals which affect a heritage asset will also have to be in accordance with respective national policies and guidance in the National Planning Policy Framework.*

*When considering the impact of a proposed development on the significance of a designated heritage asset, the Council will give great weight to the asset's conservation. Any harm or loss will require clear and convincing justification.*



*Where a proposed development would lead to substantial harm to or total loss of significance of a designated heritage asset, it will be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: the nature of the heritage asset prevents all reasonable use of the site; no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use.*

*Where a proposed development would cause less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal, including securing its optimum viable use.*

### **Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Nuclear Power Generation (EN-6)**

- 2.13 The primary planning policy documents for the determination of a proposal for a new nuclear power station at Bradwell-on-Sea are the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Nuclear Power Generation (EN-6). Section 5.8 of EN-1 sets out policies in relation to the Historic Environment. These policies broadly reflect those in Section 16 of the NPPF. Paragraph 5.8.8 requires the applicant to include within its Environmental Statement a description of the significance of any heritage affected by the proposal and the contribution of their setting to that significance.
- 2.14 The map of Bradwell supporting the strategic site assessment – featured on p. 246 EN-6 – shows the allocated land not extending south of Weymarks River or Curds Grove. That nominated area of land is approximately 298 hectares. According to paragraph C.2.101 of Annex C to EN-6 some bodies questioned whether this area of land would be large enough, ‘particularly to accommodate interim waste stores’. In response to this concern, it was observed that the Office for Nuclear Regulation ‘has advised that this is of sufficient size and shape for the safe and secure operation of a new nuclear power station’.
- 2.15 Paragraphs C.2.91 to C.2.100 of Annex C to EN-6 summarise the conclusions of the ‘Appraisal of Sustainability’ concerning the potential ‘cultural heritage’ impact of the Bradwell site. Paragraph C.2.91 explains that the Appraisal of Sustainability ‘identified potential adverse effects on the settings of Othona Roman Fort and St Peter’s Chapel, other nearby scheduled monuments, listed buildings and the West Mersea Conservation Area, as well as on buried archaeology of potentially high importance’. The appraisal concluded that ‘the effects on the setting of Othona Roman fort and St. Peter’s Chapel would be of

exceptional significance if development occurs on the eastern side of the site' (para. C.2.92). The appraisal advised that 'detailed assessment, including consultation of the Essex Historic Landscape Characterisation, consideration of Conservation Areas and other heritage assets will be required at the project level Environmental Impact Assessment stage, should an application for development consent come forward' (para. C.2.92).

### **3. Assessment of the potential impact on individual historic buildings**

- 3.1 In this section each historic building potentially affected by the power-station's proposals is considered individually. The buildings are presented in alphabetical order of their address. For each case, the aim has been to provide a summary of the building's significance, to identify any potential harm to this significance, to highlight the need for further information and, where appropriate, suggest possible mitigation measures. It must be emphasised that the assessment has been carried out rapidly, within a tight timeframe, on the basis of somewhat limited information. Many of the comments and conclusions may need to be adjusted once firmer proposals and details of assessments are provided by the developer.
- 3.2 The precise locations of the temporary park-and-ride and freight-management facilities are not clear from the consultation document. Figures 4.3 and 4.4 of the consultation document illustrate large circular 'search areas' for three potential park-and-ride locations and two potential freight-management facilities within the Maldon District. This built-heritage impact assessment has not identified every historic building potentially affected in these areas because there are so many.



*Photograph of The Cottages, Green Lane, Althorne taken 30<sup>th</sup> of April 2015*

<b>Address:</b>	Althorne, Green Lane, The Cottages
<b>Heritage Status:</b>	A grade II listed building, designated 30 <sup>th</sup> May 1986
<p><b>Description:</b> This house is orientated at right angles to Green Lane, with its principal elevation facing west. It occupies a narrow triangular slip of land adjacent the highway. It is 1 ½ storeys in height, timber-framed and weatherboarded with a clay-tiled gambrel roof. Formerly a row of three cottages, it was converted into a single dwelling in the 20<sup>th</sup> century. Analysis of the building in 2015 during refurbishment established that the southern (right-hand) two cottages were built first, probably late in the 18th century, and the third (left-hand) cottage was added in the early-19th century. Each cottage comprised just one ground-floor room and one first-floor room and a rear lean-to.</p>	
<p><b>Summary of heritage significance:</b> The listed building's heritage significance can be said to derive primarily from the fact that it is a reasonably well-preserved example of a row of vernacular Georgian cottages. The heritage asset also derives significance from its tranquil rural setting, within a well-maintained verdant garden beside a quiet country lane.</p>	
<p><b>Potential degree of harm to significance:</b> Green Lane forms part of the proposed Strategic Route 2 which, according to paragraph 4.7.57 of the Bradwell B consultation document, 'could be subject to targeted improvements and/or widening'. The noise and vibrations associated with a considerable increase in the level of HGV traffic, coupled with the loss of trees and hedges for road widening, could detract from the tranquil rural setting of this listed building. The level of harm could be quite considerable depending upon the nature and design of the work.</p>	
<p><b>The need for further information:</b> More detail is required on the design and detailing of the proposed roadworks in order to make an informed assessment. Specifically, which parts of Green Lane would be subject to widening, and what is the anticipated volume of HGV traffic?</p>	
<p><b>Possible mitigation measures:</b> As part of the roadworks associated with Strategic Route 2, consideration could be given to realignment of the road to draw it away from the boundary with The Cottages.</p>	



*Photograph of Warden's Farmhouse taken from the south on the 28<sup>th</sup> of June 2006 © IoE Mr Reginald Clark*

<b>Address:</b>	Althorne, Green Lane, Warden's Farmhouse
<b>Heritage Status:</b>	A grade II listed building, designated 30 <sup>th</sup> May 1986
<b>Description:</b> This is a small 1 ½ storey house, dated by the list description to the 17 <sup>th</sup> century. It is a timber-framed building, clad in red brickwork in the 19 <sup>th</sup> century. It has a half-hipped gambrel roof clad in clay tiles. Its principal elevation faces south, with its back to Green Lane.	
<b>Summary of heritage significance:</b> The listed building's heritage significance can be said to derive primarily from the fact that it is a reasonably well-preserved example of a small 17 <sup>th</sup> -century house. The heritage asset also derives significance from its tranquil rural setting, beside a quiet country lane.	
<b>Potential degree of harm to significance:</b> Green Lane forms part of the proposed Strategic Route 2 which, according to paragraph 4.7.57 of the Bradwell B consultation document, 'could be subject to targeted improvements and/or widening'. The noise and vibrations associated with a considerable increase in the level of HGV traffic, coupled with the loss of trees and hedges for road widening, could detract from the tranquil rural setting of this listed building. The level of harm is likely to be limited bearing in mind that the house is set back from the road with its principal elevation facing away from the highway. The precise degree of harm will depend upon the nature and design of the work.	
<b>The need for further information:</b> More detail is required on the design and detailing of the proposed roadworks in order to make an informed assessment. Specifically, which parts of Green Lane would be subject to widening, and what is the anticipated volume of HGV traffic?	





Three stitched-together photographs taken on the 22<sup>nd</sup> of May 2014 from the top of the tower to the Church of St Thomas, Bradwell, looking north-east in the direction of the site for Bradwell B

<b>Address:</b>	Bradwell-on-Sea Conservation Area
<b>Heritage Status:</b>	The conservation area was designated on the 15 <sup>th</sup> of July 1969
<p><b>Description:</b> The Bradwell-on-Sea Conservation Area is a small and remarkably unspoilt hamlet centred upon the 14<sup>th</sup>-century Church of St Thomas (listed grade II*), extending along South Street, High Street and East End Road. It is relatively unchanged from its 19th-century appearance. Most of the buildings are listed and very well preserved. Late-20<sup>th</sup>-century housing has been accommodated to the east of the village, outside of the conservation area. The village possesses a special collection of historic (mostly vernacular) buildings. The earliest are medieval timber-framed buildings such as Nos 9&amp;11 High Street, White Lyons, New Hall, Bradwell Lodge and the recently restored cross-wing at the King's Head. There are three terraces of Georgian cottages with gambrel roofs, some good two-storey Victorian cottages, and an attractive Victorian school.</p>	
<p><b>Summary of heritage significance:</b> The special character and appearance of the conservation area is described in detail in the <i>Bradwell-on-Sea Conservation Area Review and Character Appraisal</i>, which was written in 2006 and adopted by MDC in 2007 following public consultation. Briefly, the significance of the conservation area derives primarily from the high survival of well-preserved historic vernacular buildings within it. It is a remarkably unspoilt hamlet. It is the best-preserved conservation area in the Maldon District. It has a tranquil and quiet character, relatively cut off from its surroundings by the vegetation and fields around it.</p>	
<p><b>Potential degree of harm to significance:</b> The consultation document observes that 'views out of the conservation area towards the main development site are constrained by planting and more modern development outwith [sic] the conservation area along East End Road, although some views are possible, particularly along High Street' (para. 3.2.23). The composite photograph above, taken from the top of the church tower, illustrates some of the screening in place. Views of the new power station from the conservation area are likely to be limited. However, careful analysis of the potential visual impact is required before firm conclusions can be drawn. It is possible that parts of the station will be seen from the gardens of properties on the east side of High Street. Wireframe photographic mock-ups should be prepared from agreed locations throughout the village.</p> <p>Part of the village's special character derives from its quietness, which could be harmed by the noise of construction work and the operation of the station.</p>	
<p><b>The need for further information:</b> Wireframe photographic mock-ups would be useful to help assess to what extent any part of the power station would be visible from within the conservation area. Noise assessments should be undertaken to determine the level of noise from construction work and the operation of the power station likely to be audible within the conservation area.</p>	



*Photograph of The Former Queen's Head, taken 4<sup>th</sup> March 2020*

<b>Address:</b>	Bradwell-on-Sea, Bradwell Road, The Former Queen's Head
<b>Heritage Status:</b>	A grade II listed building, designated in 1985
<p><b>Description:</b> The Former Queen's Head Public House is a 2-storey, rendered brick building with hipped slate roofs and a symmetrical arrangement of front sash windows to the main block. The central round-headed front doorway is accessed by a flight of five steps from left and right. It is a typical late-Georgian building.</p>	
<p><b>Summary of heritage significance:</b> The building's heritage significance can be said to derive the fact that it is a reasonably well-preserved example of a Georgian public house, its elegant proportions, the quality of its materials and detailing, and its prominent location at the road junction.</p>	
<p><b>Potential degree of harm to significance:</b> Paragraph 4.7.43 of consultation document states '[a]t Mill End, the Strategic Route 1 could be widened and/or realigned via a new section of new off-line road to its immediate south to pull the carriageway away from the existing listed properties which currently front directly onto the road. The existing junction with the B1021 could also be reconfigured to tie into the realigned road'. It is assumed that the listed buildings referred to here are The Former Queen's Head and Oak Cottage. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced. Widening or realignment of the road is likely to conflict with the rural character of the building's setting, but drawing the traffic away from the buildings through road realignment would reduce the level of noise and vibration experienced by the occupants and the risk for damage to the building by accidents. The level of harm would fall below the high threshold of 'substantial harm', but could nonetheless be quite considerable depending upon the nature and design of the work.</p>	
<p><b>The need for further information:</b> More detail is required on the design of the proposed roadworks in order to make an informed assessment.</p>	
<p><b>Possible mitigation measures:</b> Drawing the traffic away from the buildings through road realignment would reduce the level of noise and vibration experienced by the occupants and the risk for damage to the building by accidents.</p>	



Left-hand photograph taken 4th March 2020

Right-hand photograph reproduced from the Kevin Bruce Archive

<b>Address:</b>	Bradwell-on-Sea, Bradwell Road, Oak Cottage
<b>Heritage Status:</b>	A grade II listed building, designated in 1985
<b>Description:</b> Oak Cottage is an 18 <sup>th</sup> -century roadside cottage. It is 1 ½ storeys in height, originally with just two rooms on each floor, and has a timber-framed structure mainly of elm. Old photographs show that it used to be thatched, but it now has a slate roof.	
<b>Summary of heritage significance:</b> The significance of this listed building relates to its age, the fact that it represents a good example of a humble vernacular cottage, its reasonable state of preservation, the quality of its timber-framed construction and its prominent position, alongside the former Queen's Head, beside the junction between Bradwell Road and Mill End.	
<b>Potential degree of harm to significance:</b> Paragraph 4.7.43 of consultation document states '[a]t Mill End, the Strategic Route 1 could be widened and/or realigned via a new section of new off-line road to its immediate south to pull the carriageway away from the existing listed properties which currently front directly onto the road. The existing junction with the B1021 could also be reconfigured to tie into the realigned road'. It is assumed that the listed buildings referred to here are The Former Queen's Head and Oak Cottage. The intensification in use of this road will affect the setting of this listed building and how it is experienced. Widening or realignment of the road is likely to conflict with the rural character of the building's setting, potentially requiring the loss of established vegetation on the south side of the road, but drawing the traffic away from the listed buildings through road realignment would reduce the level of noise and vibration experienced by the occupants and the risk for damage to the building by accidents. A vehicle crashed into the garden wall of Oak Cottage in 2015. Being exposed on a slight bend in the road, this property is particularly vulnerable to this sort of incident. Overall, level of harm could be quite considerable depending upon the nature and design of the work.	
<b>The need for further information:</b> More detail is required on the design and detailing of the proposed roadworks in order to make an informed assessment.	
<b>Possible mitigation measures:</b> Drawing the traffic away from Oak Cottage through road realignment and/or the imposition of a lower speed limit would reduce the level of noise and vibration experienced by the occupants and the risk for damage to the building by accidents.	
<b>Possible heritage benefits to offset harm:</b> Road realignment could make Oak Cottage less vulnerable to damage from traffic collisions.	



This old photograph from the Kevin Bruce Archive shows a row of (probably late-18<sup>th</sup>-century) cottages which used to occupy a slip of land opposite the Queen's Head, on the western side of the junction between Mill End and Maldon Road. Ironically, it is said to have been demolished around the second quarter of the 20<sup>th</sup> century to make way for highway improvements which were not implemented (Kevin Bruce, pers. comm.).





Photograph of Timbercot taken from the public footpath to the south on the 12<sup>th</sup> of March 2020

<b>Address:</b>	Bradwell-on-Sea, Bradwell Waterside, Timbercot
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<p><b>Description:</b> This is a 1 ½ storey timber-framed and weatherboarded cottage with a half-hipped gambrel roof clad in clay tiles. It most likely dates from the second half of the 18<sup>th</sup> century. It was extended to the right (east) by one bay c.1996 in a style which reflects the original. The primary building would originally have contained two main rooms on both floors. According to the list description a 'later and now demolished Dame School was attached to the right', in the position of the 1990s extension.</p>	
<p><b>Summary of heritage significance:</b> The significance of this listed building relates to its age, the fact that it represents a good example of a humble vernacular cottage, its reasonable state of preservation, the quality of its materials and construction and its idyllic setting. The cottage is situated within a verdant and well-maintained garden, set apart from the main road, accessed by a narrow footpath, with open views across the arable field to the east.</p>	
<p><b>Potential degree of harm to significance:</b> Figure 3.34 of the consultation document shows the 'Temporary workers' Accommodation' adjoining the eastern boundary of Timbercot. Figure 5.2 suggests that there would be a 'Caravan Area' to the east of the boundary with Timbercot. Paragraph 5.7.5 explains that caravans are likely to be relied upon heavily to house workers during the early stages of construction, and that hardstanding will need to be provided for the caravans. Figure 5.2 shows that to the east of the 'Caravan Area' would be the 'Campus Area' which, according to paragraph 5.7.17 would include multi-storey buildings 'up to six storeys in height'. Such buildings are likely to be prominently visible from Timbercot due to the limited existing vegetative screening and the way in which the land slopes upwards to the east. The appearance of – and the noise generated by – the proposed caravan area and multi-storeyed accommodation buildings may cause considerable harm to the significance of Timbercot, by eroding its idyllic setting. While the impact would be temporary, it would be for a significant period of time – between 9 and 12 years.</p>	
<p><b>The need for further information:</b> More detail is required on boundary treatments, the layout of the caravan area and the design of the multi-storey blocks.</p>	
<p><b>Possible mitigation measures:</b> The proposal could be screened through planting, although this would cause some harm in its own right by severing views across the open field. Planting will also take several years to become established.</p>	



Photograph of Timbercot, taken 12<sup>th</sup> March 2020, looking east towards the proposed caravan area



Photograph of Timbercot, taken 12<sup>th</sup> March 2020, looking west from the site of the proposed caravan area.



Photograph taken 12<sup>th</sup> March 2020

<b>Address:</b>	Bradwell-on-Sea, Bradwell Waterside, Peakes
<b>Heritage Status:</b>	Non-designated heritage asset / locally listed
<p><b>Description:</b> This farmhouse is composed of two ranges on an L-plan, built of yellow stock bricks embellished with horizontal bands of red brick. It is thought that the range aligned west-east was built in the 1870's while the range aligned north-south was added to the east end c.1912. The bay windows, with carved stone capitals, date from the phase of extension and renovation in c.1912. The house was built for Clement Parker, one of the more important sailing barge owners and a prominent local farmer.</p>	
<p><b>Summary of heritage significance:</b> This building has local architectural interest as a handsome and well-preserved Victorian and Edwardian Farmhouse. It has local historic interest for its association with Clement Parker. It derives some significance from its relatively secluded settings, its grounds surrounded on three sides by arable fields.</p>	
<p><b>Potential degree of harm to significance:</b> Figure 3.34 of the consultation document shows the 'Temporary workers' Accommodation' area wrapping around the garden to Peakes. Figure 5.2 suggests that there would be a 'Caravan Area' to the east of the boundary with Peakes, and that the land adjoining the north and west boundary would be 'Sports Facilities'. Paragraph 5.7.5 explains that caravans are likely to be relied upon heavily to house workers during the early stages of construction, and that hardstanding will need to be provided for the caravans. The proposals may result in some harm to the setting of Peakes through erosion of its secluded setting.</p>	
<p><b>The need for further information:</b> More information is required on the layout of the caravan area and the nature of the sports facilities to make an informed assessment of the proposal.</p>	



Photograph taken on the 12<sup>th</sup> of March 2020 of Peakes from the sea wall footpath to the north-west



Photograph taken on the 12th of March 2020 of Peakes from the sea wall footpath to the north-west



Photograph showing St Peter's Chapel from the east, taken on 12<sup>th</sup> March 2020

<b>Address:</b>	Bradwell-on-Sea, East End Road, St Peter's Chapel
<b>Heritage Status:</b>	A grade I listed building, designated in 1959. The chapel stands on the archaeological remains of a Saxon Shore Fort, the latter designated a scheduled ancient monument in 1929 (and considered in a separate report by Place Services). The chapel is excluded from the scheduling.
<p><b>Description:</b> This church stands astride the west wall of a Roman Fort, one of a series of Saxon Shore Forts built in the late 3rd century to guard against attacks by sea rovers. Only one fragment of the fort wall remains visible, hidden in the vegetation to the south of the church and increasingly eroded by badgers.</p> <p>The chapel – constructed using masonry salvaged from the Roman Fort – is in all probability the church recorded to have been built here by St Cedd c.654, making it among the oldest churches to survive in Britain. It consists now of only the imposing nave, but the existence of a west porch and an apsed chancel as wide as the nave has been ascertained. In addition, there was probably a porticus, (a side chamber), to either side of the chancel, overlapping the junction with the nave. The chancel was separated from the nave by a tall arcade, just as at the contemporary churches at Reculver and St Pancras, Canterbury. In the responds of the north and south arches, Roman brick can be recognised. The west doorway is original apart from the lintel. Above the west door is a round-headed window, its arch turned with Roman bricks. There were two windows on both the north and south walls of the nave. These windows have been quite altered but have original jambs and splays.</p> <p>After a period of use as a barn, when large entrances were made in the north and south walls, the chapel was repaired by the Office of Works and re-consecrated in 1920.</p>	
<p><b>Summary of heritage significance:</b> As one of the oldest churches in Britain, St Peter's Chapel has exceptional archaeological value. The chapel possesses exceptional historical value in that it illustrates vividly the evangelisation of Saxon England. In terms of architectural interest, although reduced from what it once was, as a substantial building of stone, the church was an extraordinary building for the period in which it was built. Aesthetically, the manner in which St. Peter's Chapel stands in the open and bare landscape – and seascape – around it lends it a very particular beauty. The chapel's isolated, open and remote coastal setting is a vitally important aspect to the way it is experienced, and its significance appreciated. Although Bradwell A is visible from the chapel, it is sufficiently distant that its intrusion into the monument's setting is slight. Approaching the chapel from the west, along a footpath aligning with a Roman road, one is barely aware of the presence of the existing power station to the north-west. The wind farm to the south-west, granted permission on appeal in 2010 at Hockley Farm, has had a greater impact upon the Chapel's setting. The wind farm is a noticeable modern intrusion into views of and from the chapel, and has caused harm to the</p>	

chapel's setting. The presence of the wind farm makes the chapel more (not less) sensitive, because the cumulative impact of additional nearby development could further detract from the chapel's landscape setting, compounding the harm it has already recently suffered.

**Potential degree of harm to significance:** The Bradwell B consultation document explains that one of the factors influencing the decision to position the power station on land to the south and west of the site was the potential to impact upon 'the Chapel of St Peter-on-the-Wall and Roman Shore Fort of Othona which are located to the east of the site' (paragraph 3.3.48). Nonetheless, the proposed power station will inevitably be much more prominently visible from St Peter's Chapel than Bradwell A because of its closer proximity to the grade I listed building and its much greater scale. The wind turbines, while noticeable within the chapel's setting, are relatively slender and ephemeral structures. By contrast, the buildings associated with new power station would represent the introduction of massive buildings which have a much more bulky and solid presence. A new power station would inevitably compound the harm caused to the setting of St Peter's Chapel by the wind turbines. Figure 3.27 provides a photographic mock-up showing how the station – a vast industrial complex – would appear in views from the chapel. What would perhaps be more useful, to an assessment of the impact, would be to see similar photographic mock-ups showing how Bradwell B might appear in views of the chapel (like the view in the photograph above) both during and after construction.

The consultation document comments that, '[i]f appropriate, it should be possible to screen views from the Chapel to minimise visual effects' (paragraph 3.4.16). Later in the document it states:

*The area between East Hall Farm and the Chapel of St Peter-on-the-Wall would be subject to ground remodelling to beneficially re-use surplus spoil that would be excavated within the site during early construction. This remodelling would seek to reflect existing ground contours, and ensure the land would not be over steepened, giving careful consideration to the setting of The Chapel of St Peter-on-the-Wall. An acceptable threshold level would be established as part of the heritage impact assessment in consultation with stakeholders, and land would not be raised above this threshold' (para. 3.5.8).*

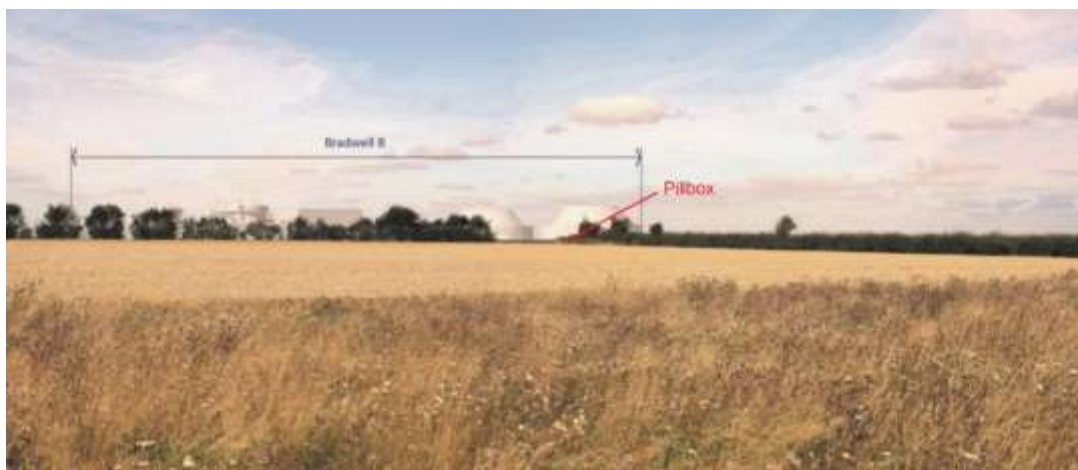
Raising ground levels in this manner, on land immediately adjacent to the chapel, poses the risk of a considerable permanent impact upon the monument's setting. It seems likely that the introduction of surplus spoil would lead to the loss of established trees and hedgerows which already provide natural screening, and result in a contrived and artificial landscape character. The document acknowledges 'that there are limits to how much material could sustainably be re-used on site without causing negative environmental impacts, for example in relation to the setting of designated heritage assets'.

Construction of Bradwell B is estimated to take between 9 and 12 years to complete (para. 3.7.1). During that time, Fig. 3.34 shows that the land within the development south and east of Weymarks River will be used for 'soil / spoil storage and redistribution'. Millions of cubic metres of soil would be piled in this area, which would inevitably have a radical impact upon on the character of the landscape close to St Peter's Chapel. Although the huge mounds of soil would only be visible from the chapel temporarily, 9-12 years is a significant period of time, during which the effect upon the setting this grade I listed building could be severe.

**The need for further information:** Photographic mock-ups should be prepared showing how Bradwell B would appear in views of the chapel from the east. Much more information is needed on the proposal to raise the ground levels of the fields in the vicinity of the chapel.

To date, there has been very limited archaeological analysis of St Peter's Chapel and the Saxon Shore Fort. Some investment by the Bradwell Power Generation Company into archaeological analysis could lead to a refined understanding of both monuments.





Photographic mock-up featured in the Bradwell B Stage 1 Consultation Document, showing how the power station may appear in views from St Peter's Chapel. Annotation added to highlight position of the WWII pillbox at the gated entrance to the Othona Community



Photograph of St Peter's Chapel taken 12<sup>th</sup> March 2020 from the south-east, looking towards the site of the proposed new nuclear power station. Annotation added to highlight position of the WWII pillbox at the gated entrance to the Othona Community, and aid comparison with the above mock-up



Photograph of St Peter's Chapel taken 12<sup>th</sup> March 2020 from the east, looking towards the site of the proposed new nuclear power station



Photographs of East Hall Farm from the south along the access track, taken 12<sup>th</sup> March 2020, stitched together and annotated to highlight key buildings

<b>Address:</b>	Bradwell-on-Sea, East End Road, East Hall Farmhouse
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<p><b>Description:</b> This is the mansion house to the manor of East Hall, the Domesday manor of Effecestra. For many centuries the manor belonged to New College, Oxford. It is a two-storeyed rendered house, comprising a timber-framed range to the south and a parallel rendered brick range to the north, both roofed with clay tiles. The main part of the southern range incorporates a timber-framed 3-bay high-end cross-wing of c.1500, which is all that remains of a once larger house which would have continued to the north. The medieval house faced west, but the house now faces south. From the outside it can be seen that the eastern (formerly rear) end of the roof has a hip and gablet, which is probably original but the roof structure has not been inspected to confirm this. There is a stair trap in the north-east corner of the eastern bay. This rear bay was accessed from the missing open hall by a doorway on the north elevation with a four-centre arched head (illustrated on p.26 below). The large scale of the cross-wing shows that it formed part of a late-medieval manor house of considerable status. The cross-wing was extended by an additional bay to the west in the 17<sup>th</sup> or 18<sup>th</sup> century. The brick rear range replaced an earlier lean-to in or soon after 1856 according to a letter held in the New College Archives. All the windows in the property are modern. The building was divided into three cottages in the 19<sup>th</sup> century and is now a pair of houses.</p>	
<p><b>Summary of heritage significance:</b> The heritage significance of East Hall Farmhouse derives primarily from the fact that it incorporates a substantial and good-quality timber-framed cross-wing of c. 1500. Its early origins are not obvious from the outside, apart from the hip-and-gablet form of its roof. The later extensions are of comparatively limited architectural merit. The adjacent historic farm buildings (three of which are separately grade II listed) complement the setting and understanding of the farmhouse. The isolated position of the farmhouse, surrounded by a remarkably open, flat and expansive agricultural landscape which it has farmed for many centuries, is an important aspect of its setting and significance.</p>	
<p><b>Potential degree of harm to significance:</b> The four grade II listed buildings at East Hall Farm would fall within the main 'development site'. Paragraph 3.2.4 of the consultation document remarks that '[a]t this stage, we anticipate that East Hall Farm would be retained during the development of the Bradwell B Project'. The qualification of 'at this stage' is slightly worrying. There seems absolutely no need to demolish this important group of buildings. Later in the consultation document there is a more reassuringly unequivocal statement that 'these designated heritage assets would be retained during the development. We would also aim to protect and enhance their settings following construction' (paragraph 3.2.22). It is understood that the Bradwell Power Generation Company intends to acquire the buildings at East Hall Farm – which raises the question of what use these buildings will be put to in the future.</p>	
<p>The consultation document indicates that the landscape surrounding East Hall Farm will change quite radically. Much of the land which it has farmed for centuries would not return to agricultural use. The proposal to raise ground levels of the surrounding land using surplus spoil excavated from the site</p>	



during construction could result in the loss of established trees and hedgerows which already provide some natural screening and result in a rather contrived and artificial landscape character.

Construction of Bradwell B is estimated to take between 9 and 12 years to complete (para. 3.7.1). During that time, Fig. 3.34 shows that the land surrounding East Hall Farm will be used for 'soil / spoil storage and redistribution'. Millions of cubic metres of soil would be piled in this area, which would inevitably have a radical impact upon the character of the landscape setting of East Hall Farm. Although the huge mounds of soil would only be in place temporarily, 9-12 years is a significant period of time, during which the effect upon the setting this group of grade II listed buildings could be severe.

**The need for further information:** Photographic mock-ups should be prepared showing how East Hall Farm would appear in long views in the context of the proposed development. Much more information is needed on the proposal to raise ground levels of the fields in the vicinity of the listed buildings. How would the spoil be stored during construction on the land surrounding East Hall Farm? What will be height of the mounds and how would they be profiled?

As an important medieval timber-framed building, which would be directly impacted by the proposals, the history and evolution East Hall Farm House would benefit from being researched in more detail.



Photograph of East Hall Farmhouse from the south-east, taken 16<sup>th</sup> July 2015



Photograph of the interior of Easthall Farmhouse, taken 16<sup>th</sup> July 2015, showing original timber framing, a blocked stair trap, and a doorway with a four-centre-arched head.



Photograph of the threshing barn at Easthall Farm from the south, taken 22<sup>nd</sup> May 2012

<b>Address:</b>	Bradwell-on-Sea, East End Road, Barn approx. 15 metres west of Easthall Farmhouse
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<p><b>Description:</b> This timber-framed and weatherboarded threshing barn dates from the early-19<sup>th</sup> century. In a survey of 1844 by John Oxley Parker it was described as an 'excellent double barn. Timber and thatched, one floor of oak plank and the other of stone with [granaries] between the porches, slated'. The roofs were clad in corrugated asbestos sheets prior to listing in the 20<sup>th</sup> century. The barn is of nine bays and has two waggon porches facing south. The roof structure has butt purlins and queen struts. There are bolted hanging knees to tie beams. Two bays of the barn are occupied by a loft/granary floor.</p>	
<p><b>Summary of heritage significance:</b> This threshing barn was built in response to the embargoes imposed on the importation of grain during the period of hostilities from 1799-1815; a situation which caused grain prices to soar, countless grain-processing barns to be erected. The very large scale of the barn reflects the wealth and ambition of its owners. It is a good quality example of timber-framed construction for its date. It shares group value with the historic farmhouse and separately listed brick shelter sheds. It derives some significance from its landscape setting, within the farmland it was intended to serve.</p>	
<p><b>Potential degree of harm to significance:</b> As described above in relation to East Hall Farmhouse, the proposed power station and landscaping works pose the potential to harm the setting and significance of this group of listed buildings.</p>	
<p><b>The need for further information:</b> Photographic mock-ups should be prepared showing how East Hall Farm would appear in long views in the context of the proposed development. Much more information is needed on the proposal to raise ground levels of the fields in the vicinity of the listed buildings.</p>	





Internal view of the threshing barn at Easthall Farm from the south, taken 16<sup>th</sup> July 2015



Photograph of the byres and stable ranges approx. 25 metres south west of Easthall Farmhouse, taken 16<sup>th</sup> July 2015

<b>Address:</b>	Bradwell-on-Sea, East End Road, byres and stable ranges approx. 25 metres south west of Easthall Farmhouse
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<b>Description:</b> A single-storey brick byre and stable range on an L-plan enclosing part of a stock yard to the south of the threshing barn. It was built c.1861 according to a letter and plans held in the New College Archives.	
<b>Summary of heritage significance:</b> This is a good quality and well-preserved example of a Victorian shelter shed, reflecting the general shift in focus to cattle farming in the 1860s.	
<b>Potential degree of harm to significance:</b> As described above in relation to East Hall Farmhouse, the proposed power station and landscaping works pose the potential to harm the setting and significance of this group of listed buildings.	
<b>The need for further information:</b> Photographic mock-ups should be prepared showing how East Hall Farm would appear in long views in the context of the proposed development. Much more information is needed on the proposal to raise ground levels of the fields in the vicinity of the listed buildings.	



Photograph of the byres and stable ranges approx. 40 metres south west of Easthall Farmhouse, taken 22<sup>nd</sup> May 2012

<b>Address:</b>	Bradwell-on-Sea, East End Road, byres and stable ranges approx. 40 metres south west of Easthall Farmhouse
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<b>Description:</b> A single-storey brick byre and stable range on an L-plan enclosing part of a stock yard to the south of the threshing barn. It was built c.1861 according to a letter and plans held in the New College Archives.	
<b>Summary of heritage significance:</b> This is a good quality and well-preserved example of a Victorian shelter shed, reflecting the shift in focus to cattle farming in the 1860s and 70s.	
<b>Potential degree of harm to significance:</b> As described above in relation to East Hall Farmhouse, the proposed power station and landscaping works pose the potential to harm the setting and significance of this group of listed buildings.	
<b>The need for further information:</b> Photographic mock-ups should be prepared showing how East Hall Farm would appear in long views in the context of the proposed development. Much more information is needed on the proposal to raise ground levels of the fields in the vicinity of the listed buildings.	





Internal view of the western byre at Easthall Farm, illustrating the pine roof structure, taken 16<sup>th</sup> July 2015



Internal view of the western byre at Easthall Farm, illustrating the original elm manger, taken 16<sup>th</sup> July 2015



Photograph of Munkins Cottage from the south, taken 19<sup>th</sup> August 2004

<b>Address:</b>	Bradwell-on-Sea, East End Road, Munkins Cottage
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<b>Description:</b> A two-storey timber-framed and rendered house with a cross-wing to the east. The list description suggest that house is 17 <sup>th</sup> century or earlier, although it was clearly not subject to an internal inspection. The cross-wing may be medieval, while the remaining section is possibly post-medieval. A true understanding of the building's age would only be possible with an internal inspection.	
<b>Summary of heritage significance:</b> The significance of this listed building derives from its probable antiquity, traditional form, materials and landscape setting.	
<b>Potential degree of harm to significance:</b> The option to have a temporary workers accommodation campus on land south of East End Road (Option 3 in Figure 5.1) would probably have had significant impact upon the setting of this listed building. The fact this option has been discounted is to be welcomed (para. 5.7.13). The power-station development may affect views of and from this listed building.	
<b>The need for further information:</b> Photographic mock-ups should be prepared showing how the power-station development would appear in views of and from the listed buildings	





Left-hand photograph of Munkins Farmhouse from the south, taken 28<sup>th</sup> March 2002



Right-hand photograph taken August 1921 by the RCHME

<b>Address:</b>	Bradwell-on-Sea, East End Road, Munkins Farmhouse
<b>Heritage Status:</b>	A grade II listed building, designated in 1953
<b>Description:</b> The form of this timber-framed building, comprising a pair of gabled cross-wings flanking a central hall range, strongly implies that it is a complete medieval house. Unfortunately, it has not been the subject of an internal inspection, so its true antiquity and significance is not completely understood. The first mention of Munkins in documents is 1285 (O'Connor, 2006, p. 8).	
<b>Summary of heritage significance:</b> The significance of this listed building derives from its probable antiquity, traditional form, materials and landscape setting. Considerable harm was caused to the listed building's setting the Hockley Wind Farm which is located immediately to the south.	
<b>Potential degree of harm to significance:</b> The option to have a temporary workers accommodation campus on land south of East End Road (Option 3 in Figure 5.1) would probably have had significant impact upon the setting of this listed building. The fact this option has been discounted is to be welcomed (para. 5.7.13). The power-station development may affect views of and from this listed building.	
<b>The need for further information:</b> Photographic mock-ups should be prepared showing how the power-station development would appear in views of and from the listed building	



Photograph of the barn to the south-west of Munkins Farmhouse, taken 28<sup>th</sup> of March 2002

<b>Address:</b>	Bradwell-on-Sea, East End Road, Barn approx. 25 metres south-west of Munkins Farmhouse
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<b>Description:</b> This timber-framed and weatherboarded 5-bay threshing barn dates from the early-19 <sup>th</sup> century. The roofs were clad in corrugated asbestos sheets prior to listing in the 20 <sup>th</sup> century.	
<b>Summary of heritage significance:</b> This threshing barn was most likely built in response to the embargoes imposed on the importation of grain during the period of hostilities from 1799 1815; a situation which caused grain prices to soar, countless grain-processing barns to be erected. It is a reasonable example of this type and age of barn. It shares group value with Munkins Farmhouse. It derives some significance from its landscape setting, within the farmland it was intended to serve.	
<b>Potential degree of harm to significance:</b> The option to have a temporary workers accommodation campus on land south of East End Road (Option 3 in Figure 5.1) would probably have had significant impact upon the setting of this listed building. The fact this option has been discounted is to be welcomed (para. 5.7.13). The power-station development may affect views of and from this listed building.	
<b>The need for further information:</b> Photographic mock-ups should be prepared showing how the power-station development would appear in views of and from the listed building	



Left-hand photograph, taken 12<sup>th</sup> March 2020, shows the entrance to an existing track which would appear to align with the proposed secondary access to Bradwell B.

Right-hand photograph, taken in the 1970s by Kevin Bruce, shows the WWII concrete 'dragon's teeth' which survive in the hedge to the right (east) of the track entrance

<b>Address:</b>	Bradwell-on-Sea, East End Road, Dragons teeth at entrance
<b>Heritage Status:</b>	Non-designated heritage asset
<b>Description:</b> A row of anti-tank concrete 'dragon's teeth' dating from WWII.	
<b>Summary of heritage significance:</b> A valuable remnant from the Second World War, which was a significant period in Bradwell's recent history.	
<b>Potential degree of harm to significance:</b> Figure 3.23 of the consultation document shows the indicative location and alignment of a secondary access to Bradwell B off East End Road, for use in emergencies. The loss of the dragon's teeth would be regrettable. The erection of a fence along this part of the development site boundary would detract from the setting of this feature.	
<b>The need for further information:</b> More information on the precise position of the secondary access is required.	
<b>Possible mitigation measures:</b> If and when the secondary access is created, the dragon's teeth should be retained.	
<b>Possible heritage benefits to offset harm:</b> Consideration might be given to the installation of an interpretation board which highlights the significance of the dragon's teeth.	



Left-hand photograph of Cricketers Cottage from the south, taken 12<sup>th</sup> March 2020

Right-hand photograph taken 12<sup>th</sup> March 2020 from Cricketers Cottage looking south, showing how Curds Grove effectively screens Bradwell A from view.

<b>Address:</b>	Bradwell-on-Sea, East End Road, Cricketers Cottage
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<b>Description:</b> This is a mid-18 <sup>th</sup> century, 1 ½ storey, timber-framed and rendered cottage with a clay-tiled gambrel roof. Its principal elevation faces south, with its back to East End Road. The rear roof-slope sweeps down in 'cat-slide' form over a single-storey lean-to with low eaves and small windows.	
<b>Summary of heritage significance:</b> Cricketers Cottage has significance as a classic example of a humble vernacular Georgian cottage. It is remarkably well preserved, having a good quality timber-frame, a wonderful fireplace in the hall with evidence for bread ovens, the original stairs and several historic doors. Its secluded position, surrounded by an expansive flat landscape, is an important part of the way in which the cottage is experienced, and its significance appreciated.	
<b>Potential degree of harm to significance:</b> The power-station development has the potential to affect views of and from this listed building. The loss of Curds Grove would be particularly regrettable since this provides established screening of the site, and any replacement planting will take many years to become established.	
<b>The need for further information:</b> Photographic mock-ups should be prepared showing how the power-station development would appear in views of and from the listed building. Will the site boundary along East End Road need to be fenced?	
<b>Possible mitigation measures:</b> Retain Curds Grove.	



Photograph of Bradwell Lodge from the south taken on the 22<sup>nd</sup> of February 2018

<b>Address:</b>	Bradwell-on-Sea, High Street, Bradwell Lodge
<b>Heritage Status:</b>	A grade II* listed building, designated in 1953
<p><b>Description:</b> Bradwell Lodge was formerly the parish rectory. The earliest part is a large but much altered timber-framed cross-wing dating from the late-15<sup>th</sup> or early-16<sup>th</sup> century. This wing was extended in the mid-16<sup>th</sup> century and in the mid-18<sup>th</sup> century. The house was transformed in 1781-3 when its owner – the Rev. Henry Bate Dudley – added an elegant villa to the south of the older house, to designs by the Essex architect John Johnson. On the roof of the villa is an unusually large belvedere or observatory affording extensive view across the flat landscape.</p>	
<p><b>Summary of heritage significance:</b> The most important of this building is the elegant and high-quality late-18<sup>th</sup> century addition by John Johnson, although the older parts – particularly the late-medieval crosswing – are also of architectural interest. The building has historical interest for its role as the parish rectory and for its association with the journalist Rev. Henry Bate Dudley. Bate Dudley was the driving force behind the reclamation of 250 acres of land from the sea and draining the marshy glebe land for improved agriculture (Robinson, 2009, p. 84). The results of these endeavours could be viewed from the belvedere which crowns his villa. The Lodge was also the home for many years of the prominent Labour M.P. Tom Driberg.</p>	
<p><b>Potential degree of harm to significance:</b> The proposed power station would be clearly visible from the belvedere on top of Bradwell Lodge, which would affect the experience of this important part of the building. However, the views of the landscape from the Belvedere have already been affected by Bradwell A and the Hockley wind farm. The impact of the proposed power station upon the overall significance of Bradwell Lodge would be limited.</p>	





Photograph taken from the Belvedere to Bradwell Lodge on 22<sup>nd</sup> of February 2018 looking north in the direction of Bradwell A



Photograph taken from the Belvedere to Bradwell Lodge on 22<sup>nd</sup> of February 2018 looking south-east in the direction of Hockley wind farm



Left-hand historic photograph of Mote Cottage, courtesy of the Kevin Bruce Archive

Right-hand photograph of Mote Cottage taken 28<sup>th</sup> of March 2002

<b>Address:</b>	Bradwell-on-Sea, Maldon Road, Mote Cottage
<b>Heritage Status:</b>	A grade II listed building, designated 5 <sup>th</sup> of August 1986
<p><b>Description:</b> A Victorian, two-storey, timber-framed, weatherboarded and slate-roofed house. The front sash windows have moulded surrounds and with pelmets supported on brackets. There is a 20<sup>th</sup>-century parallel rear range of similar style and materials to the original. This was at one time the home of the author S. L. Bensusan (1872-1958) who immortalised Bradwell and its inhabitants in his early books.</p>	
<p><b>Summary of heritage significance:</b> This is a handsome Victorian weatherboarded house. Its close proximity to the edge of the road suggests it was developed on waste of the manor, probably replacing an earlier cottage on the site.</p>	
<p><b>Potential degree of harm to significance:</b> Paragraph 4.7.42 of the consultation document observes that some residential properties along this stretch of Maldon Road (which would become Strategic Route 1) are positioned close to the edge of the highway and notes that 'existing carriageway widths are likely to act as a constraint. On this basis the section of highway between Steeple and Mill End could be subject to targeted improvements and/or carriage widening'. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building and how it is experienced. Widening or realignment of the road is likely to conflict with the rural character of the building's setting, but drawing the traffic away from the buildings through road realignment would reduce the level of noise and vibration experienced by the occupants and the risk for damage to the building by accidents. The level of harm would fall below the high threshold of 'substantial harm', but could nonetheless be quite considerable depending upon the nature and design of the work.</p>	
<p><b>The need for further information:</b> More detail is required on the design of the proposed roadworks in order to make an informed assessment.</p>	
<p><b>Possible mitigation measures:</b> Drawing the traffic away from the listed building through road realignment should be considered in order to reduce the level of noise and vibration experienced by the occupants.</p>	



Left-hand historic photograph of Cobbetts, courtesy of the Kevin Bruce Archive

Right-hand photograph taken 28<sup>th</sup> of March 2002

<b>Address:</b>	Bradwell-on-Sea, Maldon Road, Cobbetts
<b>Heritage Status:</b>	A grade II listed building, designated 5 <sup>th</sup> of August 1986
<b>Description:</b> A pair of late-18th-century, timber-framed, weatherboarded and thatched cottages, converted into a single dwelling in the 20 <sup>th</sup> century. The cottages were developed on roadside slips of land which were waste of the manor.	
<b>Summary of heritage significance:</b> A classic example of a pair of vernacular Georgian wayside cottages	
<b>Potential degree of harm to significance:</b> Paragraph 4.7.42 of the consultation document observes that some residential properties along this stretch of Maldon Road (which would become Strategic Route 1) are positioned close to the edge of the highway and notes that 'existing carriageway widths are likely to act as a constraint. On this basis the section of highway between Steeple and Mill End could be subject to targeted improvements and/or carriage widening'. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building and how it is experienced. Widening or realignment of the road is likely to conflict with the rural character of the building's setting, but drawing the traffic away from the buildings through road realignment would reduce the level of noise and vibration experienced by the occupants and the risk for damage to the building by accidents. The level of harm would fall below the high threshold of 'substantial harm', but could nonetheless be quite considerable depending upon the nature and design of the work.	
<b>The need for further information:</b> More detail is required on the design of the proposed roadworks in order to make an informed assessment.	
<b>Possible mitigation measures:</b> Drawing the traffic away from the listed building through road realignment would reduce the level of noise and vibration experienced by the occupants. The close proximity of the cottages to the road-edge reflects the historic development pattern, which would be eroded through such mitigation measures. But road realignment would result in less harm overall than the impact of the heavy volume of traffic to and from the power station.	





Photograph of Goodgrooms taken on the 12<sup>th</sup> of March 2020

<b>Address:</b>	Bradwell-on-Sea, Maldon Road, Goodgrooms
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<p><b>Description:</b> The earliest mention of Goodgrooms (Goodgromes) in documents is 1443 (O'Connor, 2006, p. 8). Inspection of the house in 2017 established that the earliest part is the south end of the front range, which represents a timber-framed, 2-cell, lobby-entrance house, built in the mid-late 17<sup>th</sup> century. In the late-18<sup>th</sup> century, a 2-bay in-line extension was added to the north of the original house and the property was subdivided into three cottages. In the 20<sup>th</sup> century the building was converted back to a single dwelling. At the time of writing, some 20<sup>th</sup> century ranges are being enlarged to provide additional accommodation.</p>	
<p><b>Summary of heritage significance:</b> The significance of the listed building derives mainly from its age, structure, well-preserved condition, numerous period features, traditional materials and detailing. The most significant part of this listed building is the 17<sup>th</sup>-century house. The Georgian extension is also of considerable significance, whereas the 20<sup>th</sup>-century additions are only of moderate value. The building's picturesque character owes something to the accretive fashion in which the building has developed over the centuries. The building's tranquil rural setting, surrounded by fields and fronting onto a quiet narrow road, complements its significance.</p>	
<p><b>Potential degree of harm to significance:</b> Strategic Route 2 would pass through the field to the west of the house, merging with the narrow road which links Maldon Road to Waterside Road. This new road would detract from the listed building's tranquil rural setting.</p>	
<p><b>The need for further information:</b> More detail is required on the design of the proposed roadworks in order to make an informed assessment.</p>	



Left-hand photograph of Bluehouse Cottages from the south-west, taken 12<sup>th</sup> March 2020

Right-hand photograph of post inside Bluehouse Cottage, carved with a heart and the date 1691

<b>Address:</b>	Bradwell-on-Sea, Maldon Road, Bluehouse Cottages
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<p><b>Description:</b> This is a timber-framed and weatherboarded building with a clay-tiled gambrel roof, two-storeys in height plus a habitable attic storey. There is a house on the site, depicted on a map of 1680 (a detail of which is reproduced below). That house was probably replaced by the existing one in 1691, since the date 1691 is carved into a post inside the Bluehouse Cottage. The building was acquired in the 18<sup>th</sup> century for use as a parish workhouse. Floor plans survive from 1844 showing a programme of remodelling to create more rooms. The building is now a pair of houses; Bluehouse Cottage to the west, and the Bakekhouse to the east.</p>	
<p><b>Summary of heritage significance:</b> The building has architectural interest as one of very few firmly-dated late-17<sup>th</sup>-century buildings in this part of Essex. It is an attractive and well-preserved example of vernacular architecture. The building has historic interest for its role as a parish workhouse. The building's tranquil rural setting, surrounded by fields and fronting onto a quiet narrow road, complements its significance. The map of 1680 shows that the land to the west of the listed building (now the garden to Bluehouse Cottage) was at that time an orchard.</p>	
<p><b>Potential degree of harm to significance:</b> It would appear that Strategic Route 2 would pass through the garden to Bluehouse Cottage, along its western boundary. The introduction of a road at this location would be severely detrimental to the setting of the listed building.</p>	
<p><b>The need for further information:</b> More information is needed on the precise position, width and design of the proposed road</p>	
<p><b>Possible mitigation measures:</b> The degree of harm to Bluehouse Cottages would be reduced if the proposed road could be located further to the west, outside the garden of the listed building. However, it should be borne in mind that this would bring the road closer to Orplands, and increase the level of harm to that non-designated heritage asset.</p>	



Stitched-together photograph of Bluehouse Cottages from the south-west, taken 12<sup>th</sup> March 2020, annotated to indicate the approximate position of Strategic Route 2.



Detail of a map dated 1680 showing that the present garden to the west of Bluehouse Cottage was at that time an orchard. Reproduced from the Kevin Bruce Archive.





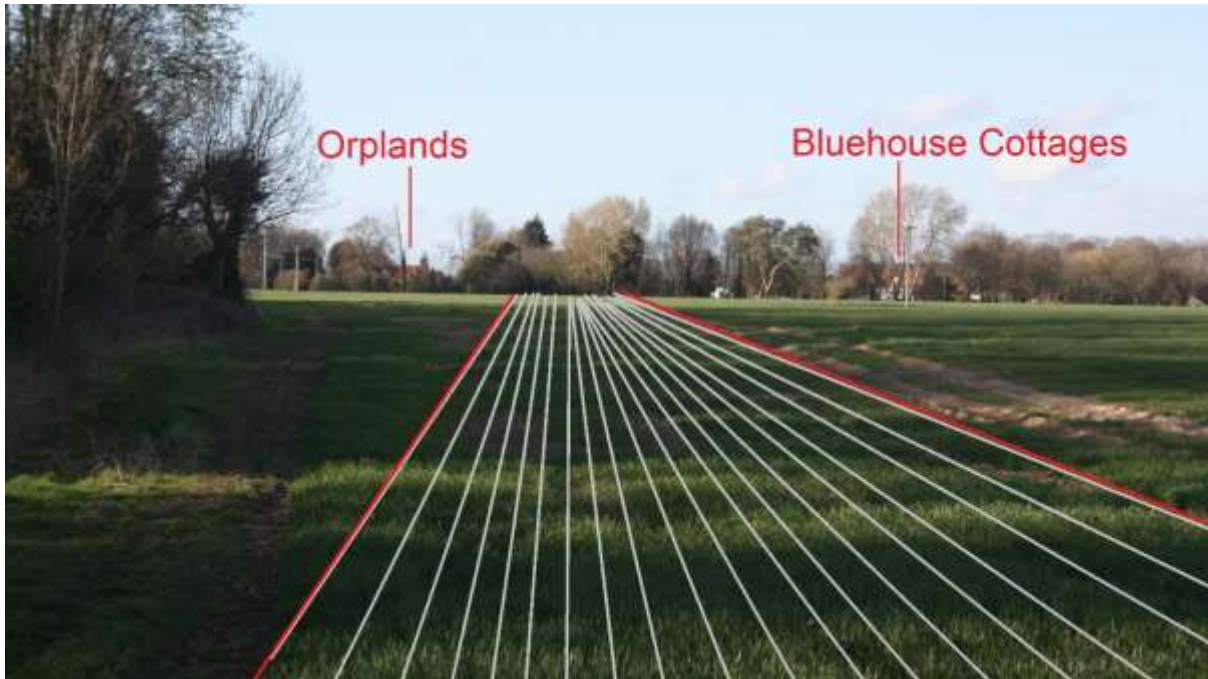
Photograph of Orplands taken March 2012

<b>Address:</b>	Bradwell-on-Sea, Maldon Road, Orplands
<b>Heritage Status:</b>	A non-designated heritage asset.
<b>Description:</b> Orplands is known to have existed since the 15th century, but the farmhouse was rebuilt in the Victorian period. It is constructed of yellow brick and roofed with clay tiles. The front range is two-storeys in height with a gabled cross-wing at the left-hand (western) end. The bargeboards have a pierced foliate decoration. The front and side doorways are framed by elaborate arched openings with carved stone responds. On the front elevation there are square bay windows with dentilled brick cornices. The windows are painted timber sashes with a single pane of glass to both the upper and the lower sash.	
<b>Summary of heritage significance:</b> This is a substantially complete Victorian farmhouse of very good local architectural interest, displaying high quality materials and detailing.	
<b>Potential degree of harm to significance:</b> Strategic Route 2 would pass through the field immediately to the east of this farmhouse. Although the distance and intervening vegetation would limit any harm to the setting of Orplands, the impact would be increased if the new road was positioned further west in an effort to reduce the effect on the grade II listed Bluehouse Cottages and Goodrooms.	
<b>The need for further information:</b> More information is needed on the precise position, width and design of the proposed road	



Photograph of Curry Farm from the south, taken 12<sup>th</sup> March 2020

<b>Address:</b>	Bradwell-on-Sea, Mill End, Curry Farm
<b>Heritage Status:</b>	A non-designated heritage asset
<b>Description:</b> A remarkably well-preserved late-18 <sup>th</sup> -century brick farmhouse with a hipped clay-tiled roof. The house retains most of its original windows and the interior is also very little altered. The earliest mention of Curry's in documents is 1262 (O'Connor, 2006, p. 8).	
<b>Summary of heritage significance:</b> This is a good example of a well-preserved Georgian farmhouse. It is an secluded location, surrounded by woodland, and the peaceful atmosphere of its grounds is an important aspect of its setting.	
<b>Potential degree of harm to significance:</b> Strategic Route 2 would run along the southern and eastern boundaries of the woodland surrounding Curry Farm. While the established woodland would limit any visual impact upon the farmhouse, the considerable vehicular activity would generate noise that would detract from the peaceful quality of the historic building's setting.	
<b>The need for further information:</b> More information is needed on the precise position, width and design of the proposed road	



Photograph taken 12<sup>th</sup> March 2020 in the field to the east of Curry's Farm looking north, annotated to show the approximate route Strategic Route 2.



Photograph taken 12<sup>th</sup> March 2020 in the field to the south-east of Curry's Farm looking west in the direction of Strategic Route 2, which would run parallel with the southern edge of Curry Farm's woodland





Photograph taken 12<sup>th</sup> March 2020 of Truscot (in the foreground) and Trusses.

<b>Address:</b>	Bradwell-on-Sea, Waterside Road, Truscott
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<b>Description:</b> A pair of late-Georgian cottages on a roadside slip of land which was 'waste of the manor', converted into a single dwelling in the 20th century. The building is timber framed but has a brick façade. It is 1 ½ storeys in height with a clay-tiled gambrel roof. The long, narrow roadside plot appears to survive in its original form.	
<b>Summary of heritage significance:</b> A classic example of a pair of vernacular Georgian wayside cottages. The quite rural surroundings of the listed building are an important part of how the building and its significance is experienced. Truscott shares group value with the adjacent row of wayside cottages; Trusses.	
<b>Potential degree of harm to significance:</b> Figures 3.34 and 5.1 of the consultation document show the field behind (to the east of) and the field opposite (to the west of) this listed building designated as potential sites for temporary workers accommodation. Waterside Road would become part of Strategic Route 1, with all vehicular traffic for the power station travelling along this stretch of road. The field to the north-east of the junction between Trusses Road and Waterside Road will become the entrance 'plaza' to the power-station site, with a new junction required to the access road which will pass diagonally through the plaza. Each of these works is likely to radically alter and detract from the immediate rural surroundings of this listed building, resulting in harm to its significance.	
<b>The need for further information:</b> More information is needed in relation to each of the proposals identified above.	
<b>Possible mitigation measures:</b> Drawing the traffic away from the listed building through road realignment could reduce the level of noise and vibration experienced by the occupants. The close proximity of the cottages to the road-edge reflects the historic development pattern, which would be eroded through such mitigation measures. But road realignment may result in less harm overall than the impact of the heavy volume of traffic to and from the power station.	



Photograph of the rear of Truscott, taken 29<sup>th</sup> August 2018 from the field to the east of it



Photograph of Truscott and Trusses, taken 29<sup>th</sup> August 2018 from Woodyards Road to the south-east





Photograph of Trusses taken 12<sup>th</sup> March 2020

<b>Address:</b>	Bradwell-on-Sea, Waterside Road, Trusses
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<b>Description:</b> A row of three late-Georgian cottages on a roadside slip of land which was 'waste of the manor', converted into a single dwelling in the 20th century. The building is timber framed but has a later brick skin. It is 1 ½ storeys in height with a clay-tiled gambrel roof. The original plot was enlarged in the 20 <sup>th</sup> century.	
<b>Summary of heritage significance:</b> A classic example of a row of vernacular Georgian wayside cottages. The quite rural surroundings of the listed building are an important part of how the building and its significance is experienced. Trusses shares group value with the adjacent row of wayside cottages; Truscott. This was the final home of the internationally renowned artist Frederick Hans Haagensen where he had his studio.	
<b>Potential degree of harm to significance:</b> Figures 3.34 and 5.1 of the consultation document show the field behind (to the east of) and the field opposite (to the west of) this listed building designated as potential sites for temporary workers accommodation. Waterside Road would become part of Strategic Route 1, with all vehicular traffic for the power station travelling along this stretch of road. The field to the north-east of the junction between Trusses Road and Waterside Road will become the entrance 'plaza' to the power-station site, with a new junction required to the access road which will pass diagonally through the plaza. Each of these works is likely to radically alter and detract from the immediate rural surroundings of this listed building, resulting in harm to its significance.	
<b>The need for further information:</b> More information is needed in relation to each of the proposals identified above.	
<b>Possible mitigation measures:</b> Drawing the traffic away from the listed building through road realignment may reduce the level of noise and vibration experienced by the occupants. The close proximity of the cottages to the road-edge reflects the historic development pattern, which would be eroded through such mitigation measures. But road realignment may result in less harm overall than the impact of the heavy volume of traffic to and from the power station.	



Composite photograph of the site of the proposed power-station entrance 'plaza', taken 12<sup>th</sup> March 2020 from the junction between Waterside Road and Trusses Road



Photograph of Down Westwick from the south-west, taken 12<sup>th</sup> March 2020

<b>Address:</b>	Bradwell-on-Sea, Waterside Road, Down Westwick
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<p><b>Description:</b> A two-storey timber-framed and weatherboarded house with a clay-tiled roof. This house appears to consist of a hall, in-line service end and parlour cross-wing. The hall has late-16<sup>th</sup>-century heavy first-floor joists, all chamfered with lambs tongue stops. This has the character of a floor inserted into an open hall, but the external walls have been altered / concealed to the extent that it is impossible to tell. The roof has been rebuilt but incorporates at least one smoke-blackened rafter from a medieval open hall. The house retains numerous other later period architectural features.</p>	
<p><b>Summary of heritage significance:</b> The significance of this listed building can be said to derive from its age, the quality of its materials and construction, its vernacular character and its picturesque and isolated rural position.</p>	
<p><b>Potential degree of harm to significance:</b> Paragraph 3.2.24 of the consultation document cites Down Westwick as a listed building potentially affected by the proposals. Figure 5.3 indicates that a field to the north-east of Down Westwick may be the site of temporary workers' accommodation. However, the distance and intervening vegetation, coupled with the way in which Down Westwick sits within a dip in the landscape, makes it unlikely that there would be any discernible impact on the setting or significance of this listed building.</p>	



Photograph of Woodyards taken 28<sup>th</sup> September 2018

<b>Address:</b>	Bradwell-on-Sea, Waterside Road, Woodyards
<b>Heritage Status:</b>	A non-designated heritage asset
<p><b>Description:</b> This two-storey, timber-framed and weatherboarded house is older than it appears from the outside. The house was first constructed in the second half of the 18th century as a pair of 1 ½ storey cottages. In the second half of the 19th-century the building was converted to a single dwelling and heightened to a full 2 storeys. A brick lean-to at the rear bears a date of 1881, which is probably a bit later than the Victorian rebuilding. The name of the house derives from Charlie Woodyard who was a local coal merchant.</p>	
<p><b>Summary of heritage significance:</b> This 18th and 19th-century house is very well preserved, displaying good quality vernacular materials and detailing. There is a good survival of multi-paned sash windows and old internal doors. The building's tranquil and rural setting contributes to an appreciation its significance.</p>	
<p><b>Potential degree of harm to significance:</b> Figure 3.34 shows the field adjacent (to the east of) this locally listed building designated as 'Potential Expansion Area for Temporary Workers' Accommodation'. The development of this land for workers accommodation (presumably caravans) would detract from the tranquil rural setting of the construction work (estimated to be between 9 and 12 years).</p>	
<p><b>Possible mitigation measures:</b> Planted screening could help mitigate the impact of the caravan site, although planting would take a long time to become established.</p>	





Photograph of the meadow to the east of Woodyards, taken 20<sup>th</sup> January 2020 from the road looking north-east



Photograph of The Old Cottage, taken 12<sup>th</sup> March 2020

<b>Address:</b>	Bradwell-on-Sea, Waterside Road, The Old Cottage
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<b>Description:</b> The main part of this house is a small late-medieval timber-framed cross-wing. Photographs taken during the 1970s while it was being re-tiled show that the original roof is well preserved and of crown-post construction. The windows and extensions are all later and of comparatively limited architectural interest.	
<b>Summary of heritage significance:</b> The significance of this listed building derives primarily from the antiquity of its original structure. It is also of interest as a small medieval house, which tend to survive in far fewer numbers than larger medieval houses. The comparatively large 20 <sup>th</sup> -century houses immediately to the north of The Old Cottage have a somewhat overbearing relationship with this diminutive medieval house, but it remains an attractive and memorable feature along Waterside Road and in the long views from Trusses Road.	
<b>Potential degree of harm to significance:</b> Figure 3.34 shows the 'Entrance Plaza' adjoining the southern boundary to The Old Cottage, and land to the west on the opposite side of Waterside Road is designated a 'Potential Expansion Area for Temporary Workers' Accommodation'. Para. 3.7.9 states: 'An entrance plaza at the primary entrance would allow for controlled and secure access into and out of the site. Our designs for this area are in the early stages, and this will be a key area for ongoing design development following Stage One consultation'. This information on what the plaza will consist of is thus quite vague. Para. 3.7.12 says access 'would be limited to security checkpoints within the entrance plaza', suggesting the area would need to incorporate fencing. The appearance of – and the noise generated by – the proposed caravan area and the 'Entrance Plaza' may cause notable harm to the significance of The Old Cottage, by eroding its rural setting. While the impact of the temporary accommodation would be temporary, it would be for a significant period of time – between 9 and 12 years.	
<b>The need for further information:</b> More information is needed in relation to the 'Entrance Plaza' to assess the impact it would have on the setting of The Old Cottage.	
<b>Possible mitigation measures:</b> Planted screening could help mitigate the impact of the development but would take a long time to become established.	





Photograph of The Old Cottage from Trusses Road, taken 12<sup>th</sup> March 2020



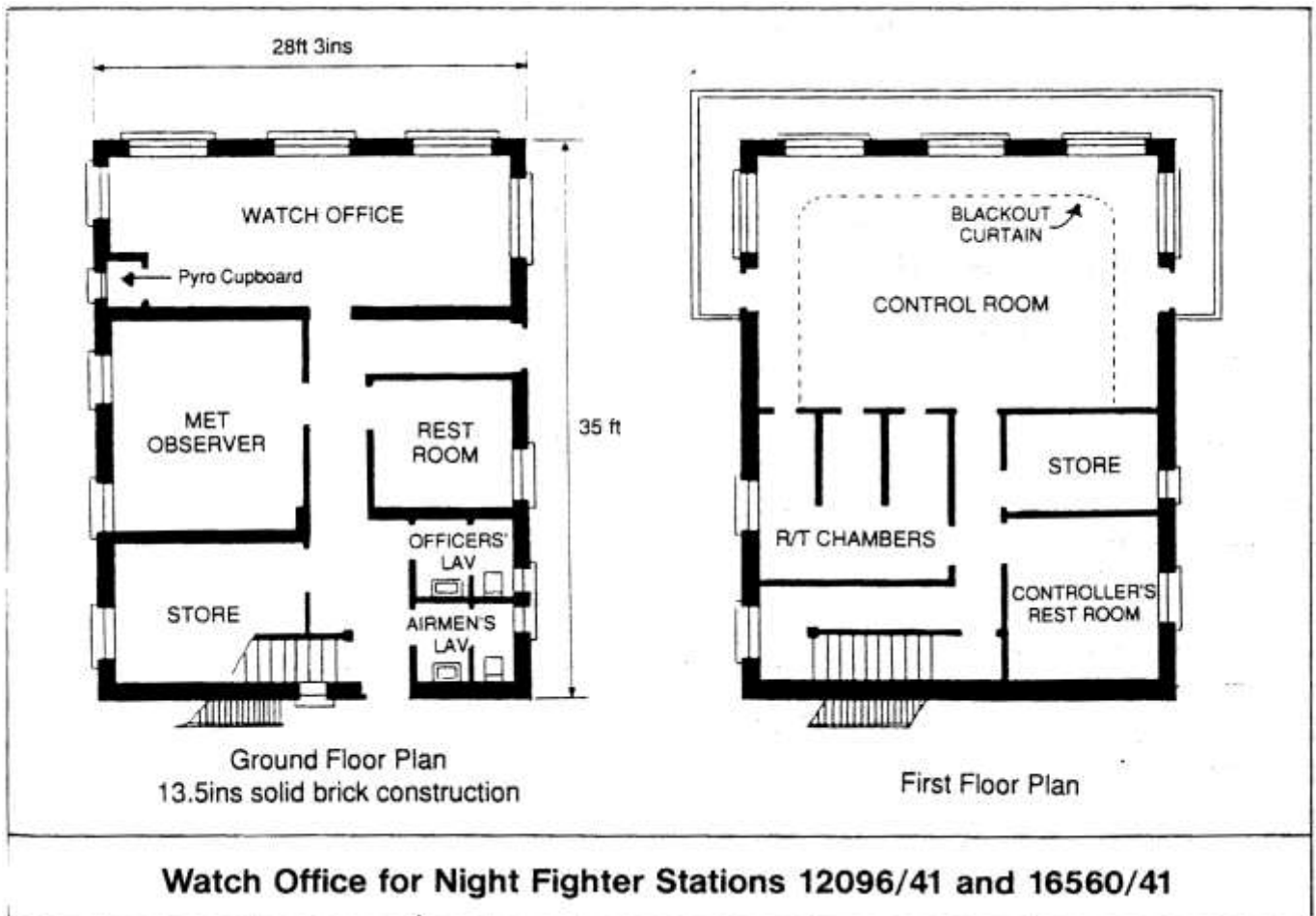
Photograph of The Old Cottage from the field to the south, taken 24<sup>th</sup> September 2015



Left-hand photograph of The Control Tower, taken 20<sup>th</sup> January 2020

Right-hand photograph, taken prior to residential conversion, reproduced with permission from Kevin Bruce

<b>Address:</b>	Bradwell-on-Sea, Weymarks Road, Bradwell Bay WWII Airfield, The Control Tower
<b>Heritage Status:</b>	A non-designated heritage asset
<b>Description:</b> This rendered brick Control Tower oversaw operations at Bradwell Bay airfield during WWII and was later converted to a residence. The roof-top observatory has been rebuilt but the basic form of the building has been preserved.	
<b>Summary of heritage significance:</b> The Control Tower, along with the Station HQ and the four Blister hangars are important to the history and heritage of Bradwell Bay airfield. The military historian Fred Nash has observed that “although they are all that remains of the 300+ buildings and structures that stood on the airfield they were, and are, of major significance in the hierarchy of airfield architecture” (Nash, 2010). The Control Tower is the most iconic building to survive from Bradwell Bay airfield.	
<b>Potential degree of harm to significance:</b> It is proposed to demolish this building.	
<b>The need for further information:</b> The building should be subject to detailed research and investigation as soon as possible to achieve a full understanding of its significance.	
<b>Possible mitigation measures:</b> Efforts should be made to retain this building, if at all possible.  If demolition is unavoidable the building must be properly recorded. Paragraph 5.8.19 of NPS EN-1 states ‘A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given’.	
<b>Possible heritage benefits to offset harm:</b> If preservation <i>in-situ</i> is not possible, consideration could be given to re-erecting The Control Tower in replica, perhaps near to the war memorial, where it could serve as an educational facility recording and commemorating the WWII history of the area.	



Original floor plan of The Control Tower, reproduced from Francis, 1993



Photographs of the Bradwell Bay Station Headquarters from the west. Above taken 20<sup>th</sup> January 2020, below undated from the Kevin Bruce Archive

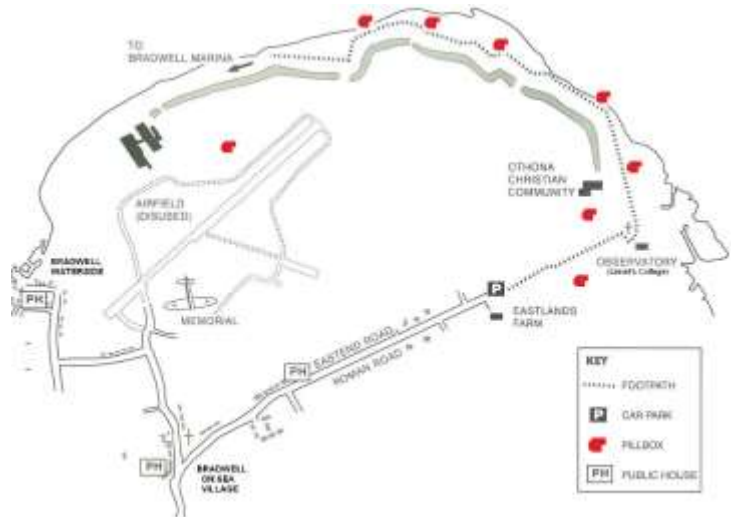
<b>Address:</b>	Bradwell-on-Sea, Weymarks Road, Bradwell Bay WWII Airfield, Station Headquarters
<b>Heritage Status:</b>	A non-designated heritage asset
<b>Description:</b> The Station HQ survives to the rear (south) of the Control Tower. It is a long single-storey building which appears to have been repurposed as a workshop.	
<b>Summary of heritage significance:</b> The Station HQ, along with the Control Tower and the four surviving Blister hangers are important to the history and heritage of Bradwell Bay airfield. Fred Nash has observed that “although they are all that remains of the 300+ buildings and structures that stood on the airfield they were, and are, of major significance in the hierarchy of airfield architecture” (Nash, 2010).	
<b>Potential degree of harm to significance:</b> It is proposed to demolish this building.	
<b>The need for further information:</b> The building should be subject to detailed research and investigation as soon as possible to achieve a full understanding of its significance.	
<b>Possible mitigation measures:</b> Efforts should be made to retain this building, if at all possible.  If demolition is unavoidable the building must be properly recorded. Paragraph 5.8.19 of NPS EN-1 states ‘A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given’.	





Photograph showing three of the four blister hangars, taken 20<sup>th</sup> January 2020.

<b>Address:</b>	Bradwell-on-Sea, Weymarks Road, Bradwell Bay WWII Airfield, Blister hangars
<b>Heritage Status:</b>	Non-designated heritage assets
<b>Description:</b> During WWII there were twelve Blister hangars dispersed across the airfield, of which only four survive. They are each approximately 90 feet in span x 60 feet in length. Three of the hangars have a corrugated asbestos roof, while the fourth has a corrugated iron roof.	
<b>Summary of heritage significance:</b> The four surviving Blister hangars, along with the Control Tower and the Station HQ are important to the history and heritage of Bradwell Bay airfield. The military historian Fred Nash has observed that “although they are all that remains of the 300+ buildings and structures that stood on the airfield they were, and are, of major significance in the hierarchy of airfield architecture” (Nash, 2010).	
<b>Potential degree of harm to significance:</b> These buildings would be demolished.	
<b>The need for further information:</b> The hangars should be subject to detailed research and investigation as soon as possible to achieve a full understanding of their significance.	
<b>Possible mitigation measures:</b> Efforts should be made to retain this building, if at all possible.  If demolition is unavoidable the building must be properly recorded. Paragraph 5.8.19 of NPS EN-1 states ‘A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given’.	



Left-hand photograph by Kevin Bruce of the pillbox at the gated entrance to the Othona Community, undated

Right-hand map showing approximate number and position of WWII pillboxes in Bradwell

<b>Address:</b>	Bradwell-on-Sea, various pillboxes
<b>Heritage Status:</b>	Non-designated heritage assets
<b>Description:</b> Several WWII concrete pillboxes on the sea wall and in the vicinity of the sea wall.	
<b>Summary of heritage significance:</b> These little structures are potent reminders of the threat of invasion posed during World War II.	
<b>Potential degree of harm to significance:</b> The pillbox highlighted on the map above which is closest to Bradwell A would be lost. The proposed 'uplift of land levels' between East Hall Farm and St Peter's Chapel makes it likely that the pillbox at the gated entrance to the Othona Community may also be lost (para. 3.5.9).	
<b>The need for further information:</b> The precise number and distribution of pillboxes in and around the development site needs to be ascertained. Which pillboxes will be lost as part of the construction work?	

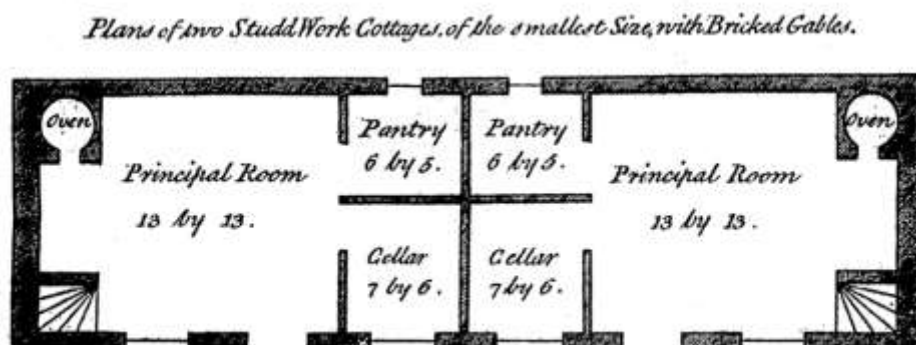
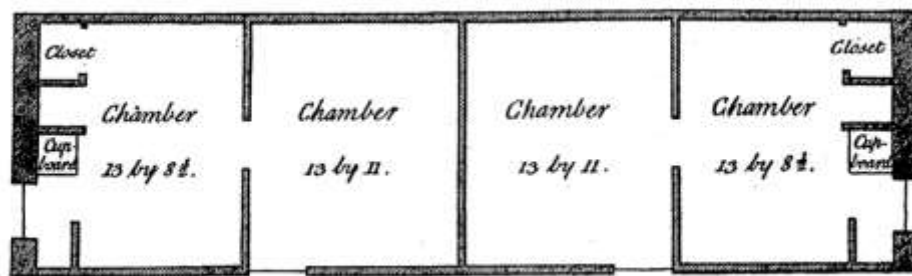
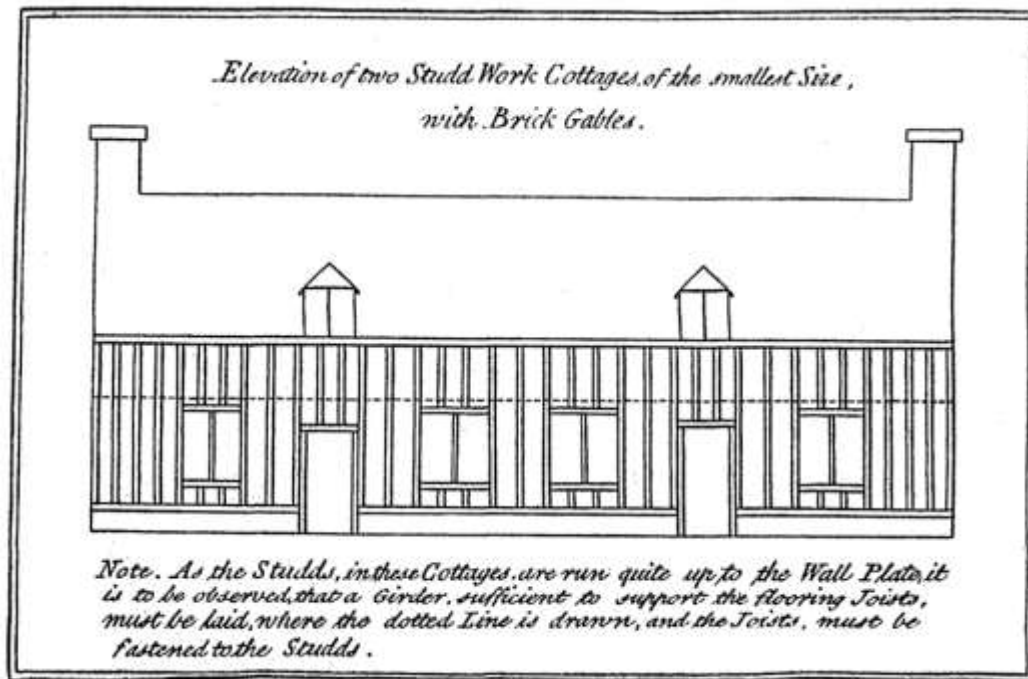




Left-hand photograph of Pear Tree Cottages, taken 20<sup>th</sup> January 2020 6161

Right-hand historic photograph, showing a man having his hair cut outside the right-hand cottage, reproduced with permission from Kevin Bruce

<b>Address:</b>	Bradwell-on-Sea, Weymarks Road, Pear Tree Cottages
<b>Heritage Status:</b>	A non-designated heritage asset
<b>Description:</b> This pair of late-Georgian cottages was built to house agricultural workers at Weymarks Farm. It was converted into a single dwelling in the 20 <sup>th</sup> century. The building is 1 ½ storeys in height with a clay-tiled gambrel roof. The roof sweeps down in 'cat-slide' form at the back over rear lean-tos.	
<b>Summary of heritage significance:</b> Apart from replacement windows, the cottages appear to be well preserved, but have not been the subject of an internal investigation. They are a good example of Georgian agricultural workers' cottages servicing an isolated farm. If it were not for the modern replacement windows, the cottages may have qualified for statutory listing.	
<b>Potential degree of harm to significance:</b> It is proposed to demolish this building.	
<b>The need for further information:</b> This building should be subject to detailed research and investigation as soon as possible to achieve a full understanding of its significance. Maldon District Council's Conservation and Heritage Specialist has particular expertise in relation to buildings of this type and could assist with the study and interpretation of the building (Howson, 2020). Careful, supervised exploratory opening-up inside the cottages, to expose original structure and features such as fireplaces would help gain a fuller understanding of the building's original design and later development.	
<b>Possible mitigation measures / heritage benefits:</b> If demolition is unavoidable, the building should be carefully recorded before and during demolition. Timber-framed structures are capable of being dismantled and re-erected more easily than any other type of construction. Consideration should be given to the re-erection of the cottages elsewhere, possible for use as educational facilities, to illustrate the living conditions of Georgian farm workers. There are many timber-framed buildings which have been salvaged and reused in this way to good effect at the Weald and Downland Museum and elsewhere.	



The above design for semi-detached cottages was published by Nathaniel Kent in 'Hints to Gentlemen of Landed Property' in 1775. They are of the same type as Pear Tree Cottages. Kent wrote that these cottages should contain 'a warm, comfortable, plain room for the inhabitants to eat their morsel in; an oven to bake their bread; a little receptacle for their small beer and provision, and two wholesome lodging apartments, one for the man and his wife, the other for his children'.



Left-hand photograph of Weymarks Farm, taken 20<sup>th</sup> January 2020

Right-hand photograph of Weymarks Farm in the 1970s, reproduced from the Kevin Bruce Archive

<b>Address:</b>	Bradwell-on-Sea, Weymarks Road, Weymarks Farm
<b>Heritage Status:</b>	None
<b>Description:</b> The earliest mention of Weymarks in documents is 1235 (O'Connor, 2006, p. 8). The present house is a timber-framed and rendered, two-storey farmhouse, with a slated roof. It would appear to date from the mid-19 <sup>th</sup> century. The house has been abandoned and is in a ruinous condition.	
<b>Summary of heritage significance:</b> The house has some moderate architectural interest as an example of a modest mid-19 <sup>th</sup> -century timber-framed farmhouse.	
<b>Potential degree of harm to significance:</b> The building will be demolished.	
<b>Possible mitigation measures:</b> It may be worthwhile recording the building during demolition.	



*Photograph of Thatch Cottage, taken 30<sup>th</sup> August 2012*

<b>Address:</b>	Latchingdon, Burnham Road, Thatch Cottage
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<b>Description:</b> Thatch Cottage was built in the 18th century on a slip of roadside waste. It is a timber-framed building of one storey with a habitable attic and a thatched roof. Parts of the timber-framed structure have been exposed externally, although originally the framing would have been covered. The house has been extended in the 20th century, in a complementary manner with a thatched roof.	
<b>Summary of heritage significance:</b> This is a good example of a humble labourer's dwelling retaining numerous period features of interest.	
<b>Potential degree of harm to significance:</b> The setting of Thatch Cottage could be affected by the proposed new road Route 2 which would run to the south of the listed building and merge with Burnham Road immediately to the east of it. The consequence of this is that the cottage would become flanked by two roads; the existing one to the north of it and a new one to the south.	
<b>The need for further information:</b> More information is needed on the precise alignment of Strategic Route 2 to assess the impact on this listed building.	



*Left-hand photograph of London Hayes from the north taken by the RCHM in 1921*

*Right-hand photograph of London Hayes from the south-west taken in 1986 by John McCann, listing inspector*

<b>Address:</b>	Latchingdon, Cold Norton Road, London Hayes
<b>Heritage Status:</b>	A grade II listed building, designated in 1953
<b>Description:</b> This timber-framed and rendered house consists of a two-storey gabled cross-wing facing south and an 18 <sup>th</sup> -century wing of one storey and attics. The two-storey cross-wing dates from the late-16 <sup>th</sup> century and incorporates high-status original features, such as carved doorways, blocked moulded-mullion windows and close studding. What survives now is thought to be one part of a much larger house. The house is in an isolated position and this author has not had the opportunity to visit it.	
<b>Summary of heritage significance:</b> The significance of this house would appear to derive primarily to its age and high-status original architectural features. Its isolated location may be considered to form an important aspect of the way the building and its significance is experienced.	
<b>Potential degree of harm to significance:</b> The setting of London Hayes could be affected by the proposed new road Strategic Route 2, Western Section, Option 2, which would appear to run very close to it. The noise and visual impact associated with a new road could detract from the listed building's tranquil rural setting.	
<b>The need for further information:</b> More information on the precise position of the proposed road is needed to assess the impact on the setting of the listed building.	
<b>Possible mitigation measures:</b> The alignment of the proposed road could be drawn away from London Hayes to help reduce its impact.	





*Left-hand photograph taken of the Huntsman and Hounds around 1920 (Kevin Bruce Archive)*



*Right-hand photograph taken 30<sup>th</sup> April 2015*

<b>Address:</b>	Latchingdon, Green Lane, The Huntsman and Hounds Public House
<b>Heritage Status:</b>	A grade II listed building, designated 18 <sup>th</sup> of November 1983
<b>Description:</b> A timber-framed and thatched pub dating from the 18 <sup>th</sup> century.	
<b>Summary of heritage significance:</b> A handsome example of Georgian vernacular architecture in a rural location.	
<b>Potential degree of harm to significance:</b> Green Lane forms part of the proposed Strategic Route 2 which, according to paragraph 4.7.57 of the Bradwell B consultation document, 'could be subject to targeted improvements and/or widening'. The noise and vibrations associated with a considerable increase in the level of HGV traffic, coupled with the loss of trees and hedges for road widening, could detract from the peaceful rural setting of this listed building. The level of harm would fall below the high threshold of 'substantial harm', and is likely to be limited bearing in mind that the pub is set back from the road. The degree of harm will depend upon the nature and design of the work.	
<b>The need for further information:</b> More detail is required on the design and detailing of the proposed roadworks in order to make an informed assessment. Specifically, which parts of Green Lane would be subject to widening, and what is the anticipated volume of HGV traffic?	





Photograph of Snoreham Hall from the east, taken 12<sup>th</sup> March 2020

<b>Address:</b>	Latchingdon, Rectory Lane, Snoreham Hall
<b>Heritage Status:</b>	A grade II listed building, designated in 1986
<b>Description:</b> A late-16 <sup>th</sup> -century timber-framed and rendered farmhouse.	
<b>Summary of heritage significance:</b> The significance of this listed building derives primarily for its 16th-century timber-framed structure which, according to the list description, survives large <i>in-tact</i> .	
<b>Potential degree of harm to significance:</b> The setting of Snoreham Hall could be affected by the proposed new road Route 2, Western Section Option 2, which would traverse the field to the south of it. The noise and visual impact associated with a new road could detract from the listed building's tranquil rural setting.	
<b>The need for further information:</b> More information on the precise position of the proposed road is needed to make an informed assessment of its likely impact on the setting of this listed building.	



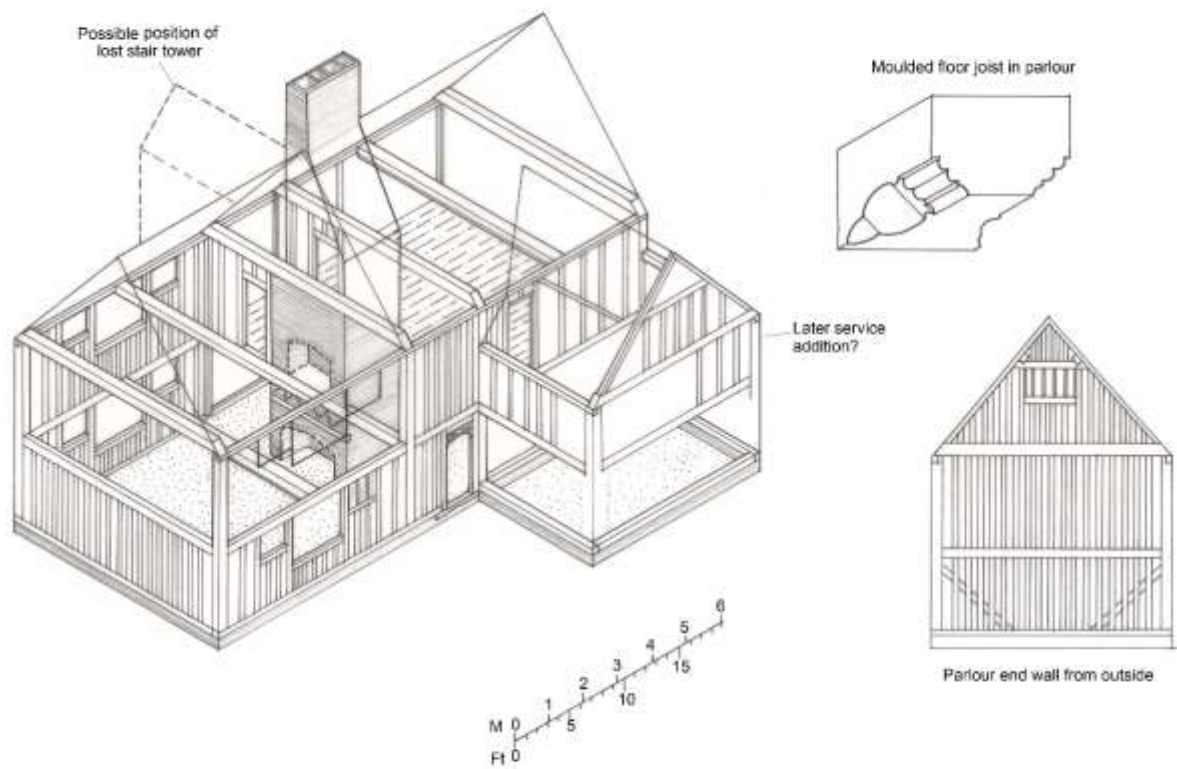
*Photograph of Gallants from the south, taken 16<sup>th</sup> November 2010*

<b>Address:</b>	St Lawrence, Southminster Road, Gallants
<b>Heritage Status:</b>	Grade II listed, designated 5 <sup>th</sup> of August 1986
<b>Description:</b> This is a mid-18th-century cottage. It is timber framed and weatherboarded with a half-hipped gambrel roof clad in clay tiles.	
<b>Summary of heritage significance:</b> Gallants is a well-preserved example of a vernacular Georgian cottage. It derives some significance from its tranquil rural setting beside a quiet country lane.	
<b>Potential degree of harm to significance:</b> The noise and visual impact associated with a new road could detract from the listed building's tranquil rural setting.	
<b>The need for further information:</b> More information on the precise position of the proposed road is needed to make an informed assessment of its likely impact on the setting of this listed building.	



*Photograph of Moynes taken 20<sup>th</sup> July 2013*

<b>Address:</b>	St Lawrence, Southminster Road, Moynes Farmhouse
<b>Heritage Status:</b>	Grade II listed, designated 10 <sup>th</sup> of January 1953
<b>Description:</b> This is a late-16th-century timber-framed and weatherboarded farmhouse occupying a moated site in an isolated location. It retains an original chimney stack and a high-status timber-framed structure, including a heavily moulded ceiling joist, moulded-mullion windows, an original carved doorway and carved panelling bearing the date 1595 which is plausibly the date of the present building	
<b>Summary of heritage significance:</b> The significance of this house would appear to derive primarily to its age and high-quality original architectural features. Its isolated and tranquil rural location, accessed via a private track, is an important aspect of the way the building and its significance is experienced.	
<b>Potential degree of harm to significance:</b> The setting of Moynes Farmhouse would potentially be affected by the proposed new road Route 2, Options 2 and 3. The noise and visual impact associated with a new road may detract from the listed building's tranquil rural setting.	
<b>The need for further information:</b> More information on the precise position of the proposed road is needed to assess the impact on the setting of the listed building.	



Interpretive drawings of Moyne by Tim Howson, 2013.



*Photograph of 'Barn approximately 50 metres east of Moynes Farmhouse' taken from the south-west on the 29<sup>th</sup> of June 2006 © IoE Mr Reginald Clark*

<b>Address:</b>	St Lawrence, Southminster Road, 'Barn approximately 50 metres east of Moynes Farmhouse'
<b>Heritage Status:</b>	Grade II listed, designated 20 <sup>th</sup> December 1983
<b>Description:</b> An early-19th-century timber-framed and weatherboarded threshing barn converted to residential use in the late-20th century.	
<b>Summary of heritage significance:</b> This threshing barn was most likely built in response to the embargoes imposed on the importation of grain during the period of hostilities from 1799 1815; a situation which caused grain prices to soar, countless grain-processing barns to be erected. It is a reasonable example of this type and age of barn. It shares group value with Moynes Farmhouse. It derives some significance from its landscape setting, within the farmland it was intended to serve.	
<b>Potential degree of harm to significance:</b> The setting of this listed building would potentially be affected by the proposed new road Route 2, Options 2 and 3. The noise and visual impact associated with a new road may detract from the listed building's tranquil rural setting.	
<b>The need for further information:</b> More information on the precise position of the proposed road is needed to assess the impact on the setting of the listed building.	





*Photograph of Lower Farmhouse taken from the north-west on the 12<sup>th</sup> March 2013*

<b>Address:</b>	Steeple, Maldon Road, Lower Farmhouse
<b>Heritage Status:</b>	Grade II listed, designated 5 <sup>th</sup> August 1986
<b>Description:</b> A pair of two-storey, timber-framed and weatherboarded cottages, probably dating from the 18th century. The cottages were converted into a single dwelling in the 20th century. According to the list description the building is 'virtually unaltered' internally.	
<b>Summary of heritage significance:</b> The significance of this listed building derives primarily from the fact it is a particularly well-preserved pair of cottages.	
<b>Potential degree of harm to significance:</b> The proposed road works will potentially result a fourway junction in the immediate vicinity of Lower Farmhouse between Strategic Route 1, the bypass to the south of Steeple, and Strategic Route 2 Eastern Option 1. The noise and visual impact associated with a new road has the potential to cause harm to the listed building's setting.	
<b>The need for further information:</b> More information on the precise positions of the proposed road is needed to assess the impact on the setting of the listed building.	





*Photograph of Thatched Cottage taken 13<sup>th</sup> November 2001*

<b>Address:</b>	Steeple, The Street, Thatched Cottage
<b>Heritage Status:</b>	Grade II listed, designated 5 <sup>th</sup> August 1986
<b>Description:</b> This single-storey, timber-framed and rendered, thatched cottage, was built as a pair of houses in the 18th or early-19th century on a slip of roadside waste, and was converted to a single dwelling in the 20th century.	
<b>Summary of heritage significance:</b> This is a well preserved and picturesque roadside cottage.	
<b>Potential degree of harm to significance:</b> Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume or HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced.	



*Photograph of Church of St Lawrence and All Saints, taken 24<sup>th</sup> October 2010*

<b>Address:</b>	Steeple, The Street, Church of St Lawrence and All Saints
<b>Heritage Status:</b>	Grade II listed, designated 5 <sup>th</sup> August 1986
<b>Description:</b> a parish church built in 1884 to designs by F. Chancellor, re-using some materials from demolished old church.	
<b>Summary of heritage significance:</b> A fine Victorian parish church and a highly attractive feature in the street-scene.	
<b>Potential degree of harm to significance:</b> Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume or HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced.	



*Left-hand historic photograph from the Kevin Bruce Archive*

*Right-hand photograph of Anchor Cottage, Sun Cottage and The Bakery, taken 6<sup>th</sup> July 2011*

<b>Address:</b>	Steeple, The Street, Anchor Cottage, Sun Cottage and The Bakery
<b>Heritage Status:</b>	Grade II listed, designated 5 <sup>th</sup> August 1986
<b>Description:</b> Georgian cottages developed on roadside strips that were waste of the manor	
<b>Summary of heritage significance:</b> Fine examples of Georgian vernacular architecture making a very positive contribution to the character of the streetscene	
<b>Potential degree of harm to significance:</b> Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume of HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced.	



*Ash Cottage in August 2009, image from Google Streetview*

<b>Address:</b>	Steeple, The Street, Ash Cottage
<b>Heritage Status:</b>	Grade II listed, designated 5 <sup>th</sup> August 1986
<b>Description:</b> A Victorian timber-framed and weatherboarded cottage	
<b>Summary of heritage significance:</b> An attractive Victorian weatherboarded cottage and a positive feature in the street-scene.	
<b>Potential degree of harm to significance:</b> Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume of HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced.	





*Photograph of Pump House and Adjoining Cottages, taken 9<sup>th</sup> of July 2010*

<b>Address:</b>	Steeple, The Street, Pump House and Adjoining Cottages
<b>Heritage Status:</b>	Grade II listed, designated 5 <sup>th</sup> August 1986
<b>Description:</b> A Victorian row of three timber framed and weatherboarded houses; one of two storeys and the other two single-storeyed.	
<b>Summary of heritage significance:</b> An attractive example of a row of Victorian weatherboarded cottages and a positive feature in the street-scene	
<b>Potential degree of harm to significance:</b> Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume of HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced.	



*Photograph of Steeple Stores featured on the Rightmove website in 2017*

<b>Address:</b>	Steeple, The Street, Steeple Stores
<b>Heritage Status:</b>	Grade II listed, designated 5 <sup>th</sup> August 1986
<b>Description:</b> A row of three Georgian timber-framed and weatherboarded 1 ½ storey cottages with a clay-tiled gambrel roof.	
<b>Summary of heritage significance:</b> A good example of Georgian vernacular architecture and a positive feature in the street-scene.	
<b>Potential degree of harm to significance:</b> Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume of HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced.	





*Rosedene and other nearby grade II listed houses, image from Google Streetview March 2009*

<b>Address:</b>	Steeple, The Street, Rosedene, Mizzens Cottage, The Cottage, and Hipseys Cottage
<b>Heritage Status:</b>	All individually grade II listed, designated 5th August 1986
<b>Description:</b> These are all cottages developed close to the edge of the road between the mid-18th century to the mid-19th century.	
<b>Summary of heritage significance:</b> These are a fine group of vernacular cottages	
<b>Potential degree of harm to significance:</b> Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume or HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced. The road is very narrow and there is no capacity for road widening because there are listed buildings either side	



*Photograph of High House Farmhouse taken from the east on the 18<sup>th</sup> of April 2018*

<b>Address:</b>	Tillingham, Southminster Road, High House Farmhouse
<b>Heritage Status:</b>	Grade II listed, designated 5 <sup>th</sup> of August 1986
<b>Description:</b> An 18th century 1 ½ storey brick house with a clay-tiled gambrel roof.	
<b>Summary of heritage significance:</b> A particularly handsome example of a vernacular Georgian house. The listed house shares 'group value' with the three separately listed historic agricultural buildings to the south of it. The isolated location of the house, surrounded by large arable fields, is an important aspect of its setting and the way it is experienced.	
<b>Potential degree of harm to significance:</b> The setting of High House Farmhouse would potentially be affected by the proposed new road Route 2, Option 3, which would pass through fields to the west of it. The new road would be prominent in views of and from this listed building.	
<b>The need for further information:</b> More information on the precise route of the proposed road is need to assess its impact on the setting of this listed building.	



*Photograph taken 18<sup>th</sup> of April 2020 looking through western first-floor window of High House Farmhouse towards the proposed new road*

## 4. Conclusions and recommendations

- 4.1 This Built-Heritage Impact Assessment has identified over fifty historic buildings, along with the Bradwell-on-Sea conservation area, potentially affected by the proposals for a new power station at Bradwell-on-Sea. No attempt has been made to assess which historic buildings might be affected by the planned park-and-ride and freight-management facilities since the 'search areas' indicated in the consultation document are so wide, containing very many listed buildings.
- 4.2 The information contained in the stage one consultation document is quite limited in certain respects, meaning that the true impact on many of the historic building is difficult to gauge. As more information emerges, it will be possible to make more meaningful assessments. Clarification on the precise position of new roads and road-widening measures, for example, would help enable a clearer understanding of the potential impact on many of the historic buildings in this report. Throughout this report recommendations have been made for the preparation of photographic mock-ups of key views, which may prove a useful tool in assessing the impact on particular buildings.
- 4.3 There are several historic buildings on the development site which would be demolished; namely Pear Tree Cottages (p.61), The Control Tower (p.56), the Station Headquarters (p.58), the four blister hangars (59) and probably two pillboxes (60). Although not nationally listed, these structures qualify as non-designated heritage assets because of their local architectural and historic interest. These buildings should be subject to detailed research and investigation as soon as possible to achieve a full understanding of their significance.
- 4.4 There is considerable cause for concern about the impact of the development upon the setting of St Peter's Chapel, arguably the most important historic building in the Maldon District, and certainly the oldest by many centuries (p.21). The proposed power station will inevitably be much more prominently visible from St Peter's Chapel than Bradwell A because of its closer proximity to the grade I listed building and its much greater scale. The proposal to store millions of cubic metres of soil / spoil on land close to the chapel during the construction of the power station, and to then use that soil for ground remodelling, could radically alter the chapel's landscape setting. It is important to remember that this soil storage and ground remodelling would take place on land beyond the south-eastern boundary of the site originally allocated for a new nuclear power station. The map of Bradwell supporting the strategic site assessment – featured on p. 246 of National Policy Statement for Nuclear Power Generation (EN-6) – shows the allocated land not extending south of

Weymarks River or Curds Grove. In summarising the conclusions of the 'Appraisal of Sustainability' concerning the potential 'cultural heritage' impact of a power station at this location, it was stated that 'the effects on the setting of Othona Roman fort and St. Peter's Chapel would be of exceptional significance if development occurs on the eastern side of the site' (para. C.2.92, Annex C to NPS (EN-6)). The current proposal for substantial earthworks beyond the south-eastern boundary of the original site allocation, so close to the scheduled shore fort and grade I listed Saxon chapel, would seem to conflict with the conclusions of the strategic site assessment.

- 4.5 The power station and the suggested earthworks are also expected to have a major impact upon the group of four grade II listed buildings at East Hall Farm (p.24). The introduction of a road through the garden of Bluehouse Cottage would be severely detrimental to the setting of this grade II listed building, and the position or need for this road should be re-evaluated (p.43).
- 4.6 The proposed workers accommodation could have a dramatic effect upon the settings of grade II listed building to the west of the site; particularly Timbercot (p.17), The Old Cottage (p.54), Trusses (p.49) and Truscott (p.47). It may also impact the setting of Peakes (p.19) and Woodyards (p.52), which are non-designated heritage assets. While the harm caused by caravans and accommodation blocks would be temporary, limited to the duration of the construction phase, this is estimated to last between 9 and 12 years which is a significant period of time.
- 4.7 Many of the historic houses identified in this report are built close to the edge of the road, reflecting their development on narrow roadside strips of land. Their close proximity to the road means they are vulnerable to the noise and vibration that would be generated by the increased volume of HGV traffic, something that would affect the way these buildings are experienced and appreciated. In some instances, it may be possible to realign the road away from the front of the listed building, but that is not practical in every case. Along certain parts of The Street, Steeple, there are listed cottages directly opposite one another, either side of a narrow road, making any road widening impossible (p.79). A bypass around Steeple would therefore be vital to avoid unacceptable harm to several listed buildings.
- 4.9 One of the stated aims of the Bradwell B Project is to '[a]void significant adverse environmental effects from the Bradwell B Project where practicable, and where these are unavoidable, work to mitigate or compensate them. We are also looking for opportunities to provide enhancement where possible'. It is stated that '[w]e will also consider measures to enhance the setting of the RAF

Bradwell Bay War Memorial to deliver a heritage legacy benefit from the Project' (paragraph 3.10.12). The Bradwell B project will inevitably result in notable loss of and harm to local heritage, in conflict with the requirements of section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, section 16 of the NPPF, section 5.8 of the NPS (EN-1) and policy D3 of the Maldon Local Development Plan. How might this harm be compensated, and what might the 'heritage legacy benefit', referred to in the consultation document, actually consist of (besides some landscaping around the 1990s war memorial)?

- 4.10 Two of the buildings facing demolition – The Control Tower (p.56) and Pear Tree Cottages (p.61) – are of particular architectural and historic interest and might merit being carefully dismantled and re-erected, possibly in the vicinity of the modern war memorial. A fund could be established for the repair / enhancement of listed buildings in and around Bradwell-on-Sea. Dilapidated and redundant listed buildings on the Maldon District Heritage at Risk Register could be targeted for funding to secure their repair and sensitive reuse - [https://www.maldon.gov.uk/info/20049/heritage\\_and\\_conservation/9673/heritage\\_at\\_risk\\_register](https://www.maldon.gov.uk/info/20049/heritage_and_conservation/9673/heritage_at_risk_register) .
- 4.11 No discussions were held with the Local Planning Authority in relation to listing buildings or conservation areas in advance of the Stage 1 Consultation. The developer should engage with Maldon District Council alongside Essex County Council and Historic England at an early stage to ensure that the historic environment is fully assessed as part of a wider baseline and impact-assessment prior to the formation of firm proposals for the main site and associated development.



## 5. Bibliography

- Bettley, J. and Pevsner, N.: *The Buildings of England: Essex* (Yale, 2007)
- Brown, H.: *History of Bradwell-on-Sea, Essex* (1929)
- Bruce, K.: *Bradwell Power Station: 40 years of power* (1997)
- Colchester, P.: *Bradwell-on-Sea Conservation Area Review and Character Appraisal* (ECC & MDC, 2006)
- Essex Record Office (ERO)
- Francis, P.: *Control Development of the Control Tower on RAF Stations in the United Kingdom* (20th Century Military Archaeology, 1993)
- Howson, T.: 'A pair of late-medieval two-cell house in an Essex village, and a regional context for the building type', *Vernacular Architecture*, Vol. 45 (2014) 67–80
- Howson, T.: 'The King's Head, Bradwell-on-Sea: The medieval cross-wing and its restoration', *Transactions of the Essex Society for Archaeology and History*, Vol. 6, 2016, 249-253
- Howson, T.: 'Georgian cottages in the Maldon District of Essex', *Eavesdropper*, No. 61, Spring 2020, 8-13
- Nash, F.: *Survey of World War Two Defences in the District of Maldon* (ECC & MDC, 2010)
- O'Connor, T.: *Bradwell-on-Sea Historic Settlement Assessment* (2006)
- Robinson, J. M.: "Quintessence of Georgian elegance: Bradwell Lodge, Essex", *Country Life*, September 16, 2009, pp. 82-87

This page is intentionally left blank

## APPENDIX 2: BRB Stage 1 Consultation Main Document Questions

	<b>Main Development Site</b>
	<i>We believe that these are the key environmental considerations that should be taken into account as we develop our proposals for the Bradwell B Project but we would like to know if you agree with this interpretation and if there are any other matters we should consider. [Page 43]</i>
	Response:
	The main environmental context of the main site listed in paragraph 3.2.1 would benefit from explicitly including a reference to local residents and communities rather than incorporating comment under other headings. Broadly however the headings highlight the key environmental considerations that need to inform the contextual analysis of the site. At this early stage of consultation there is an absence of evidence and supporting information to enable the Councils to provide detailed comment. It is acknowledged that BRB will be undertaking detailed assessments in due course and a formal Environmental Assessment will be prepared. The Councils will welcome engagement with BRB as detailed baseline assessments for the main site are prepared.
	<i>Safety, efficiency and other technical considerations will inform the preferred proposal for key elements of the main development site masterplan and therefore there is limited ability for these choices to be influenced by consultation. However, we are interested in your views on our initial design process and the emerging design principles that we will use to determine the location and design of these components. [Page 51]</i>
	Response:
	The Stage 1 Consultation provides inadequate information for the Councils to provide comment on BRB's initial design process. It is considered that BRB's emerging design proposals need further refinement in both how the design principles are address together with a method establishing how these will be measured and improved through development. The Councils ask that the design approach be informed by the National Infrastructure Commission design principles.
	<i>We are interested in your views on the information that has informed our understanding of the main development site and the local area, which is shaping our current thinking. [Page 65]</i>
	Response:
	At this early stage of consultation there is an absence of evidence and supporting information to enable the Councils to provide detailed comment. It is acknowledged that BRB will be undertaking detailed assessments in due course and this will provide a firmer basis for design decisions. The Councils will welcome engagement with BRB as detailed baseline assessments for the main site are prepared.
	<i>We welcome your feedback on the design principles described above and if there are any other matters that we should consider. [Page 75]</i>
	Response:
	It is considered that BRB's emerging design proposals need further refinement in both how the design principles are address together with a method establishing how these will be measured and improved through development. The Councils ask that the design approach be informed by the National Infrastructure Commission design principles.

<b>2</b>	<b>Transport</b>
	<i>We welcome your feedback on the six search areas described above and invite suggestions for sites within or around them that meet the functional and operational requirements for the park and ride facilities. [Page 103]</i>
	Response:
	<p>The Councils consider a well-developed transport strategy covering all aspects of the movement of both people and goods to be essential for the management of the project. Once the strategy has been developed it can provide the framework necessary for further assessment of more specific transport options and define modelling requirements necessary to inform the selection of suitably located P&amp;R sites including design, capacity and constraints on the highway network.</p> <p>Moving forward, there will be a need to consider how bus services will serve the Bradwell B site from the surrounding settlements as well as from Park and Ride sites, involving early approaches to bus companies who are best situated to provide these new services. Services should be up and running for the construction phase to transport construction workers from accommodation to the construction site. Bus stop locations will need to be identified on the basis of need and this could be part of the development of the Strategic Route development work.</p> <p>The six broad search areas are largely located beyond defined settlements and are subject to policies of development restraint. The planning justification for the development would therefore need to be evidence based and at the Stage 1 Consultation does not provide adequate information for detailed comments to be made at this stage.</p> <p>Detailed assessments of potential sites' environmental constraints will also need to inform the selection of sites. The Councils will welcome engagement with BRB as detailed baseline assessments for the Associated Development sites are prepared.</p>
	<i>We would welcome your views on whether we have identified the right search areas for Freight Management Facilities and invite suggestions for sites within or around them that meet the characteristics described above. [Page 107]</i>
	Response:
	<p>The Councils consider a well-developed transport strategy covering all aspects of the movement of both people and goods to be essential for the management of the project. Once the strategy has been developed it can provide the framework necessary for further assessment of more specific transport options and define modelling requirements necessary to inform the selection of suitably located freight management facilities including design, capacity and constraints on the highway network.</p> <p>The three broad search areas for Freight Management Facilities are also located beyond defined settlements and are subject to policies of development restraint. The planning justification for the development would therefore need to be evidence based and at the Stage 1 Consultation does not provide adequate information for detailed comments to be made at this stage.</p> <p>Detailed assessments of sites' environmental constraints will also need to inform the selection of sites. The Councils will welcome engagement with BRB as detailed baseline assessments for the Associated Development sites are prepared.</p>

	<i>Do you have views on the proposed options for intervention along strategic route 1 in the western section described above. In particular do you have any views on the option to bypass Latchingdon as an alternative to upgrading/improving the existing road through the village? [Page 115]</i>
	<i>Do you have views on the proposed options for intervention along Strategic Route 1 in the eastern section described above. In particular do you have any views on the option to bypass Mayland and Steeple as an alternative to upgrading/improving the existing road through the villages, and in the case of Steeple potentially delivering localised highway realignment? [Page 116]</i>
	<i>Do you have any views on the proposed options for intervention along Strategic Route 1 in the Bradwell section described above? [Page 118]</i>
	<i>Do you have any views on the proposed options for intervention along Strategic Route 2 in the western section described above? In particular we would welcome your views on the options presented as alternatives to use of the existing improved/ upgraded road? [Page 119]</i>
	<i>Do you have any views on the proposed options for intervention along Strategic Route 2 in the eastern section described above? In particular we would welcome your views comparing the three off-line new road options (Eastern Section Options 1-3) that connect back into Route 1 at Maldon Road or ways in which they could be improved. [Page 122]</i>
	Response:
	<p>The Stage 1 Consultation does not provide sufficient information for detailed comments to be made at this stage.</p> <p>The Councils consider a well-developed transport strategy covering all aspects of the movement of both people and goods to be essential for the management of the project. Once the strategy has been developed it can provide the framework necessary for further assessment of more specific transport options including highway traffic modelling to inform the route selection and suitability of highway proposals. The potential advantages and disadvantages of bypasses and other highway interventions will need to be assessed in detail once sufficient information is available. Whilst the well-developed integrated transport strategy must come first, MDC supports in principle highway proposals based upon the Strategic Route 1 (Blue route) within the Maldon District, including consideration of the proposed bypasses.</p> <p>Once the Strategic Route(s) have been identified, the opportunity to develop facilities for sustainable modes of transport must be taken in order that the routes are as attractive to alternative transport, particularly to cycles and bus use. Any bus stops must be fully accessible and provide in some cases interchange facilities where cyclists in particular can leave their cycles securely parked and use the buses serving that particular stop. There must be the facility somewhere on these routes to provide electric vehicle charging points to give potential users the confidence to use electric vehicles.</p> <p>The Councils will welcome discussions going forward to ensure a beneficial legacy for the area.</p>
	<b>Jobs and People</b>
	<i>Do you have any views on our selection principles for Project- provided accommodation? Is there anything else that you think should be considered? [Page 132]</i>
	Response:
	The environmental considerations identified for the comparison of the sites proposals are only broadly described and will need to be supported by detailed evidence and assessment. The magnitude and significance of any constraint could then be assessed to inform the relative

	advantages and disadvantages of the shortlisted sites. The Councils will welcome detailed discussions on the location of project provided accommodation going forward.
	<i>We would welcome your views on whether we have identified the right search area and potential sites for a temporary workforce campus or whether improvements to these could be made. [Page 134]</i>
	Response:
	The functional benefits of having a temporary workforce campus close to the construction site is recognised but at this early stage there has not been sufficient environmental information provided to enable detailed comment on the suitability of the search areas identified. The Councils will welcome detailed discussions going forward.
	<i>We would welcome your views on the two scenarios and the zoning diagram that have been presented and whether improvements to these arrangements could be made. [Page 137]</i>
	Response:
	The Councils consider that further environmental information is required to ascertain the suitability of the sites before detailed comments are provided on the two scenarios presented in the Stage 1 Consultation. The Councils will welcome detailed discussions going forward.





## **REPORT of DIRECTOR OF PLANNING AND REGULATORY SERVICES**

---

to  
**COUNCIL**  
**23 JUNE 2020**

### **APPROVAL TO ADOPT THE LISTS OF LOCAL HERITAGE ASSETS FOR BRADWELL-ON-SEA AND TILLINGHAM**

#### **1. PURPOSE OF THE REPORT**

- 1.1 This report seeks the Strategy and Resources Committee's approval to adopt the Lists of Local Heritage Assets for Bradwell-on-Sea and Tillingham (**APPENDIX 1**).

#### **2. RECOMMENDATION**

That the Lists of Local Heritage Assets for Bradwell-on-Sea and Tillingham (**APPENDIX 1**) are approved for formal adoption.

#### **3. SUMMARY OF KEY ISSUES**

- 3.1 The Maldon District contains over a thousand nationally listed buildings, which are protected by law. In addition to this there are many historic buildings which, although they may not meet the criteria for national listing, possess local value because of their architectural and historic interest. The National Planning Policy Framework (NPPF) and Policy D3 of the Maldon Local Development Plan (LDP) refer to such buildings as 'non-designated heritage assets'. These assets are defined in Planning Practice Guidance as those 'identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets'. Planning Practice Guidance encourages Local Planning Authorities to identify 'non-designated heritage assets' against consistent criteria and notes that adding them to a 'local list' is a positive way of improving the 'predictability of the potential for sustainable development'.
- 3.2 While addition of a building to a local list will not of itself result in additional planning controls, it does mean that the building's conservation as a heritage asset becomes a material consideration when determining the outcome of a planning application. Paragraph 197 of the NPPF states:

*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*

- 3.3 Policy D3 of the Maldon LDP requires that applications affecting non-designated heritage assets both 1) preserve or enhance the asset's special character, appearance, setting and special features, and 2) be supported by a heritage statement which describes the asset's significance.
- 3.4 Individual lists are currently being drafted for each parish by the Council's Conservation and Heritage Specialist, with assistance from local historians. Due to the considerable amount of work involved, a phased approach is planned for the survey of the whole District.
- 3.5 Draft Lists for Bradwell-on-Sea and Tillingham were approved for public consultation on 20 February 2020. The Bradwell-on-Sea list includes 20 entries and the Tillingham list includes 16 entries. Copies of the document were published on the Council's website and sent to the relevant Ward Members, every affected resident, Bradwell-on-Sea Parish Council and Tillingham Village Council. A table summarising the consultation responses is reproduced as **APPENDIX 2**. Only 3 consultation responses were received during the consultation period, each in response to the Bradwell-on-Sea list.
- 3.6 The owners of The Gatehouse, Bacons Chase, Bradwell-on-Sea, submitted that their house should not be included on the local list because an outstanding planning permission is currently being implemented to alter the original roof. Bearing in mind the original roof structure is being replaced, the original chimney has been demolished, the windows are modern and the original front doorway has been blocked, this building is now considered insufficiently well-preserved to meet selection criteria. The Local List for Bradwell-on-Sea in **APPENDIX 1** now excludes The Gatehouse.
- 3.7 Bradwell-on-Sea Parish Council welcomed the draft list and suggested several other buildings for inclusion. Most of the additional buildings fall short of the selection criteria, and two are listed buildings and therefore not eligible. However, Maldon District Council's Conservation and Heritage Specialist agrees that the pillboxes along the sea wall represent an important group and a potent visible reminder of the threat of invasion posed during World War II. The Local List for Bradwell-on-Sea in **APPENDIX 1** now includes the group of coast pillboxes as a single entry.

#### **4. CONCLUSION**

- 4.1 Maldon District Council has a commitment to protect and improve the environment of the District which includes built heritage. Policy D3 of the Maldon District Local Development Plan sets out this Council's objective of 'safeguarding, enhancing and promoting the historic environment'. Up-to-date Parish Lists of Local Heritage Assets, which highlight and promote locally important historic buildings in each parish, will be a useful tool in meeting these objectives.

## 5. IMPACT ON STRAGIC THEMES

- 5.1 The recommendations of this report will support the Strategic Theme for Place by encouraging the protection and improvement of built heritage, which is a valuable component of the local environment.

## 6. IMPLICATIONS

- (i) **Impact on Customers** – The goal of the Lists of Local Heritage Assets is to highlight and promote the significance of local heritage, reinforcing a sense of local identity and distinctiveness in the historic environment. Engagement with local residents and interest groups through public consultation, and the opportunity to submit further nominations, enables locals to help identify and celebrate aspects of local heritage. Proactive identification of the buildings which should be regarded as ‘non-designated heritage assets’ will allow greater certainty of the issues to be considered as part of the planning process.
- (ii) **Impact on Equalities** – None.
- (iii) **Impact on Risk** – The Parish Lists of Local Heritage Assets will identify instances where heritage significance and conservation should be a material consideration in the planning process, thereby reducing the risk that local heritage assets are harmed or lost unnecessarily or without justification.
- (iv) **Impact on Resources (financial)** – The Lists of Local Heritage Assets will be maintained within existing budgets.
- (v) **Impact on Resources (human)** – The Lists of Local Heritage Assets will be maintained within existing resources.
- (vi) **Impact on the Environment** – Positive, due to the way in which the Lists will encourage the conservation of locally valuable historic buildings.
- (vii) **Impact on Strengthening Communities** – Positive, due to the way in which the local lists encourage pride in local built heritage and distinctiveness.

Background Papers: None.

Enquiries to: Tim Howson, Conservation Officer (Tel: 01621 875725).

This page is intentionally left blank

# **Draft List of Local Heritage Assets in**

## **Bradwell-on-Sea**



*Artist impression by Alan Sorrell of Bradwell Bay Airfield during World War II, entitled 'New arrivals report at the Guard Room' reproduced with permission from the Imperial War Museum (image number: Art.IWM ART LD 5404)*

June 2020

Planning Policy

01621 854 477

[planning@maldon.gov.uk](mailto:planning@maldon.gov.uk)



## Introduction

The Maldon District contains over a thousand nationally listed buildings, which are protected by law. It has also been recognised that there are many historic buildings which, although they may not meet the criteria for national listing, possess local value because of their architectural and historic interest. The District Council is developing Parish Lists of Local Heritage Assets to identify and celebrate these locally important buildings. Unlike nationally listed buildings, inclusion on a Local List does not of itself bring any additional consent requirements over and above the existing requirement for planning permission, but it does mean that a building's heritage significance will be a material consideration in the planning process. The following criteria have been developed to help identify those buildings which merit inclusion on the Register of Local Heritage Assets. As with the national list the word building can apply to any type of permanent structure.

### 1. Age and integrity

- a. All buildings which retain a significant degree of pre-1840 architectural character in terms of form, materials and stylistic detailing or for which there is realistic potential for restoration of that character.
- b. 1840-1880 buildings that are reasonably complete and of good local architectural and historic interest
- c. 1880-1945 buildings that are substantially complete and of very good local architectural and historic interest
- d. Post 1945 buildings that are wholly complete and of an outstanding level of local architectural and historic interest
- e. Buildings which are valued as rare examples of a particular type

### 2. Historic Interest

- a. Historic association with important national or local historical figures, architects, events or industry
- b. Social or communal importance: relating to structures perceived as a source of local identity and cohesion. (This might include important commemorative structures such as war memorials or places of worship).

### 3. Architectural Interest

- a. Important examples of a past type or style
- b. Quality materials, detailing and workmanship
- c. Buildings which display technological innovation
- d. Group Value: Buildings whose local importance derives from their visual relationship with other important buildings in a village or town setting or where they make an important contribution to an historic skyline.
- e. Buildings which make a positive contribution to an attractive rural setting
- f. Sustainability: Buildings which can be easily adapted for continuing use due to robust construction or quality materials

This document lists the buildings in the parish of Bradwell-on-Sea which have been identified as meeting the above criteria.





### **Down Hall Beach, Fire Box**

*Photograph reproduced from the Kevin Bruce Collection*

### **Description**

This small red-painted fire box was installed during WWII by the RAF Bradwell Bay. It was one of four fire boxes originally placed in the village, the others being outside the village hostelrys. The only two boxes which now survive are this one and the one outside the King's Head.

### **Significance**

This fire box is an unusual survivor connected with war time activities in the village, probably positioned to deal with potential fires created by enemy attacks on the airfield.



**East End Road, St Cedd's Church of England Voluntary Aided Primary School, and School House West**

*Photograph taken May 2014*

**Description**

This school was rebuilt in 1861 along with School House West (Brown, 1929). It is built of red brick laid to English bond with yellow stock brick used for banding and to enliven brick arched heads. The buildings present a complex arrangement of gabled forms punctuated by strong chimney stacks. The roofs are steeply pitched, clad in clay peg tiles and have exposed rafter feet. The 18<sup>th</sup>-century former School Master's House at the eastern end of the complex is grade II listed and not included on the local list. The later extensions to the school, dating from the 20<sup>th</sup> and 21<sup>st</sup> centuries are also excluded from the local listing.

**Significance**

This is a reasonably well-preserved example of a Victorian village school. It has a pleasingly irregular composition, deploying high-quality materials and detailing. It makes a very positive contribution to the street-scene and the character of the Bradwell-on-Sea Conservation Area. Founded in the 18<sup>th</sup> century through the bequest of the Rev. Dr Buckeridge, the school is of local historical, social and communal importance.



### **High Street, King's Head**

*Photograph taken May 2018*

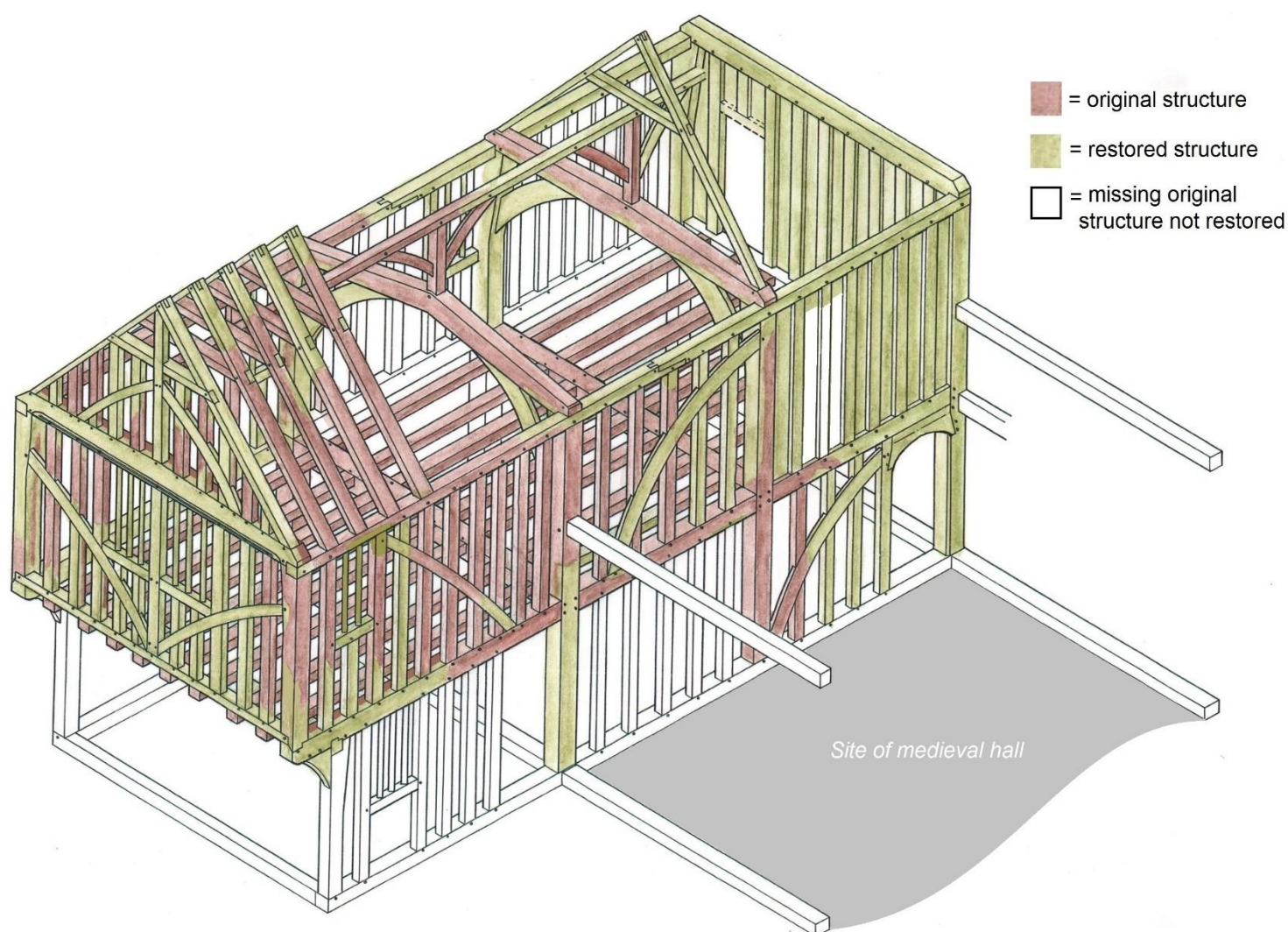
#### **Description**

This building has been used as a public house since at least the late-17<sup>th</sup> century, when it was known as 'The Three Connys'. At the left-hand (southern) end is a timber-framed cross-wing dating from c.1500. The remainder of the building is mostly Victorian in date and constructed primarily of red brick. The cross-wing is of three bays and has a crown-post roof structure and a front jetty. Study of the cross-wing following a fire in 2014 revealed several unusual features including areas of plank infill and evidence for a first-floor fixed bench (Howson, 2016). An early-17<sup>th</sup> century chimney stack and fireplaces survive on the southern flank of the cross-wing. The building's owner, Richard King, undertook a meticulous restoration of the medieval wing after the fire, which won the Maldon Conservation and Design Awards in 2017.



## Significance

Although much of the original structure was destroyed in the 2014 fire, the timber-framed range at the King's Head is a remarkably faithful and evocative restoration of a medieval cross-wing. Both the medieval and Victorian parts of the building display high quality materials, detailing and workmanship. The building is also of considerable communal value, as a long-serving village pub.



*Isometric reconstruction by Tim Howson of the medieval cross-wing at the King's Head, illustrating the restoration completed in 2017*



*Interior of the grand chamber at the King's Head,  
photograph taken May 2017*





**High Street, Red Fire Box adjacent King's Head**

*Photograph taken May 2018*

### **Description**

This small red-painted fire box was installed during WWII by the RAF Bradwell Bay. It was one of four in the village placed outside the three village hostelrys with a fourth which survives at Down Hall beach.

### **Significance**

An unusual survivor connected with war time activities in the village, probably positioned to deal with potential fires created by enemy attacks on the airfield.





### **High Street, Village Pump**

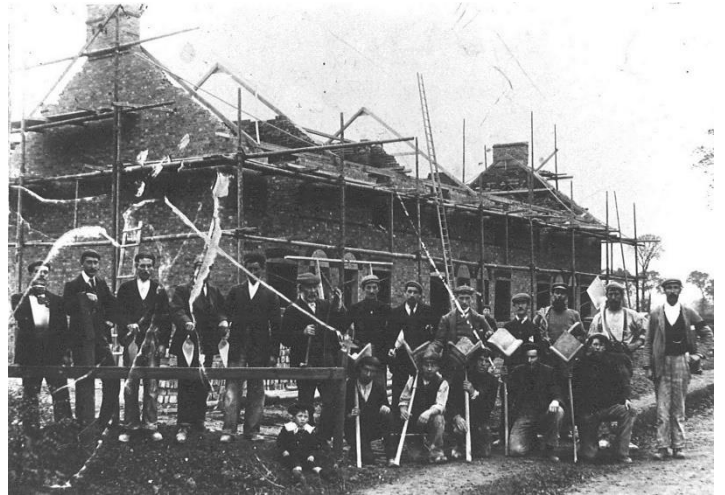
*Photograph taken March 2020*

#### **Description**

A water pump was probably first built in this position around 1880. It was rebuilt in 1974. Behind the pump is a distinctive ramped picket fence with original cobble floor surround.

#### **Significance**

Although it has been rebuilt, the pump remains a valuable survival of the important late-Victorian drive to ensure a healthy public water supply for the village. Ill health was a major problem in marshland communities, often caused by water-borne diseases.



### **Maldon Road, Many Weathers Houses**

*Left-hand photograph taken 20 January 2020*

*Right-hand photograph taken during construction in 1904/5, reproduced with permission from Kevin Bruce*

### **Description**

This row of six cottages, completed in March or April 1905, were the first council houses erected in Essex. The Maldon Rural District Council was the third rural authority in the country to build council houses. The row is constructed mainly of yellow stock brick and has a pitched slate roof. The front ground-floor windows and doors have arched heads of red brick, and a single course of red brick aligns with the front first-floor window cills.

### **Significance**

While these cottages are constructed of good quality materials, their architectural interest is limited due to their plain design and relative youth. All the front windows and doors are modern replacements. However, the cottages possess historic and social interest as one of the first developments of council housing to be built in England.





### **Maldon Road, Orplands**

*Photograph taken March 2012*

#### **Description**

Orplands is known to have existed since the 15<sup>th</sup> century, but the farmhouse was rebuilt in the Victorian period. It is constructed of yellow brick and roofed with clay tiles. The front range is two-storeys in height with a gabled cross-wing at the left-hand (western) end. The bargeboards have a pierced foliate decoration. The front and side doorways are framed by elaborate arched openings with carved stone responds. On the front elevation there are square bay windows with dentilled brick cornices. The windows are painted timber sashes with a single pane of glass to both the upper and the lower sash.

#### **Significance**

This is a substantially complete Victorian farmhouse of very good local architectural interest, displaying high quality materials and detailing.



### **Maldon Road, terrace including Old Police House, The Nest, and Cheyne**

*Left-hand photograph taken 20 January 2020*

*Right-hand photograph reproduced with permission from Kevin Bruce*

#### **Description**

This row of three timber-framed cottages was built in 1795 on a slip of roadside waste (research by Kevin Bruce from Manor Court Book, ERO ref. D/DBr M7). The cottages are 1 ½ storeys tall with a clay-tiled roof punctuated by red brick chimney stacks. Originally the cottages would have had just one ground-floor room and one first-floor bedroom. A lean-to was added across the back of the terrace in the 19<sup>th</sup> century, served by yellow brick chimney stacks. Historically each of the cottages were clad in weatherboarding, but much of the weatherboarding is now covered by pebbledash render.

#### **Significance**

This is a reasonably well-preserved row of Georgian vernacular cottages built on a roadside slip of land that was ‘waste of the manor’. The original form and composition of front windows and doors remains legible. The row is a picturesque feature in the street scene.



### **Mill End, Hill House**

*Left-hand photograph taken May 2014*

*Right-hand photograph, taken before the building was extended, reproduced with permission from Kevin Bruce*

### **Description**

Hill House is a 2-storey timber-framed building with a clay-tiled roof and a central chimney stack. It was built as a pair of cottages in the late-18<sup>th</sup> century before being converted to a single dwelling early in the 20<sup>th</sup> century. The taller range at the right-hand (southern) end is a 20<sup>th</sup>-century extension. Historically it was clad in weatherboarding, but is now finished with pebble-dash render.

### **Significance**

This is a reasonably well-preserved example of Georgian cottage development. Although it has been altered, the building's historic form remains legible. It is one of a group of several Georgian cottages along Mill Road, the other examples being grade II listed.





### **Mill End, Curry Farm**

*Left-hand photograph taken 13<sup>th</sup> March 2020*

*Right-hand photograph reproduced from the Kevin Bruce Collection*

### **Description**

A remarkably well-preserved late-18th-century brick farmhouse with a hipped clay-tiled roof. The house retains most of its original windows and the interior is also very little altered. The earliest mention of Curry's in documents is 1262 (O'Connor, 2006, p. 8).

### **Significance**

This is a good example of a well-preserved Georgian farmhouse. Its secluded location, surrounded by woodland, and the peaceful atmosphere of its grounds is an important aspect of its setting.





### **South Street, Bradwell-on-Sea Village Hall**

*Photograph taken March 2020*

### **Description**

This village hall was designed in 1932 by the architect A. H. Mackmurdo. It is a large-single storey brick or concrete building rendered in rough cast. The gable end faces the road and is enriched with cusped timber framing in the gable. The building is arcaded along its sides and to its front.

### **Significance**

Mackmurdo was an Arts and Crafts architect who lived and worked in the Maldon District. He had a particular interest in social reform and designed a handful of village halls in the District under the auspices of the Rural Community Council for Essex. The village hall at Bradwell, with its elegant arcaded design, is arguably Mackmurdo's most distinguished community building to survive in the Maldon District. It makes a valuable contribution to the character of the Bradwell-on-Sea Conservation Area and is of social and communal importance.



### **Waterside Road, Riverview and Waterside House**

*Left-hand photograph taken May 2014*

*Right-hand photograph reproduced with permission from Kevin Bruce*

### **Description**

There is a date plaque of 1861 on the flank elevation of Riverview and the similar design of Waterside House suggests is of a similar date. Both houses are of brick with hipped slate roofs. While the walls of Riverview have been rendered, the front elevations of both houses retain their original windows and front doors. These houses were built by the Parker family.

### **Significance**

The two houses are reasonably complete examples of mid-19<sup>th</sup> century villas of good local architectural interest.



### **Waterside Road, The Green Man Inn**

*Photograph taken 12<sup>th</sup> March 2020*

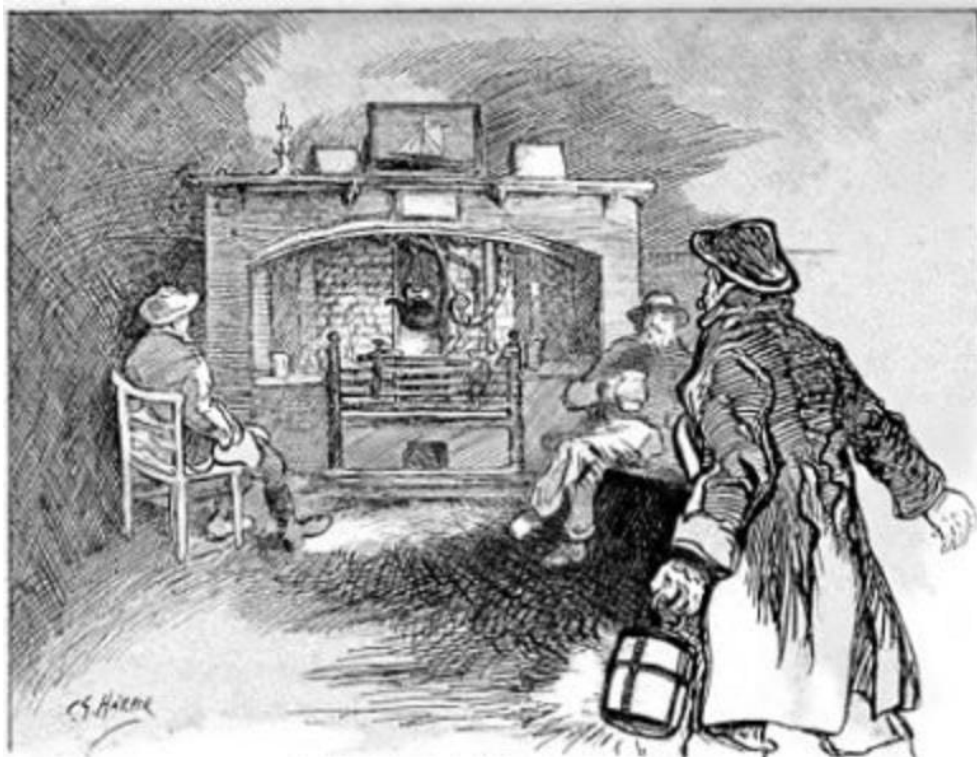
### **Description**

A late-18<sup>th</sup> or early-19<sup>th</sup> century public house. Constructed of brick with hipped clay-tiled roofs. Internally, parts of the ground floor are paved with old flagstones. Within the bar there is a large well-preserved fireplace retaining an old wrought iron chimney crane. In the 19<sup>th</sup> century the pub was ran by the Parker family.

### **Significance**

This is a fine example of a late-Georgian brick public house which – despite the modern plastic windows – retains a significant degree of its architectural character.





An illustration from C J Harper (1909). Harper wrote: *The old stone-floored kitchen of the “Green Man,” nowadays a cool and refreshing place in which to take a modest quencher on a summer’s day, still remains very much what it was of old; and the quaint fireplace round which the sly longshore men of these Essex creeks foregathered on those winter nights when work was before them keeps its old-time pot-racks and hooks* (p. 115)



The same view in March 2020



### **Waterside Road, Peakes Farm**

*Photograph taken 12<sup>th</sup> March 2020*

### **Description**

This farmhouse is composed of two ranges on an L-plan, built of yellow stock bricks embellished with horizontal bands of red brick. It is thought that the range aligned west-east was built in the 1870's while the range aligned north-south was added to the east end c.1912. The bay windows, with carved stone capitals, date from the phase of extension and renovation in c.1912. Internally there is a fine entrance hall of c.1912 fitted with an oak fire surround and over-mantle, a staircase with decorative splat balusters, all illuminated by a large mullion and transom window with stained glass. The house was built for Clement Parker, one of the more important sailing barge owners.

### **Significance**

This building has local architectural interest as a handsome and well-preserved Victorian and Edwardian Farmhouse. It has local historic interest for its association with Clement Parker.





### **Waterside Road, Woodyards**

*Photograph taken September 2018*

#### **Description**

This two-storey, timber-framed and weatherboarded house is older than it appears from the outside. The house was first constructed in the second half of the 18<sup>th</sup> century as a pair of 1 ½ storey cottages. In the second half of the 19<sup>th</sup>-century the building was converted to a single dwelling and heightened to a full 2 storeys. A brick lean-to at the rear bears a date of 1881, which is probably a bit later than the Victorian rebuilding. The name of the house derives from Charlie Woodyard who was a local coal merchant.

#### **Significance**

This 18<sup>th</sup> and 19<sup>th</sup>-century house is very well preserved, displaying good quality vernacular materials and detailing. There a good survival of multi-paned sash windows and old internal doors.





### **Weymarks Road, Bradwell Bay WWII Airfield, The Control Tower**

*Left-hand photograph taken 20 January 2020*

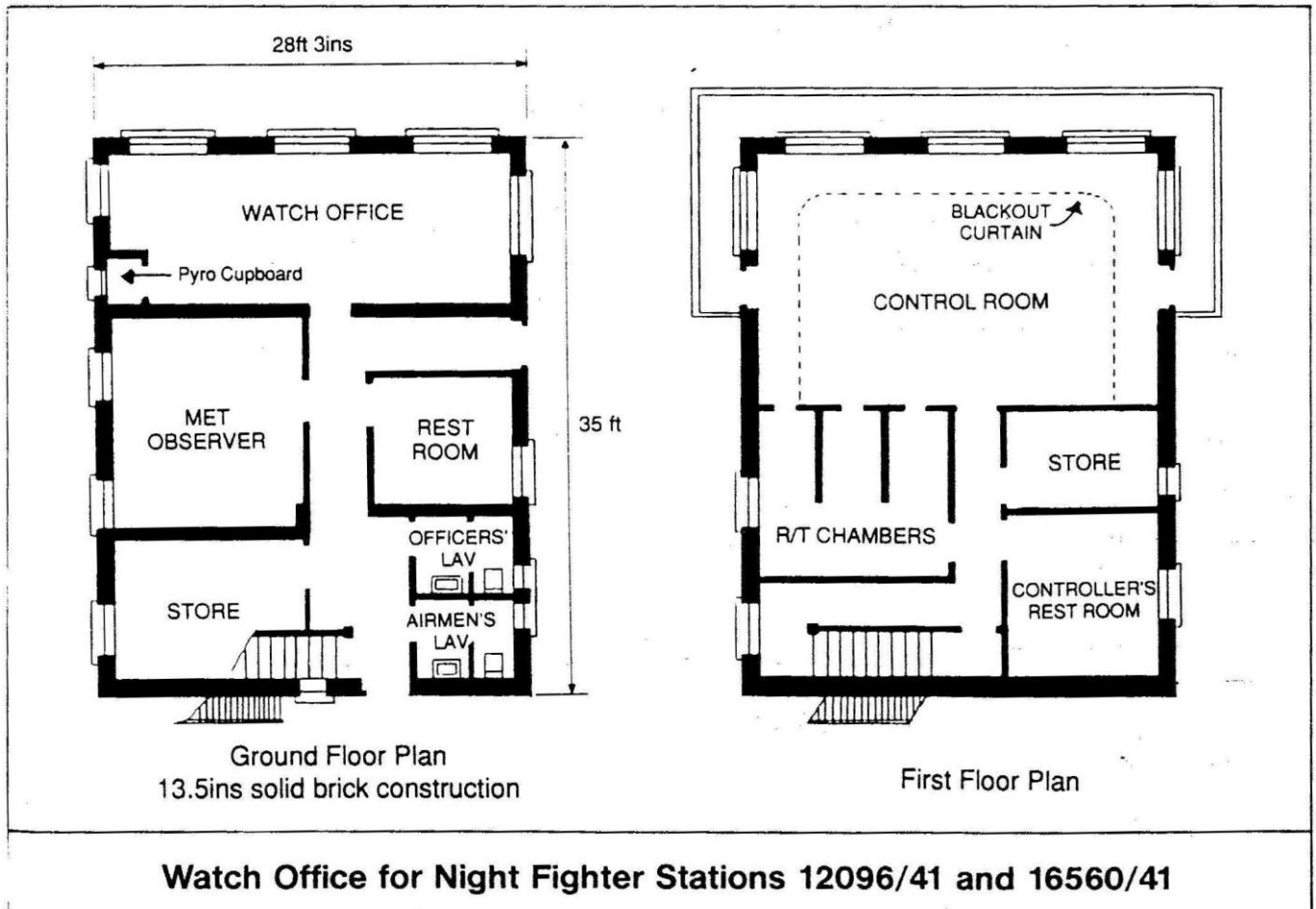
*Right-hand photograph, taken prior to residential conversion, reproduced with permission from Kevin Bruce*

### **Description**

This Control Tower oversaw operations at Bradwell Bay airfield during WWII and was later converted to a residence. The roof-top observatory has been rebuilt but the basic form of the building has been preserved.

### **Significance**

The Control Tower, along with the Station HQ and the four Blister hangars are important to the history and heritage of Bradwell Bay airfield. The military historian Fred Nash has observed that “although they are all that remains of the 300+ buildings and structures that stood on the airfield they were, and are, of major significance in the hierarchy of airfield architecture” (Nash, 2010).



*Original floor plan of The Control Tower, reproduced from the Kevin Bruce Collection*



### **Weymarks Road, Bradwell Bay WWII Airfield, Four Blister Hangers**

*Photograph showing three of the four hangers, taken 20 January 2020*

#### **Description**

During WWII there were twelve Blister hangers dispersed across the airfield, of which only four survive. They are each approximately 90 feet in span x 60 feet in length. Three of the hangars have a corrugated asbestos roof, while the fourth has a corrugated iron roof.

#### **Significance**

The four surviving Blister hangers, along with the Control Tower and the Station HQ are important to the history and heritage of Bradwell Bay airfield. The military historian Fred Nash has observed that “although they are all that remains of the 300+ buildings and structures that stood on the airfield they were, and are, of major significance in the hierarchy of airfield architecture” (Nash, 2010).



### **Weymarks Road, Bradwell Bay WWII Airfield, Station HQ**

*Photograph from the Kevin Bruce Collection showing the Station HQ to the right (south) of the Control Tower*

#### **Description**

The Station HQ survives to the rear (south) of the Control Tower. It is a long single-storey building which appears to have been repurposed as a workshop.

#### **Significance**

The Station HQ, along with the Control Tower and the four surviving Blister hangers are important to the history and heritage of Bradwell Bay airfield. Fred Nash has observed that “although they are all that remains of the 300+ buildings and structures that stood on the airfield they were, and are, of major significance in the hierarchy of airfield architecture” (Nash, 2010).





### **Weymarks Road, Pear Tree Cottage**

*Left-hand photograph taken 20 January 2020*

*Right-hand photograph, showing a man having his hair cut outside the right-hand cottage, reproduced with permission from Kevin Bruce*

### **Description**

This pair of late-Georgian cottages was built to house agricultural workers at Weymarks Farm. It was converted into a single dwelling in the 20<sup>th</sup>. The building is 1 ½ storeys in height with a clay-tiled gambrel roof. The roof sweeps down in 'cat-slide' form at the back over rear lean-tos.

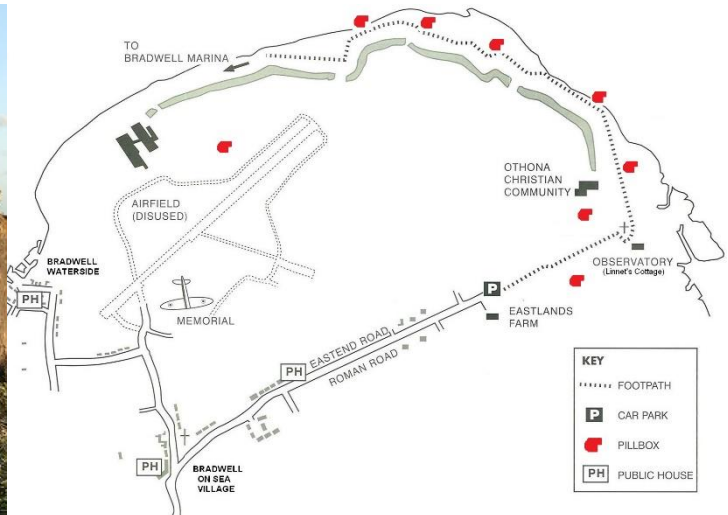
### **Significance**

Apart from replacement windows, the cottages appear to be well preserved. They are a good example of Georgian agricultural workers' cottages servicing an isolated farm.





Left-hand photograph by Kevin Bruce of the pillbox at the gated entrance to the Othona Community, undated



Right-hand map showing locations of coastal WWII pillboxes in Bradwell

## **Coastal Pillboxes in Bradwell-on-Sea**

*Left-hand photograph by Kevin Bruce of the pillbox at the gated entrance to the Othona Community, undated*

*Right-hand map showing locations of coastal WWII pillboxes in Bradwell*

## **Description**

WWII concrete pillboxes on the sea wall and in the vicinity of the sea wall

## **Significance**

This is an important group of pillboxes, which serves as a potent reminder of the threat of invasion posed during World War II.

## **Sources**

Bettley, J. and Pevsner, N.: *The Buildings of England: Essex* (Yale, 2007)

Brown, H.: *History of Bradwell-on-Sea, Essex* (1929)

Colchester, P.: *Bradwell-on-Sea Conservation Area Review and Character Appraisal* (ECC & MDC, 2006)

Essex Record Office (ERO)

Harper, C. J.: *The Smugglers: Picturesque Chapters in the Story of an Ancient Craft* (London, 1909)

Howson, T.: 'The King's Head, Bradwell-on-Sea: The medieval cross-wing and its restoration', *Transactions of the Essex Society for Archaeology and History*, Vol. 6, 2016, 249-253

Howson, T.: 'Georgian cottages in the Maldon District of Essex', *Eavesdropper*, No. 61, Spring 2020, 8-13

Nash, F.: *Survey of World War Two Defences in the District of Maldon* (ECC & MDC, 2010)

O'Connor, T.: *Bradwell-on-Sea Historic Settlement Assessment* (2006)

**Preparation of the list of local heritage assets for Bradwell-on-Sea has been greatly assisted by the input of local historians Kevin Bruce and David Thorpe**

This page is intentionally left blank

# **Draft List of Local Heritage Assets in** **Tillingham**



June 2020

01621 854 477

[planning@maldon.gov.uk](mailto:planning@maldon.gov.uk)



## Introduction

The Maldon District contains over a thousand nationally listed buildings, which are protected by law. It has also been recognised that there are many historic buildings which, although they may not meet the criteria for national listing, possess local value because of their architectural and historic interest. The District Council is developing a List of Local Heritage Assets to identify and celebrate these locally important buildings. Inclusion on the Register does not of itself bring any additional consent requirements over and above the existing requirement for planning permission, but it does mean that a building's heritage significance will be a material consideration in the planning process. The following criteria have been developed to help identify those buildings which merit inclusion on the Register of Local Heritage Assets. As with the national list the word building can apply to any type of permanent structure.

### 1. Age and integrity

- a. All buildings which retain a significant degree of pre-1840 architectural character in terms of form, materials and stylistic detailing or for which there is realistic potential for restoration of that character.
- b. 1840-1880 buildings that are reasonably complete and of good local architectural and historic interest
- c. 1880-1945 buildings that are substantially complete and of very good local architectural and historic interest
- d. Post 1945 buildings that are wholly complete and of an outstanding level of local architectural and historic interest
- e. Buildings which are valued as rare examples of a particular type

### 2. Historic Interest

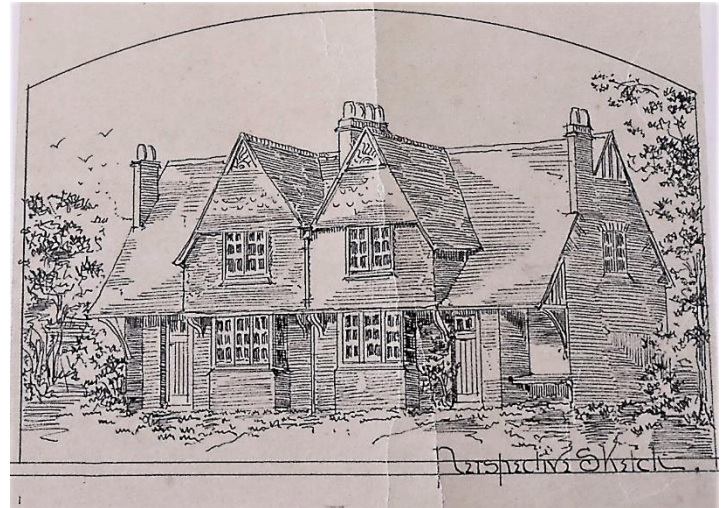
- a. Historic association with important national or local historical figures, architects, events or industry
- b. Social or communal importance: relating to structures perceived as a source of local identity and cohesion. (This might include important commemorative structures such as war memorials or places of worship).

### 3. Architectural Interest

- a. Important examples of a past type or style
- b. Quality materials, detailing and workmanship
- c. Buildings which display technological innovation
- d. Group Value: Buildings whose local importance derives from their visual relationship with other important buildings in a village or town setting or where they make an important contribution to an historic skyline.
- e. Buildings which make a positive contribution to an attractive rural setting
- f. Sustainability: Buildings which can be easily adapted for continuing use due to robust construction or quality materials

This document lists the buildings in the parish of Tillingham which have been identified as meeting the above criteria.





### **Brook Road, Nos 1 & 3**

*Photograph taken June 2014*

*Sketch by F. Chancellor, architect, 1881*

### **Description**

This pair of brick cottages was designed in 1881 by the County architect, Frederick Chancellor, for the Dean and Chapter of St Paul's Cathedral. The cottages have clay-tiled roofs with low, oversailing eaves to the front. In the middle of the front roof slope is a pair of large, tile-clad dormer windows above square ground-floor bay windows. The cottages are well preserved, retaining timber windows, doors and bargeboards. This is one of three pairs of houses of the same type in the village centre, all included on the local list. Two further pairs of the same type, outside the village, on Marsh Road are excluded from the local list because they have been very altered.

### **Significance**

These are highly attractive Victorian cottages, designed by a notable architect, displaying good quality materials and detailing. They are a fine example of the move to provide healthier, more modern, accommodation in rural areas during the later 19th century. The building makes a very positive contribution to the character and appearance of the Tillingham Conservation Area.



### **Brook Road, Nos. 2 & 4**

*Left-hand photograph taken July 2008*

*Right-hand photograph reproduced with permission from Kevin Bruce*

### **Description**

This timber-framed and weatherboarded house was built early in the 19<sup>th</sup> century. It is 1 ½ storeys in height with a clay-tiled gambrel roof. A single-storey brewhouse / bakehouse is attached at the southern end. There is an old water pump fixed to the front elevation of the house. The windows were historically multi-paned sliding sashes but are now modern uPVC casements.

### **Significance**

Despite the replacement windows, this building has local architectural interest as a reasonably well-preserved early-19th-century vernacular house. It is a good example of the white weather-boarded buildings that are typical in the village. It makes a positive contribution to the character of the Tillingham Conservation Area.





### **Marsh Road, Tile Cottage**

*Left-hand photograph taken March 2015*

*Right-hand photograph reproduced with permission from Kevin Bruce*

### **Description**

This tiny cottage was probably built very shortly after 1812, which is the date that the 'waste of the manor' roadside plot on which it stands was enclosed (Kevin Bruce research of Manor Court Rolls at ERO). It is a 1 ½ storey house with a gambrel roof and a gable-end chimney stack. Its walls are timber-framed and weatherboarded except for the front elevation which is of brick. Originally it had just one ground-floor room and one first-floor room, a plan-form known as '1-cell'. Between 1914 and 1938 the cottage was occupied by Weymouth Nunn Moul, who features in the old photograph above. He was as a fisherman, wildfowler and long-shore man (Bruce, 1981).

### **Significance**

Although the house has been altered, its historic form remains legible and it is a good example of a small Georgian cottage. One-cell cottages in terraced form are common, whereas detached 1-cell cottages are quite rare.



### **North Street, Tillingham Hall**

*Left-hand photograph taken April 2012*

*Right-hand photograph reproduced with permission from Kevin Bruce*

### **Description**

Tillingham Hall was probably the only medieval house in the village centre, other than the Cap and Feathers. It was the principal manor house, belonging to the Dean and Chapter of St Paul's. However, the house was completely rebuilt in the late-19th century. The building's composition is emphatically asymmetrical, presenting a busy mixture of gables, projecting windows, bold chimneys, brick, tile, tile-hanging and mock timber-framing.

### **Significance**

This is a striking example of the Victorian Domestic Revival style, displaying high quality materials and detailing.



### **North Street, Barn**

*Photograph taken 2014*

### **Description**

This timber-framed and weatherboarded former agricultural building, with a pantile roof, was built early in the 19<sup>th</sup> century as a stable with a hayloft above it. It also had a brick forge to the rear and a loose box on its southern flank. The rear of the building was rebuilt in brick in the mid-19<sup>th</sup> century and a new forge was erected. A brick outshot was built on the northern side whose purpose is unclear but may have been a privy and coal store. Following a period of dereliction, the building was converted to a house in 2014.

### **Significance**

This building is of architectural interest as an early-19<sup>th</sup> century stable. It contributes positively to the rural character of the Tillingham Conservation Area.





### **North Street, No.23**

*Left-hand photograph taken 2008*

*Right-hand photograph – showing the house and the adjacent carpenter's workshop and yard – reproduced with permission from Kevin Bruce*

### **Description**

This house was built between 1874 and 1897. It was built and occupied by the Collins family who were carpenters responsible for erecting several weatherboarded houses in the village. It is single-storeyed, timber-framed and weatherboarded with a hipped slate roof. It has multi-paned, sliding sash windows and a six-panel front door. The associated carpenter's workshop and yard have been replaced with a modern house (No. 23a).

### **Significance**

This is a good example of the vernacular, white weather-boarded buildings typical in the village. It is notable for its distinctive form and modest scale. It makes a very positive contribution to the character of the Tillingham Conservation Area.



### **North Street, No. 30, Lime Tree Cottage**

*Photograph taken September 2019*

#### **Description**

Lime Tree Cottage is a 2-storey painted brick house, originally built in the late-18<sup>th</sup> century but substantially refurbished early in the 19<sup>th</sup> century. Its roof is covered with clay Roman tiles and at the rear the roof sweeps down in 'catslide' form over a single-storey lean-to. On its front elevation there are several Victorian painted-timber sliding-sash windows and a 6-panel painted-timber front door. The house is depicted on a map of 1799, and inside there are old fireplaces with timber lintels, which are characteristic of the 18th century. The front roofslope is much less steeply pitched than the rear roofslope, suggesting the house was originally 1½ storeys in height until early in the 19th-century when the front wall was heightened to a full 2 storeys.

#### **Significance**

Lime Tree Cottage is a good example of a late-Georgian vernacular house. It makes a positive contribution to the character of the Tillingham Conservation Area.



### **South Street, Nos. 2 & 4**

*Photograph taken January 2019*

#### **Description**

This pair of brick cottages was designed in 1881 by the County architect, Frederick Chancellor, for the Dean and Chapter of St Paul's Cathedral. The cottages have clay-tiled roofs with low, oversailing eaves to the front. In the middle of the front roof slope is a pair of large, tile-clad dormer windows above square ground-floor bay windows. This is one of three pairs of houses of the same type in the village centre, all included on the local list. Two further pairs of the same type, outside the village, on Marsh Road are excluded from the parish list because they have been very altered.

#### **Significance**

These are highly attractive Victorian cottages, designed by a notable architect, displaying good quality materials and detailing. They are a fine example of the move to provide healthier, more modern, accommodation in rural areas during the later 19th century. The building makes a very positive contribution to the character and appearance of the Tillingham Conservation Area.





### **South Street, Chapel**

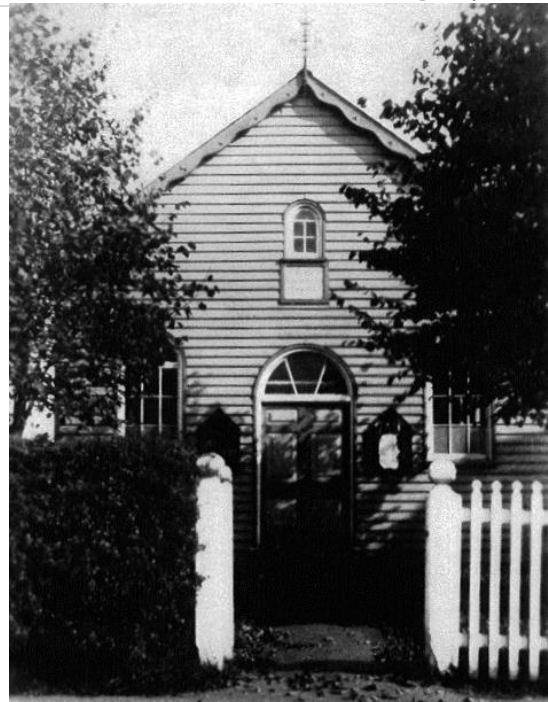
*Photograph taken 2008*

### **Description**

This Congregational Chapel was built in 1868 after the earlier barn meeting house burnt down. It is constructed of red brick with yellow brick embellishments and a slate roof. The windows and doors have pointed-arched heads. It comprises a large chapel room with wooden pews and a meeting room at the rear. It closed in 2018.

### **Significance**

This is a good example of a Victorian Congregational Chapel, built using good quality materials and detailing. The chapel forms an impressive, attractive building in the street scene making a positive contribution to the character of the Tillingham Conservation Area.



### **South Street, Peculiar People's Chapel**

*Left-hand photograph taken August 2019*

*Right-hand reproduced, with permission, from the Kevin Bruce Collection.*

### **Description**

This timber-framed chapel was built in 1897 by local builder Benjamin Rooda for £249.10.6d. It was built for the Essex-based sect known as the Peculiar People. The original weatherboard cladding survives beneath 20<sup>th</sup>-century pebble-dash render. The gabled front elevation has simple arch-headed windows and doors with top-opening fanlights.

### **Significance**

Aesthetically, this modest and well preserved 19<sup>th</sup>-century chapel makes an important contribution to the special character of the Tillingham Conservation Area. It has local historic interest as one of only four Peculiar People chapels in the Maldon District, others being at Steeple (Grade II listed) and Little Totham. The fourth Peculiar People chapel is at 40 South Street, Tillingham, built in the 1870s, which became the home of a church elder when the congregation moved to the new chapel (40 South Street is not included on the local list due to the level of alteration).





### **The Square, St Nicholas' Church of England (VC) Primary School**

*Left-hand photograph taken 2008*

*Right-hand photograph reproduced with permission from Kevin Bruce*

### **Description**

This National School was designed by Wild Stammers of Southminster in 1860 and built in 1861. It was funded by public subscription. It is built of red brick with grey brick embellishments and has slate-clad pitched roofs.

### **Significance**

The building is a good example of a Victorian village school, deploying good quality materials. It also has local historic, communal and social value.



### **Tillingham Road, The Limes**

*Left-hand photograph taken June 2014*

*Right-hand photograph reproduced with permission from Kevin Bruce*

### **Description**

This grand house is thought to have been built for the village Doctor in the 18th century and remained the village surgery until 1906. It is constructed of brick, two storeys in height, the front range have a slate-clad mansard roof. The attic storey was for servants' quarters, two of whom can be seen at a window in the old photograph above.

### **Significance**

This house has local architectural interest as a well-preserved Georgian house of good quality materials and detailing.



### **Vicarage Lane, Nos. 2 & 4**

*Photograph taken July 2008*

### **Description**

This pair of brick cottages was designed in 1881 by the County architect, Frederick Chancellor, for the Dean and Chapter of St Paul's Cathedral. The cottages have clay-tiled roofs with low, oversailing eaves to the front. In the middle of the front roof slope is a pair of large, tile-clad dormer windows above square ground-floor bay windows. This is one of three pairs of houses of the same type in the village centre, all included on the local list. Two further pairs of the same type, outside the village, on Marsh Road are excluded from the local list because they have been very altered.

### **Significance**

These are highly attractive Victorian cottages, designed by a notable architect, displaying good quality materials and detailing. They are a fine example of the move to provide healthier, more modern, accommodation in rural areas during the later 19th century. The building makes a very positive contribution to the character and appearance of the Tillingham Conservation Area.





### **Vicarage Lane, The Old Vicarage**

*Left-hand photograph taken 2008*

*Engraving of 1790 showing the medieval vicarage, reproduced with permission from Kevin Bruce*

### **Description**

This two-storey rendered brick house dates from the mid-19<sup>th</sup> century but replicates the basic form of the medieval vicarage which it replaced (depicted above in the engraving of 1790). Like its medieval predecessor the house has a cross-wing at the right-hand (western) end. The roofs are clad in clay tiles. There are hood moulds over the sash windows on the front elevation.

### **Significance**

This is a well-preserved example of a mid-19<sup>th</sup> century vicarage of good local architectural and historic interest. It makes a very positive contribution to the character of the conservation area.



### **Vicarage Lane, Clifton**

*Photograph taken November 2016*

### **Description**

Clifton is a mid-19th century thatched cottage. It is timber-framed and rough-cast rendered with cosmetic battens applied externally in imitation of exposed timber framing. The roof is half-hipped with 'eyebrow' dormer windows on the eastern slope.

### **Significance**

This is a picturesque Victorian cottage which shares group value with the adjacent grade II listed Thatched Cottage.





### **Vicarage Lane, Village Hall**

*Left-hand photograph taken July 2008*

*Right-hand photograph taken on the 28<sup>th</sup> of September 1927 when the hall was officially opened by the Dean of St Paul's, reproduced with permission from Kevin Bruce.*

### **Description**

Tillingham Parish Hall was opened in 1927 by the Dean of St Paul's. It is a timber-framed building clad in corrugated iron. The architect was W. Stammers of Southminster and the contractors were C. M. Collins and Sons, carpenters who operated out of the yard at No. 23 North Street.

### **Significance**

This is a good example of an early-20<sup>th</sup> century corrugated iron building, contributing positive architectural variety to the Tillingham Conservation Area. It also has historic, social and communal interest.

## **Sources**

Bettley, J. and Pevsner, N.: *The Buildings of England: Essex* (Yale, 2007)

Bruce, K.: *Dengie: The Life and the Land* (Essex Record Office, 1981)

Colchester, P. and Hurst, M.: *Tillingham Conservation Area Review and Character Appraisal* (ECC & MDC, 2004)

Essex Record Office (ERO)

Hilman-Crouch, B.: *Building at Lime Tree Cottage, North Street, Tillingham, Essex. Description and analysis of the former stable* (2013)

Sorrell, M.: *The Peculiar People* (1980)

This page is intentionally left blank

### Summary of responses to public consultation on the Draft Local Lists for Bradwell-on-Sea and Tillingham

Date and source of comments	Summary of comments	Response
<p>12/3/2020</p> <p>Angela Brown, occupant of Old Police House, Maldon Road, Bradwell-on-Sea</p>	<p>Read the consultation letter with interest. A 'little surprised' to see her property on the list.</p> <p>Concerned about the fate of buildings on Bradwell airfield which are at risk of demolition if the proposed nuclear power station goes ahead.</p> <p>Dismayed by the power station proposals, which will be a 'total blight on the village of Bradwell and the Dengie'.</p>	<p>Comments noted.</p> <p>Tim Howson arranged to visit owner at her property to discuss in further detail, but the visit had to be cancelled due to the Covid 19 pandemic.</p>
<p>18/3/2020</p> <p>Bradwell-on-Sea Parish Council</p>	<p>Parish Councillors enjoyed looking at the list and found it very interesting. The following additional buildings were suggested for inclusion:</p> <p>Old HQ building on power station approach road</p> <p>Underground bunkers on the airfield</p> <p>Various air raid shelters around the village (Hockley Lane, behind Bradwell Lodge)</p> <p>Pill boxes on the sea wall</p> <p>Bradwell lodge</p> <p>New Hall</p> <p>With the new Bradwell B power station proposals just coming into the public domain there is a lot of worry that some or all of the historical elements listed above will be lost due to the sheer size of the proposed plans.</p>	<p>Comments noted.</p> <p>This is included in the draft list.</p> <p>Unlikely to meet the selection criteria, but information requested on precise location.</p> <p>Unlikely to meet the selection criteria</p> <p>Agree that the coastal pill boxes are an important group. These will be included in amended list.</p> <p>This is a grade II* listed building</p> <p>This is a grade II listed building</p> <p>Comments noted.</p>
<p>23/3/2020</p> <p>Mr and Mrs Riley, owners of The Gatehouse, Bradwell-on-Sea</p>	<p>Thank you for considering inclusion of The Gatehouse, but do not feel it should be included. An outstanding planning permission is currently being implemented to alter the original roof structure, as part of a loft conversion, alongside other alterations.</p>	<p>In view of the fact that the original roof form is being altered, the chimney has been demolished, the windows are modern and the original front door has been blocked, this building now falls short of the selection criteria. The amended list will exclude this property.</p>

This page is intentionally left blank





## **REPORT of MONITORING OFFICER**

---

**to  
COUNCIL  
23 JUNE 2020**

### **JOINT STANDARDS COMMITTEE - PARISH COUNCILLOR CO-OPTES**

#### **1. PURPOSE OF THE REPORT**

- 1.1 To inform the Council that the two Parish Councillor co-optees to the Joint Standards Committee have no lawful right to vote and the Committee needs to be re-composed.

#### **2. RECOMMENDATIONS**

- (i) That the Joint Standards Committee should have an increase in District Councillor membership to six or seven members;
- (ii) That political balance provisions should be applied on the basis that the co-optees cannot vote;
- (iii) That Joint Standards Committee can be convened for remote meetings

#### **3. SUMMARY OF KEY ISSUES**

- 3.1 The Joint Standards Committee is not a joint committee in the terms of S101 of the Local Government Act 1972, even though its name may suggest that it is. The Committee deals with member conduct issues for town and parish councillors in addition to District Councillors as required by the Localism Act 2011. It is thus a committee of the District Council and it is the District Council that determines membership of the Committee, even though it accepts nominations from the Essex Association of Local Councils for two town / parish councillors to sit on the Committee.
- 3.2 As a committee of the District Council co-optees can only vote on matters if included in the list of co-optees mentioned in S13 of the Local Government and Housing Act 1989, otherwise they can be committee members but non-voting. This means that they can only debate any issue and influence the committee.
- 3.3 The implication of this legislation means that although past decisions of the committee were made contrary to section 13 of the 1989 Act they are not automatically invalid. This would require an order of the High Court and the three month limitation period for the last decision in January 2020 has already past meaning that previous decisions remain valid. In any event none of the decisions made by the

committee in the last few years have been determined by any of parish councillors' votes.

- 3.4 The existing composition of the Committee with five district councillors who can vote would require three members from the Conservative Group and two members from the Independent Group. If that number is increased to six members then the split would be 4 / 2. If it becomes a seven member committee then the split is 4 / 3. An odd number of members is preferable to avoid the Chairman having a second and casting vote.
- 3.5 There are three investigations that need a decision from the Committee that justify its resumption of decision-making remotely.

#### **4. CONCLUSION**

- 4.1 There must be a re-composition of the Joint Standards Committee with the two parish councillors remaining co-optees but without the right to vote.

#### **5. IMPACT ON CORPORATE GOALS**

- 5.1 The Committee is correctly composed in accordance with political balance regulations.

#### **6. IMPLICATIONS**

- (i) **Impact on Customers** – None.
- (ii) **Impact on Equalities** – None.
- (iii) **Impact on Risk** – None.
- (iv) **Impact on Resources (financial)** – None.
- (v) **Impact on Resources (human)** – An increased level of staffing is required to run a committee remotely.
- (vi) **Impact on the Environment** – None.

Background Papers: None.

Enquiries to: Simon Quelch, Monitoring Officer.

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted



This page is intentionally left blank