

Chelmsford City Council Consultation Response

Chelmsford City Council (CCC) thanks Bradwell Power Generation Company Limited (BRB) for the opportunity to comment on its initial proposals for a nuclear power station at Bradwell B.

About Chelmsford

1. Chelmsford is located at the heart of the county of Essex with a population of over 170,000. As England's newest city and the County Town, with a strong economy, good transport connections, high quality of life and attractive environment, it is already a major draw for employment, shopping, leisure and one of the best places to live in the United Kingdom (Annual National Halifax Quality of Life Surveys 2012-2014). Chelmsford is already delivering 1,000 new homes and 800 jobs every year, and over the coming decades it is forecast to be the major growth location for new homes and jobs in Essex. Along with the City of Chelmsford, the Council's area includes the riverside town of South Woodham Ferrers and villages set within attractive countryside. Chelmsford's population is continuing to grow and is predicted to increase to around 199,000 by 2037 (ONS 2014 Sub National Population Projections). Chelmsford is located approximately 38 km to the west of the Bradwell B main development site and has good road and rail connections. Car ownership is high with high levels of vehicle movements. Cost of living is relatively high, and some workers live a significant distance from Chelmsford. Chelmsford has a mixed economy with a high number of jobs in the service sector, education and health, administration, manufacturing and construction. For more information about Chelmsford please refer to the Chelmsford Local Plan 2013-2036 available at <https://www.chelmsford.gov.uk/your-council/committees-and-meetings/calendar-of-meetings/?id=d8c1de9f-7fad-45c3-ad71-57d0f3caaf89>

Summary of Consultation Response

2. Though in principle opposed to reliance on nuclear power if to be subsidised by Government, CCC recognises that National Planning Policy is now such as to enable this development subject to certain provisos (see "Principle of Development" points 7, 8 and 9 below).
3. In that light, therefore, this response provides a commitment for this Council to work proactively with BRB to identify and address all the effects of the development on CCC's administrative area and to maximise the positive impacts and to minimise the negative impacts that the project could bring.
4. CCC considers that a considerable number of issues need to be examined, tested and addressed before the stage 2 consultation to enable CCC and its communities to come to

a considered view on the development proposals in so far as they affect this Council's area. At this stage CCC raises significant concerns and objections on a number of key aspects of the proposals, including:

- The significant lack of recognition, consideration and information on the impacts of the project on CCC's area including on its local and strategic highway network, communities, environment and settlements;
- The early years and peak construction transport strategy which focuses on utilising the existing highway through Danbury and South Woodham Ferrers (SWF) and which is considered wholly unsuitable;
- The proposed modal split between marine, rail and road transport for freight which is considered too road-dominated;
- The potential use of Chelmsford train station and Brook Street Goods Yard for the movement of rail freight which would involve HGVs travelling through the city centre and which is considered wholly unsuitable;
- The scope and suitability of proposed highways transport improvements which are not evidence based;
- The lack of consideration of the Danbury Air Quality Management Area (AQMA) and air quality and noise impacts of the proposals;
- The suitability of proposed construction worker park and ride sites which are not evidence based;
- The lack of adequate consideration of the new strategic housing and employment-led development north of SWF Urban Area and the B1012 and consideration of highways mitigations around the town, such as a SWF bypass;
- The lack of consideration of the new allocated development in Danbury;
- The suitability of proposed construction freight management facilities which are not evidence based;
- The lack of identified highways interventions on CCC's local and strategic highways network in particular through and west of SWF;
- The potential significant negative impact of the proposals on the Essex coast designated Habitats Sites and the lack of detailed studies that any harm can be sufficiently mitigated: and
- The lack of a strategy to reduce the carbon emissions generated through the different phases of the project, a mitigation strategy and a method of monitoring and reporting on the emissions.

5. Therefore, the response urges BRB to make available additional information and evidence to support its development proposals as quickly as possible and with the input from CCC as a key local stakeholder. The consultation also raises concerns about whether BRB has considered the cumulative effects of the Bradwell B developments alongside other proposed development within the area including the strategic development north of SWF, new housing growth in Danbury and the new National Grid sub-station required to export the electricity generated by the power station. Furthermore, the consultation response raises concerns about the effectiveness of the consultation during the Coronavirus pandemic and urges BRB to commit to undertaking additional pre-application stages of consultation to ensure all interested parties have the opportunity to get involved.

6. Notwithstanding the concerns or objections to key aspects of the development proposals, CCC's consultation response recognises a number of BRB's project aims and aspirations and recognises the benefits that the development could bring to Chelmsford and the wider region. These include:

- BRB's commitment to work with local stakeholders including local planning authorities to identify the effects of the project (including on businesses, services, local places and communities), to maximise the positive economic effects, to understand potential adverse effects so these can be avoided or mitigated, and to deliver a project that provides a positive legacy;
- BRB's commitment to use sustainable transport modes for construction freight and workers as far as practicable to help reduce HGV traffic on local roads, including a potential 'rail and ride' bus service from key railway stations;
- Implementation of permanent road and junction improvements to mitigate and minimise highways impacts;
- Implementation of an Accommodation Strategy and potential Housing Fund to meet the demands of the development in terms of attracting and retaining the construction workforce and to minimise impacts on the local housing market;
- An Employment, Skills and Education Strategy and a Jobs Service to develop a local skills base that can support the delivery of the Bradwell B Project;
- An Asset Skills Enhancement and Capability (ASEC) Fund to support local skills providers to deliver appropriate training;
- A Regional Skills Coordinator to provide a link between local providers, supply chain businesses and the Project;
- Building on training initiatives already established working with the Local Enterprise Partnership, local colleges and private training providers;
- Linking construction contractors with colleges to provide advance information on the jobs and skills that will be needed, so that training can be carried out in good time; and
- Supply Chain Team and Supply Chain Portal partnering local business groups and the Project to assist local, regional and UK businesses in winning contracts for the supply of goods and services to deliver the Project.

Specific Consultation Responses

Principle of Development

7. CCC acknowledges that National Policy Statement for Nuclear Power Generation, July 2011 (NPS EN-6) identifies Bradwell B as one of 8 potentially suitable sites for the deployment of a new nuclear power station in England & Wales before the end of 2025.
8. CCC declared a Climate Change and Ecological Emergency Action Plan in 2019 and supports the transition towards a low or zero carbon economy in support of climate change and sustainability. In addition, CCC strongly encourages the development as a

whole to maximise opportunities to reduce its carbon footprint and support the transition to a zero-carbon economy (see points 14 and 19 below).

9. CCC notes that the Overarching National Policy Statement for Energy, July 2011 (NPS EN-1) also states that the Planning Inspectorate “must decide an application for energy infrastructure in accordance with the relevant National Policy Statements except to the extent it is satisfied that to do so would lead to the UK being in breach of its international obligations; be in breach of any statutory duty that applies to the Infrastructure Planning Committee (now undertaken by the Planning Inspectorate); be unlawful; result in adverse impacts from the development outweighing the benefits; or be contrary to regulations about how its decisions are to be taken.” Therefore, although the Bradwell B site is identified as potentially suitable within NPP EN-1 it does not prevent the adverse impacts being considered greater than the benefits, resulting in the Development Consent Order (DCO) being refused. As such, CCC is committed to working with BRB, as a key stakeholder, to identify and address all the effects of the development on CCC’s administrative area and to maximise the positive impacts and to minimise the negative impacts that the development could bring. Furthermore, CCC welcomes BRB’s commitment to engage with key stakeholders including local planning authorities on their proposals and evidence base and to build positive and trusted relationships. CCC wishes to be considered a key stakeholder alongside Maldon District Council (MDC) and Essex County Council (ECC) during this process.

Local Plan

10. The Chelmsford Local Plan 2013-2036 was adopted on 27 May 2020 and forms part of the statutory development plan for the CCC area. Policies in the plan will be relevant to the decision-making process for any associated site works proposed within CCC’s area such as construction worker park and ride sites and freight management facilities. CCC would also be responsible for discharging and monitoring relevant planning conditions of any associated development works within its area.
11. The Chelmsford Local Plan 2013-2036 also includes a development to the north of SWF which will provide a sustainable urban extension for around 1,000 homes, 1,000sqm of flexible business space and 1,900sqm for convenience retail. This is expected to be delivered between 2021 and 2035. A range of new community services and facilities including a potential new primary school, two early years and childcare nurseries, healthcare, open space, recreation facilities and neighbourhood centre will be provided on the site. These services and facilities will not only serve the new communities but are also expected to be easily accessible by walking, cycling and public transport to residents in the existing town directly to the south of the allocation. The development will also provide access by walking, cycling and public transport to facilities and services in the wider area including the railway station, town centre, and schools. This will include safe crossing points on Burnham Road to enable seamless integration with the existing settlement. As such, BRB is urged to have full regard to relevant policies and proposals contained within the Chelmsford Local Plan 2013-2036 and supplementary planning documents including Making Places and Planning Obligations when developing and testing its development options and proposals. BRB are also urged to have regard to the

emerging site masterplan, SWF Neighbourhood Plan and Danbury Neighbourhood Plan, and to engage fully with the SWF Town Council, Danbury Parish Council and SWF and Danbury Neighbourhood Plan groups.

Level of Information

12. Whilst CCC recognises that this is the first stage of consultation, significant concerns are raised over the lack of detail, information and published evidence base provided to support the development proposals, in particular the absence of traffic modelling, a sufficiently developed transport strategy and environmental assessments. Considerable disappointment is raised over the lack of recognition and information in the stage 1 consultation on the impacts of the project on CCC's area including its communities, environment and settlements, particularly given the significant proposed construction traffic movements and associated development within this Council's area. CCC is also frustrated that BRB have not engaged with this Council before the launch of the consultation. Overall, it is not possible for CCC to adequately assess all the implications of the proposed development on its area, to rule out significant adverse impacts and to determine whether it will be possible to effectively mitigate, manage or compensate for the significant adverse impacts. As such, at this stage CCC raises concerns or objects to a number of key aspects of the proposals. These are set out within this consultation response.
13. CCC urge BRB to develop and share their evidence base as quickly as possible and to not defer any full details or studies until the DCO application stage. CCC also wishes to reserve the right to supplement its consultation response as more information and evidence becomes available. Furthermore, CCC urges BRB to fully acknowledge and investigate the impacts on this Council's area in future publications and consultation materials.

Climate Change

14. As noted earlier, CCC acknowledges that the Bradwell B development has the potential to contribute towards the transition to a low or zero carbon economy in support of climate change and sustainability. However, CCC considers that there is lack of information and strategy within the consultation. CCC urges BRB to develop and share a strategy to reduce the carbon emissions generated through the different phases of the project, a mitigation strategy and a method of monitoring and reporting on the emissions.

Electricity Transmission

15. CCC notes 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, including the future of the high voltage powerlines that run to the north of the existing town of SWF. These are located within the area proposed for future strategic development including around 1,000 new dwellings, 1,000 sqm of employment space, a

Neighbourhood Centre and potential new Primary School. CCC therefore ask that BRB work closely with National Grid and CCC to enable details on these proposals to be shared and assessed as quickly as possible and to ensure all proposals are aligned to enable cumulative impacts to be fully assessed and mitigated.

Main Development Site Proposals

16. As CCC does not lie adjacent to the main development site it is generally considered that the consideration of the site-specific impacts such as upon landscape and seascape, public access and recreation, historic environment, flood risk, ecology and lighting is deferred to the relevant consultees who are more appropriately placed to respond. These include ECC, MDC, the Environment Agency and Natural England.
17. CCC welcome the recognition that the proposed project would impact on an environmentally sensitive area as the main development site is within or close to a number of environmental designations including the Blackwater Estuary SSSI and Essex Estuaries SAC. However, CCC is concerned about the potential significant negative impact of the proposals on the Essex coast designated Habitats Sites and the lack of detailed studies that any harm can be sufficiently mitigated. BRB is advised that more information on the key ecological constraints associated with the coastal and marine environment can be found in the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) Strategy Document. CCC agrees that recreational disturbance at these reserves is already an issue and it will be important for BRB to consider what additional impact the development could have alongside other relevant plans such as the proposed England Coast path and Essex Coast RAMS Strategy Document. Although the Bradwell B development is outside the scope of the Essex Coast RAMS, BRB are requested to involve the Essex Coast RAMS Steering Group on emerging proposals to mitigate the impacts of the development on protected sites. CCC would also like to be kept informed during the preparation of the Habitat Regulations Assessment which will assess the potential for adverse effects on the conservation objectives of the European Protected Sites resulting from the Bradwell B Project.

Transport

18. Overall, CCC recognises in general terms the aims of the proposed transport strategy which include maximising the use of marine and/or rail transport over road transport for the movement of freight and promoting sustainable transport modes for Bradwell B construction workers and staff. However, as the emerging transport strategy is not fully formed and in the absence of the transport modelling evidence base, CCC considers that it is impossible to fully quantify the impact of the proposed transport strategy on CCC's administrative area and to satisfy itself that negative impacts can be effectively mitigated, managed or compensated. This will only be possible once BRB plans and its evidence base is more developed. CCC is also keen that any identified mitigations provide positive longer-term transport legacy improvements. CCC is however concerned that the use of marine and / or rail transport over road transport for movement of freight where "effective and deliverable within the Project timescales" is not strong enough to ensure a significant modal shift. CCC considers that this aim should instead be driven by ensuring

the most appropriate strategy for the local and strategic highway network and local communities, rather than cost and time.

19. CCC is very concerned that BRB may be pursuing a more dominant road-led freight movement strategy and urges it to fully explore a strategy for moving freight by rail via upgrades to the Southminster branch line and via existing commercial port facilities located at Felixstowe, Harwich and Tilbury to increase its minimum target for marine freight movements to more than 50%. Based on the stage 1 consultation and available information, at this stage CCC strongly objects to any potential use of Chelmsford train station and Brook Street Goods Yard and/or any potential new rail freight interchanges in Chelmsford City for the movement of rail freight. This would involve freight being transferred into HGVs and hauled for the remainder of the route to site by road which is considered wholly inappropriate on city centre and local roads. CCC urge BRB to do all they can to reduce the traffic, particularly HGVs, on CCC's rural roads and that comprehensive, robust and timely evidence is provided to fully explain and justify the preferred approach. In order to move towards a low carbon future, sustainable transport and the use of rail and marine needs to be encouraged wherever possible over road during construction and operation of the site. Consideration should also be given to utilising electric or ultra-low emission freight vehicles and park and ride buses wherever possible.
20. CCC welcome the principle of Freight Management Facilities but at this stage CCC cannot be assured that these options would not have adverse impacts on traffic flows on the local highway network including along the A132 and B1012. CCC also has concerns about other potential negative impacts including on the landscape and viewpoints, openness of the Green Belt and loss of existing habitat and how they could be effectively mitigated. CCC will expect to see robust traffic modelling and other environmental assessment information before forming a view on which of the options could be preferable or if other sites need to be considered. CCC also request clarification on how many HGVs they would provide space for. CCC welcome the provision of temporary accommodation for 4,500 workers close to the site to reduce daily traffic to and from the site. However, this figure is not supported by adequate evidence and CCC would like to understand whether additional accommodation could be provided on site to reduce the impact on the road network further.
21. As already noted, the absence of a more developed transport strategy and any transport evidence base for the proposed development, it is not possible to be assured that any of the proposed highways improvements and potential mitigation, management and compensation measures will be effective. However, published traffic modelling evidence prepared for the MDC and CCC Local Plans show that several roads and junctions along the proposed early years 'in and out routing loop' for HGVs through Danbury and SWF and then during the peak construction period through SWF could be wholly unsuitable for both the movement of HGV traffic (being already heavily trafficked and forecast to be operating at capacity at peak times by 2036) as well as for any additional highways improvements or mitigations (which would be essential to mitigate the additional development traffic).

22. The A414 through the centre of Danbury is also constrained due to its undulating and windy nature resulting in slow-moving vehicles which would be worsened in combination with additional development freight and worker vehicles. Danbury also has an AQMA along the proposed early years construction route (see also point 26 below).
23. Several key junctions along the B1012 around the north of SWF, the A132 and Rettendon Turnpike have also been identified as requiring improvements to mitigate the planned development of 1,000 new homes and 1,000sqm on new employment floorspace north of SWF in the Chelmsford Local Plan 2013-2036. At this stage there is no evidence to confirm that the potential vehicle and freight movements (predicted between 500-700 two-way movements per day during the peak construction period during SWF) could be adequately accommodated on these roads.
24. CCC is extremely concerned that the consultation does not acknowledge new residential development allocated in Danbury and gives inadequate consideration to the new strategic housing and employment-led development north of SWF and the B1012. The development north of SWF is expected to require road and junction highway improvements along the B1012, Ferrers Road and Rettendon Turnpike, and the A132 and local junctions between the Town and the A130. This allocation is expected to be constructed by the early-mid 2030s and a site masterplan is in preparation. This process is currently exploring active residential frontages along Burnham Road, reducing the speed limit along the B1012 to 40mph and improving connectivity to the existing town to the south, for example through the provision of additional multi-user crossings along the B1012. CCC is extremely concerned that the impact of between 500 – 700 HGV movements a day along this route will be wholly unacceptable, hinder the creation of safe multi-user crossing points and result in severance issues between the existing town and its services, and the new development areas and its facilities. CCC is also extremely concerned about the proposed traffic and potential highways works that may be proposed along the B1012 and the adverse impact this could have on its place-making aspirations to ensure the new development creates a well-connected, seamless and well-designed urban extension to the existing town.
25. BRB are requested to study published local transport evidence including ECC's A132 – A132 Route Based Strategy (RBS) and the transport evidence base prepared for the Maldon Local Development Plan and the Chelmsford Local Plan 2013-2036, in particular EX 023 – EX 029 available at (<https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-new-local-plan/new-local-plan/evidence-base/>). Based on the stage 1 consultation and available information, at this stage CCC strongly objects to the proposed early years and peak construction transport strategies which pass through Danbury and SWF.
26. CCC is particularly concerned that the consultation document does not acknowledge the Danbury AQMA designated in October 2018. CCC considers that the proposals could directly affect air quality within the Danbury AQMA and that the project Environmental Impact Assessment (EIA) must fully quantify the air quality impact that the construction and operational phases will make to the AQMA in Danbury and onto the transport network around SWF. CCC expect that due consideration will be given to minimising the

affect that freight movements, private car use, the proposed park and ride facilities and the routes to access the site will have on air quality. To support this aim, electrical vehicle charging points at park and ride sites and freight management facilities is positively encouraged.

27. In terms of transport to the site by construction workers, CCC would encourage the use of rail and other public transport including park and ride and a potential 'rail and ride' bus service from key railway stations to minimise travel by private car. CCC expect this to be fully explored as part of BRB's transport work and studies and before the stage 2 consultation. This should include provision of dedicated direct buses to pick up construction workers from local population centres such as Chelmsford, SWF and Danbury and from local rail stations such as at Southminster, Chelmsford and the new station in North East Chelmsford in order to encourage construction workers to make use of rail passenger services.
28. CCC welcome the principle of park & ride facilities for construction workers but is concerned about the impacts on the local and strategic highway network and in particular traffic flows and connections along the A132, A130, B1012, B1418, A414 and B1018 for each option. CCC also has concerns about adverse impacts on the landscape and viewpoints, existing habitat including woodland, trees and hedgerow, the historic environment including listed buildings, Sandon Conservation Area and the Chelmer and Blackwater Navigation Conservation Area, the openness of the Green Belt and the potential for impacts on Danbury Common SSSI, Blakes Wood and Lingwood Common SSSI and other designated environmental assets. CCC will expect to see comprehensive and robust evidence base studies including traffic modelling and environmental assessments before it can form a view on whether any of the options is preferable or if other sites need to be considered, and to determine whether the total number of car park spaces proposed to be accommodated is appropriate. BRB is also asked to consider the existing park and ride facility (Sandon Park & Ride) serving Chelmsford, located within search area 2 and is advised that Chelmsford already has two park and ride facilities, and more are planned in the Chelmsford Local Plan 2013-2036 to the north and west of Chelmsford.
29. CCC notes that the consultation document considers that the A132 and B1012 up to the section to Fambridge Road (junction with the B1018) could be subject to junction and highway upgrades and improvements, with the preference that works take place within the designated highway boundary. However, no specific details of potential mitigation measures are given along the section around SWF as the stage 1 main consultation document outlines for other sections of the road including to the east of SWF. There is no evidence to support the assumption that junction and highway upgrades and improvements will be viable and effective around SWF and why other measures proposed elsewhere on the route are not discussed for around SWF including a bypass. CCC also considers that there is also inadequate consideration of the number of key community and environmental sensitivities along the B1012 and A132 around SWF (as there is for other parts of the route), which include existing residential properties, a health centre and primary school and the proposed new residential properties and community uses to

the north of SWF which may all be susceptible to noise, visual intrusion and/or air quality impacts.

30. CCC is extremely disappointed that the consultation document does not adequately identify transport mitigations through and west of SWF, including a potential northern bypass, or sufficiently consider the substantial new development allocated to the north of SWF and to be accessed from the B1012. More information about this development is contained within the Chelmsford Local Plan 2013-2036 and has been separately provided to BRB during the consultation process. CCC is very concerned about the potential additional congestion and for noise, vibration and air quality impacts from increased traffic from both the predicted freight and the construction worker traffic. It is specifically concerned about the impact on the B1012 through SWF. The A132 linking with the A130 also requires further consideration in view of the increase in HGV traffic. Traffic modelling alongside other environmental assessments will be critical to enable CCC and other key stakeholders to fully understand the likely traffic impacts and the mitigation, management and compensation measures that will be required. CCC expect the traffic modelling to test a potential bypass around SWF's Urban Area (as defined in the Chelmsford Local Plan 2013-2036) which includes the allocated land to the north of the B1012.
31. The proposed project transport strategy must assess and provide appropriate mitigation and interventions for the full length of the A132/B1012/B1018 corridor from the Bradwell B site to the strategic road network at the A130. It is very disappointing to see the omission of the busiest part of the corridor to Bradwell on the B1012 and A132. CCC, in partnership with ECC, have carefully considered the traffic impact of its Local Plan allocation on this busy part of the corridor and expects BRB to do likewise which is likely to require significant additional interventions.
32. CCC wishes to be fully engaged in the preparation of all project baseline transport studies and modelling including discussions to define their scope, baseline assumptions and the data sets. This includes the development of a detailed freight management strategy, highway network condition surveys and traffic management and contingency/ emergency planning arrangements. CCC urge BRB to provide detailed evidence on the potential impacts and mitigations alongside impacts on allocations in the Chelmsford Local Plan 2013-2036 and any other potential developments. Detailed evidence should include assessments on traffic modelling, ecology impacts, landscape and visual impacts, as well as air quality, noise and safety impacts.
33. In the absence of any traffic modelling CCC is concerned that there will be additional significant detrimental impact on other parts of the local and wider road network that are not referred to in the consultation document. These may include congestion along the A130 and A12 caused by the increased numbers of HGVs resulting in longer journey times and delays; increased delays and queueing along the B1012 which could encourage more traffic along other local roads such as Ferrers Road, Woodham Road, Edwin's Hall Road and Willow Grove in SWF, and Hackmanns Lane and Bicknacre Road in Danbury; severance issues for local communities in SWF and Danbury and users of the rights of way network, and increased maintenance costs of highway infrastructure due to increased

volume of HGV's. BRB is urged to ensure that the traffic modelling considers where further stress may be placed on the existing Chelmsford road network and communities as a result of the transport proposals to help identify all possible impacts and mitigation, management and compensation measures that will be required.

34. CCC is disappointed that aside from workers resident at the temporary workforce campus, no construction workers have been assumed to cycle to the main development site. CCC considers that SWF is within a suitable cycling distance of the site (if only by electric bike) and that the cycle route network should be improved to provide accessibility for the workforce of Bradwell B from the town.

Jobs and People

35. CCC welcomes BRB's aims, objectives and intentions around jobs and people which aim to limit any significant adverse economic and social impacts, while creating significant business, training and job opportunities for local and regional communities during construction and operational stage.
36. CCC also welcome that BRB is considering the impacts of a "worst-case scenario" of construction workforce numbers and await further information as quickly as possible on how appropriate mitigation can be put in place to accommodate them. CCC equally welcome that BRB recognises the wide range of impacts their development may have on services for the local community, including on the health system, emergency services and education.
37. CCC acknowledge that the development could bring significant benefits to local employment markets, local supply chains and for training and skills development. The impact of the predicted number of construction workers on local housing markets, transport network and community facilities will be considerable, and much more work needs to be done to define and quantify the likely effects on jobs, skills, economy, people, businesses, accommodation, services and local places, to determine whether the aspirations are achievable or ambitious enough, to maximise local benefits and to avoid or manage adverse impacts.
38. CCC is particularly concerned over the potential impact of an additional workforce on its local housing market which could see a significant increase in workers seeking accommodation in the private rented sector and local tourist accommodation. Greater competition in the private rented sector could adversely impact on the more vulnerable members of society currently in this accommodation. CCC requests evidence on how the additional workforce would be accommodated in the local housing market, and how it should be modelled in the gravity model to determine what additional mitigation will be required, where and when. BRB is also expected to ensure that its accommodation strategy and potential housing fund covers this Council's area and that CCC is engaged alongside MDC and ECC to ensure that the housing market can sustainably accommodate additional workers. CCC would expect the provision of permanent accommodation to provide a positive local legacy.

39. CCC would welcome the opportunity to discuss opportunities to enhance community services and facilities in its area, in particular at SWF, such as sport and recreation facilities for campus residents, in order to provide benefit and legacy to the local community.
40. CCC also expect BRB to invest in skills, employment and business interventions that will provide a range of significant benefits including new employment opportunities for young people and the unemployed, enhanced local skills and training services and new opportunities for businesses and inward investment. CCC expect to be fully engaged in the development of initiatives and projects, alongside Essex Chamber of Commerce and Chelmsford Business Board, in the development of the supply chain opportunities to ensure Chelmsford businesses can benefit as much as possible.

Cumulative Impacts

41. BRB are advised to consider fully the proposals for substantial new infrastructure, housing and employment development in the South Essex which will be in addition to the Bradwell B development. This will include a major new residential and employment-led development at SWF, 100 new dwellings in Danbury, growth in Basildon and Rochford's Districts, Cross Rail and the Lower Thames Crossing. It is unclear in the consultation document if BRB has adequately considered the cumulative effects of these developments including the availability of construction labour. BRB is urged to consider the timing and impacts of all local developments and any opportunities to work together and coordinate joint approaches to mitigation. As such, BRB is asked to work closely with other developers, including the developers of land north of SWF, to consider how mitigation across schemes and in particular at SWF can be coordinated and combined to minimise the impact of the combined developments and disruptions to the local area.
42. The new connection required to export the electricity generated by Bradwell B to the National Grid could also have significant impacts across a wide area including SWF. CCC expect BRB to work closely with National Grid to align proposals to enable cumulative impacts to be fully assessed and mitigated, and to include CCC in these discussions.

Consultation and Covid-19

43. The Coronavirus pandemic has led to the cancellation of some of BRB's planned consultation events including the majority of public exhibitions and this may have limited the opportunity for consultees to participate effectively in the consultation. Extending the consultation period and offering alternative ways to engage such as webinars, interactive exhibitions and telephone surgeries will have helped some interested parties to still engage. However, it is considered that this unprecedented pandemic will have reduced the opportunity for some to respond and CCC urge BRB to undertake more than one further stage of pre-application consultation to reflect this.

Conclusion

44. CCC has identified a considerable number of issues that need to be addressed before the stage 2 consultation. As such, CCC either objects, is not content or is unable to come to a clear view on several key aspects of the proposal in so far as they affect this Council's area. In particular, CCC strongly objects to the proposed early years and peak construction years transport strategy and the proposed modal split between marine, rail and road transport for the movement of construction freight and workers. CCC considers that there should be much greater reliance on marine and rail and will expect a range of robust evidence to be made available to fully understand the preferred proposals to be put forward by BRB in the stage 2 pre-application consultation.
45. CCC expects to work proactively with BRB to help understand and address its issues and to identify effective mitigation, management and compensation measures that will be required across the local and wider area.