



FREEPOST
Bradwell B Consultation

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Please ask for : Gary Guiver

8 July 2020

Our Ref : GG/BRB/2020/01

Your Ref :

Dear Sir or Madam,

Bradwell B Stage 1 Consultation

Thank you for giving Tendring District Council the opportunity to respond to the consultation on the initial proposals for a new nuclear power station at Bradwell, Essex.

This Council supports the development in principle and welcomes the potential benefits that could arise in terms of clean energy generation and job creation. We would like to ensure that full consideration is given, in particular, to the potential economic opportunities for the Tendring district arising from the development in supporting the construction, servicing and maintenance of the power station by sea/estuary from its ports and the role that the district could play in hosting some associated supply-chain industries.

Whilst the Council is supportive of the development, we wish to endorse the submission from Essex County Council and Maldon District Council which highlights a number of concerns to be addressed whilst supplementing their comments by highlighting the matters of particular importance to Tendring as a neighbouring authority within the wider Essex area. The Council requests that specific attention be given not only to the potential positive economic implications of the development but also to the landscape and visual impacts on Tendring's seascape and the setting of its coastal communities; ecological impacts (both direct and indirect) on the internationally and nationally important wildlife areas around the Tendring coast.

Economic Opportunities for Tendring

Tendring's location on the coast offers many opportunities to support the development of the power station and bring economic activity to the area. Tendring is positive about economic development and the Council's 'Tendring4Growth' initiative aims to encourage schemes that support the local economy.

The ports of Brightlingsea and Harwich (the latter of which is the largest sea port in the Essex County Council area) have played an important role in the recent past in the construction and ongoing servicing and maintenance of the Gunfleet Sands, Greater Gabbard and Galloper Offshore Windfarms and other similar developments, and given their similar proximity to Bradwell, they could fulfil a similar function, providing capacity for offsite construction and assembly, the marshalling of goods and services, logistics and workforce transfer to/from site – thus helping to reduce the apparent over-reliance on the road network which is one of the key concerns raised by our fellow authorities. Harwich International Port is also well served by rail with extensive rail sidings providing the opportunity to maximise use of rail to transport goods to site. The port can also provide fuel bunding services given its proximity to the neighbouring Carless Refinery.

These options for transport by rail and sea could not only help to reduce lorry movements on inadequate country roads, but could help to minimise the overall carbon footprint of the development and make travel and 'just in time' site deliveries more manageable – avoiding the risk of delay that is inherent in any reliance on congested trunk roads and narrow country roads. As has been realised in the recent Court of Appeal decision on the Heathrow Airport expansion, it is important that the climate change impacts of major infrastructure projects such as this are fully understood and addressed and the opportunities to minimise the carbon footprint in the ways suggested above should be properly explored.

Associated with this is the potential for existing or new business areas in the Tendring District to play a role in the supply chain for the construction and ongoing servicing and maintenance of the power station with premises that can be established or expanded in areas close to Brightlingsea, Harwich and in close proximity to Colchester's eastern border (A12/A120) that are established in the Council's Local Plan and have the capacity to benefit from increased activity. These opportunities should be fully explored and the benefits assessed against other opportunities.

The potential for the ports to enable commuting of workers by sea (perhaps via local Ferry services) is another opportunity to be explored which could have a potential positive impact on the local service sector economy, as is the opportunity to build upon Tendring's location as a potential centre for education and innovation in the seeking to embrace ever cleaner and ever greener forms of energy generation and energy efficiency – particularly given the area's association with off-shore and on-shore wind, solar farms and its visible proximity and association with Bradwell.

Finally, this Council would fully support measures to implement a local jobs and training programme to provide the maximum opportunity for local people to find employment and career development directly or indirectly in the construction, operational and ongoing maintenance and servicing of the power station and associated infrastructure.

Impacts on Housing Provision and Delivery

The North Essex Authorities (NEAs) of Braintree, Colchester and Tendring have set out an ambitious programme of development, including residential development, in the emerging jointly prepared Section 1 Local Plan and authority-specific Section 2 Local Plans aimed at meeting objectively assessed housing needs – with a healthy level of flexibility or 'headroom' to guard against the risk of under-delivery.

The Section 1 Local Plan for North Essex has recently been the subject of independent examination and the Planning Inspector has concluded that one of the three proposed 'Garden Communities' (proposing 7,000-9,000 homes and 25ha of employment land on the

Tendring/Colchester Border) can proceed within the current plan period to 2033, with the majority of development likely to take place beyond 2033.

The Section 2 Local Plan for Tendring proposes major mixed-use developments around Clacton and Harwich including the 'Hartley Gardens' development of 1,700 homes on the edge of Clacton and the predominantly employment-led 'Harwich Valley' development on the A120 within close proximity of Harwich International Port. There are also emerging proposals for the regeneration of Jaywick Sands which will include new quality housing and opportunities to establish new business premises.

In considering the potential benefits of the Bradwell development, there are opportunities for the project to have a catalytic impact on the delivery of the schemes mentioned above – particularly given the headroom in the housing land supply that has been planned (which could provide accommodation for some of the generated workforce) for along with the employment site opportunities being brought forward in strategically important locations which could serve any supply chain requirements. The Tendring Colchester Borders Garden Community from a housing perspective in particular is located close to the University of Essex within a relatively short commute of south Colchester and routes into and out of Maldon District.

The government's current consultation on the potential to establish 'Freeports' may offer the potential for locations like Harwich to play a key role in accommodating supply chain industries including those involved in the assembly of components for a future power station, or the on-site construction of pre-fabricated components for new housing. This adds weight to the Council's view that the potential of Harwich Port (which, incidentally, along with the port of Felixstowe is owned by a Chinese company HPUK) to assist in this project should not be discounted or underestimated.

Environmental and transport impacts

The Council fully endorses the comments submitted jointly by Essex County Council and Maldon District Council and shares the concerns raised, in particular, about the:

- The impact of the Coronavirus COVID 19 pandemic on the ability of BRB to carry out a meaningful consultation exercise that achieves appropriate engagement with the general public and other consultees;
- The need for the benefits to be appropriately weighed against the potential negative impacts and for those impacts to be avoided or otherwise mitigated in striving to achieve a sustainable development;
- The lack of information at the current stage of the project, on a range of topics including the development's carbon footprint, that makes it difficult for consultees at this stage to respond to the consultation in a meaningful and properly informed manner;
- The potential impact on local housing markets and the needs for accommodation arising from the development, both during the construction and operational phases and how these affect the proposals for development already planned for in adopted and emerging Local Plans for Maldon and surrounding districts and boroughs and the potential for a positive legacy of new permanent housing provision;
- Environmental impacts including ecological, heritage and landscape impacts (discussed further below);
- The impact on existing communities arising from the development both in the construction and operational phases;
- Transport implications and the need to maximise the opportunities to better utilise transport of construction materials by rail and sea/estuary and minimise the reliance on road transport;

- Implications surrounding how and where the power station will connect to the National Grid and the infrastructure required both on and off site to achieve this; and
- Impacts on the tourism economy and the natural and manmade assets that contribute to that economy and attract visitors to both Maldon and the wider area.

The Bradwell site is clearly visible on the seascape when viewed from southern parts of the Tendring District, including from the historic coastal town of Brightlingsea on the Colne Estuary and the low-lying communities of Point Clear, Jaywick Sands and parts of Clacton on Sea and the exposed coastal landscapes that lie between.

It is therefore essential that any potential landscape and visual impacts arising from the development are considered, not only from the immediate vicinity of the site – but also from surrounding communities and districts further up and down the coast – including those mentioned above.

Whilst it is appreciated that any development of this scale is inherently going to bring about a net negative impact on the landscape, the positioning, massing and appearance of the structures need to be carefully considered to keep negative impacts to a minimum whilst seeking to achieve an addition to the landscape/seascape that could be seen positively as a landmark and a feature of local interest.

With this in mind, any proposed development will need to take account of the existing East Marine Plan as well as the policies contained within the emerging South East Marine Plan.

Both during the phases of construction and operation (and subsequent decommissioning), the development and any associated infrastructure will bring about an impact, both directly and indirectly, on ecology both on the site and in the wider area – affecting habitats of local, national and international importance.

The coast of Tendring is affected, in particular, by three sites of international importance to wildlife – namely the Colne Estuary (within obviously close proximity to Bradwell); Hamford Water; and the Stour Estuary. In dealing with planning applications for the proposal, the relevant decision making body whether national or local, will have an obligation as the ‘competent authority’ under the European Habitat Regulations to assess the potential direct and indirect impacts on all internationally designated sites (both within and beyond the relevant administrative area) before coming to a decision.

Indirect impacts on such designated areas could include those arising from discharges affecting water and air quality, transportation during construction phases and recreational disturbance arising from increased activity associated with new housing or temporary accommodation.

The need for impacts to be assessed through the necessary Environmental Impact Assessment, Habitat Regulation Assessments, Appropriate Assessments, Sustainability Appraisals and Strategic Environmental Assessments is clear. The need for identified impacts to be avoided, mitigated and, as a last resort, compensated is of particular importance to Tendring District Council and the evidence that sits behind any conclusions in that regard must be extremely robust.

We trust that the above comments will be taken into account as the project progresses and welcome any opportunity for further engagement aimed at maximising the potential economic benefits of the development and minimising and mitigating and negative impacts.

Yours sincerely

Cllr. Neil Stock OBE

Leader of the Council

Cllr. Mary Newton

**Portfolio Holder for Business &
Economic Growth**