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Response to Bradwell B Proposed Nuclear Development Stage One Pre-application Consultation

Via email to: feedback@bradwellb.co.uk

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INTRODUCTION

The Parish of Cold Norton is a village on the Dengie Peninsula in Essex lying approximately 4 miles south of Maldon and 10 miles south east of Chelmsford. It is situated at the south-east end of the Danbury Ridge.

Nearby villages include Purleigh, Latchingdon and North Fambridge. Administratively, Cold Norton forms part of the Purleigh ward in the district of Maldon.

There are 431 dwellings, some industrial and commercial enterprises and the Three Rivers Golf and Country Club.

Cold Norton Primary School is in St Stephens Road as is the local parish church, St Stephen's, which was the location of the first Church of England marriage ceremony to be conducted by a woman priest.

The Village Hall is situated in Cherry Blossom Lane, an un-adopted road, and has a small car park which doubles for school parents to drop off and pick up their children. A zebra crossing connects the route from this car park to the school.

The main part of the settlement is astride the Latchingdon Road between Three Ashes Corner and the railway bridge, with some housing extending north and west of Three Ashes corner, eastward from the railway bridge towards Palepit Corner, and to the south near to North Fambridge. The built core of the village is generally well landscaped with many mature trees and established hedgerows.

The rural parish beyond is partially wooded with scattered areas of dense vegetation, particularly along the bridleway following the course of the disused railway. The golf course to the south of the village includes Beacon Hill, which is a dominant feature in the landscape.

The Stow Maries Aerodrome is situated within Cold Norton. It is a grade II listed World War I aerodrome built to defend London from zeppelin attack. 24 buildings remain standing, which have been sympathetically restored.

In normal circumstances an open meeting in the Village Hall would have been convened to ascertain an accurate response from the residents. Due to Covid-19 a questionnaire covering the major impacts on the village was distributed and used to inform this response from the Parish Council.

To enable consistency with feedback from our own questionnaire and the Stage One Questionnaire distributed by Bradwell-B for individual household response, the Parish Council's response will follow the same structure as follows:

Q1: BRADWELL B PROPOSALS: OVERALL

- It is known that Government has identified Bradwell as a potential location for a new power station in National Policy Statement on nuclear energy EN-6 and we recognise that BRB expects the on-going review process to re-confirm the Bradwell B site as acceptable for the application for a Development Consent Order (DCO).
- Despite the fact that 69% of responders to the parish survey believe the proposal will have a negative impact on the village this response is made in good faith on the understanding that it is designed to inform BRB in its preparation of a DCO and is centred around a very restricted set of questions focussing on short term construction issues and transportation of workers and materials. It is understood there will be further consultation during this process allowing further opinion seeking of the wider issues surrounding the

introduction of a huge industrial undertaking into a small rural coastal peninsular.

- The scale of the proposed built infrastructure will irrevocably alter the Dengie peninsula from one of rural farmland, salt marsh and important tidal estuary into the biggest building site in Europe in the medium term and an industrial landscape in the long term. Residents fear that with such a huge expansion of the site and influx of workers the very nature of Dengie communities will be destroyed. Concerns are expressed in terms of our road infrastructure and local housing capacity and the current plans do not address these issues sufficiently.
- The critical issue to address in the short-term is road usage: even with road improvements the proposal for up to 700 two-way movements per day during early years of construction is entirely infeasible and would put impossible pressure onto the narrow 'one way system' proposed in Fig. 6.5 in the Summary Document. It is believed that the B1010 Fambridge Road route must be brought up to the standards specified in the current Design Manual for Road and Bridges, CD 127, Revision 1 (formerly Volume 6, Section 1, Part 2, TD 27/05). Furthermore the upgrading must extend the full distance to the B1010 Lower Burnham Road and include increasing the capacity of the mini roundabouts at Palepit Corner. **This must be completed before construction commences.**
- Although the road routes described in the consultation document do not flow through the village it is inevitable that any congestion on the planned routes will divert drivers onto local alternatives such as Latchingdon Road passing through the centre of our village. In order to mitigate the effect of this risk and potential danger to school children and parents crossing this road twice daily it is considered that traffic calming measures such as single carriageway chicanes with appropriate signage should be installed well before the increased HGV and car traffic commences.
- The critical issue to address in the long-term is increased housing capacity and the effect on the existing road network in and out of the Dengie peninsular. It is essential that the extent of roads which are currently subject to upgrading be reassessed: without the additional upgrading of the road network (between South Woodham Ferrers and the Rettendon Turnpike interchange with the A130) there will be daily gridlock around South Woodham Ferrers which will not only affect local residents but also be extremely

detrimental to the smooth flowing of construction traffic and employees attempting to access Bradwell B, with financial implications and major delays in the overall construction period. When assessing traffic flows, allowance should also be made for the future major increase in local traffic loads on the B1012 around South Woodham Ferrers now that there is ECC approval for a major new housing and industrial development which is solely to be accessed from the same stretch of B1012. This major pinch-point will seriously impede traffic flow into and from the Dengie.

- We acknowledge the significant potential economic benefits to our Local Community and would expect to be supported throughout the entire construction phase and to receive social economic benefits and support initiatives to educate, train and employ local people for work at Bradwell B.
- We expect development at all steps stages to prioritise the protection of the environment and civil amenity.
- Published literature does not mention or consider longer-term transformational development, which could be significant in this area. (Transformational development refers to a project that creates the economic conditions for further investment. Projects such as Bradwell B are widely recognised as being highly likely to rapidly shift the geographical, sectoral, and distributional characteristics of the local economy, in particular by spurring urbanisation and industrialisation). More understanding is required through formal cost-benefit analysis at the next stage of planning.

At the current level of understanding our overall conclusion is that the potential benefits to the whole Dengie community and our Parish of Cold Norton in particular are limited to potential job opportunities and training, downstream supply chain economics and increased demand for local goods and services. 67% recognised these factors as either a minor (29%) or very (37%) positive impact on the district.

In contrast, 69% of our responders view the overall impact of Bradwell B proposals for a new nuclear power station and associated developments to have a minor (13%) or very (56%) negative impact. The reasons for this negative perception include increased noise and pollution, traffic issues, environmental considerations, damage to wildlife and conservation areas and the loss of a peaceful, rural environment.

Q2: THE POWER STATION: DESIGN & ENVIRONMENT

Location

- Bradwell is situated on the low-lying Essex coast in a tidal floodplain of the Blackwater estuary which, undefended, would be flooded at high tide. Much of the site is in Flood Zones 2 and 3, highly vulnerable to flooding and especially to sea level rise, storm surges and coastal processes consequent on climate change. Various studies have demonstrated the site's being prone to flooding. Well before the site was designated it was described as 'vulnerable to subsidence, rising sea levels and rollover of the Blackwater estuary'. The potential impacts of climate change were well documented: 'The Bradwell B site is low-lying and would need to be raised significantly in order to avoid potential flood risk and inundation from the sea'. *Ref: Local options - potential effects of coastal erosion and seawater inundation on coastal nuclear sites, CoRWM, Doc. 1625*
- The proposal that Bradwell B would sit on a raised platform surrounded by new sea defences is by its very nature an indication that the site is manifestly inappropriate for a potentially hazardous nuclear installation. Furthermore it is the consequential requirement to import vast quantities of land-fill material that is to a large measure driving the proposals for HGV traffic management to the detriment of the communities within the Dengie. Significantly, every option concerned with the impact of road transport and freight management was responded to in negative terms ranging from 24% to 83%.

Design

- The enormous scale of the development, occupying approximately 600 hectares is about 10 times the size of Bradwell. Local residents have expressed the view that the scale of the proposed site will irrevocably transform this unique peninsula from one of rural farmland, salt marsh and important tidal estuary into a huge industrial landscape. Residents fear that the very nature of the communities of the Dengie will be destroyed.

Environment

- Bradwell on Sea's unspoilt, remote beaches and nature reserves attract tourists, walkers, artists and photographers, dog walkers and ornithologists

from the local area and much further afield. The loss of amenity during construction will include access to beaches and reserves via the new English Coastal Path. Reduction in tourism will negatively impact the local economy and could adversely affect the Dengie's reputation as an increasingly important wine region within the United Kingdom.

- Some biologists have concluded that the building of Bradwell B will have a negative impact on five nationally and internationally protected nature conservation sites including sites of special scientific importance (SSSIs) and those protected under the 'RAMSAR convention on wetlands of international importance especially waterfowl habitats' and on the Marine Conservation Zone which will affect the rare Essex Native Oyster, mussel and clam stocks. The need for water intake and outfall into the estuary for cooling purposes will scour the seabed which will be detrimental to the estuary's ecology raising water temperatures and harming fish stocks.

Q3: PEOPLE & JOBS

- We note the number of temporary and permanent jobs it is claimed will be created and clearly welcome any opportunities for local people. 37% of our responders anticipate a very positive and 29% a minor positive impact to the area. However, given the attention put into the accommodation and park and ride locations, it is clear the project is working on an assumption the majority of the temporary roles will be filled by workers from outside the area. Given this, we can only assume that there will be a significant influx of workers into the area and as such will present a number of other challenges.
- Recruitment should prioritise the local community within a 30 miles radius and a programme should be established to liaise with all educational establishments to set up training/apprenticeships to ensure that the relevant skills/subjects are followed to ensure local employment will continue throughout the life of the power station.
- Local contractors should be given the opportunity to bid for contract(s) enhancing the prosperity of the local community as locals will be employed again within a 30 miles radius. Employment of local people will also lessen the extent of future increases in traffic loads on an inadequate road network, and benefit Bradwell B financially through a reduction in the need for new housing accommodation and associated servicing facilities.

Q4: ACCOMMODATION: OVERALL APPROACH

- There is a clear expectation of several types of accommodation being required by the influx of workers:
 - Permanent housing
 - Holiday rentals
 - Private rentals
 - Temporary “on-site” accommodation

This will strain demand on existing housing stock, increasing prices which will impact on the feasibility of local younger people to enter the housing market. The issue of the retention of younger people in rural communities is a well-documented concern for the continued viability of such rural areas. 55% of responders perceive a very negative impact on the village.

- All temporary accommodation should be built to an approved standard. See Q5.
- The critical issue which is not addressed is housing capacity in the long-term. The impact of full-time workers moving into the area would be the significant displacement of local people, which is unacceptable. Likewise, the plan for 350–700 houses to be built during the Generation stage in Bradwell will have a huge impact on the local community. Local infrastructure is not adequate now, so a fully comprehensive plan is needed for health and education and other shops and services. Additionally, the local road network should be upgraded with as little disruption as possible to the environment and put in place prior to the start of the Bradwell B build
- All services provided within the site should be given by local businesses, which again will lessen future traffic loads.

Q5: ACCOMMODATION: TEMPORARY CAMPUS & CARAVAN SITES

- All temporary accommodation should be built to an approved standard. It is laudable that Bradwell B states that it intends to remove this accommodation after construction has finished, with the reinstatement of the land to its present use. However, in this context it is questionable whether the proposed accommodation blocks of up to six storeys is the most practical or financially advantageous to Bradwell B. Low rise accommodation whilst taking up a great footprint, would be more appropriate, and be more environmentally friendly.

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- The whole of the site should be screened.
 - Scenario 1 is mandatory as it is within the project site and does not impact so heavily on Bradwell Village.
 - Scenario 2 is entirely inappropriate as it permits 'project creep'.

Q6: TRANSPORT: OVERALL APPROACH

- We would favour a greater emphasis on marine and rail transport.
 - Highly recommend vastly increasing the baseline figure of 50% for using marine transport in bringing materials into the site.
 - Further research into Network Rail needs to take place to bring in supplies and keep them off the roads.
- When planning road network use please consider that the roads into the Dengie to Bradwell are already inadequate given the thousands of dwellings being built in Maldon, Burnham and South Woodham Ferrers even before factoring in the increased Bradwell B traffic movements. Few of these are, as yet, occupied, but will be before the power station project commences and add significantly to the traffic numbers.
- When assessing traffic flows, allowance should thus be made for the future major increase in local traffic loads on the B1012 around South Woodham Ferrers following ECC approval for a major new housing and industrial development (SGS7) which can only be accessed from the same stretch of B1012. It is essential all upgrading plans due to SGS7 be reassessed to include the impact of Bradwell B traffic to the road network between South Woodham Ferrers and the Rettendon Turnpike interchange with the A130. There will be daily gridlock around South Woodham Ferrers which will not only affect local residents of the Dengie Hundred but also be detrimental to the smooth flowing of construction traffic and employees travelling to Bradwell B, with financial implications and major delays in the overall construction period.
- The increase in traffic generated by the Bradwell B development will almost inevitably increase the risk of accidents, noise and air and light pollution. We anticipate a reduction in the quality of life of residents in all the parishes of the Dengie Hundred, including Cold Norton. It will also increase congestion in the wider area including Danbury and South Woodham Ferrers, both of which already experience severe traffic flow problems at peak times.

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- Acknowledging that some HGV usage will be required:
 - No HGV or coach movements should take place during the hours of 8.30–9.30 a.m. and 3:00–4:00 p.m. during term-time when school runs are being made and residents travelling to and from work.
 - Restriction of any lorry movements at night should be a priority with a total ban between 7:00 p.m. and 7:00 a.m.
 - HGVs not to travel in convoy.
 - Once the strategic route is chosen, all traffic should be excluded from any other routes and definitely not being diverted through any villages. Clear signage will be essential to ensure this. Recent experience of the temporary closing of Wellinditch Bridge and Mundon Ford demonstrated how ‘rat runs’ are quickly found to the detriment of amenity and safety.
 - The Dengie Peninsula has a lot of farming traffic all year round which needs to be factored in.

Q7 MOVING FREIGHT: SEA TRANSPORT

- We would welcome any measures adopted to minimise the use of road transport and therefore mitigate the impact on local communities from greatly increased traffic volumes and vehicle pollution.
- Option 1: Appropriate
- Option 2: Inappropriate
- Option 3: Inappropriate
- We note your assessment of the environmental impact of options 2 and 3 and whilst not an expert the impact on the marine life does seem to negate any benefits; however, we would like to see any option being developed to include plans to maximise the volume and regularity that sea transport could be utilised both during development of the site and once the facility moves to full operation.
- Sea Transport is entirely appropriate. The consultation document mentions a lack of suitable ports in the vicinity, which is inaccurate. Both Harwich and Tilbury would be suitable, having all tide access and connected to the rail network, shipping time is hardly relevant in the context, it is loading times and good transport access that matter, which both of these locations have.

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- Option 4 – Inappropriate – totally against dredging and installing of a pipeline as this will have a huge impact on the local oyster beds, fishing and the environment far more than the above options.

Q8 ROAD TRANSPORT: STRATEGIC ROUTE 1

- The early years route, which we note does not even warrant a question in the response document, envisages the use of either Strategic Route 1 or 2 east of the Palepit junction situated at the east end of Cold Norton Village but proposes employing the A414 between Danbury and Maldon turning onto the B1010 Fambridge Road towards Palepit corner. From Day 1 a road network capable of supporting planned HGV movements is needed so must be built from the start of the project. The B1010 Fambridge Road should be brought up to the standards specified in the current Design Manual for Road and Bridges, CD 127, Revision 1 (formerly Volume 6, Section 1, Part 2, TD 27/05).
- Currently Fambridge Road already handles HGV traffic into the Dengie sand pits aptly demonstrating the inadequacies of Fambridge Road which has passing places on the hill section. The dual mini-roundabouts at Palepit Corner are inadequate for such vehicles and will need enlarging.
- Preference is shown for Strategic Route 1 as it is the shortest and is considered to be the most environmentally friendly route with the least impact.
- The by-passes considered will reduce heavy traffic through the villages en route and should be designed carefully to minimise the impact on their residents and the environment.

Q9 ROAD TRANSPORT: STRATEGIC ROUTE 2 WEST

- Option 1 – The preferred response, which is to widen and straighten the existing B1010 and connect to the B1018.
- Option 2 – Inappropriate – North runs very close to Cold Norton Village and impacts the Danbury Ridge Conservation Area.
- Option 3 – Inappropriate – South would detrimentally affect the environment of Ramsar, ESA and SSSI sites which carry significant numbers of migratory waders and other birds. The Crouch Valley SSSI is also there to protect a rare invertebrate environment on which Bumble Bees are being encouraged. The South facing slopes in the vicinity are also important to vineyards in the Crouch

Vale area which are increasingly significant to the Dengie Hundred in terms of commerce, tourism and the need to retain its agricultural character.

Q10 ROAD TRANSPORT: ROUTE 2 EAST

- Option 1: Inappropriate
- Option 2: Inappropriate
- Option 3: Inappropriate
- These options are considered to be totally inappropriate due to the damage to the environment.

Q11 ROAD TRANSPORT – STRATEGIC ROUTES 1 AND 2 BRADWELL SECTION

- Restrictions on times of vehicle movements need to be imposed in order to protect the amenity of residents.
- Light and noise pollution need constant monitoring and corrective action taken if acceptable limits are exceeded.
- Air pollution needs constant monitoring and corrective action taken if acceptable limits are exceeded
- Very old listed buildings are situated on these routes so property owners must be allowed to have a survey carried out before and after construction at the expense of Bradwell B and compensated if damage to properties is proved to have been caused by excessive traffic..

Q12 TRANSPORT: FREIGHT MANAGEMENT FACILITY

- Freight holding areas should not be on the Dengie Peninsula as this will have impact on light, noise and air pollution. Search Areas 1 & 2 are inappropriate. Negative Impact for Area 1: 79% and Area 2: 48%
- HGVs must not travel in convoy as this will have a greater impact on the environment.
- No HGV movements between 7 p.m. and 7 a.m.
- For health and safety reasons, no HGV movement between 8.30–9.30 a.m. and 3:00–4:00 p.m. during school term-time.

Q13 TRANSPORT: PARK & RIDE

- Park and ride areas should be located out of the Dengie Peninsular at urban areas of Chelmsford, South Woodham Ferrers and/or Maldon. Sites 2, 3 and 4 received strong preference. Negative Impact for Area 1a: 83% and Area 1b: 67%
- There should be a system to monitor where full time employees of Bradwell B live, and if a significant number live outside of the locality, the park and ride services should be maintained beyond the construction phase on an ongoing basis. Where they are not required, all park and rides should be reinstated to existing land uses after construction has finished.
- Regular commuter traffic entering the Dengie on a daily basis via planned routes will inevitably force more traffic on to alternative routes which will have a very negative impact on Cold Norton channelling vehicles through the village on Latchingdon Road, a route leading to the Primary School. The railway bridge has weight limitation and is likely to deteriorate further as was the case for Wellinditch Bridge down the line in Stow Maries.
- It is considered essential for reasons of safety and the environment that calming measures such as one-way islands with signage together with substantially widened footpaths be introduced.

Q14 CONSULTATION PROCESS

- **The consultation process itself.** We consider the consultation is premature in that it is taking place before key issues have been fully considered, let alone resolved. These include the key stage of the GDA, the long-awaited energy review and the revised National Policy Statement. The consultation is taking place during a national emergency when people are distracted and unable fully to participate or engage in the process.
- **The scope of the consultation.** ‘The principle of the need for new nuclear power stations and the choice of Bradwell as a potentially suitable site is a matter for Government policy and outside the scope of the consultation.’ This is disingenuous and deliberately narrows the scope so that people may be led to conclude that the power station is already a ‘done deal’ and that they are only being invited to comment on the details of the project. The Government has identified Bradwell as a site through a process of site selection but Bradwell has not been redesignated by Government and, in any case, it is only a

potentially suitable site. Therefore, the issue of whether Bradwell B should be built at all is very much a matter for discussion.

- **The consultation is imbalanced.** By excluding the overall question of site suitability the consultation focuses on components of the proposal such as power station design, transport arrangements, port development and so on. This lures people into assuming the project is agreed with only the details to be determined. Additionally, far more attention is devoted to issues such as cooling system, transport, accommodation arrangements while the treatment of other matters of concern such as ecology, environmental and historical legacy, radioactive waste management etc. are given scant coverage with little useful information on the detail or extent of what is proposed.
- A negative response to the consultation process was recorded as 65%.
- Unfortunately with Covid-19 restricting the planned Workshops, in order for Parish Councils to be able to consult their parishioners more widely requests to delay the final response date have been ignored. In Cold Norton a process was instigated to gather written questionnaires specific to impacts on the parish but was a poor substitute for a Parish Meeting.
- It is grossly unfair (and contrary to the principles of Equal Opportunities legislation) to deny these residents the opportunity of responding, bearing in mind the immense impact that Bradwell B will have on their future lives. Simply cancelling virtually all the consultation exhibitions (even libraries have been closed for many weeks) is not acceptable, and negates your stated position that everyone's 'views are important to the development of our proposals ... and will help shape future plans'.
- We have encouraged our residents to respond directly to BRB as well as to the Parish Council.

Brian Haydon
Chairman

For and on behalf of Cold Norton Parish Council