

# Danbury Society

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## BRADWELL B - THE SOCIETY'S RESPONSE

**T**hanks to the inputs we had from Members responding to our last on-line edition of the Newsletter, the Society has made a submission to the initial (or Phase 1) consultation on the proposed Bradwell B nuclear power station.

The consultation was very short on detail of how the problems of Danbury's traffic were to be mitigated. The Society's submission takes up these points as it is vital they are addressed in the later, Phase 2 consultation.

That consultation will provide the basis for the Chinese promoter to submit its application to the government for authority to proceed.

Some members have written to our local MP, John Whittingdale to complain or protest. We fear that Mr Whittingdale (*below*) may not be able to offer much support.

He is now a minister of state within the Department of Digital, Culture, Media and Sport (DCMS). As Bradwell B is part of the government's nuclear policy, as a minister within that government he can hardly be expected to speak against it.

In addition, Maldon Dis-

trict Council has already welcomed Bradwell B for the employment benefits it will bring to the council's area.

Consequently the Society has focused in its submission on addressing just 2 aspects: traffic through Danbury and the inadequacy of the consultation.

### THE SUBMISSION

#### 'Early Years' = 25% of construction

The transport arrangements proposed for the period 'Early years of construction' are grossly unfair to Danbury residents. These years, that are so dismissively treated by the Bradwell Planning Team, will be taking up about a quarter of the total construction period, yet no adequate transport proposals have been offered that cover that period.

#### Danbury ignored

There is scarcely any mention of Danbury in the Phase One document. This disregard for Danbury, which is the only settlement of any size through which it is proposed to put a large number of HGVs - according to the brochure up to 700 a day - and the additional traffic of construction workers' vehicles, is astonishing. Out of 32 pages



devoted to transport in the Stage One consultation document, only two (one text, one map) are devoted to what it calls 'early years' when Danbury will suffer disproportionately to any other place in the area.

### **Mitigation? Forget it!**

The Phase One document declares “4.2.6 Our initial work indicates that several junctions, including the A130 / A12 (junction 17) and the A12 / A414 (junction 18), currently operate within capacity during network peak hours, but we recognise that routes to these junctions run through several villages and through constrained junctions where there are limited opportunities to accommodate further HGV traffic without demand management measures and/or highway improvements being put in place. This has informed our proposed transport strategy and interventions.”

Yet the Phase One document offers no information whatsoever as the strategy and interventions affecting Danbury, the most populous of those villages during a quarter of the construction period.



*Ideas for Eves Corner junction?*

Maldon and South Woodham Ferrers are both affected but only on their respective by-passes. In the case of Danbury, the proposed A414 route runs right through

the village centre, passing next to two primary schools, busy shops and the Conservation Area. The Phase One document suggests that for the main period of construction (year 4 onwards) by-passes may be built for 'sensitive communities' listed as Latchingdon, Maylandsea and Steeple. These are no doubt nice places but none of them are Conservation Areas.

The Phase One document states, “4.7.6 One of the key elements of the process of assessing the likely traffic impacts of a major development is the preparation of a traffic model of the parts of the local road network which are likely to be affected by the development.”



*Traffic impacts?*

### **Danbury is already traffic affected**

The Society questions whether this has been done in the case of Danbury. The last traffic census carried out in March 2016 near the Esso garage, showed 17,000 vehicles a day. Of this total about 4.3% were HGVs, either artic or rigid or, numerically, 741 vehicles in the 18 hour period 06.00-24.00 hrs. In a worst case scenario, therefore, Danbury could see the number of HGVs passing through each day, doubled.

A few months after, in December 2016, Maldon District Council approved an

outline application for land around Wycke Hill and Limebrook Way for up to 1,000 dwellings, an employment area of 3.4 hectares, a local centre, and other facilities with "...vehicle accesses onto the existing highway network..." Thus we have an existing 2-lane road close to or exceeding its design capacity, yet even more traffic is now on its way. This makes nonsense of one of the stated objectives of the Transport Strategy 'reduce traffic on local roads'!

### **Our members agree.**

*"The A414 through Danbury is already coping with more traffic than that for which it was designed. The explosion of housing in and around Maldon and in Danbury itself will add to this problem as many of the residents will travel through Danbury for work and shopping. To add several hundred HGV movements will be inappropriate in terms of pollution and traffic volumes."* (DK)



**Accommodating HGVs**

*"With the present and future development of housing and commercial premises in the Maldon and surrounding areas the prospect of using the A414 as a route to the Bradwell site is totally unacceptable and cannot be permitted."* (IW)

*"The movement of freight and workers will put a huge demand on the existing road network. The A414 is already over its design capacity and causes grid lock at rush hour."* (MH)

*"It seems that residents in the area will be*

*trying to access the Park & Ride at Sandon to get to the Railway will be met with a surge of traffic trying to travel in the opposite direction which will bring about chaos. Maldon/Heybridge has developed enormously over the past decade and continues to grow."* (DB)

*"A small percentage in traffic flows is all we can accept bearing in mind the need to preserve reasonable living conditions. This in the light of the growth in traffic from the housing developments built and proposed for Maldon. These are already causing saturation at peak times. 500 to 700 heavy vehicles a day as proposed feels like something from a nightmare too real to contemplate."* (JF)

The Phase One document explains that "large quantities and wide variety of construction materials required for the Bradwell B Project both in advance of [our emphasis] and during the peak construction period means there would still be freight that could not practically or economically be moved other than by road." The total weight of construction materials required is expected to be over 6 million tonnes which would include abnormal indivisible loads (AILs), bulk materials, fill material, steel reinforcement and...for the construction of temporary and permanent buildings, utilities, lighting and fencing." What proportion will be delivered during the first quarter of the construction is not stated but from the items listed would be significant.

### **And what about air quality?**

The Transport Strategy aims to 'reduce environmental impacts'. One of these must surely deal with the air quality issue. Right in the centre of Danbury is an air quality management area (AQMA)



designated thus by Chelmsford City Council in October 2018.

The Phase One document states, “4.3.8 The thrust of policy, therefore, is that the applicant (i.e. Bradwell) should take reasonable steps to provide mitigation so as to reduce impacts.” How is the additional heavyweight traffic effect to be mitigated in respect of the AQMA? The Phase One document remains silent. Instead it declares “We will prepare a Transport Assessment for the Bradwell B Project in line with the requirements of NPS EN-1 and this will be submitted as part of the Development Consent Order (DCO) application.”

The Society, speaking for many residents who are having to endure poor air in a country setting, thinks that this response is completely unsatisfactory. This is a consultation exercise and air pollution in Danbury is a major issue yet the Phase One document fails to address it in a meaningful way.

### **‘Promoter speak with forked tongue’**

The Phase One document states within its Transport Strategy Objectives the following: “Implement highway improvements or other measures to mitigate any residual transport effects of the Project to an acceptable level.”

Again the document is silent on any clear recommendations about which residents might make comments. Why should Danbury's concerns be ignored in this way? Perhaps one comment from a Society member has it in a nutshell.

*“there is the possibility for highway improvements but in the case of Danbury there is no such scope!”(IW)*

Another member may have the solution. *“the answer must be to build a completely new road avoiding all settlements be-*



*Air Quality Management Area (AQMA) lies between the Bakers Arms and Eves Corner. tween the A12 and Bradwell.” (DK)*

The Phase One document again: “4.4.3 Our initial proposals have been developed in order to meet the strategic transport objectives outlined above. They take account of the environmental and community constraints that have to be identified in order to develop a sustainable transport strategy for the Project that is viable and deliverable.”

Unfortunately they do no such thing in the case of Danbury. The village's environmental and community constraints are utterly ignored. The impression is that the problems of construction traffic through Danbury conservation area are too hard for the Bradwell B planning team so it pretends the issue is only a passing matter in 'early years.'



**Heritage? Just ignored.**

### **Workforce travel**

One of the aspirations set out in Phase One consultation is to reduce the distance the workforce needs to travel and

to promote sustainable transport modes. "4.5.15 Informed by the initial gravity model assessments, we are currently looking at options for park and ride facilities in a series of search areas." The 'gravity model' is contrived by theorising from whence workers would gravitate to Bradwell and thus set potential park & ride (P+R) sites that would be of most utility.

It's a concern as expressed by a resident. *"...in an area with low unemployment. The brochure cites 3000 workers travelling to the site at peak within a 90 minute commute - that is how long it takes to get to Gatwick from here so hardly environmentally friendly or local. (MH)*

Of the P+R sites, Danbury Society comments on the one near A12 junction 18, presumably adjacent to or an extension of, the existing site. It is intended for "Workers travelling from areas to the north of the Dengie peninsula". The Society considers a far more imaginative approach would be to eliminate the need for such workers to travel along the A12 at all. The existing under-used P+R site alongside the A12 at Colchester would be preferable. From there a shuttle bus could be arranged to West Mersea that would pass Colchester railway station for workers commuting by rail. From West Mersea, a passenger ferry could cross the Blackwater estuary direct to the power station site.

By comparison, the distance from that P+R to Bradwell via A12 and A414 is 45 miles while across the estuary is only 16 miles. (13 miles by road and 3 miles by water).

As the Phase One document states, "4.2.19 The local marine environment at the main development site is well suited to marine transport. It is sheltered and

has benign wave and current conditions."

Such an arrangement would also mitigate – one of the aims of the Transport Strategy – the traffic on the A414 and other roads through villages. It would also avoid over use of the existing P+R at Sandon (J18), extensively used by Danbury residents commuting to Chelmsford and onwards by rail.

### **Our view of the Consultation process**

The consultation process does not deal with the first 3 years properly. This will be a busy time with activities having a damaging effect on several communities, most severely on Danbury's environment of schools, shops and homes, its Conservation Area and its heritage assets. The tone of the Phase One document is condescending classing this period as 'the early years'.

As the late Tony Hancock might have quipped. "It may be only early years for you, mate, but for me it's 36 months of purgatory."

Bradwell B planning team is ignoring the damaging effects likely to be caused during the initial period of construction without any attempt at mitigation. Perhaps it is struggling with its brief. As a resident remarked:

*I think that the planners should really plan a much more comprehensive strategy to improve the infrastructure in this large area. (DB)*

But that is not allowed. The fact that a massive project has been earmarked for a remote part of the coast with inadequate infrastructure is not up for consultation according to the headings in "Figure 1.1 - Scope for influencing the Bradwell B Project." That casts doubt on the validity and significance of the whole consultancy process.

“Your opinion matters,” claims the Phase One document. Does it? Or does it merely give legitimacy to a project already decided?

Note that the Society’s submission made for the consultation, did not include the paragraph headings nor the illustrations which have been added here for layout purposes.

### What Happens Now?

Over the 4-month phase 1 consultation process the Bradwell B team has received over 1,600 submissions from people and organisations. The team will now be analysing and evaluating this mass of opinions and attitudes.

There will be additional stages of consultation over the next few years which are statutory - they must be carried out. That was why the Society felt Danbury’s interests - ignored at phase 1 - must be considered at subsequent stages.

The Bradwell B team will provide an update on its proposals in a later statutory stage of consultation. The phase 2 consultation ought to provide detail on how Danbury’s transport difficulties are to be mitigated. It is hard to see that being concluded before early 2022.

After the project team has taken feedback from that exercise it would be able to prepare its application for a Development Consent Order (DCO), probably later that same year.

### And then what?

Consider the case of Hinkley C which was listed as a nuclear site in October 2010 in the same paper as Sizewell C and Bradwell B. EDR, the contractor, applied for its DCO in October 2011 and this was granted 2 years later by the Dept. of Energy. Negotiations about price followed and construction did not begin until December 2018.

Using that example as a benchmark, it could be 2029 before any trucks start moving for building to start at Bradwell.

### However...

There’s many a slip twixt cup and lip.

First of all there is General Election probably in 2024. The last Labour government published a list of 11 sites for nuclear power stations. The Tories chopped the list back to 8 from which the 3 have been named. Will there be the same advocacy for nuclear in 2024?

Then there is the price. EDF and the Chinese negotiated a price of £92.50/MWh for Hinkley with then Chancellor Osborne. That was before the huge fall in prices for wind and solar. Since then, Ofgem reports the top wholesale price of electricity as £67.7/MWh (in September 2018). It has fallen steadily since.

Thirdly there is the political dimension. Two years ago everyone was chums with the Chinese. Now, for reasons well known, there is concern.

So possible change in government policy, little chance of an economic price and concerns over a foreign power, all combine to make the prospect of Bradwell B less than certain.

### Other submissions

Our fraternal civic organisation, Hands Off Danbury, has made a submission which is posted on its Facebook page.

<https://www.facebook.com/groups/1683249618669161/>

Danbury Parish Council has also done this. It should be posted on the Council website but has not appeared yet.

Do not overlook a local campaign group, Bradwell B Action Network (BAN) <https://www.facebook.com/bradwell-BAN/>