

SOUTH WOODHAM FERRERS TOWN COUNCIL

Bradwell B Draft Consultation Report June 2020

Introduction

This document sets out the response of the South Woodham Ferrers Town Council to the public consultation, published on 4 March 2020, outlining proposals to build a new power station (Bradwell B) on the Dengie peninsula.

South Woodham Ferrers is the largest town in the Chelmsford District and will be significantly impacted throughout the construction of Bradwell B and its ongoing operation.

The Town Council was invited to meet with the Bradwell B team (through video) on 26 May 2020. The team invited questions before the meeting to enable them to prepare responses. Notwithstanding the Town Council giving the requested prior notice, none of the questions were fully addressed through the team's presentation or during the following question and answer session. This detracted from the presentation, which, as a consequence, lacked authenticity. This response includes reference to concerns raised through the questions asked at the meeting.

The Town Council is disturbed that the consultation failed to recognise the emerging Chelmsford Local Plan (adopted on 27 May 2020) and the South Woodham Ferrers Neighbourhood Plan, which both outline definitive plans for a substantial growth area of up to 1,500 homes and supporting infrastructure to the North of the B1012. This is an obvious omission and highlights the impracticality (if not impossibility) of using the B1012 as a route for construction traffic and provides evidence that the project team have not thoroughly researched their proposals. The implementation of the two plans will introduce several additional crossing points, roundabouts and speed restrictions providing safe access to and from the planned new housing development for residents.

The Town Council recognises that Bradwell B power generation is a significant national Government policy and a separate concern. We offer comments that seek to negate the detrimental effects of the project on the environment and the impact on the South Woodham Ferrers (and wider) community. The evidence presented to support the proposals is severely lacking in detail; further information is required, and sufficient time required thereafter provided to allow the public to consider full details and provide the informed response the consultation team require to ensure that plans are well-grounded. Traffic surveys need to be carried out and results published before the next phase of the consultation process commences

South Woodham Ferrers Town Council must be considered a key stakeholder for issues which affect residents as negotiations on the project move forward.

1. Design & Environment

- 1.1. The proposals do not sufficiently consider the impact of Bradwell B on the environment. The design of the power station does not minimise the impacts on the sensitive marine environment of the Blackwater Estuary nor is it sensitive to the distinctive landscape and seascape character of the Dengie peninsula, considerations follow:
- 1.2. The area is an important habitat for wildlife and the Blackwater, Colne, Crouch and Roach Estuaries are essential ecologically and support commercial fisheries. The mudflats and saltmarshes provide foraging for many thousand wintering water birds, as well as providing a breeding habitat. The sites are Special Protection Area, Ramsar, National Nature Reserve and Site of Special Scientific Interest areas and are protected under national and international law, it is therefore not sufficient for the design to “minimise” the impact. (BRB Stage 1 Cons Doc pages 41 and 43)
- 1.3. The Borrow Dyke which flows next to the proposed site is also designated as a Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Ramsar site. It may also support water voles, a protected species. The proximity of the Borrow Dyke to the proposed Power Station is shown in the Main consultation document on page 40 Figure 3.12.
- 1.4. Although the main development site benefits from the existing flood embankment, this is insufficient to protect Bradwell B power station from flooding, over the lifetime of the plant, considering foreseeable climate change. The site must be raised, and new larger sea defences constructed. On page 39 of the main consultation document, Figure 3.11 Flood Zone Map for planning, shows the whole site apart from 2 irrigation reservoirs (Flood Zone 2) are in Flood Zone 3. This is not mentioned in the Summary document.
- 1.5. The carbon footprint for the construction of the power station must be considered in addition to any perceived benefits. There appears to be a lack of a strategy to reduce carbon emissions during the construction of the power station and the resultant huge carbon footprint is highly likely to significantly outweigh the benefits of the small footprint of the energy produced once the power station is operational. Appropriate monitoring and reporting must be put in place, and a clear strategy, with the aim of reducing the carbon emissions during the construction phase for the benefit of all. (Chelmsford Local Plan – May 2020 Page 222, Policy DM19)
- 1.6. The new connection to the National Grid will have a major and detrimental impact on South Woodham Ferrers, particularly in respect of the proposed development to the north of the B1012, it is essential that Bradwell B works closely with the National Grid to align proposals and to allow impacts to be fully assessed, before the 2nd consultation stage. (Chelmsford Local Plan Strategic Growth Site 10 North of South Woodham Ferrers, Page 169)

2. People and Jobs

- 2.1. It is encouraging that it is considered that building Bradwell B will create long-term operational employment opportunities for more than 60 years, potentially benefiting local people and businesses, nevertheless the Council considers that essential safeguards are required to mitigate against obvious negative risks:
- 2.2. Funding must be provided to build a local skills base with a link to individuals and local schools & colleges.
(BRB Stage One Consultation Document – Jobs & People 5.1.3, Page 126)
- 2.3. The project needs to consider a housing fund in the local areas including South Woodham Ferrers to ensure the extra pressure on housing does not adversely impact of the town's population. (BRB Stage One Consultation Document – Jobs & People 5.5.9, Page 128)
- 2.4. There is reference to constructing housing for employees, which could be left as part of the legacy from the Bradwell B project. Wherever these houses are built we would expect that they will be built in accordance with the relative planning rules and provide all the necessary infrastructure, the proposals do not make this explicit (BRB Stage One Consultation Document – Jobs and People Pages 128 & 129)

3. Transport

- 3.1. There is a high level of car ownership in the area and consequently of vehicle movements on the road network. There is already significant traffic congestion on the B1012/A132/A130/A12_ and A414 - all routes that construction traffic will need to use to access the Bradwell B site. Congestion will increase when the Chelmsford Local and the South Woodham Neighbourhood plans have been delivered. Further housing developments in Maldon District will also lead to more traffic on South Woodham Ferrers roads and will only be compounded by construction traffic for the new power station. Further delays to both public transport and 'rush hour' traffic are inevitable and unacceptable. (The Chelmsford Local Plan Preferred Option Strategic & Local Junction Modelling – Jan. 2018 (Essex Highways) show that the roads are near or at capacity. Pages 22-27,82-86,91-96,105, and 115 go into detail. Appendix H shows the results of a Traffic Survey undertaken In October 2016.
- 3.2. The proposal to use the B1012 for haulage traffic is unworkable as they ignore the Chelmsford Local Plan and the South Woodham Neighbourhood Plan; these are obvious omissions. The proposals if implemented will be detrimental to South Woodham Ferrers and the wider Dengie peninsular population, specific comments follow: (Chelmsford Local Plan Strategic Growth Policy 10, North of South Woodham Ferrers, Page 168).

4. Road

- 4.1. The Town Council has major concerns about the detrimental effects of the massive increase in road transport on air quality and the increased noise pollution in South Woodham Ferrers. This will have a significant impact on residents. There is a Health Centre, a school, and homes next to the proposed route on the B1012. The two Strategic Routes shown on pages 20 and 22 of the Stage One Summary Document, both show the proposed routes for heavy goods vehicles (HGVs) to be along the B1012. Since the proposal says that it is envisaged that during the main construction phase 500 to 700 HGVs will pass South Woodham Ferrers, (as shown on page 18 of the Bradwell B Stage one Summary document). It is essential that other modes of travel (sea and rail) are used to negate the impact on South Woodham Ferrers.
- 4.2. The project team appear to have planned on the basis that there is a ring road around South Woodham Ferrers, when presently there is not one and none agreed. The construction of Bradwell B gives a clear requirement for a bypass around the whole of town, for which clarity will be required regarding the funding of this solution, which must be included in the Bradwell B plan. (Chelmsford Local Plan Strategic Growth Policy 10, North of South Woodham Ferrers, Page 170)
- 4.3. The project must consider the introduction of a congestion charge for H.G.V.'s to incentivize the use of alternative modes of transport to and from the Bradwell B site.
- 4.4. Once the Chelmsford local plan has been delivered the B1012 will bisect the expanded South Woodham Ferrers town; the proposals omit recognition of this known future development. (Chelmsford Local Plan Strategic Growth Policy 10, North of South Woodham Ferrers, Page 170)
- 4.5. The workforce required during construction of the site will be between 9,100 and 10,600 as shown (Page 12, 2.1.5) of the Bradwell B Stage One Consultation Document). A large percentage of the workforce will commute, and there are concerns that this will mean more traffic on the B1012. The Town Council consider that a rail alternative must be considered.

5. Park & Ride/Freight Management Facilities

- 5.1. The Council is concerned about the suggestion of a park & ride facility on the A132/B1012 route where there are two grade 2 listed buildings, Shaw Farm and Tabrums, with one just a few feet from the B1012 and therefore strongly advise other sites are considered. (Chelmsford Local Plan Strategic Growth Policy 10, Page 169. This is also contrary to Strategic Policy S3, Page 40) Other comments below:

- 5.2. If the Freight Management Facilities depot/Park & Ride facilities are based at the junction of the A130/A132 with 10-15 hectares of land being used this will affect traffic in the area with the potential for severe traffic congestion. (BRB Stage One Summary Document Pages 24 & 25)
- 5.3. Specified lanes for park & ride facilities must be considered to negate traffic congestion.
- 5.4. Zero emission (electric/hydrogen) buses on the park & ride must be used to remove pollution issues.

6. Rail

- 6.1. The council is concerned about the percentage of construction materials that will be transported by sea and rail (page 104, para 4.6.1 refers). A possibility of 50% by sea but no mention of how much, if any, would be transported by rail.
- 6.2. An Estimated 6 million tons of material will need to be transported during the construction phase. (BRB Stage One Summary Document Page 16) Leaving the rail transport possibilities out of the equation because of the constrictions quoted by the project team would leave South Woodham Ferrers having up to 3 million tons of materials being delivered by road through our town. We urge the project use sea and rail transport to a maximum capacity to alleviate this.
- 6.3. A hierarchy of Sea, Rail and Road must be developed with more than 50% of the materials transported by sea to the site and a significant proportion transported via the Southminster Network Rail Service to minimise the use of HGV's on the local highways as per 4.6.2 on Page 104.
- 6.4. The park & ride schemes being considered for construction workers have a clear bias towards road transport, with only bus not rail being mentioned. Rail transport is an obvious option for employees to minimise traffic on road networks.
- 6.5. Extending the railway line to Bradwell B from Southminster would be advantageous to both Bradwell B during construction and to its employees and we urge Bradwell B to consider this. It would also provide a long-term legacy to ensure people living in Bradwell are connected to the National Rail Network.
- 6.6. The railway line was used in the past for the construction of the original Bradwell Power Station in the 1960's and therefore we believe it to be both reasonable and possible for it to be considered for Bradwell B together with the advantages that it would give. The line was also regularly used for the transport of aggregates for many years well into the 1970's and the nuclear waste service, until Bradwell A was decommissioned.
- 6.7. The transport system being proposed is too road dominant without considering the use of rail which appears to have been dismissed by Bradwell B. With an estimated 6 million tonnes of materials due to be transported during construction

we urge Bradwell B to ensure that Network Rail are informed by the Government that rail must also be used.

7. Sea

7.1. Recently 3 million tonnes of soil were transported by sea to RSPB's Wallsea Island site on the River Crouch estuary together with the new windfarm infrastructure off the Dengie coastal area also being sent by sea. These were decisions influenced by the poor road infrastructure leading to these sites. All aggregates and large infrastructure needed for Bradwell B must be transported by sea for the sake of the environment and the existing population of the area.

8. Conclusion

8.1. In conclusion, the proposals for transport modes, environmental protections and housing impacts are so flawed that they are bound to warrant full reconsideration. These proposals ignore international environmental law and known housing development plans, impacting on South Woodham Ferrers and other major conurbations in the area.

8.2. The adopted Chelmsford Local Plan and the South Woodham Ferrers Neighbourhood Plan (which has reached inspection stage) are both relevant and must be considered because they determine the future South Woodham Ferrers road infrastructure.

8.3. Given the legal status of the Local Plan, including the large housing development North of South Woodham Ferrers and the Town's Neighbourhood Plan it appears that the current Bradwell B proposal does not meet legal requirements.

END

NOTES

The following references were used in the preparation of this response:

- i. Bradwell B Stage One – Consultation Document (Bradwell Power Generation Company Limited 2020)
- ii. Bradwell B Stage One – Consultation Summary Document (Bradwell Power Generation Company Limited 2020)
- iii. Chelmsford Local Plan. Full Council Version. Our Planning Strategy 2013-2036 (Chelmsford City Council – Adopted May 2020)
- iv. Chelmsford Local Plan – **EB 026** Preferred Options Strategy & Local Junction Modelling – January 2018 (undertaken by Ringway Jacobs for Essex Highways – Essex County Council)

- v. Chelmsford Local Plan – **EB 108(A)** Heritage Assessments – March 2017
- vi. Chelmsford Local Plan – **TP 003** Transport Topic Paper
- vii. Chelmsford Local Plan – SWF Extract
- viii. Chelmsford Local Plan – SWF Data Sources
- ix. North of South Woodham Ferrers Masterplan consultation
- x. South Woodham Ferrers Neighbourhood Plan : Submission Version
- xi. Residents presentation on Highway matters