

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 [\[1\]](#).
- 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

[\[1\] https://www.nic.org.uk/wp-content/uploads/NIC-Design-Principles-Final.pdf](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 Councils 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.