



Essex County Council

Place Services and Economic Growth Policy and Scrutiny Committee

10:30	Thursday, 25 June 2020	Online Meeting
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The meeting will be open to the public via telephone or online. Details about this are on the next page. Please do not attend County Hall as no one connected with this meeting will be present.

For information about the meeting please ask for:

Lisa Siggins, Democratic Services Officer

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Email: democratic.services@essex.gov.uk

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Please note that an audio recording may be made of the meeting – at the start of the meeting the Chairman will confirm if all or part of the meeting is being recorded.

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1	Membership, Apologies, Substitutions and Declarations of Interest	6 - 6
2	Minutes 23.04.20 To approve as a correct record the Minutes of the meeting held on 23 April 2020.	7 - 11
3	Questions from the public A period of up to 15 minutes will be allowed for members of the public to ask questions or make representations on any item on the agenda for this meeting. No statement or question shall be longer than three minutes and speakers will be timed. Questions need to be submitted in advance - details of how to do this will be posted in the 'joining instructions' document which will be posted on the web page for this specific meeting a few days before the meeting.	
4	Update on Proposals to Construct a Nuclear Power Station in Bradwell on Sea, Essex Members to receive report (PSEG/05/20) and a presentation from Councillor Tony Ball, Cabinet Member for Economic Development and Mark Woodger, Principal Planning Officer.	12 - 166
5	Reopening of Essex Libraries Members to receive report (PSEG/06/20) alongside a presentation from Cllr Susan Barker, Cabinet Member for Customer, Communities, Corporate and Culture and Juliet Pirez, Head of Libraries.	167 - 223
6	Proposals on ECC's future role in relation to services provided by ECC to Gypsy, Roma and Traveller communities in Essex. Members to receive report (PSEG/07/20) and a presentation from Councillor Susan Barker, Cabinet Member for Customer, Communities. APPENDIX B WILL BE CONSIDERED UNDER EXEMPT ITEMS	224 - 239

- 7 Date of next meeting**
To note that the next Committee activity day will be on Thursday, 19th July 2020.
- 8 Urgent Business**
To consider any matter which in the opinion of the Chairman should be considered in public by reason of special circumstances (to be specified) as a matter of urgency.

Exempt Items

(During consideration of these items the meeting is not likely to be open to the press and public)

The following items of business have not been published on the grounds that they involve the likely disclosure of exempt information falling within Part I of Schedule 12A of the Local Government Act 1972. Members are asked to consider whether or not the press and public should be excluded during the consideration of these items. If so it will be necessary for the meeting to pass a formal resolution:

That the press and public are excluded from the meeting during the consideration of the remaining items of business on the grounds that they involve the likely disclosure of exempt information falling within Schedule 12A to the Local Government Act 1972, the specific paragraph(s) of Schedule 12A engaged being set out in the report or appendix relating to that item of business.

- 9 Urgent Exempt Business**
To consider in private any other matter which in the opinion of the Chairman should be considered by reason of special circumstances (to be specified) as a matter of urgency.
- 10 Proposals on ECC's future role in relation to services provided by ECC to Gypsy, Roma and Traveller communities in Essex. CONFIDENTIAL APPENDIX B**
- Information relating to the financial or business affairs of any particular person (including the authority holding that information);

Agenda item 1

Committee: Place Services and Economic Growth Policy and Scrutiny Committee

Enquiries to: Peter Randall, Senior Democratic Services Officer

Membership, Apologies, Substitutions and Declarations of Interest

Recommendations:

To note

1. Membership as shown below
2. Apologies and substitutions
3. Declarations of interest to be made by Members in accordance with the Members' Code of Conduct

Membership

(Quorum: 5)

Councillor I Grundy
Councillor A Erskine
Councillor I Henderson
Councillor S Hillier
Councillor P Honeywood
Councillor D Kendall
Councillor S Lissimore
Councillor B Massey
Councillor R Moore
Councillor C Pond
Councillor R Pratt
Councillor W Schmitt
Councillor C Weston
Councillor A Wood

Chairman

Minutes of the meeting of the Place Services and Economic Growth Policy and Scrutiny Committee, held Online on Thursday, 23 April 2020

Present:

Councillor I Grundy (Chairman)	Councillor B Massey
Councillor B Aspinell	Councillor R Moore
Councillor A Erskine	Councillor C Pond
Councillor I Henderson	Councillor R Pratt
Councillor S Hillier	Councillor W Schmitt
Councillor P Honeywood	Councillor C Weston
Councillor D Kendall	

Councillors M Durham, J Moran and S Robinson were also present.

The following officers were present in support throughout the meeting:

Peter Randall	Senior Democratic Services Officer
Joanna Boaler	Head of Democracy and Transparency
Paul Turner	Director, Legal & Assurance
Emma Tombs	Democratic Services Manager
Lisa Siggins	Democratic Services Officer

- 1 **Membership, Apologies, Substitutions and Declarations of Interest**
The Chairman opened the meeting by paying tribute to the late Councillor Terry Cutmore, and on behalf of the Committee extended his sympathy to Councillor Cutmore's family as this very sad time.

1. The membership of the Committee was unchanged since the last meeting;
2. No apologies were received.
3. There were no declarations of interest.

- 2 **Minutes 20 February 2020**
With regards to Minute 4 (Update on Visit Essex and Marketing) Councillor Pond raised a point of clarification in that bullet point 5 should read:

Members raised the issue of Greater Anglia, who are owned by the Dutch State Railways, providing their rail/ship passengers with free tickets to any Dutch station. The same should apply for passengers from Holland to any destination in East Anglia.

Members asked officers to explore negotiating for a similar deal across East Anglia.

The minutes of the meeting held on 20 February were thereafter agreed as a correct record.

3 Questions from the public

There were none.

4 Essex Climate Change Commission - Update

Members received report **(PSEG/03/20)** and a presentation from Samantha Kennedy, Director Environment and Climate Change Action and Philip Oldershaw, Senior Strategy Advisor. Councillor Simon Walsh, Cabinet Member for Environment and Climate Change Action was also in attendance for this item.

The presentation can be found [here](#).

In addition to the information contained in the presentation Members were advised that there would be representation on the Commission from 6 ECC cross party members: Councillors Walsh, Mitchell, Bentley, Lissimore, Henderson and Abbott. Councillor Ian Grundy, as Chairman of the Place Services and Economic Growth Policy and Scrutiny Committee has also been invited to join the committee as an official observer.

Following the presentation, members were invited to ask questions and the areas raised included:

- Impact of Covid-19 19 restrictions with regards to engagement and planned Commission meetings - virtual meetings have been scheduled which will allow the commission to move forward as planned
- Concerns regarding continued social distancing and restrictions on public transport having an adverse effect on the environment with increased car usage. - Officers advised that it is felt that different working practices will be encouraged to remove pressure on public transport.
- Public access to Commission meetings – whilst the current plan is not to allow public questions at the actual meetings, options for public engagement are currently being considered.
- Formulation of data outlining the effect of new ways of working due to Covid-19 and consolidation of environmental gains into the Commission's work programme. – Ms Kennedy advised that she will be looking into how to capture ECC's activity during the Covid-19 restrictions.
- Feedback process to this Committee- it was confirmed that that there is commitment to regular updates and feedback with continued engagement.

- Engagement with Districts/Boroughs – it was confirmed that there is commitment to engage effectively with districts. The internal policy and strategy team will lead on this.
- Progress of work already undertaken by ECC as set out in report **(PSEG/03/20)**. It was confirmed that work is currently underway regarding the progress made thus far and that this can be shared once completed.
- How will the Commission measure its success – It was confirmed that a final report will be made which will include a set of recommendations. It will then be for ECC to develop a mechanism to monitor and measure success against recommendations. The exact method for this has not yet been determined
- Negatives as a result of Covid-19 restrictions, such as increased use of IT, cloud storage and social media. Councillor Walsh pointed out that these should be considered alongside reported environmental gains to determine the holistic environmental net gains from the last two months.
- Identification of sites for planned tree planting – it was confirmed that 500 potential sites have been identified but at this stage it is too early to confirm sites. This information can be shared at a later date. Members were advised that it is felt that the best impact is to plant to develop new woodlands.

The Chairman thanked Councillor Walsh and the officers for their attendance at the meeting

5

Essex Developers' Guide to Infrastructure Contributions

Members received report **(PSEG/04/20)** and contributions from Councillor Tony Ball, Cabinet Member for Economic Development, Graham Thomas, Head of Planning and Joy Thomas, Infrastructure Planning Manager.

Councillor Ball introduced the item and explained why it is necessary to update the Guide:

- The current Essex Developers Contribution Guide was written in 2015 and published in 2016. It is several years old and therefore needs to be updated.
- There have been significant changes to legislation which came into effect on 1st September 2019.
- There are new infrastructure requirements which historically have not been addressed, for example in relation to the provision of specialist education facilities.

Graham Thomas and Joy Thomas then proceeded to advise the Committee:

the purpose of the Guide

- Essex has provided a developer contribution Guide to assist developers since 2003.
- The Guide sets-out the costs to provide necessary infrastructure required of new development, to ensure we support the district and borough councils in the delivery of good quality places for people to live, work and enjoy.
- The Guide provides detailed cost information to support the planning policies as set-out in District Local Plans.
- It provides clarity on cost expectation for the construction and house builders in Essex to enable them to bring forward planning policy compliant development.

Consultation that has been undertaken

- Consultation in November/December 2019 for 6 weeks was extensive and included developers, the Essex Developers' Group, Planning Portfolio Holders, all Members of ECC, EPOA, and all Essex local authorities.
- Several meetings with the Essex Planning Officers' Association, collectively and followed in January/February with meetings with all local councils who wanted a meeting
- A second round of consultation was held in March for 3 weeks with Essex local authorities.
- Many helpful points have been raised in response to the two rounds of consultation and changes have and will be made to the updated Guide.

Members were invited to ask questions and the areas raised included:

- Concerns around the triggers for contributions by developers set out in Table 5 of Appendix 1- some members felt that these figures was too high.- It was explained that help will be offered to Local authorities in connection with smaller scale developments and that this will not be the sole mechanism with a programme of support rolled out. It was further explained that this is new guidance which may be reviewed.
- Whether comments made by Districts/Boroughs had been accepted and incorporated and if not, has feedback been passed back to local partners - - Members were advised that the review process is still in progress and a number of changes will be incorporated as a result of the consultation with Districts/Boroughs. It was further confirmed that the next step would be Cabinet Member Action (CMA) which would include all relevant information and clarity in order to provide a proper audit trail.
- Impact of the current economic situation as a result of the Covid-19 lockdown. - there was concern that some developers will try to

renegotiate terms due financial difficulties encountered. Mr Thomas explained that it is likely that new Government planning reforms are likely to be introduced to cover this, but there are no details of such at present.

The Chairman thanked Councillor Ball and the officers for their attendance at the meeting.

6 Date of next meeting

The Committee noted that the next Committee meeting will be on Thursday, 21st May 2020.

7 Urgent Business

Councillor D Kendall raised the following issues:

- The reopening of our Recycling Centres - the timing and how it will be managed
- The reopening of our Country Parks following the announcement made by the Communities Secretary at the weekend that all parks should be opened.

The Chairman confirmed that he had noted the questions and that they would be submitted to Councillor Walsh, Cabinet Member for Environment and Climate Change Action.

The meeting ended at 12.17 pm

Chairman

AGENDA ITEM 4

Report title: Update on Proposal to Construct a Nuclear Power Station in Bradwell on Sea, Essex.		PSEG/05/20
Report to: Place Services and Economic Growth Policy and Scrutiny Committee		
Date: 25/06/20	For: Discussion and Decision	
Report authors: Graham Thomas - Head of Planning & Development		
Enquiries to: Graham.thomas@essex.gov.uk ; or Mark.woodger@essex.gov.uk		
County Divisions affected: All Essex		

1. Background

- 1.1. A new nuclear power station is planned for Bradwell. The pre-application phase of consultation has started, to which ECC is invited to respond. Government recognise this to be a scheme of national significance, and the Secretary of State will ultimately determine the application at the end of the process.
- 1.2. A considerable amount of work is needed to engage and shape this development. The power station once completed will provide around 900-1000 often high-quality operational jobs, and an 12-year build-out providing up to 10,000 construction jobs at the peak of the build, of which 1,000 could be apprenticeships spread over the lifetime of the build. When built the plant would supply energy to 4 million homes.
- 1.3. We are at the earliest phase of this proposal. The ambition of the developer is to progress at pace, with construction work starting as early as 2024/5.

2. Introduction

- 2.1. This report provides an update on proposals from BRB, which is a joint venture company between the Chinese Group Nuclear UK (CG) (66.5%) and EDF Energy (33.5%), to build a twin reactor nuclear power station on the Dengie peninsula, in the District of Maldon.
- 2.2. As part of the pre-application process a non-statutory consultation on the proposal for a power station commenced on 4 March and closes on 1 July 2020. This Council has worked closely with Maldon District Council (MDC) in order to increase our influence and leverage with the developer and we have therefore produced a joint response to this consultation.
- 2.3. As we move forward towards the formal application stages in dealing with this Nationally Significant Infrastructure Project (NSIP) ECC will be an important statutory consultee in what is a complex process. By working together with other local authorities this enables all the local authorities to become more muscular and will help us shape the development proposals and have a far greater influence. Neither MDC nor ECC will be the decision maker. The ultimate decision will rest with the Secretary of State for the Environment following a formal hearing held by the Planning Inspectorate.

3. Background

- 3.1. In July 2011 the Department of Energy and Climate Change published the National Policy Statement (NPS) for Nuclear Power Generation (EN-6) setting out the future strategy for low carbon energy, including a series of new nuclear stations across England and Wales. In addition, the Overarching National Policy Statement for Energy (EN-1) provides a primary basis for decisions taken by the Infrastructure Planning Commission (IPC) on new low carbon energy developments.
- 3.2. Bradwell B is identified within the NPS as being a site which is potentially suitable for the deployment of new nuclear power station providing the impacts of the development do not outweigh the overarching proposals to produce energy from this low carbon source.
- 3.3. A twin reactor development, together with associated development which includes on site cooling, would take up to 12 years to build in this remote rural location. It would employ at peak times up to 10,000 people on site, with 1,000 permanent jobs during the operation of the station which is intended to generate power for 60 years which sufficient energy to power up to 4M homes.
- 3.4. The final decision on any necessary Development Consent Order application rests with the Secretary of State. Essex is a consultee in the process and will have a material say in creating a lasting legacy for the site and ensuring mitigation is in place to reduce the impact of what will be the largest civil engineering site in Essex in a generation.

4. Discussion

- 4.1. The joint response to this proposed development sets out the following headline topics:
 - It is identified in the National Policy Statement for Nuclear Power Generation (EN-6, July 2011) that Bradwell is a site identified for the development of new nuclear facility.
 - The significant and lasting scale of the proposed development and its potential importance at a local, regional and national level.
 - That the benefits of the proposal must be off set against the dis-benefits on the environment, pressures on communities, transport, landscape, flooding, health and wider consequences for other development, infrastructure and supporting services across a huge range of stakeholders.
 - The development must have an appropriate strategy to maximise mitigation and enhancement going forward. To provide a substantive legacy.
 - Continued engagement is necessary as the project develops particularly in light of the lack of detail on a number of key topics in the current consultation.
 - Significant additional commitment from the applicant is necessary on numerous strategic issues to correctly shape the proposals prior to its eventual application.
 - Officers continue to press for the most sustainable ways of implementing the development, which includes using the coastal location to maximise deliveries by sea, an minimise the impact on the local road network.
- 4.2. After submission of the Council's Stage 1 Response on the 01 July the Council and other stakeholders in this complex and involved process for which the applicants have provided a project plan going forward. Whilst it is currently difficult to predict when an additional round of consultation will take place an all Member briefing will be factored into the work programme going forward.

5. Session aims

- 5.1. Members are asked to discuss the proposed response to the consultation and provide feedback and input from the committee.

6. List of Appendices

- **Appendix A:** Joint Response to Stage 1 Consultation

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PREFACE

The Councils' capacity to fully engage with the Stage 1 Consultation has been impacted by the unprecedented impacts of the Coronavirus COVID 19 pandemic. The officer comments below have been limited by priority commitments to addressing the COVID 19 response, and similar impacts on other organisations and stakeholders that limited the normal level of co-ordination and discussion between colleagues before the comments were provided. Site visits were also cancelled due to home working. Whilst some officers could provide limited input, some officers were unable to provide comments on the Stage 1 Consultation at all due to COVID 19 impacts.

1. SUSTAINABILITY: CLIMATE CHANGE

1.1 A Zero Carbon Future

The Councils welcome the potential contribution towards the transition to a low or no carbon economy in support of climate change and sustainability. Further details of the proposals are requested, in terms of the carbon footprint of the development and the measures proposed that would support the transition to a zero-carbon economy and the provision a positive legacy that reaches beyond the supply of electricity from the power station. There are clear opportunities for the project to be an example of low carbon development that is transformational in its approach to development and transport.

The UK is bound by the Climate Change Act 2008 to achieve net zero carbon emissions by 2050. This shift to net zero target from the previous target of 80% reductions on a 1990 baseline has brought into sharp focus the need to radically tackle Green House Gases (GHG) across all sectors including the built environment and nuclear development.

ECC has made a commitment to formulate a Climate Action Plan to reduce carbon emissions across the county of Essex. In addition, ECC has inaugurated an independent, cross-party Essex Climate Change Commission with the purpose of:

- Identifying ways in which ECC can mitigate the effects of climate change, improve air quality, reduce waste across Essex and increase the amount of green infrastructure and biodiversity in the County, explore transport modal shift, research energy generation and fully engage with communities around behavioural change.
- Reducing the carbon footprint of both ECC and Essex as a whole – the Commission is expected to recommend an ambitious, but realistic target year to have achieved net zero greenhouse gas emissions.

As the UK transitions into a net zero carbon future, nuclear power stations have been recognised as important in generating the low carbon electricity mix required to power a sustainable UK. However, the scale of such nationally important infrastructure developments do carry an equally large and conflicting carbon footprint in their embodied and operational carbon. The Councils welcome the benefit that nuclear development at Bradwell can have to decarbonising the supply of energy in the UK but is equally concerned to see that material provisions are made in the development proposal that mitigate the carbon emissions generated from the construction and operation of the power station and its associated development.

Adequate provision for reduction and offsetting of carbon emissions, both embedded and operational, need to minimise the development's carbon footprint and mitigate the effects of climate change and with reference to planning principles set out nationally and locally including:

- National Planning Policy Framework, S14, para 148 which states: *"The planning system should support the transition to a low carbon future in a changing climate [...]. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions [...] and support renewable and low carbon energy and associated infrastructure."*
- National Policy Statement for Nuclear Energy (EN-6), taken together with the Overarching National Planning Statement for Energy (EN-1), provides the primary basis for decisions taken by the Infrastructure Planning Commission (IPC) on applications it receives for nuclear power stations (capacity 50MW or more). Specifically, EN-1 5.2.11 states that the IPC should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage.
- Maldon District Local Development Plan policy D1 states that: "All development must [...] make a positive contribution in terms of energy and resource efficiency." Policy D2 states that: All non-residential development should achieve a minimum of BREEAM 'Very Good' rating or be supported by a bespoke assessment that demonstrates appropriate environmental performance results above current Building Regulation requirements; Development should seek to maximise the use of building materials from sustainable sources and apply sustainable construction methods where appropriate; Development will contribute towards making more efficient use or re-use of existing resources and reducing the lifecycle impact of materials used in construction. The Council may require large scale development proposals to be supported by a Site Waste Management Plan;

1.2 Minerals Local Plan (2014)

A key approach to reducing the demand for minerals in new developments is through encouraging and supporting aggregate recycling. Policy S4 – Reducing the use of mineral resources, criteria 4, seek to ensure:

The maximum possible recovery of materials from construction, demolition and excavation wastes produced at development and re-development sites. This will be promoted by on site re-use/recycling at other aggregate recycling facilities in proximity to the site.

1.3 Accommodation Strategy

The emerging accommodation strategy recognises that the relocation of staff onto the site is a major contributor in improving the sustainability of the workforce through reducing transport related emissions. There is also the recognition that a sustainable transport plan will further reduce the impact of the peak workforce for those not living on site and the Councils will want to see in detail the kind of measures that will be adopted to enable the Plan to be effective. We would also highlight the need for the accommodation development itself to ensure it is a net zero carbon accommodation development with high energy efficiency standards, use of on-site renewable energy technology to meet demand and measures to offset any net emissions after measures to maximise efficiency and generation measures have been maximised. This includes all other facilities

associated with the accommodation e.g. canteen, sports facilities, laundrette, shops, street lighting, health centre etc.

There are Building Research Establishment (BRE) guidelines which is recommended to BRB to promote exemplary practice; to encourage the exploration of the most suitable use of local energy generation; to devise a scheme for exploring this and for monitoring carbon use and emissions over the lifetime of the project. Such a scheme should be monitored throughout the life of the development together with adaptation to revisit and improve on the set targets if they are found not to be met.

1.4 Transport

The importance of sustainable transport and the use of rail and water over road during construction and operation is recognised; but requires further detailed investigation. There is a need to be more ambitious through the incorporation of net zero carbon principles into transport, for example, through the electrification of the park and ride and other bus fleets. With the national move away from fossil fuel vehicles and towards electric vehicles, we would encourage efforts towards the use of electric and ultra-low emissions vehicles as far as feasible, highlighting the opportunities for electrification of transport fleet for the movement of the workforce to and from site from the temporary “park and ride” sites and while on site, and the use of ULEVs for the movement of freight and goods. The provision of electric charging infrastructure is necessary along any selected road based “strategic route” and would be a welcomed legacy.

1.5 Main Development Site

We would also encourage the carbon footprint of the development to be considered in both the construction and operational phases through consideration of the use of sustainable materials as well as the impact of supply chains on the carbon footprint of the development. The Councils wish to see a plan to show how carbon is managed, through an agreed Carbon Plan, and how its impact can be lessened. We would encourage further thought into the sustainable use, recycling of materials and the lifecycle impact of materials.

1.6 Emissions Measurement and Mitigation

We recommend the measuring of the carbon footprint of the whole development throughout its life cycle, with the yearly disclosure of this information in aid of pursuing low carbon targets through the Carbon Plan. This is an omission from the proposal which would provide considerable support in monitoring, reducing, mitigating, as well as offsetting carbon emissions associated with the construction and operation of the development. In order to achieve national targets of net zero carbon by 2050, and to reduce the carbon footprint of Essex, the need to decarbonise large infrastructure developments in Essex is significant. Any measuring should be made available yearly and reviewed going forward.

The inclusion of the above suggestions will aid the development in not only attaining national low carbon targets, but also in achieving project aims for whole life sustainability and avoiding adverse environmental effects (Stage One Consultation, paragraph 2.1.13).

Supported by: Tom Day, Head of Energy and Low Carbon Programme (ECC)

2. SUSTAINABILITY: SOCIO-ECONOMIC

2.1 Economic Prosperity

2.1.1 Summary

The Councils welcome Bradwell B's plans around people and jobs, especially the explicit commitment to maximise positive economic effects whilst mitigating against any potential adverse effects the Project could have. The Councils have been in early dialogue with BRB (via the EDF Energy Workforce Development Strategy Team) in order to communicate and align our ambition and that of our existing skills ecosystem and partnerships. We have identified key skills ambitions drawn from various ECC and partner strategies, policies and action plans and mapped these to some potential interventions that could be part of the Bradwell B skills and employment plans, and which would complement and strengthen existing activity.

The construction of the Bradwell B Power station could undoubtedly create tens of thousands of jobs and deliver millions of pounds of investment. However, without careful planning, controls and mitigation, the risk is the short and longer-term economic effects will not be realised or benefit local residents. It is vital that the Project avoids harm to the area's existing business community, does not put future investment in the area at risk, or create displacement and disruption to the current workforce.

We welcome BRB's intention to maximise the positive economic effects and to understand any potential adverse effects the Project could have, so these can be avoided or mitigated (5.1.5 in the Consultation document). The Councils are committed to working with the Project Team to help them achieve these economic benefits and identify the adverse effects. We envisage a collaborative and supportive relationship that will enable BRB to realise such benefits and appropriately mitigate such effects. Including those identified by NPS EN-1 (Section 5.12) and EN-6:

- Sustained economic growth and prosperity in local businesses
- The creation of jobs, training opportunities and skills
- Provision of local services, improvements to local infrastructure and educational facilities
- Effects on tourism, including those caused by environmental, visual and transport impacts and socio-economic effects, and visitor facilities
- The effect of an influx of workers including pressures on local and regional resources and demographic change (also addressed as part of the Community response)

We know that where economic clusters are established, a virtuous circle emerges whereby inter-firm competition promotes innovation and productivity and ultimately means that local companies are able to compete for work. Our strategic aim, therefore, is to ensure that major projects work to bring about skills clusters that support the matching of workers to in-demand career opportunities and companies to communities where the skills exist (or are being trained for) that they need.

We welcome BRBs focus on the importance of creating a local supply chain and the need for a Supply Chain Team, which is also commented upon later. However more information is required regarding the way this will function and, post peak construction, how it will ensure longer-term stability for the businesses involved. It is the Councils' joint expectation that an independent dedicated Essex Supply Chain Team and Supply Chain Portal be created, focussed on supporting local businesses.

The consultation fails to recognise the risk of a short-term boom that cannot enable a sustainable long-term economic legacy for local business and the economy, nor how this will be mitigated. To manage this the Supply Chain Team and Portal should support and enable:

- Maldon District and Essex businesses to win contracts
- Bradwell B to show how it will maximise opportunities for local businesses through its procurement process.
- Local companies to access funded specialist accreditations and/or Health and Safety qualifications that are required to supply new nuclear.
- A legacy to support the post-construction sustainability of local businesses, who have enabled the construction and operation of the Power Station, through training and support.

The Project may have a significant adverse impact on other inward investment and entrepreneurship, especially in non-connected sectors. As local businesses will be affected by the limited availability of staff, land and resources, along with high wages. Failing to support the business community and the area's Sense of Place would result in considerable harm to the (existing and future) diverse and prosperous economy. This, along with other risks, must be managed through measures such as;

- Funding to support the economic development and tourism function of Maldon District Council
- Funding to commission necessary economic planning/studies and to facilitate and expedite strategic projects and objectives.
- Working with partners to build local supply chains from existing and new businesses
- Investment in the local workforce
- A business development grant funding program
- Creation of local incubation or enterprise facilities
- Measures to incentivise the reduction of future out-commuting
- Investment/expansion/creation of new schools and other skills/education facilities
- Commitment to encourage the opportunities for local employment to transfer into higher quality roles at Bradwell B
- Support initiatives to provide future investment and employment in growing sectors, such as green energy and infrastructure
- The provision of significant mitigation measures to address the effects the Project will have on businesses and tourism with regard to increased traffic flows, impact on environment, demands on local temporary and permanent accommodation and harm to the Maldon District "Sense of Place" brand and reputation
- Investment in the local visitor offer and facilities, accessible through sustainable modes, including electrically enabled travel and public transport.
- Investment in opportunities to create/develop and improve further education, apprenticeships and training to ensure a sustainable highly skilled workforce.

The ECC Employment and Skills Principles for Major Projects and Developers' requires that major projects, such as Bradwell B to:

- Cultivate and foster partnerships to develop a flexible and responsive skills system that aids regional and sub-regional business development, which develops industry clusters and skills engines.
- Develop highly-skilled sub-regional talent eco-systems with transferable skills and competence, responsive to current and future jobs; which:

- builds capacity and conditions to enable shared prosperity
- enables innovation, knowledge-driven and digital skills, which increases productivity; aiding wealth, output and opportunity
- Mitigate adverse employment effects, which may arise from a large-scale influx of non-home-based workers, which evidence suggests increases salaries and job competition, leading to higher churn and displacement effects. This crowding out effect raises the cost for all local people, including those not directly employed by the large employers, by increasing demand for property and local services. We would welcome early sight of your 'gravity model' assumptions, methodology and outputs in this regard.
- create the conditions for effective skills devolution by developing and taking forward an integrated whole-system approach to employability and skills.

Comments are provided on particular sections of the Stage 1 Consultation:

2.1.2 Approach to Managing Effects - Core Principles (Section 2.1.2)

The Project's core principles, as identified in the consultation document (reference para 5.4.2), complement the ECC's Skills and Employment Principles for Major Projects and Developments. However, we would welcome greater detail about specific actions to complement these principles. To meet our Employment and Skills principles and ambitions, Bradwell B will be expected to:

Link educators, business and people to develop a shared understanding of skills and drive local prosperity

- Drive strong leadership to enable local anchor institutions/strategic infrastructure projects to invest in and deliver local outreach and engagement to support sub-regional, latent talent pools; enabling future employment and agglomeration spin-out
- Ensure local educational provision aligns with sub-regional employment needs
- Develop and take forward integrated approaches to employability and skills with other agencies.
- Foster educational partnerships to upskill and train highly-skilled workers.

Cultivate skills needed for the future economy supporting productivity, future prosperity and the fourth industrial revolution

- Invest in lifelong learning, to adapt to changing employment landscapes
- Develop and unlock skills needed for future jobs
- Prioritise knowledge-driven skillsets and higher-level jobs

Develop and enhance sustainable high-value employment opportunities

- Support access to a highly skilled pool of local labour
- Drive knowledge economy jobs
- Increase the percentage of residents with skills at Level 3 and above
- Further utilise the apprenticeship levy and opportunities for skills devolution to support industry and develop highly-skilled sub-regional talent eco-systems
- Maximise local labour opportunities from regional developments, with career sustainability and lifelong learning at its foundation

Develop world class training and provision

- Invest in and support the local educational landscape including through primary and secondary, especially in the rural Maldon District where access to higher education may otherwise be limited.

- Develop a culture of education and industry knowledge share and pool of associate lecturers, teachers\ tutors and assessors to drive economic prosperity.
- Invest in new models of skills facilities and equipment which are aligned to employer skills need to support skills for the future and a knowledge-based economy
- Invest in and develop new vocational pathways such as apprenticeships, T-Levels and new models of Work Based Learning

Ensure a diverse and inclusive workforce

- Offer targeted opportunities for the hard to reach and those furthest away from the job market to access sustainable employment
- Address workforce gender imbalances and promote a culture of fairness, inclusion and respect for all, through vigorous outreach, local engagement and pro-active measures to break down negative perceptions
- Create localised initiatives addressing the skills needs of specific subregions of Essex, such as addressing: in work poverty, low skills levels, long term unemployment or high levels of individuals Not in Education, Employment or Training (NEET)
- Invest in and work with specific cohorts of residents that are furthest away from the jobs market to promote employability and skills development

Protect the visitor economy and existing businesses that rely on natural resources

- Identify and support opportunities for more domestic and international visitors, a greater proportion of overnight trips, and increased spend per visit to mitigate negative impacts on local landscape amenity
- Identify businesses that rely on natural resources and work with them to develop and implement appropriate strategies to mitigate any negative impacts on their activities

2.1.3 Proposed Jobs, Skills and Supply Chain Strategy (Section 2.1.3)

2.1.3.1 Employment and skills measures

It is welcomed that the development could enable the creation of significant numbers of skilled employment opportunities in Maldon District Council and the wider economy of Essex both for the project and to support the backfill to local companies. We would like to maximise through the school curriculum, apprenticeships, adult learning, training opportunities etc our residents' preparedness as the workforce for roles in construction and operations as well as auxiliary roles; security, catering, and drivers. We would also like to ensure as many local people as possible can benefit from the Project via sustainable employment. We agree that the Project provides a unique opportunity to help lower youth unemployment and provide them with clear and lasting career pathways for young people, and we welcome BRB's early engagement on this matter.

We particularly welcome the implementation of an Employment, Skills and Education Strategy (ESE) and a Jobs Service focussed on developing a local skills base in Maldon and the wider Essex area that can support the delivery of the Bradwell B Project. We agree that that BRB's ESE Strategy must focus on delivering local initiatives that support local people into work on the project, including both young people and those currently unemployed, along with facilitating programmes to re-train the local workforce. We support the emphasis on ensuring a pipeline of skills training starting with schools to inform and engage students in the opportunities arising from the scheme, and based on the industry leading "Inspire" programme introduced at Hinkley Point C.

As part of our ongoing dialogue with BRB, the Councils will expect SMART objectives to populate the Employment, Skills and Education plan which aim to create an environment where people can gain sustainable employment - including those from education and those who may not normally have access to such opportunities. We welcome Bradwell B's recognition of the importance of working collaboratively within existing structures for skills and education in the region in order to build a stronger infrastructure not only to deliver the Project but to leave an important and lasting legacy. We agree that these engagements must focus on understanding the existing skills and education landscape and then working in collaboration to identify intervention opportunities. As part of our ongoing engagement with EDF's Workforce Development Strategy Team, we have identified examples of some of the potential interventions:

Support an Integrated Job Shop and Brokerage Service (*Essex Works*)

- An Information, Advice and Guidance (IAG) and a single point of access for all employment and skills opportunities in Essex across the range of construction programmes.
- A Bradwell B Jobs service integrated with Jobcentre plus and other employment contacts in Essex.
- Tackle specific barriers to training and employment, including basic literacy and numeracy.
- Identify and implement measures to assist local resident labour to find alternative employment once the construction phase is over.
- Sustain and extend the lifecycle of existing one-stop-shop construction skills hubs.
- Use data to monitor skills shortage areas and future skills requirements for the various projects.
- Support and improve local access to jobs and training.
- Maximise local resident participation.
- Integrate new Bradwell B skills and jobs requirements into an update of the Essex Careers Guide 'What's Your Thing'.

Complement Councils' skills and economic growth plans, especially those targeting specific localities and sectors

- Target economic interventions that ensure the benefits of growth are experienced more widely, including within economically disadvantaged communities and for new entrants to the labour market. We will seek to work with Bradwell to identify key localities for focussed skills engagement and outreach.
- Link in with ECC's Skills for Growth programme, which will maximise our ability to address skills gaps and support greater inclusion in the labour market. ECC intends to engage with government to secure greater control of the skills system and capital investments in key places in order to better support our productivity objectives, and by working closely with employers to encourage in-work training and progression.
- Help MDC and ECC make Maldon and Essex a destination of choice for local, national and international businesses.
- Support local community centres, schools and libraries to provide outreach facilities.
- "Back to work" schemes for disadvantaged communities.
- Funding for specific ECC and MDC identified projects that target young people and promote training and development opportunities to help maintain social cohesion.
- Promote direct employment and social enterprise contract opportunities for disadvantaged people so that they can gain experience working on small scale community projects related to the project, such as landscaping.
- Bring new employers to the County.
- Develop the capacity of existing employers to deliver.
- Encourage and widen the labour market.

- Support for local businesses where key staff are displaced due to the Bradwell B development, including skills training to increase the pool of people in skills shortage areas.
- Support outreach delivered by voluntary and third sector organisations, including Princes Trust, to promote work with disengaged youth and adults in deprived communities.

Consider and engage with other major construction projects in Essex in order to ensure that planning for construction skills training, apprenticeships etc – and demand/supply issues – are considered on a strategic and ongoing basis.

- Projects to consider and engage with should include the Garden Communities and Lower Thames Crossing.
- Other major road projects.

Champion a schools and education engagement programme

- Raise awareness of project plans and future skills requirements at the appropriate time of the project cycle.
- Workforce planning for the five phases of the project.
- Engage schools on CEIAG related to the knowledge economy, nuclear skills and high-level skills.
- Engage School Governors to promote Bradwell B as an opportunity.
- Branded study programmes specific to an employer or sector (via employer group)

Apprenticeships

- Raise the aspirations of all young people.
- Provide opportunities for adults that are distant from the labour market and help them to re-integrate into work.
- Identify and support aspirational number of pre-apprenticeships, apprenticeships and higher-level qualifications, as well as traineeships.
- Maximise use of levy budgets across the partnership by sharing unused levy from Tier 1 and Tier 2 contractors through to local supply chain.
- Support a portal whereby all construction vacancies are detailed, training listed, and companies can register for Apprenticeship levy transfer.
- Pledged levy and apprenticeship vacancies tied to postcodes with target KPIs for demographics.

Support regional Higher Education (HE) and Further Education (FE) skills development plans

Support investment in Essex's infrastructure to:

- Deliver higher level skills to bolster a knowledge economy.
- Improve FE infrastructure to mitigate for increase in skills requirements and displacement.
- Increase supply of level 3 and 4 and beyond to support Bradwell B's requirements and ECC's ambitions.
- Improve FE infrastructure to support availability of STEM skills and construction skills potentially using Institute of Technology (IoT) exemplar.
- Support a tutoring hub and bank of STEM based Associate Lecturers from industry.
- Champion sector experts to enhance learning by providing Training for teaching staff on specialist areas (train the trainer).
- Increase the Knowledge base of residents and local businesses and improve productivity.
- Support expansion of existing HE provision to meet the needs of Bradwell B and ECC's Higher Education growth plans.

Align ambitions with the North Essex Economic Strategy Group

- Support measures to enable workforce development.

- Develop productive strategic relationships between influential industrialists, FE & HE, to ensure the advent of centres of excellence across North Essex and in key areas of opportunity.
- Prioritise capital funding projects linked to HE & FE provision in STEM related disciplines and leadership and management linked to improved productivity as part of an agreed strategic approach.
- Support the introduction of a quality kitemark which recognises agreed standards of employment in a business and will be awarded across North Essex. This will include fair pay and conditions, workplace health and wellbeing, skills and development and diversity in the workplace and recruitment.
- Support the FE sector to capitalise on future capital investment opportunities, by actively championing a joint portfolio of strategic planning both in terms of Greater Essex and at a higher level across SELEP, importantly to include the promotion of virtual tuition (the hub and spoke approach).

2.1.3.2 ASEC Fund

The Councils welcome the creation of a flexible Asset Skills Enhancement and Capability (ASEC) Fund to support local skills providers to deliver appropriate training to support Project requirements alongside direct support and provision to local training centres. We expect the ASEC to support Maldon and Essex's Productivity and Prosperity Plans and our ambitions to grow the knowledge sector, technology and the knowledge economy. We also welcome the suggestion of an ECC appointed Regional Skills Coordinator to provide a link between local providers, and supply chain businesses to ensure the Project delivers an effective, joined-up approach on skills. We support BRB's intention to ensure the training sector in Essex, Maldon and the wider region has the capacity to provide major upskilling for local workers and we will assist all efforts to provide advance information on the jobs and skills that will be needed, so that training can be carried out in good time, and the skilled workforce is available when required.

2.1.3.3 Supply chain

The Councils propose the development of an independent dedicated Essex Supply Chain Team and Supply Chain Portal focussed on developing local businesses which will benefit from the Supply Chain partnership. We would expect this portal to enable Essex businesses in winning contracts for the supply of goods and services to deliver the Project. We therefore expect Bradwell B to use the Portal to provide information to partners on:

- How Bradwell B is contacting businesses in Essex to ensure that they are aware of the project/engagement events, and how to register an interest or seek further information.
- The future activities and timeline in relation to supply chain and engagement with local businesses.
- How Bradwell B intends to maximise opportunities for local businesses in Essex through its procurement process.
- How Bradwell B will ensure the maximisation of the local Social Value elements of its supply Chain.
- How local companies can access funded specialist accreditations and/or Health and Safety qualifications that are required to supply new nuclear.
- Calendar of virtual and/or face to face events for supply chain companies. We would encourage Bradwell B to actively engage with the Best Growth Hub which can act as a referral point to businesses for all supply chain-related enquiries and activities.

2.1.4 Effects on tourism, including those caused by environmental impacts and socio-economic effects, and visitor facilities

We are pleased that the consultation recognises the risk to tourism. However, the consultation appears to underestimate the vital part the visitor economy plays in the local economy and Maldon District Sense of Place. Economically tourism accounts for about 15% of economic value and jobs. However, its effects are far wider as it supports visitor attractions, heritage assets, recreational activities, key organised events, and retail, spent in the town centres and villages including restaurants and cafes that rely on the increased and high value trade to survive. Accordingly, any damage to the area's attractiveness for visitors would impact negatively on the food and drink sectors, and the brand and reputation of the District and would be considered an unacceptable risk. Further work is required to identify and assess how any impact on the tourism economy will be managed and mitigated.

To mitigate the significant impact on visitor and tourist facilities; a close working partnership with Maldon District Council, the Maldon Sense of Place Board, Visit Essex and BRB is important. Some opportunity also exists to develop mutually beneficial visitor centres and facilities either at the site or at other visitor/tourism locations.

The area's visitor offer also relies on the availability of its visitor accommodation offer (eg bed and breakfast, camping, caravan and static sites etc) which is in high demand especially during the peak summer months. Any short-term disruptions to this accommodation supply would have lasting effects on repeat visitor numbers. It is vital that this increased demand on certain types of accommodation during the peak construction period does not negatively impact on the visitor numbers and will need to be managed during the construction and operational phases. The Councils seek the provision of legacy benefits through the provision of new and improved existing accommodation alongside create new, sustainable, quality visitor accommodation.

Given the importance of tourism in the area the Councils consider it necessary for BRB to undertake a detailed study to address the concerns as raised above. The Councils are willing to assist in the scoping and commissioning of any study.

2.1.5 The effect of an influx of workers including pressures on local and regional resources and demographic change

From the information submitted it is clear that far more information is required on the approach to managing the effects of the size and distribution of the workforce. While there may be a short-term gross gain in local job numbers, this consultation appears to fail to recognise the level of risk that; without timely and significant investment and mitigation in advance of the construction phase, for example in transport services and infrastructure, the net and longer-term impact may be detrimental to the District's diverse and prosperous economy.

More information is also required in relation to mitigating the effect of increased housing demand and traffic on existing businesses, longer term investment, tourism and sense of place. The consultation indicates that local businesses will benefit from increased demand for services and accommodation, while this may be true for a short period it fails to recognise that a short-term peak in demand may have a negative legacy without significant mitigation. The impacts on environment, landscape and the perception of the area could also escalate the negative consequences without careful management and mitigation.

2.1.6 Other economic infrastructure observations

Where technically feasible the project should ensure that any new communications infrastructure should be of high quality to benefit local residents and support economic growth and wellbeing. Ideally, this would be Fibre to the Premises; however, fully operational 5G mobile connectivity may also be accepted as appropriate broadband coverage, if arrangements are made for premises to access this at affordable prices, comparable to a fixed-line fibre broadband service, and this access is fully available at the time of completion of the build.

The project is expected to increase the demand for local business accommodation. Bradwell B is expected to generate 900 post-construction direct jobs. Applying multipliers for the electricity sector, a further 720 indirect jobs and 90 induced jobs can be expected – 810 jobs in total, taking the likely total to 1710 jobs in total during the operational phase of 60 years. Applying the current mix of employment activity in Maldon District and typical employment densities, this would generate demand for some 2,136 sq m of office; 4,183 sq m of industrial; and 7,910 sq m of warehousing floorspace. However, whilst Bradwell B proposals would generate a demand/need for such floorspace to support its ongoing operation, the Maldon Local Plan evidence base suggests that there could be viability issues associated with the delivery of new speculative business accommodation – we would therefore welcome an ongoing discussion with BRB regarding how the scheme could support the delivery of supporting economic floorspace, for example through financial support for the delivery of a new Enterprise Centre at Maldon.

Supported by: Robert Willis, Economic Infrastructure Manager (ECC); Hassan Shami, Commissioner for Skills Development (ECC); and Jack Ellum, Strategic Theme Lead (MDC)

2.2 Social / Community

The impacts of Bradwell B on communities and their services will be significant. The opportunities and impacts on communities during the construction, operation and decommissioning of the nuclear power station will be a 'once in a lifetime' occurrence. Bradwell B will leave a legacy on existing and future communities and it is therefore critical to consider the wide ranging social and community impacts which include, but are not limited to:

- Community services and infrastructure,
- Community safety,
- Leisure and recreation,
- Health and wellbeing,
- Educational provision (primary, secondary, sixth form and early years and childcare services, and
- Communication to our communities.

The BRB commitment to work in partnership with the Councils and the community to manage the impacts of Bradwell B and maximise the benefits for the community is welcomed. Only by working in partnership will we be able to achieve the best outcomes for existing and future communities.

Whilst it is acknowledged that this is an early Stage 1 consultation, there is some concern that there is no substantive assessment or detail included on the impact that this development proposal will have on communities, including health and wellbeing. The National Planning Policy Framework (NPPF) requires development to enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier foods, allotments,

walking and cycling. These fundamental matters will need to be addressed and the Councils seek early discussions to understand how the project will be assessing and addressing community impacts in this area moving forward.

BRB is required to undertake an Environmental Impact Assessment (EIA) and the Councils' recommend that population and human health elements are considered in the EIA. Given the scale, size and significance of the project and the health and wellbeing impacts that may arise from the proposal, it is recommended that BRB should also undertake a stand-alone Health Impact Assessment (HIA) and BRB should consider how elements of the HIA might support the socio-economic and behavioural elements of this chapter. The biophysical elements of the population and human health chapter should be directed by the relevant technical and scientific environmental scientists and health protection officers within both Public Health England's Centre for Radiation, Chemicals and Environmental Hazards and relevant local authorities.

The Essex Design Guide (2018) includes supplementary guidance regarding the updated Essex Planning Officers' Association Health Impact Assessment guide, which also includes the wider Essex Healthier Places guidance. These provide more in-depth information on what needs to be considered when looking at health, wellbeing, the environment and communities (<https://www.essexdesignguide.co.uk/supplementary-guidance/health-impact-assessments/>)

The Councils recommend that the HIA is a fully participatory assessment incorporating a robust literature review and involves extensive stakeholder community engagement, consistent with the HIA Guide. As part of this, the Councils request that a stakeholder engagement group is set up, facilitated by BRB, to ensure that key health, wellbeing and community stakeholders can be engaged in this process. The Councils can provide a list of suggested stakeholders for this group. In addition, it is recommended that the Public Health England Healthy Places nationally significance infrastructure projects (NSIPs) lead officers are engaged to provide a national strategic public health overview in addition to that provided at a local level.

The community stakeholder engagement group would also help to influence and drive the Bradwell B legacy at a local level with local residents, Parish Councils, stakeholder groups and organisations participating. This group should be integral to moving the project forward and ensuring that local communities are brought into this process. Key local organisations and community groups should be included whilst also linking in to other local boards, such as the Llivewell Group, Maldon Youth Strategy Group, Maldon Sense of Place, Maldon Children's Advisory Board for example.

Due to the complexity and range of potential impacts upon the various communities surrounding the development over the extensive and multiple construction phases, assessments should consider impact at differing community levels. Some of our preliminary thinking which will be refined at the HIA scoping phase will be required to consider the impacts upon the immediate villages within the Dengie Peninsula, such as Bradwell village, the villages adjacent and surrounding Bradwell within the Dengie Peninsula, and the wider sphere of influence in Maldon District and the county of Essex. We would wish to consider the impact on East of England as a region and further but would wish to discuss this with relevant other stakeholders to understand their requirements, especially those concerning socio-economics, economic growth and highway matters.

Any formal recommendations arising from the HIA should relate back to the aims of the HIA from the scoping assessment. Any recommendations should seek to maximise the potential health and well-being benefits as well as minimising unintended consequences that have been identified. The HIA will enable the Councils and BRB to understand how the various development options proposed will impact upon each identified community, health or wellbeing element and what the effect the

impact will be. For some pathways, this is likely to provide multiple options and having this level of detail will enable us to promote the best options for health and wellbeing in existing and proposed communities. For the assessments, we must understand the magnitude, significance and duration of the preferred option's effect and as part of this specifically, the impact on any group that may be impacted by this including those impacted by inequalities including with protected characteristics, those impacted by differences in socio-economic circumstances, those impacted by differences through place/locality and those in excluded and under-served groups. Sensitive receptors sites must also be identified and impacts and effects on these must be considered at the differing community levels as raised above.

Where any community or health effect is identified through the various options proposed, it is the expectation that clear mitigation measures are included within the proposals before preferred proposals are identified. Should positive elements of the proposal be identified, it needs to be demonstrated how these can be maximised and whether they can play a part in legacy arrangements that might be secured. This is especially relevant to socio-economic opportunities such as skills, training and employment as well as housing and other social infrastructure, as examples. Where any negative, unintended consequences are raised, it must be clear how the applicant proposes to either remove, minimise or mitigate against these and the duration of this mitigation.

With regards to any potential legacy funds to be set up, the Councils would wish to discuss how these are allocated with relevant stakeholders, to give an understanding of the project funding, the scale of the project proposed, and the amount of funding necessary. It is envisaged that a local stakeholder engagement group will be important to ensure an appropriate breadth of representation on discussions as to how best funds are allocated.

Extensive public engagement, and the feedback that arises from this, on matters related to health, wellbeing and communities should be included in any HIA so that stakeholders are aware of these and can be involved as appropriate. The role of Parish Councils should also be fully recognised.

At this stage, the Councils wish to highlight a number of community, health and wellbeing issues that should be considered by the BRB as it develops its proposals. This list will expand:

Construction workforce

- Access to a range of Healthcare and the impacts on commissioned public health services
- Housing and the impact on the need for temporary housing, tourist accommodation and the capacity within the local housing market to accommodate demand including the impact on available affordable housing for local people
- Physical sport and formal and informal activity opportunities
- Mental wellbeing
- Emergency planning
- Skills, training and employment opportunities for local people including supply chain
- Impact on other local and strategic social infrastructure from the workforce not mentioned above
- Community safety implication and demands
- Local community health and voluntary service demands
- Active travel (walking and cycling) and general travel by river, train, bus, car etc.
- Liaison with education providers (service capacity, pupil and childcare, apprenticeship and career opportunities)
- Community integration opportunities preventing severance and isolation.
- Code of conduct agreements

Construction phase

- Impacts on community including impacts on facilities, services and social infrastructure including healthcare and education premises
- Impacts on physical activity opportunities for leisure and recreational use including use of the Blackwater Estuary.
- Severance of Public Rights of Way (footpaths, bridleways and byways), cycle routes and footways physical activity routes and active travel routes including coastal paths (including the emerging England Coastal Path) and routes connecting relevant places of natural beauty and heritage sites
- Creation of active design principles regarding sustainable travel and environmentally friendly travel initiatives, routes and measures to link with and enhance local Green Infrastructure provision.
- Impacts of significant HGV movements, the movement of the construction workforce (including park and ride), potential rail and water transport movements on health and wellbeing including relevant safety issues and environmental concerns including but not limited to noise and air quality
- Impact on the local and strategic road network, the performance of that network and access for local people to key services
- Planning blight
- Impacts on public mental health, including community cohesion and social isolation.
- Community safety both perceived and actual threat
- Impacts on the opportunity for local employment to successfully compete for direct and indirect supply chain opportunities
- Opportunities for training and skills support for local population including apprenticeship schemes and careers engagement for schools
- Impacts on access to appropriate housing on local population (including impacts on affordable housing)

Operational

- Impacts on community including impacts on facilities, services and social infrastructure including healthcare, community and education premises
- Impacts on physical activity opportunities for leisure and recreational use including use of the Blackwater Estuary and potential improvements to local Green Infrastructure.
- Severance of PROW, physical activity routes and active travel routes including coastal paths and relevant places of natural beauty and heritage sites
- Creation of active travel and environmentally friendly travel initiatives, routes and infrastructure, building on and with reference to the Maldon Cycle Action Plan.
- Impacts of HGV, construction workforce, potential rail and water routes on health and wellbeing including relevant safety issues and environmental concerns including noise and air quality
- Impact on road network and access for local people to key services
- Planning blight
- Impacts on public mental health, including community cohesion.
- Community safety both perceived and actual threat
- Impacts on local employment to include direct and indirect supply chain opportunities
- Opportunities for training and skills support for local population including apprenticeship schemes and careers engagement for schools
- Impacts on housing on local population (including impacts on affordable housing)
- Community services and infrastructure impact
- Severance of coastal paths, walking routes and heritage sites and impact on health and wellbeing

Decommissioning

The Councils would wish to have decommissioning considerations included in assessments.

It is stressed that detail information and stakeholder engagement is required to establish the level of community services required to support the needs of the proposals, either temporary or permanent. The need for permanent homes to meet the needs of the operational phase is not currently addressed, as identified in the housing response below, and so community impacts are impossible to assess at this stage. The demographic profile of construction workers and operation workers, as well as potential indirect impacts, is necessary to robustly assess and help inform likely community needs e.g. for additional school places, libraries or health facilities. Detailed discussions based upon relevant evidence will be essential following details of any future demographic profiling.

The impacts arising from Bradwell B on communities and their necessary infrastructure covers a range of inter-related topic matters. For example, the selected option for movement of freight and workers will have a direct impact on matters such as highway capacity, air quality, noise, and road safety along route corridors through villages. It could also lead to the severance of safe walking routes required for sustainable movements to existing schools. The Councils expect avoidance or mitigation of adverse impacts if impacts are significant.

It is a concern that the Stage 1 Consultation makes no reference to the impact on or on the potential benefits to upgrade and enhance the Green Infrastructure and the development's contribution and connectivity to the wider network (including blue infrastructure). The impact on the recreational use of the Blackwater Estuary will also need to be considered. The Councils will welcome details and discussions on this important topic. The Councils recommend consideration is given to the Green Essex Strategy (2020) and the Maldon Green Infrastructure Strategy SPD (2019).

The Green Essex Strategy seeks to take a positive approach to enhance, protect and create an inclusive and integrated network of high-quality green infrastructure in Greater Essex, to create a county-wide understanding of green infrastructure – its functions and values, and to identify opportunities for delivering green infrastructure. The aim is to guide and shape planning and other services through setting principles that can inform plans and strategies, that will enable a coherent approach and partner collaboration in the delivery and long-term management of multi-functional natural assets, which will provide environmental, social and economic benefits.

The proposed discussions on emergency planning are welcomed with safety at the heart of the proposals. It is acknowledged that the Generic Design Assessment Process and the operating approvals from Office for Nuclear Regulation and Environment Agency will separately assess the safety of the site operation and UK HPR1000 nuclear technology.

The Radiation (Emergency Preparedness and Public Information) Regulations (REPPiR) 2019 impose requirements for off-site emergency arrangements relating to Bradwell B following the nuclear operator completing the hazard assessment process. Clarification would be welcomed on BRB's proposals to ensure appropriate off-site emergency plans for the project, including workers during the construction phase (see Stage 1 Consultation, para.2.15).

The Office for Nuclear Regulation (ONR) provides land use planning policy advice. This, in conjunction with REPPiR 2019, confirms that Essex County Council Emergency Planning will only get legally involved once a nuclear operator provides a Consequence Report. At that stage ECC would commence the process of consultation and preparation of Off-site planning with partner agencies.

MDC would welcome clarification from BRB on proposals during the construction and pre- nuclear phase of the project including the following details relevant to emergency planning:

- Proposals to manage an incident on a haul route to the site which may impact upon local residents and business which could result in evacuation or significant disruption to transport in and out of the Dengie peninsular during an incident.
- Any construction process or activity on site which could have off site consequences to local residents and business (including evacuation and maritime pollution arrangements)
- Any construction process, activity or incident involving on-site residential accommodation which could result in the evacuation of the workforce from the site and the proposals to manage and support displaced workers during an emergency
- Details of the proposed timeline for the emergency planning workstream would be welcomed.

Supported by: Laura Taylor-Green, Head of Wellbeing and Public Health: Healthy Places and People (ECC); Ben Page, Strategic Theme Lead – Community (MDC); Blaise Gammie, School Place Planning Manager (ECC); James Pinnock, Customer Business Development Lead (ECC); Jayne Rogers, Environment Officer (ECC); and Mick Gurden, Emergency Planning and Resilience Consultant, Emergency Planning & Resilience Team (ECC); Richard Holmes, Director of Service Delivery (MDC).

2.3 Housing / Accommodation

The impacts of Bradwell B development would have wide-ranging and long-term impacts on the housing market within the Maldon District and probably beyond. The scale and scope of these impacts will bring challenges as well as opportunities for the area. This will need to be positively planned following a thorough consideration of the potential impacts of the proposals which will be understood once the relevant evidence has been gathered. Such evidence must include a thorough housing market impact assessment to understand the housing needs of the new workforce, both during construction of the station and when operational, and how and where those needs will be located. Future housing needs can then be incorporated into the planning of new transport and community infrastructure.

The Stage 1 Consultation does not adequately evidence or explain the proposals to meet the housing needs of the project and to address the impacts of the proposal. Engagement with BRB will be welcomed to discuss the strategic approach to housing, including meeting the needs of workers during the operation of the power station and housing market impacts during the construction and operational phases. The need for permanent homes to meet the needs of the operational phase is not currently addressed within the Stage 1 consultation.

There are potential housing issues that will need to be addressed, including but not limited to:

- Local housing impacts arising from the construction workforce. Exiting residents could be out priced on new build and existing homes for sale leading to pressure being placed on the Local Authority Housing Register. This could place additional pressure on the limited social rented sector.
- Impacts on tourist accommodation that could negatively impact on the availability of temporary accommodation available to support homeless applicants to the Council. There is concern that this would increase placements outside of the local area, which has several disadvantages over local placements.
- The role that permanent housing will be part of the housing strategy for the development together with details on its location, scale, dwelling type, tenure and contribution to a positive local legacy.

- Impacts on the small private rented sector, including effects on the available premises available to the Council to fulfil duties to the homeless.
- The potential for applications from workers to be placed on the Housing Register to access limited local affordable housing provision.
- The potential for homeless approaches arising from loss of employment family breakdown within the workforce community.
- Homeless approaches from worker with family where private landlord has served notice on property (possibly due to selling property). If workers and family have been resident for six months or more they have a Local Connection under the Housing Act and potentially a duty by the local authority to place into temporary accommodation/possibly secure long term permanent housing.
- The measures proposed to avoid, mitigation or compensate for negative impacts or to maximise positive impacts from the housing proposals. Discussion on the opportunities for affordable housing, working with Registered Providers to provide affordable rental homes, will be especially welcomed.

It is acknowledged that paragraph 5.7.25 of the Stage 1 Consultation document provides a brief reference to measures that other large-scale infrastructure projects have used to support local housing markets but we will welcome discussions specific to the Bradwell B proposal. Whilst paragraph 5.5.9 references the potential for a flexible Housing Fund it also does not appear to be specific to a thorough understanding of the Maldon District and surrounding areas. There is a small private sector housing sector within the Maldon District and BRB's expectation that it will only be marginally impacted during the construction peak period will need to be supported by evidence.

Strategic and detailed discussions are requested to inform the baseline assessment and the development of BRB's preferred specific proposals by Stage 2 of the consultation.

Supported by: Damion Ghela, Lead Specialist Community (MDC); John Swords, Senior Housing Specialist (MDC); Matt Leigh, Lead Specialist Place (MDC); Christopher Downes, Housing Growth Lead (ECC).

3 SUSTAINABILITY: ENVIRONMENT

3.1 Environment: Environmental Health

There is potential for the proposed development to have a significant impact on environmental health issues. However, there is inadequate information included in the Stage 1 Consultation for an informed view to be provided at this stage. Evidence and assessments are nevertheless expected later in the DCO process and early discussion with the Environmental Health service on assessment methodologies will be welcomed. Pre-application engagements as the proposals develop are also requested.

The proposals for the main site and areas of search for Associated Development are inadequately detailed or too broad for advice to be provided at this stage. It is notable to see that some of the main local environmental impacts (noise and air quality from associated development in particular) have not been acknowledged at this stage. The Air Quality Management Area at Griffin Hill, Danbury, should also have been acknowledged.

A more detailed account of existing baseline environmental conditions on the main development site, associated development sites, search areas and preferred strategic transport routes is considered essential. This will need to be informed through desk-based studies, environmental surveys, new traffic surveys and associated traffic modelling, and site investigations; include the methodologies employed to undertake the environmental impact assessment; the outcomes of any assessments to date; proposed mitigation and potential residual and cumulative effects.

All data collection, assessment methodologies and traffic modelling should be clearly described and justified in the context of relevant national guidance and planning policy. Clear identification of sources of pollution and quantification of adverse effect levels at sensitive human (and ecological) receptors is necessary for all phases of the development.

Supported by: David Cant, Senior Specialist Environmental Health (MDC).

3.2 Environment: Ecology

3.2.1 Ecology

The location of Bradwell B adjacent to the Blackwater Estuary and the Essex coast lies in a highly sensitive coastal area. There is potential for unacceptable impacts from the project on:

- Internationally important sites are designated under the Conservation of Habitats and Species Regulations 2017 - Special Protection Areas (SPAs) and Special Areas for Conservation (SAC) and the Ramsar convention on wetlands (Ramsar sites);
- Nationally important sites e.g. Sites of Special Scientific Interest (SSSIs) designated under Wildlife & Countryside Act 1981 as amended and Marine Conservation Zones (MCZs) designated under the Marine and Coastal Access Act 2000
- Non-statutory designated sites eg, Local Wildlife Sites (LoWS)
- European Protected Species listed in the Conservation of Habitats and Species Regulations 2017
- UK protected species listed in Wildlife & Countryside Act 1981 as amended, and

- Priority habitats and species Listed under s41 Natural Environment and Rural Communities (NERC) Act 2006 - to ensure the Secretary of State can fulfil their statutory duty to have regard to conserving biodiversity under s40 NERC Act.

Ecological assessment will therefore need to cover potential impacts on a wide range of habitats and species from internationally important numbers of non-breeding and breeding birds which depend on the inter-tidal zone, marine species such as the native oyster and a range of fish to terrestrial species such as water voles, bats roosting in trees and farmland birds. The likely impacts of development stretch beyond the Main Development site to Associated Development sites and all of these will require the same high level of ecological survey and assessment to inform choices on options.

The submitted documentation has identified a list of designated sites which could be affected including the Blackwater Estuary SPA & Ramsar site, the Essex Coast SAC and the Blackwater, Crouch, Roach and Colne Estuaries Marine Conservation Zones. However it is recognised that an early decision has been made to opt for setting the power station back from the coast (retaining the borrow dyke and all other designated habitat on its seaward side) and not proceeding with direct cooling as set out in the nomination documents for Bradwell and National Policy Statement EN1 Vol II Annex C, and instead to cool the condensers indirectly using cooling towers (reducing the impact on the marine environment, particularly on native oysters or other wildlife). Evidence to support the options considered and the relative environmental impacts is needed.

3.2.2 Baseline Information requirements

Section 3 on terrestrial ecology has identified the likely impacts from the Main Development site on features of the ten statutory designated sites close to and within the site e.g. protected species likely to be present and affected by the development. It is noted that the terrestrial interest associated with the main development site includes foraging habitat for wintering dark bellied Brent geese, and the arable fields may also support other wintering waders and wildfowl. The borrow dyke may support water voles and other protected species may be present on the field margins. This baseline assessment needs to be expanded to include the results of a range of ecological surveys, to be agreed on through early stakeholder engagement, in order to ensure a robust starting point for decisions on options and detailed design.

The reference to an Evidence Plan to produce a Shadow Habitats Regulations Assessment (HRA) is welcomed as the Bradwell B project will be required to assess if the proposal is likely to result in an adverse effect on site integrity (either alone or in combination with other plans and projects) for the Habitats (European) sites within scope of the Part One Appropriate Assessment. This will be necessary for the Secretary of State to provide sufficient information for Natural England to consider this before the any Development Consent Order can be approved. It is noted that NPS EN6 Vol II Annexes paragraph C.8.102 states: "...there may be interactions and cumulative effects on biodiversity should both Bradwell and Sizewell C sites be developed. Guidance on the consideration of cumulative effects is in EN-1. For instance, Section 4.2 says that *"the IPC should consider how the accumulation of effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place"*.

It will be essential to assess possible significant adverse effects on nationally important nature conservation sites and further studies will need to be carried out, as part of the Environmental Impact Assessment process, to determine the significance of the effects and the effectiveness of any

mitigation measures. Any key inter-relationships between biodiversity and other sustainability effects will need to be identified particularly in relation to flood risk management and water quality.

The Associated Development sites need to be assessed to an equal level for ecological impacts as woodland and other habitats affected by these, in addition to the Main Development site.

There is no reference to a desktop data search to inform surveys so it is recommended that data searches are sought from both Essex Field Club and Essex Wildlife Trust Biological Records Centre to inform terrestrial and marine ecology surveys for discussion with key stakeholders i.e. before Stage 2 consultation and the Preliminary Ecological Information Report.

The reference to farmland bird species of conservation importance is welcomed as these may use the arable fields on the main development site, including species such as turtle dove, grey partridge and skylark. It is recommended that the scope of surveys should also cover Priority s41 species (both terrestrial and marine) and any Schedule 9 species which could affect the proposal.

The potential impact on all the relevant species and habitats must be effectively assessed and appropriate avoidance, mitigation and compensation identified to minimise adverse impacts on the environment. In delivering new schemes, the Government expects applicants to avoid and mitigate environmental impacts in line with the principles set out in the National Planning Policy Framework (NPPF) and the Government's Planning Practice Guidance (PPG).

The use of nationally agreed guidelines for surveys and that all survey work is to be undertaken in the appropriate season by appropriately qualified ecological consultants is good practice and supported. Survey and assessment should meet the requirements of both Natural England Standing Advice, and the Essex Biodiversity Validation Checklist, using Defra's biodiversity metrics, as well as CIEEM Guidelines for Ecological Impact Assessment (EcIA) 2016.

Surveys should include walkover surveys to inform further surveys on habitats and species, to include Priority habitats and both protected and Priority species, sufficient for the Secretary of State to discharge all associated statutory duties, including NERC s40. This should meet the EcIA definitions of Important Ecological Features of local or greater importance for biodiversity and include terrestrial and marine environments. The assessment of likely ecological impacts needs to inform the evaluation of alternatives and incorporate effective and deliverable mitigation measures to minimise the impacts as well as identify compensation including offsite measures for any residual impacts. There will be seasonal constraints for species surveys so these need to be scheduled carefully to meet the programme timetable.

Ecological assessment needs to cover the entire development area, including all ancillary sites (new highway routes, roads, park and ride and freight compounds, permanent and temporary housing, marking, pylons, new transmission infrastructure on or off site) and any offsite works needing to be secured, and assess potential impacts on the marine, inter-tidal and terrestrial environments.

The work to support early discussions should include identification of statutory designated sites within any evidenced zone of influence (not a generic distance from the site) and non-statutory Priority habitats at least within 1km of the Main or Associated Development route or site.

Identification of biological records for protected and Priority species records should inform surveys and assessments of all parts of this development.

3.2.3 Approach to landscaping and managing environmental effects

There will be opportunities to enhance parts of the site, in particular by creating Priority habitats such as hedgerows, to improve connectivity across the landscape particularly to mitigate for disconnections caused by road improvements. The ecology chapter of the Environmental Statement (ES) should thoroughly explore all reasonable options to enhance the development for biodiversity including Protected and Priority species to support the Secretary of State in demonstrating the statutory duty to have regard to conserving biodiversity (s41 NERC Act 2006).

As well as the options for mitigation set out in EN-1, the Nuclear Appraisal of Sustainability and HRA, have identified possible mitigation options for Energy projects which include variations to building layout to avoid ecologically sensitive areas and on-site measures to protect habitats and species and to avoid or minimise pollution and the disturbance of wildlife.

It is expected that, during the EIA process, all opportunities to deliver biodiversity enhancements will be explored in consultation with appropriate stakeholders as a mechanism to deliver measurable net gain for biodiversity. BRB are requested to confirm its commitment to achieving Biodiversity Net Gain which is not explicit in the Stage 1 Consultation.

It is noted that NPS EN1 para 5.3.4 states that *“the applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests”* and para 5.3.8 *“In taking decisions, the IPC should ensure that appropriate weight is attached to designated sites of international, national and local importance; protected species; habitats and other species of principal importance (Priority) for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment”*.

For Priority habitats and species, EN1 para 5.3.17 states that these *“...species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and thereby requiring conservation action. The IPC should ensure that these species and habitats are protected from the adverse effects of development by using requirements or planning obligations. The IPC should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits (including need) of the development outweigh that harm. In this context the IPC should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance which it considers may result from a proposed development.”*

In line with para 5.3.18 of the NPS, the applicant should therefore include appropriate mitigation measures as an integral part of the proposed development. In particular, the applicant should demonstrate that:

- during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works;
- during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements;
- habitats will, where practicable, be restored after construction works have finished; and
- opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals.

It is expected that the Bradwell B project maximises opportunities in and around developments in order to ensure that such beneficial features are delivered. A monitoring strategy is also expected

with clear objectives outlined for those significant environmental effects that remain following mitigation.

It is pleasing to see that the ecological principles of respecting the outstanding marine biodiversity of the Blackwater Estuary and protecting the rich biodiversity and ecology of the Dengie Peninsula are both acknowledged as being important to the emerging proposals for the main site. The success of delivering the project to these principles will require a full programme of surveys and assessments and that sufficient information is provided to the statutory consultees in a timely manner to inform their responses to consultations.

3.2.4 Accommodation Options

Ecological impacts are likely to result from disturbance during construction of the workforce accommodation and its temporary, though long-term operation, and decommissioning, as well as loss of foraging habitat along the coast. Areas that may be used by protected wintering wildfowl should particularly be avoided and minimised when considering the potential sites. At this stage, without detailed surveys and assessment, it is considered that Site 3 is likely to be the preferred location from an ecological perspective and Site 1 may be unacceptable.

3.2.5 Transport and associated works

It is noted that the proposed options could affect areas which could potentially be functionally linked land for designated features of statutory designated sites. Priority habitats, including deciduous woodland and hedgerows (loss and severance) are also likely to be affected. In line with the suggested design principles, the mitigation hierarchy should be followed, and opportunities taken to inform decisions on highways improvements, park and ride sites and freight management facilities to avoid and minimise ecological impacts. Compensation will be expected for all losses and biodiversity enhancements to deliver net gain.

The four options set out for marine transport are based on initial considerations and although option 1 Beach Landing Facility (BLF) appears to result in the least environmental impacts, detailed investigations in the coming months will be necessary to inform the choice of options and specific locations. This is necessary to avoid, minimise and compensate for any impacts in the estuary and in the inter-tidal area will before a final choice on options is made, particularly if two BLFs are considered necessary.

The Councils recommend that all the potential transport mitigation options considered should consider how they will be taken to contribute to the creation of coherent and resilient ecological networks as highlighted in the Government's Environment Bill 2020.

3.2.6 Further information required:

It is recommended that integrated and ongoing engagement with key stakeholders on a range of ecological and habitat issues is undertaken at the earliest opportunity during the pre-application period. This is essential to inform and refine the project scope and options before Stage Two Consultation. Consideration of alternatives will be key to all decisions and will be expected. From an ecology point of view, consultation on Environmental Impact Assessment (EIA) scoping will be key to securing the necessary surveys and assessment of likely ecological impacts from the Main site and Associated Development. It is expected that this assessment will need to consider any impacts in combination with other plans and projects, including Sizewell C in Suffolk.

To avoid delays, it is expected that EIA assessments and details of avoidance, mitigation and compensation measures will feed into the early versions and consultation on the Preliminary Environmental Impact Report (PEIR) ahead of the Stage Two consultation. It is considered too late to leave this detail until the full Environmental Statement is submitted as part of the DCO application.

The Councils will need to be involved in discussions on the preparation of an Outline Code of Construction Practice (containing embedded avoidance and mitigation measures) and an Outline Landscape and Ecological Management Plan (LEMP). This needs to be part of the ongoing discussions with key stakeholders rather than leaving this detail until Stage Two consultation.

The EIA documentation will need to clearly set out the details of the environmental avoidance, mitigation, compensation and enhancements plans for the Main site and the Associated Development sites.

Supported by: Sue Hooton, Principal Ecological Consultant (Place Services advising MDC) and Nicky Spurr, Environment Officer (ECC).

3.3 Environment: Historic Environment

Bradwell B and its associated infrastructure has the potential to result in adverse impacts on the historic environment, including both designated and non-designated heritage assets. In addition to the physical impact on below-ground archaeological remains the development will also be intrusive within the wider historic landscape, and the settings of multiple heritage assets, resulting in potential harm to their significance.

The *NPS for Energy* (EN1) states that 'All proposals for projects that are subject to the European Environmental Impact Assessment Directive must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project.' The Directive specifically refers to effects on human beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. The Directive requires an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects. The requirements for appropriate assessment are covered under Section 5.8, including that the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to their significance.

The *Annexes to the National Policy Statement for Nuclear Power Generation* (EN-6), D8: Areas of amenity, cultural heritage and landscape value identified 'potential adverse effects on the settings of Othona Roman Fort and St Peter's Chapel, other nearby scheduled monuments, listed buildings and the West Mersea Conservation Area, as well as on buried archaeology of potentially high importance'.

The primary legislation with regard to Scheduled Monuments is provided in the Ancient Monuments and Archaeological Areas Act (AMAA) 1979. In order to be scheduled, a monument should be of 'national importance' (section 1 (3) of the AMAA. The National Planning Policy Framework (NPPF) states that the setting of a designated heritage asset can contribute to its significance. Most of the buildings affected by Bradwell B proposals are listed buildings. Listed buildings are buildings of special architectural and historic interest. In accordance with section 66(1) of the *Planning (Listed*

Buildings and Conservation Areas) Act 1990, the Secretary of State must have special regard to the desirability of preserving any affected listed building or its setting or any features of special architectural or historic interest which it possesses. There are also local lists of important heritage assets.

Maldon District Council's Heritage and Conservation Specialist has produced an assessment of impacts on above-ground built heritage assets potentially impacted by Bradwell B, including designated and locally listed buildings within the Maldon District. This full report is attached as Addendum to this Appendix and forms part of this topic-based response.

Whilst the attached report focuses on listed buildings it is probable that each of these buildings will also have associated archaeological deposits which relate to the origins and development of these heritage assets.

The proposal will also impact upon the setting of the Bradwell-on-Sea Conservation Area and the report in Appendix B provides some consideration of potential impacts. Conservation areas are 'areas of special architectural and historic interest, the character and appearance of which it is desirable to preserve and enhance'. Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* requires the Secretary of State to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

In addition to the many above-ground heritage assets that could be affected by the proposals, the location of the proposed power station lies within a highly sensitive area of archaeological significance. It has been identified in the submitted documentation that several heritage assets will be impacted, including the grade I Listed Chapel of St Peter on the Wall and the Scheduled Roman Saxon Shore Fort at Othona, as well as numerous grade II Listed buildings and locally listed buildings. The Councils also raise concern regarding the Scheduled fish-traps within the estuary which although just outside the main site area have the potential to be impacted by sea-borne traffic and changes to tidal processes. There is also concern that BRB have yet to appropriately consider the non-designated heritage assets or the historic landscape which will be impacted by BRB's proposals. In addition to the significance of these assets in their own right, they also contribute to the setting and significance of the designated assets. These will need to be included in BRB's assessment and the Councils expect that Historic England will be making similar recommendations. It also needs to be understood that the impacts of the scheme are not only on individual heritage assets (both designated and non-designated), but also the cumulative impacts of many changes to the historic environment along the length of the Dengie peninsula and beyond.

It is clear that the scheme will involve major landscape disturbance from the very start of the scheme and as such it is essential that the archaeological assessment and field evaluation for the proposed scheme should be completed early in the DCO process so that all of the heritage assets that will be impacted can be identified, and the nature of their significance understood and taken into account as BRB's proposals develop.

As this development will impact on extensive designated and non-designated heritage assets both on land and within the estuary it is essential that heritage meetings are held jointly with local authority advisors and Historic England to ensure the best outcome for the heritage of the area. Other NSIPs (Lower Thames Crossing, Tilbury 2) have all been undertaken in this way which ensures a consistent approach. There needs to be clear communication, early discussion and evaluation of the archaeological deposits and setting assessments to facilitate a robust understanding of the impact that the scheme will have on the historic environment.

The following Historic Environment Research Strategies apply to this area; The Greater Thames Research framework, The East of England Research Framework and Agenda (both the extant versions and the ongoing revisions). Historic Environment Characterisation has been undertaken for the entirety of Maldon District and should be used to inform the development of a historic environment strategy for the scheme.

3.3.2 Requirements for the DCO Process

Archaeological assessment needs to cover the entire development area, including all ancillary sites (highways, areas of search for park and ride compounds, housing, marking, pylons) and environmental off-setting. It needs to cover both marine, inter-tidal and terrestrial environments, and the interactions between the three. This work needs to be undertaken as early as possible within the DCO process.

The work to support the DCO process should include:

- *Desk Based Assessment*

Identification of designated and non-designated assets, to include archaeological and built heritage (integrated with the documentary and cartographic assessment)

Assessment of the Historic Environment Record Data

Assessment of the National Monument Record

Assessment of landscape character including identification of historic trees/hedges/ponds

WWII assessment of Bradwell Bay airfield and its surviving assets

- *Aerial photographic and Lidar assessment and rectification*

All available sources (including Google Earth) should be used, to better than 2m accuracy

- *Documentary and cartographic assessment*

Cartographic assessment within the Record Office

Initial assessment by a qualified historian as to the nature, range and potential of the documentary archive available

- *Built heritage assessment*

Designated and non-designated built heritage assets (including WWII structures) and their settings need assessing.

- *Deposit model/geotechnical work*

The Medway channel, alluvial deposits and saltworks, former creeks

Blackwater estuary

Interpretative mapping of landforms (former coastline, cheniers, former islands, sand-banks, palaeochannels, sea defences, etc.

(there is potential for information to be gained if this work is integrated with the overall geotechnical work being undertaken)

The project will require a geoarchaeologist and a Palaeolithic specialist in order to fully integrate the geoarchaeological information, including all past geotechnical work and surveys in the area and forthcoming geotechnical work and surveys. This will have to be a document that is added to as survey work progresses.

- *Geophysics survey – land and water*

All methods, including magnetometer, GPR and side-scanning sonar will need to be considered (potential for information to be gained if this work is integrated with the overall unexploded ordnance surveys being undertaken)

- **Shoreline assessment**

The inter-tidal area will require a walkover and recording exercise after each set of winter storms at a period of low tide

- ***Trial-trenching***

Geoarchaeological test-pits will be excavated within a selection of the trenches to provide transects across the site to refine the Palaeolithic potential of the site. The results are to be integrated back into the deposit model

Trial-trenching at a density of 5% of the area (this is the standard approach used across Essex for this type of work), using 30m trenches on a staggered grid pattern (with some adjustment to target previously identified features). In the area of the airfield trial-trenching maybe the only appropriate method to use.

- ***Tidal flow and erosion survey and its impact on scheduled monuments and archaeological sites on the foreshore***

- ***Setting assessments of heritage assets***

Setting assessments for designated and non-designated heritage assets. This must also be included within the Landscape and Visual Impact Assessment (LVIA)

- ***Integrated conclusions from the above surveys***

To include phased interpretation of the historic landscape, to include the geoarchaeological interpretation as well as the information from the Historic Environment Record (HER), aerial photos, geophysics, trenching and cartographic/documentary evidence.

3.3.3 The proposals for Bradwell B, including the BRB approach to landscaping and managing environmental effects.

The proposed development will have a significant impact on the historic environment, a full programme of assessments will be required in order to inform the development of a robust strategy to deal with potential impacts. This might include avoidance, preservation *in situ*, management or restoration of heritage assets, or preservation by record.

The development area and its surroundings are a largely flat, open country with wide views both inland and along the estuary. The Grade I Listed Saxon chapel of St Peter-on-the-Wall and the Scheduled Roman Saxon Shore fort are located on the eastern edge of the area. The inter-relationship between the two nationally important heritage assets and their setting majorly contributes to the significance of these assets. The Roman Saxon Shore Fort was located on the tip of on a ridge of slightly higher ground projecting out through the marshes and guarding the entrance to the Blackwater and the wider Greater Thames Estuary. Saxon Shore forts were heavily defended later Roman military installations. They were all constructed during the third century AD, probably between c.AD 225 and AD 285. They were built to provide protection against the sea-borne Saxon raiders who began to threaten the coast towards the end of the second century AD, and all Saxon Shore forts are situated on or very close to river estuaries or on the coast, between the Wash and the Isle of Wight. The fort is approached by Eastend Road, which follows the line of the original Roman road to the fort. The fort was reused in the 7th century when St Cedd founded a monastery

there as part of his work to convert the then pagan Anglo-Saxon inhabitants of Essex to Christianity. St Peter's Chapel is located in the gateway of the Roman fort and is constructed from reused Roman building materials. It is typical of monasteries founded by missionaries trained in the Irish tradition of Christianity in that it is sited in a remote location, albeit one with excellent sea links. The proposed landscaping will impact on the setting of these nationally important heritage assets by, amongst other things, curtailing views out across the landscape and impinging on historic routeways to it.

The historic field-scape comprises rectilinear sub-axial fields of possible mid -Saxon origin. The road network is also ancient in origin and is noted for its sharp right-angle bends as it fits into the historic field pattern. The Dengie peninsula was bordered by extensive salt-marshes which were largely enclosed in the 18th and 19th centuries. The Southminster-Tillingham gravel ridge is located near the eastern end of the Dengie peninsula. The gravels relate to the former pre-Anglian glaciation course of the River Medway and contain important Pleistocene remains. The ridge reaches a maximum elevation of around 37 metres OD at St. Lawrence and has extensive views out across the marshes to the North Sea.

The historic settlement pattern comprises dispersed settlement along the roads on the top of the ridge. Settlements developed at Southminster, Asheldham, Tillingham and Bradwell all of which have Historic settlement assessments which provide in depth historic environment information for each settlement and associated parish. Throughout the area there are dispersed farmsteads and Halls many of which have their origins in the medieval or early post medieval period. The settlement on the gravel ridge had a close relationship with the reclaimed marsh and marshland to the east with this providing the main sheep grazing area. The gravel ridge has attracted settlement since earliest times, and finds of Neolithic, Bronze Age and Iron Age, material are known from quarrying and other ground disturbance. There is an important concentration of cropmarks following the line of the ridge, the only such examples within the Dengie peninsula, these represent a range of site types of multi-period date. There are a number of probable Roman settlement sites on the site of the proposed power-station and it is possible that some or all of these were contemporary with the Saxon Shore fort.

The edge of the Dengie peninsula is bordered by an extensive area of present and former salt and grazing marsh. The landscape is very flat, in places bisected by old creek tributaries, with wide, open views to the North Sea and eastwards to the North Sea, and inwards to the dryland. Within the marshland the remains of Late Iron Age and Roman salt working sites (Red Hills) are identified as burnt areas visible both from the ground and the air. In the medieval and post medieval period the marshes were a valuable resource, providing pasture for sheep, salt making sites, fisheries and hunting grounds related to the settlements on the gravel ridge above the marshes. Finally, during the Second World War (WWII) defences were built into the sea wall to protect the area from German invasion. The power station site is located on the former WWII Bradwell airfield.

The intertidal zone contains nationally important archaeological sites stretching back to the Neolithic. Extensive surveys have been undertaken over the last two decades assessing the eroding landscape in the inter-tidal zone which has shown occupation of multi-period date. During the Neolithic sea level was still considerably lower than it is today but the sea was much closer to the present coast and in the Blackwater estuary it seems that the present low water mark was roughly the position of high water during the early Neolithic. Large areas of what is now the intertidal zone were still dryland and some of the best evidence of early Neolithic settlement in the East of England comes from the Blackwater estuary. The area is particularly significant for the extent and variety of archaeological remains reflecting the exploitation of coastal resources, it is also important for military defences relating to the wars of the 20th century. Within the estuary a number of very large Middle Saxon fish traps have been identified which comprise a series of surviving timber posts,

visible at very low tides. The largest complex of fish traps, at Collins Creek stretches for about 1km. Three of these sites are now protected as Scheduled Monuments. Saxon burials have been recorded eroding out of the foreshore beside Bradwell A. A range of archaeological sites dating to the post medieval period are located in this area including groups of oyster pits, remains of wrecks and a series of hulks. There is a close and important relationship between the estuary and the Dengie peninsula.

The proposed landscaping works will need to take into consideration the present historic landscape and how this relates to the setting and significance of the associated heritage assets. There is concern that the land-raising proposals would have an adverse impact on the historic landscape, and the setting and significance of heritage assets.

It is pleasing to see that the historic environment is well represented within the initial design principles. However, this will require a full programme of investigation to allow an appropriate understanding of the complex historic environment of the area and how the adverse impacts of the scheme can be avoided, mitigated, or compensated.

With regard to work within the estuary it will be important to understand the impact on tidal processes, including erosion and how these in turn will impact the Scheduled fish-traps and the surviving Neolithic land-surfaces in the inter-tidal area. In addition, Saxon burials have been found washing out of the foreshore beside Bradwell A, and it is anticipated that further burials may be present. An appropriate assessment will need to be put in place to establish both the effects of the proposed changes to the Indicative Zone for Marine Infrastructure and its surrounding area and to establish a baseline as to what heritage assets are present and their significance. It will be important to have joint discussions with Historic England regarding the designated fish traps.

3.3.4 Accommodation

There is the potential for surviving below-ground archaeological deposits in the areas of the proposed accommodation developments. These should be assessed and evaluated in order to fully define the impacts of the proposed scheme. Any assessment should include an assessment of the setting of the historic settlements, listed buildings and other heritage assets impacted by the proposal.

3.3.4.1 *Scenario 1 – Land west of the existing Bradwell Power Station site*

This accommodation site will need to be appropriately assessed for impacts on heritage assets and an appropriate mitigation strategy put in place. Any assessment should include an assessment of the setting of the historic settlements, listed buildings and other heritage assets.

3.3.4.2 *Scenario 2 – Land west of the existing Bradwell Power Station site with extension sites*

This accommodation site will need to be appropriately assessed for impacts on heritage assets and an appropriate mitigation strategy put in place. Any assessment should include an assessment of the setting of the historic settlements, listed buildings and other heritage assets.

3.3.5 Transport and associated works

The initial proposals will largely impact on the Dengie peninsula. There has been little archaeological fieldwork in this area to date and the soils are not conducive to cropmark formation. However, small scale excavations in advance of development have demonstrated that the area has been settled since the later prehistoric period. The area is characterised by a distinctive co-axial rectilinear field

pattern that is of considerable antiquity and may have its origins in the middle Saxon period, if not before. The field boundaries on the peninsula were historically bordered by elm hedgerows, which were severely affected by Dutch Elm disease, with the loss of standard trees the hedges are now dominated by elm scrub. Historically, settlement was highly dispersed with isolated farms and moated sites. There are a number of church/hall complexes such as those at Purleigh, North Fambridge, Snoreham, Mayland, Althorne and Steeple.

It is notable that in Table 4.1, relating to Park and Ride search areas, the 'Potential for impacts on buried archaeology, which is recognised as a key risk and requires further study' is only referenced for Search Areas 1a and 1b. This constraint is also applicable to the remainder of the Search Areas and should be included accordingly. The constraint should also be reflected in Table 4.2 relating to Freight Management Facility Areas.

3.3.6 Marine transport:

For any works in the estuary area joint meetings with Historic England and the Local Authority representatives will be required to discuss heritage impacts. Early heritage assessment such as side-beam sonar and magnetometer surveys will be required to help define appropriate routes for moving freight by sea. Both the potential for wrecks and the extensive surviving prehistoric land-surfaces, as well as other heritage assets including burials, both within the estuary and in the inter-tidal area will need to be assessed to support the DCO process. A protocol will also need to be put in place to avoid inadvertent impacts by shipping on the Scheduled fish-traps which lie immediately to the east and west of the Indicative Marine Zone.

3.3.7 Road Transport Strategic route 1:

There is potential for surviving below-ground archaeological deposits in the areas of the proposed groundworks. These should be assessed and evaluated in order to fully define the impacts of the proposed scheme. Any assessment should include an assessment of the setting of heritage assets.

3.3.8 Road Transport Strategic route 2:

Strategic Route 2 will require a much larger land-take than Strategic Route 1 and the scale of its impacts will be correspondingly larger. In particular, the construction of an entire new length of road cutting across from Foxhall Road to Bradwell is likely to have a significant impact on below-ground deposits dating from the Palaeolithic period onwards, as well as on the wider historic landscape and its legibility. There is potential for surviving below-ground archaeological deposits in the areas of the proposed groundworks. These should be assessed and evaluated in order to fully define the impacts of the proposed scheme. Any assessment should include an assessment of the setting of heritage assets.

3.3.9 Transport: Freight management facility

There is potential for surviving below-ground archaeological deposits in the areas of the proposed groundworks. These should be assessed and evaluated in order to fully define the impacts of the proposed scheme. Any assessment should include an assessment of the setting of heritage assets.

3.3.10 Transport: Park and Ride

There is potential for surviving below-ground archaeological deposits in the areas of the proposed groundworks. These should be assessed and evaluated in order to fully define the impacts of the proposed scheme. Any assessment should include an assessment of the setting of heritage assets.

3.3.11 Consultation process

It is recommended that early meetings are held to discuss the impacts on the historic environment, including the historic landscape, involving the Councils' archaeological specialist advisors, local specialist conservation officers and Historic England inspectors. This will facilitate an integrated approach to the management of the heritage response to this major scheme.

Supported by: Maria Medlycott, Senior Historic Environment Consultant (Place Services advising MDC) and Tim Howson, Specialist – Heritage and Conservation (MDC)

3.4 Environment: Landscape

3.4.1 Landscape

Given the site is a predominantly flat, low-lying coastal landscape with wide views both inland and along the estuary, it is likely that the proposal will have a major adverse visual and landscape impact.

The Stage One consultation document states that the "landscape characteristics include large open and mostly arable fields. Where present, hedgerows tend to be small and non-continuous, and provide little screening. A general absence of trees further contributes to the sense of openness, affording panoramic views across the marsh and out to sea" (Para. 3.2.9). Although to the east of the site, this is very apparent, there are wooded clusters/copses and extensive hedgerows and hedgerow trees to the south west and west (i.e. Curds Grove). For this reason, a more comprehensive assessment of the landscape character and existing qualities needs to be undertaken.

The open nature of the area is visually sensitive to new development, which would be visible within views from adjacent character areas. Primarily, the landscape offers a sense of historic integrity, resulting from historic field boundaries, including water-filled ditches and remnants of old sea walls. The main development site primarily falls within the Bradwell Drained Estuarine Marsh Landscape Character Area (LCA) (Braintree, Brentwood, Chelmsford, Maldon And Uttlesford Landscape Character Assessments (2006)). Although referenced in the document, there is little detail provided in terms of its landscape and visual characteristics.

Key characteristics include:

- the sense of huge sky, sound of birds, tranquillity, and panoramic views across the marshland and out to sea.
- restricted access provided by a very few lanes; absence of settlements.
- Bradwell Nuclear Power Station A as a visual landmark.
- St Peter-on-the-Wall church.
- Strong sense of being windswept and desolate.
- Field boundaries comprising water-filled ditches.
- Remnants of the original seawalls, which are still visible as relict landscape features.
- Unimproved grasslands

Given this proposal will bring forth visually intrusive development it is important that where possible, existing landscape characteristics and qualities are conserved and enhanced on-site, and off-site interventions are also explored. For instance, enhancements to declining hedgerows and field boundaries as well the preservation of drained marsh and sinuous ditches. The current document does not provide any of these landscape details and therefore it is expected that a comprehensive landscape assessment of the sites landscape value, qualities and characteristics will be undertaken to fully understand the special qualities this area of the LCA holds, and which should be retained. This should be undertaken to inform proposals as part of the Stage 2 consultation process.

Reference has also not been made to the Landscape Character Assessment of the Essex Shore (2005). In this document the development areas fall within the Dengie Coastlands Landscape Character Area. This large distinctive character area extends from the small remnant of marshland east of Bradwell to the broad tracts of polder several miles in extent between Burnham and the sea. It includes the fringing salt marshes and the broad sweeps of the Dengie Flats and Ray Sand, which at low tide forces all but boats of the shallowest draft well offshore. Generally, settlement in this area is not characteristic of the diverse coastal marshland but scattered established farmsteads instead with private lanes and tracks linking one to another. The boundary between the uniform marshland and the more diverse coastal marshland is generally aligned along the change in soil type from the good quality silts of the uniform marshland, to the harder-to-work clays of the older diverse marshland.

It is agreed that views from across the estuary are an important consideration when discussing visual and landscape impacts of the proposed development. The document states that “the horizontal spread of the development across the peninsula is an important consideration. Siting the permanent development as far to the south and west as possible - close to the existing Bradwell power station buildings - helps to reduce this impact. (Para 3.4.5)”. The Councils concur with this statement but further consideration will be required to ensure the best alignment of buildings having regard to key views, especially considering the size of the cooling towers which offers limited opportunities to use landscape for screening. We understand that ‘architectural composition’ is important, and it is clear the towers will become a prominent feature of the skyline, but it is also important to reduce impacts where possible.

Landscape mitigation is more plausible from viewpoints from the south and south-west. The Council’s concur that there are likely opportunities “to reduce impacts on visual amenity by replicating and extending the increased tree cover which prevails in this area.” However, as the project progresses, the detail of landscape mitigation locations needs to be carefully considered in line with existing and historic field patterns, ditches and tree cover to retain and enhance the green infrastructure network and character of the area

The construction of Bradwell B will have its own landscape and visual impacts, for example the storage of soil and spoil from earth works. These storage areas can be significant in mass and height; therefore, we would recommend that these, along with other construction facilities are shown on visualisations where possible and their impacts fully assessed. In principle, temporary screening that becomes long-term mitigation to alleviate impacts on local residents is welcomed.

As part of the site works, the consultation document states that the Bradwell B station platform will be raised to 7.4m AOD and ground reprofiling around properties will be needed. This is a significant operation, and the likely impacts are major. There are concerns that the area set out for soil and spoil storage may cause fragmentation of habitats and current GI network of the area. Therefore,

opportunities for advanced planting in the early stages of construction should be sought, where practicable. We would also expect all slopes to be gentle with appropriate landscape treatment given the existing landscape character. At present, the section illustration (Figure 3.29) shown in the document are considered inappropriate and we would welcome discussion in advance of the next stage of consultation.

3.4.2 Approach to landscaping and managing environmental effects

The Councils require that all the landscaping work referenced in paragraphs 3.5.8-3.5.13 should take into consideration the existing landscape qualities such as the planting palette and habitats present, as well as the historic landscape and how this relates to the setting and significance of impacted heritage assets. The consultation document declares that the vision of Bradwell B is “to take account of its distinctive local landscape and seascape setting as far as possible, whilst also recognising that existing energy infrastructure dominates the skyline from a number of views.” We look forward to seeing proposals for how this can be completed, both on and off site.

The National Planning Statement (NPS) EN-1 Section 5.10 sets out recommendations and requirements in relation to land use including open spaces, green infrastructure and green belt. These include that the mitigation of any adverse effects on Landscape, Green Infrastructure (GI), and other forms of open space. Maldon District Green Infrastructure Strategy Supplementary Planning Document and the Green Essex Strategy 2020 provides guidance regarding the Council's approach to green infrastructure provision in the District. As stated under Policy N3 of the Maldon District Pre-Submission Local Development Plan 2014-2029: “development should not increase existing deficiencies of open space” and therefore, if not to be retained, alternative and improved provision should be provided that retain and enhance existing landscape features and qualities, and are in the “most appropriate and accessible location in the locality for existing and future users.”

The footpath (PRoW 241-15) along the top of the flood embankment that wraps around the main development site has been identified as important, given it is a proposed England Coast Path National Trail (ECP). The section between Burnham-on-Crouch and Maldon covers 62km and passes around the main development site. The project is at stage 4 – Determine, whereby Natural England has consulted upon proposals and submitted a report to the Secretary of State (SoS). An Inspector will make recommendations to the SoS on any objections received. Once the Secretary of State has approved the report, Natural England will start work with ECC on preparing the route for public use and to contact will be made with owners and occupiers of the affected land to discuss the design and location of any new infrastructure. Temporarily closures may be acceptable during construction, however an alternative footpath route that provides a positive substitute during periods of closure will be required. The trail will also be impacted by the proposed sea defences; its envisaged that the new sea defences would need to have a crest level (top) up to 9.8m AOD to protect Bradwell B from flooding over the full lifetime of the plant. Therefore, it's important that consideration is given to the footpath, and the user experience, whether that's through landscape mitigation and/or material treatment. Figure 3.28 of the consultation document identifies different areas within the main development site that will take a different approach to landscaping, following construction of the power station; Permanent development integration area, Landscape restoration and Estuarine marsh restoration. Although briefly defined, there is little detail provided and the analysis process behind the justification and implementation needs further thought as the landscape / planting strategy is key, as it needs to be a balance between responding to the local conditions, with the need to provide an effective visual screening where necessary.

Consideration will also need to be given to the potential impacts on existing Green Infrastructure and future provision.

3.4.3 Road Transport

The Councils consider that all potential strategic highway routes, junctions/route improvements and freight management/park and ride areas of search have an adverse environmental and landscape impact. However, at this stage of the project, given the detail provided, it is unclear to what these impacts will be. From a landscape perspective, any new routes and areas of search that are closer to existing settlements and infrastructure will reduce the impact on the wider landscape.

The Stage 1 Consultation document describes the key environmental sensitivities as being “roadside habitat, including deciduous woodland, hedgerow and drainage ditches; highway drainage and the potential for interaction with surface water flow routes and flood plain; roadside residential properties, which may be susceptible to noise and/or visual intrusion; and roadside listed buildings and buried archaeology. (Para. 4.7.53)”. Given the unique landscape character and qualities this landscape provides it is recommended that further detailed landscape studies to be undertaken before either of the as proposed strategic routes are chosen as the preferred option. These are necessary to measure potential impacts, vegetation loss and ensure mitigation and enhancement proposals are appropriate

3.4.4 Marine Transport

Early seascape and visual impact assessment studies should be undertaken to understand the extent of the impacts for each option being considered.

3.4.5 Accommodation

Of the accommodation locations proposed, location one and two may have less landscape and visual impact than location three but any conclusions cannot be made until full detailed assessments are undertaken. It is important to understand how the sites will be sympathetic to their surroundings and integrate into the existing settlement through layout and design and how the landscape and visual impacts can be mitigated.

Both accommodation scenarios will require access to green spaces and green infrastructure to create a sense of place and for the health and wellbeing of employees and the communities. Localised cycling and walking routes will need to be considered along with how the accommodation will integrate into the existing neighbourhood/community. Importantly, any proposal should integrate and utilise the existing landscape features present, which is why further landscape baseline information is necessary before any formal view can be provided.

3.4.6 Further information required:

There is little detail regarding the impact on the existing landscape features present across the main development site and areas of associated development. Therefore, before assessment studies are undertaken, the Councils would expect additional landscape baseline information is collected across all areas of the scheme. This includes; landscape assets such as existing trees, hedgerows, shrub planting, recreational routes and habitat areas as well as characteristics such as topography, scenic quality and landscape typology. Once complete, an appropriate review of the proposed landscape loss, preservation and enhancements can be undertaken, and assessments made.

Once sufficient baseline information has been collected, the Councils would expect to see an Arboricultural survey and impact assessment to give us a greater understanding of the impact on trees and hedgerows that may be impacted on within the local area. This assessment should be undertaken in accordance with BS 5837:2012 Trees in relation to design demolition and construction recommendations and should provide details on trees and shrubs quality, those to be retained and/or removed, the impact on them and any constraints.

A Landscape and Ecological Mitigation Strategy will be required to provide clear details of the design for the whole site (including ecological area, landscape integration area and area surrounding the accommodation), types of planting, management and maintenance and should include Green Infrastructure (GI) where the Environmental Impact Assessment (EIA) indicates potentially significant effects on landscape character, visual amenity, nature designated sites, biodiversity net gain value and health and wellbeing of the community (i.e. access to open spaces, encouraging active travel and recreation and reduce air pollution etc.) that may require mitigation. The EIA, ES and Landscape, ecological and GI strategy(s) will need to clearly set out the details of the environmental mitigation, compensation and enhancements plans for the whole site.

The Landscape and Visual Impact Assessment (LVIA) will need to follow the principles set out on the third edition of "Guidelines for Landscape and Visual Impact Assessment"(GLVIA3). The Councils would expect the assessment methodology to be agreed with the Councils prior to being undertaken. Currently there is a set of viewpoints proposed (Figure 3.25), however, before these can be reviewed, we would expect baseline evidence such as a Zone of Theoretical Visibility (ZTV)/ Zone of Visual Influence (ZVI) to be submitted to truly understand where viewpoints are necessary. Viewpoints can then be chosen and agreed with the Councils before surveys are undertaken. We would also recommend the Councils' landscape consultant(s) attends the surveys with the applicant to review and amend viewpoints, photo angles and locations accordingly. It will be expected that LVIAs are undertaken for all associated developments and infrastructure (such as highways) as these will also have an adverse impact on visual amenity, landscape quality and character. The same methodology and Council review process should be used to ensure consistency and compliance. As stated in the Overarching National Policy Statement for Energy (EN-1) The "assessment should include the effects during construction of the project and the effects of the completed development and its operation on landscape components and landscape character (Para 5.9.6)." The assessment should also "include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on local amenity, and nature conservation (5.9.7).

All visual representation with any submitted Landscape and Visual Impact Assessment (LVIA) should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made.

Due to the indicative location for the main development site and associated development, many residential properties will be adversely impacted, whether that's through a deterioration of visual amenity, increase in noise, light and/or other disturbances. Because of this, as part of the landscape and visual impact assessment we would expect a Residential Visual Amenity Assessment (RVAA) addendum to also be included. The purpose of RVAA is to provide an informed, well-reasoned answer to the question: 'is the effect of the development on Residential Visual Amenity of such nature and / or magnitude that it potentially affects 'living conditions' or Residential Amenity', otherwise known as the Residential Visual Amenity Threshold. In keeping with recommendations in GLVIA3 this should be done using succinct narrative as opposed to a numerical tabular assessment

format. Tables summarising narrative can, however, be very helpful. For further guidance details, please see the Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19 (Landscape Institute, 2019).

Given the scale and magnitude of the proposal, the Councils recommend an Environmental Colour Assessment (ECA) is undertaken. An ECA is an objective process that helps to resolve many of the issues associated with colour selection and specification, especially in the external environment. Its use can also support landscape and visual mitigation. Such mitigation can range from effectively camouflaging or minimising the visual appearance of a building, to emphasising the distinctive character and qualities of a place through architecture, expressed in colour, form and massing. For reference, an example of an effective ECA is the 'Guidance on the selection and use of colour in development' produced by Waygood Colour for Dedham Vale AONB (July 2018). Further assessment details can also be found in the Environmental Colour Assessment Technical Information Note 04/2018 (Landscape Institute, 2019).

Supported by: Ryan Mills, Senior Landscape Consultant (Place Services advising MDC)

3.5 Environment: Masterplanning and Design

3.5.1 Masterplanning and Design

The Stage 1 Consultation Report sets out a broad approach to design topics. However, the Councils consider that there is a lack of information (and justification) to how some of the approaches have evolved through the report. This is evidenced by assessments against criteria not being presented, development of design principles with little or no back reference, and with assumptions being made around wider development approaches. Design principles provide the key link in demonstrating a clear understanding of the project requirements from both a local and national level, while committing to ongoing reference and review.

The National Infrastructure Commission design principles, which reflect the wider effects and benefits when planning for national infrastructure projects, appear to be directly relevant to this national energy infrastructure scheme.

As stated in the Overarching National Policy Statement for Energy (EN-1), good design is not purely related to the visual appearance of a building but *“should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. (EN-1 para 4.5.1)”*.

The Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Nuclear Power Generation (EN-6) provide clear approaches and expectations regarding “good design”, quality and reference to context and setting. The following comments refer to the National Design Guide around core principles and approaches associated with both infrastructure and quality. At local level and where applicable, the following comments have referenced the Essex Design Guide to provide a context driven approach at a local and community level.

3.5.2 Design Principles

The creation of design principles is an important tool that the Stage 1 report can set early in the design process. This will provide constant reference, grounding and focus around the approach and delivery of development.

The Councils consider that the current 13 design principles included within the Stage 1 Consultation cover a range of topics and approaches but consider there is no clear approach to the project vision. Each of the 13 principles included within the Stage 1 report fail to provide any justification of the design principles. At this stage, the Councils would have expected to see a more detailed series of desired outcomes which are measurable, responsive and accountable as the project moves forward.

The National Infrastructure Commission; Climate, People, Place, Value guidance (February 2020) provides a review of approaches and topics around setting design principles around national infrastructure and the Councils request that the BRB project align with this recent and relevant guidance moving forward. The guidance provides a direct and clear method in the creation of flexible and measurable principles while ensuring clear methods in championing design and quality. We would recommend that each of the design principles are clear and to the point, avoiding the need for a long list of principles to be proposed.

The principles should be flexible and not over prescriptive especially where design and other influences will change and amend over the lifespan of a project. There should be a clear drive for innovation in design and a push to improve the quality of life for local communities and workforce.

The overall principles should have measurable outcomes rather than open statements. A clear drive in improving design, environment, climate, quality of life and other factors need to be consistently referenced.

It's clear from the principles proposed that many of these could become measurable outcomes within a wider overarching design principle, in turn reducing the amount of core principles proposed. These should align with national guidance and include value, sustainability, health, wellbeing and climate, which are currently not addressed. These topics can fall across multiple approaches and it is expected to see a continued reference made through the development of design principles.

In summary the Councils consider that further refinement is required in both how the design principles are addressed together with a method establishing how these will be measured, reviewed and improved through the lifetime of the development process.

3.5.3 Masterplanning

The consultation report sets out a basic approach to how layout, scale and location/arrangement of the main development site has been considered to date. These are, as expected, high level statements which at this stage in the design process and will require considerable development moving forward. Further work will be required including topographical analysis, site and wider landscape sections and detailed visual assessments. There is a need to fully analyse context for all development before starting the design process and prior to further work progressing regarding design.

The wider masterplanning of associated development is limited at this stage; basic information has been provided within the report to outline the development but further clarification around site

selection, opportunities, impact and a steer on the use of permanent and temporary builds are required. Discussions on masterplanning will be welcomed to explore the relationship between temporary and permanent development and how these can be phased to consider impacts on the communities, landscape and wider considerations. These require coordination and consideration in terms of infrastructure, location, scale and how this translates into the existing communities.

The report outlines that further considerations are required around the final proposed placements of the two cooling towers and this is noted. The current proposals will have a significant impact on key viewpoints, landscape character and wider ecological and heritage considerations. It is clear there will be significant impact on views from Mersea Island and Tollesbury to the north, broken views from existing settlements on the Dengie to the west and south, and from local PROWs. The approach taken to reducing the field of view from the crucial vantage points would be key in reducing the visual impact. The Councils seek early discussions to review the detailed criteria used to inform the initial proposals and to review detailed assessments on visual character impacts moving forward.

The Councils are disappointed that no alternative assessment has been provided for the options in terms of the visual appearance of the cooling towers within the consultation. The impact the plant and towers will have on the surrounding landscape character and communities appears to be based on scale alone. The Councils recommend that further engagement is necessary to consider the form, appearance and setting of the cooling towers. Structures of this size and scale will inevitably be prominent in the flat open landscape and a clear approach is needed to show how this is going to be addressed going forward.

3.5.4 Adaptability, Phasing & Associated Works

Considering the construction timescales and associated works the Councils would have expected further clarity to have been provided around how the built form would respond to the demands and growth of the workforce. At its peak it is expected to see 4500 new bed spaces provided to accommodate workers. The Consultation provides little reference to the phasing of these associated works, their impacts on existing communities, (including how this impact will be mitigated) and the extent of amenities required to accommodate the workforce. A workforce of some 4500 people will have a significant impact on the quality of life for existing residents' infrastructure and services to communities and a clear strategy into how this is managed is necessary moving forward.

Similar to the other impacts of other components of the main development site the construction of 6 storey accommodation blocks will have impacts on hugely significant visual amenity and character of place. The Councils recommend further work is required to see an approach and vision which highlights how accommodation will be phased to scale up to the anticipated peak workforce on site. The potential legacy uses of associated development should also be explored.

3.5.5 Design Process and Tools

The Stage 1 report includes very little or no reference to how championing good design will be led and developed as part of the project. It is considered there are several options the project could explore and put forward to ensure design is at the forefront of discussions and considerations.

The appointment of a design champion will ensure good design is prioritised from Stage 1 consultation. Their role would be to provide a continual review and promotion of design

vision/principles throughout the project, this would include planning but also project management and delivery.

Design Review Panel.

This would provide a robust and independent resource for applications and projects. Their focus is to improve quality of design through independent panel members. Their value in expertise, experience and knowledge can be a great resource for the project and design team. Early engagement and continued referral will see the most beneficial. NPPF, paragraph 129 seeks to ensure that local authorities have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. The Essex Planning Officers Association (EPOA) has appointed Place Services to manage and deliver the Essex Quality Review Panel. results.

Design Champion.

It is considered that a resource such as a Design Champion and/or Design Review Panel are incredibly important to demonstrate a clear drive for quality in design by the applicant. Having a resource which pushes, and tests approaches will hold decision making accountable and achieve high value and high-quality developments.

The Councils consider that the above would be an integral part of the design process in line with planning, a clear approach in design documents should be outlined going forward, enabling various designs to be tested provide for accountable decision making. A commitment to the production of design codes, briefs and guides will allow design principles and visions to be promoted through to detail. Design parameter plans may be appropriate for temporary structures. This level of detail around design, both from an aesthetical, safety, quality and setting approach, is important at every stage.

3.5.6 Further information required:

In order to ensure a clear narrative of the approach to design, the Councils expect to see further information and works presented around the design principles. As outlined within the response, this process is critical around setting expectations and conveying BRB's commitment to the development, quality, community and setting. The Councils will expect to see clear measurable principles covering a set of approaches in line with current guidance and able to push and improve standards and quality of development.

The Councils are disappointed that the Consultation does not provide the background assessment information and criteria used to assess the design development. Even if this would have been presented as an appendix. As outlined above there are several sections within the report that state criteria have been assessed where the current masterplan option has been presented. Given the lack of criteria and justification the Councils would have expected to see the assessment process in more detail to provide constructive feedback. This should be provided to support discussions going forward.

Further clarification on the approach to the cooling towers, in particular around the siting, scale, design and clear approach to either blend or promote.

The Council recommends that Design Codes are used to ensure high quality design for the associated works such as accommodation blocks etc. Codes will be crucial in driving design, materiality, scale and other details expected as part of development.

National Policy Statement NE1 and the Essex Design Guide identifies the use of a Design Review Panel to promote and drive the quality of design. The Councils recommend that BRB provide a clear commitment to this process going forward to demonstrate commitment in quality through design. This can be complemented through the appointment of a design champion to provide the ongoing drive and promotion of quality in design.

It is considered there is a lack of approach to the topics such as sustainability, climate health, wellbeing and value, these appearing entirely missing at this time. Good design adds value, whether it incorporates safety and sustainability or identifies social benefits for existing communities, or adding value to the setting of development, landscape and character. The Councils ask that the design approach be informed by the National Infrastructure Commission design principles.

Supported by: Chris King, Senior Urban Design Consultant (Place Services advising MDC) and Jackie Longman, Strategic Theme Lead - Place (MDC)

3.6 Environment: Flood Risk

3.6.1 Flood Risk

Essex County Council is the Lead Local Flood Authority (LLFA) and provides advice on Sustainable Drainage Systems (SuDS) schemes for major developments. The Environment Agency is also a key organisation in relation to flood risk.

It is expected that sustainable drainage proposals comply with the required standards as set out in the following documents:

- Non-statutory technical standards for sustainable drainage systems
- Essex County Council's adopted Sustainable Drainage Systems Design Guide
- The CIRIA SuDS Manual (C753)
- BS8582 Code of practice for surface water management for development sites.

The LLFA has the following comments in relation to the DCO Stage 1 Consultation:

3.6.2 Flood Risk Assessment

The development will need a detailed Flood Risk Assessment which should consider all form of flood risk.

This should include:

- Flooding from the sea or tidal flooding;
- Flooding from land;
- Flooding from groundwater;
- Flooding from sewers; and
- Flooding from reservoirs, canals, and other artificial sources. It should be considered how any flood risk will interact with the development and drainage scheme.

It should be considered how any flood risk will interact with the development and drainage scheme.

3.6.3 Run off Destinations

Surface water run-off should be disposed of in line with the discharge hierarchy and should be investigated in the below order:

- Discharge via infiltration
- Discharge to a watercourse
- Discharge to a sewer

If infiltration is proposed, groundwater and infiltration testing in line with the BRE 365 testing procedure and methods found in Chapter 25.3 of The CIRIA SuDS Manual C753 will need to be submitted to show that this is feasible. Any infiltration storage devices should have 1m between the base of the storage device and seasonal high groundwater level. If infiltration is unlikely to be possible at the site due to ground conditions, then the LLFA will still require high level ground investigations to be carried out in order to prove that this is not a viable option.

If discharge to a watercourse or sewer is proposed, it must be ensured that the site discharges at a suitable rate and any appropriate permissions are in place.

Where the discharge is to a watercourse, the outfall should be above the 1 in 100 plus climate change level or alternatively the effect of surcharging of the outfall should be modelled and appropriate mitigation measures should be put in place.

3.6.4 Peak Flow

If following the discharge hierarchy infiltration is not found to be feasible on site, discharge from the site should be limited to the Greenfield 1 in 1 year rate.

Alternatively, surface water can be discharged at equivalent Greenfield rates with the inclusion of long-term storage. Information would need to be provided about the values used to calculate this rate and these would be reviewed on submission of any Flood Risk Assessment to inform any Stage 2 Consultation

If discharge is direct to the Blackwater Estuary, then the rate may be less restricted although the impact of such on the coastal environment and its array of ecological designations needs to be proven.

Please also note that the LLFA does not accept a flat rate of 5l/s discharging from the site if the Greenfield 1 in 1 year rate is below 5l/s. Historically 5l/s was applied to an outlet where Qbar was lower than 5l/s, as most devices would require an outlet orifice size smaller than 50mm, which would increase the susceptibility of blockage and failure.

There are now vortex flow control devices which can be designed to a discharge at 1l/s, with 600mm shallow design head and still provide a more than 50mm orifice diameter. Furthermore, it is expected that appropriate measure should be put in place to remove materials that are likely to cause blockage before they reach the flow control device.

3.6.5 Storage requirements

It should be demonstrated how surface water up to the 1 in 100 year plus climate change event is managed within the main development site.

The Environment Agency updated their climate change allowance in February 2016 and the LLFA requires the design to be to the upper end allowance (i.e. 40%).

Details regarding the half-drain time of any storage device should also be submitted for review which, in this instance could be demonstrated by the 1 in 30yr +CC RP, followed by the 1 in 10yr RP storm event as necessary.

Detailed calculations considering a range of summer and winter storms should be submitted for storage requirements.

Storage features should be located outside of the 1 in 100 year plus climate change overland exceedance flood level, however where this is not possible it must be demonstrated that the storage feature will be sized appropriately to accommodate surface water from the site, along with any additional flows that may enter.

3.6.6 Water Quality

There should be treatment in line with Chapter 26 of the CIRIA SuDS Manual C753 for all areas of the site.

Whether the main development site is considered a medium or low pollutant risk depends on the traffic movements expected on the development. If the development is expected to have, for example, over 300 daily traffic movements then the medium pollution indices should be applied whereas the low pollution indices should be applied if less than 300 daily traffic movements are expected. . Given there will be up to 4500 workers on site during construction and average daily two-way HGV movements at peak of between 500-700, it is likely that the medium pollution indices should be applied.

Considering impact of water pollution, in line with Paragraph 170 of the NPPF, priority should be given to SuDS and all SuDS options should be explored. However, if proprietary features are used, it should be demonstrated how these features will provide sufficient treatment in terms of total suspended solids, hydrocarbons and metals in line with Chapter 26 of the CIRIA SuDS Manual C753.

The LLFA does not consider that trapped gullies and catch pits are appropriate forms of pollution mitigation because of the high risk of remobilisation of pollutants.

3.6.7 Residual Flood Risk

It should be ensured that surface water is managed so that there is no flooding in a 1 in 30-year storm event and no internal flooding in a 1 in 100 year, inclusive of climate change storm event. It is acknowledged that the power station itself will be protected to a higher standard. Detail should also be given with regards to exceedance routes above the critical 1 in 100 year, inclusive of climate change storm event, which should be directed away from properties.

3.6.8 Maintenance and Adoption

The on-going maintenance of any features will be necessary to ensure that flooding does not occur due to failure of components. A Maintenance Plan should be provided as part of the DCO process detailing the maintenance activities and frequencies as well as who will be maintaining the system. The maintenance of such a system as may be agreed should be managed and maintained in perpetuity on the development site for its lifetime at no cost to the SUDs authority.

3.6.9 Additional comments:

The following additional comments to the Stage 1 Consultation are also raised.

Within the report it states:

3.2.35 Our proposals would retain Weymark's River as the primary drainage feature within the site, although a section of the river would need to be culverted on a temporary basis to provide access for construction vehicles while Bradwell B is being built. All of the other land drains within the main development site, which are classified as 'Ordinary Watercourses', would be backfilled. See Section 3.7 for further information on our proposed construction masterplan.

Temporary works associated with this development should not increase flood risk and it should also be ensured that water quality is managed.

It is noted that under Section 23 of the Land Drainage act (1991) any proposed structure that impacts on the cross-sectional area of a watercourse first requires Ordinary Watercourse consent to be sought from Essex County Council. This consent is required for both temporary and permanent changes. This consultation states that culverting and backfilling of ditches will be undertaken which both require section 23 consent. Such applications are separate from and are required in addition to the planning process. Please contact Floods@essex.gov.uk.

The LLFA would expect the following documentation to be submitted at DCO stage and be covered in full in an accompanying Environmental Impact Assessment.

- Flood Risk Assessment
- Drainage strategy
- Preliminary ground investigation report, to show potential infiltration viability
- Evidence of third-party agreement to discharge
- Detailed storage calculations
- Detailed drainage network calculations
- Detailed drainage layout including location of features, exceedance routes, finished floor levels, discharge locations and rates
- Full structural, hydraulic and ground investigations, including detailed infiltration testing in line with BRE365, groundwater level

This is not an exhaustive list and other information may need to be submitted alongside the application, depending on the site-specific requirements. We request pre-application consultation on these matters and look forward to stakeholder engagement prior to the development of firm proposals for the main site and associated development.

Supported by: Richard Horswill, Development and Flood Risk Officer (ECC)

3.7 Environment: Minerals and Waste

3.7.1 Mineral Safeguarding Issues

The proposed development at Bradwell-on-Sea lies within a Mineral Safeguarding Area (MSA) for sand and gravel and is therefore subject to Policy S8 of the Essex Minerals Local Plan 2014 (MLP). The MLP can be viewed on the County Council's website via the following link:

<https://www.essex.gov.uk/minerals-waste-planning-policy/minerals-local-plan>

Policy S8 states “... *Proposals which would unnecessarily sterilise mineral resources or conflict with the effective workings of permitted minerals development or Preferred Mineral site allocation shall be opposed.*”

Policy S8 of the MLP requires that a non-mineral proposal located within an MSA which exceeds defined thresholds must be supported by a Minerals Resource Assessment to establish the existence, or otherwise, of a mineral resource capable of having economic importance. This will ascertain whether there is an opportunity for the prior extraction of that mineral to avoid the sterilisation of the resource, as required by the National Planning Policy Framework (Paragraphs 203 & 204).

Our records show that the area of the proposed development that is located on land designated as an MSA for sand and gravel is approximately 207 hectares. This is shown in Appendix One. This exceeds the 5ha threshold for sand and gravel as set out in Policy S8 of the Essex Minerals Local Plan (MLP). Therefore, a Mineral Resource Assessment (MRA) would be required as part of the planning application.

The scope and level of detail of an MRA will be influenced by the specific characteristics of the site's location and its geology. However, several key requirements can be identified which are likely to satisfy the MPA that the viability and practicality of prior extraction has been suitably assessed in the MRA. For development of the magnitude proposed at Bradwell-on-Sea, it is expected that particular consideration is given in the MRA to the potential to use indigenous material as part of the construction of the facility, or whether it could serve another market.

MRA Section	Matters to Cover
Nature of the Application	Description of proposed development.
	Area of proposed development (text and red line boundary on appropriate scaled map). To include building footprints if known.
	Any previous reference to show mineral may be present (including any Development Plan Allocation).
Nature of the existing mineral	An appraisal of the geology of the site.
	Whether there is any previous relevant site history – this could include any previous mineral assessments and market appraisals, boreholes, site investigations, technical reports and applications to the Minerals Planning Authority for extraction.
	The type and extent of mineral present at the site.
	Depth of deposit and overburden with commentary to include any variations across the site. To be expressed as both actual depths and ratio of overburden to deposit.

	Mineral quality (BSI standard) and how processing may impact on quality. Consideration should be given to the extent to which material available on site would meet the specifications required for construction
	To what extent mineral resources are likely to be sterilised if it is not prior extracted.
Constraints impacting on the practicality of mineral extraction	Contextual information regarding the site and any existing development or designations in close proximity such as ecology designations, landscape character, heritage designations, proximity to existing dwellings, highways infrastructure, proximal waterbodies, hydrology, land stability, utilities present etc. These should be assessed in light of the fact that construction of the non-minerals development would be taking place, should the practicalities of prior extraction be expressed as unviable. It is held that mitigation methods employed as part of the construction of the non-minerals development may be appropriate to allow prior extraction at that locality.
The viability of prior extraction	An assessment of the current and future economic and/or special value of the mineral resource.
	Whether prior extraction is practicable at the site.
	Distance/route to potential market.
	Any evidence of discussions with local operators to confirm the viability of prior extraction.
	Where prior extraction can be undertaken, an assessment of the amount of material that can be extracted and an explanation of how this will be carried out as part of the overall development scheme.
	Any opportunities for incidental extraction as part of the development of the site such as foundations, footings, landscaping, sustainable drainage systems.
	The potential for indigenous material to be used in the construction of the proposed development.

Please note that borehole logs do not have to be commissioned specifically for an MRA where they already exist, but they must be indicative of the site as a whole, taken from within the application boundary and conform to industry standards.

To ensure that a comprehensive assessment is undertaken on a site, it is recommended that:

- a draft borehole location plan is agreed with the County Council as early as possible and preferably as part of pre-application;
- the borehole depths should be the full extent of the mineral to the bedrock;
- borehole analysis must note the depth of the water table; and
- a non-stratified sampling technique is applied. An initial spacing of approximately 100m-150m centre to centre should be considered, with additional locations if required to determine the extent of deposits on site.

The MRA should be prepared using the Pan-European Standard for Reporting of Exploration Results, Mineral Resources and Reserves (PERC) Standard, which was revised and published on 23 May 2013.

3.7.2 The Sourcing of Constructing Materials

Notwithstanding the amount of indigenous material that may be able to support construction, given the mineral take of the Bradwell B development, ECC requests that a mineral supply audit is carried out in relation to the proposal. Such a supply audit should consider the approximate volume of mineral required to facilitate the development on a phased basis (ie linked to the phasing as set out in Paragraph 3.7.3 and disaggregated from the approximated 6mt of 'construction materials' required over the project as stated in Paragraph 4.6.1), the broad area(s) where aggregate will likely be supplied from, implications for this demand on local aggregate supply and the impact on any proximal infrastructure that may potentially arise as a consequence of the need to import that aggregate.

The NPPF states at Paragraph 207 that mineral planning authorities need to plan for a steady and adequate supply of aggregates by (inter-alia) taking into account relevant local information. The ability for proximal mineral authorities to accommodate the mineral demand of a local project of the uniqueness of Bradwell B would greatly benefit from the submission of such an aggregate supply audit as described above. These proposals amount to a significant one-off project for the area and the amount of aggregate required to facilitate the construction of the new station, and necessary associated infrastructure, has not been specifically quantified in future demand forecasts within each individual MPA area. Essex County Council has not, for instance, been able to make any specific allowance, qualitative or otherwise, relating to the demand the construction of the facility may have on the county's existing aggregate reserves, although the consultation material highlights that there are a number of existing quarries in the area that are of interest.

It is acknowledged that material would need to come from a wide area and may not be immediately attributable to any one MPA area. It is further acknowledged that market availability will dictate where the mineral is sourced from and therefore any detailed quantification at an administrative level may not be possible. An assessment of the approximate volume of material required and its potential supply areas should however be possible. With regard to the use of mineral on-site, the potential use of borrow pits and the stockpiling of excavated material for eventual backfilling, as set out as part of the Earthworks Strategy, is strongly supported. The MPA explicitly support the use of borrow pits through Policy S6 of the MLP.

Paragraph 3.1.11 of the consultation material states that "We will need to transport significant quantities of construction materials to site to construct the power station" and that sustainable transport options are being considered. In this regard, the Mineral Planning Authority (MPA) note the intention to use beach landing facilities as a means of transporting the 'majority' of sand, aggregate and cement to the site, as set out in Paragraph 3.7.19 and expanded on through the presentation of a number of marine based transport options under Section 3.9. The intention is then restated in Paragraph 4.6.2 as transporting 'at least 50% of bulk construction materials' by sustainable modes, with early work suggesting marine transport could accommodate this stated commitment.

It is further noted that the consultation material recognises the need for technical studies to confirm project needs regards the quality and quantity of aggregate. The MPA welcomes the production of this document.

3.7.3 Emerging Design Principles

Whilst the 'Design for efficiency' principle states a need to ensure that 'related construction processes are well connected and streamlined', there is no design principle that explicitly sets out that sustainable construction methods will be employed, both in the sourcing and use of construction materials and in the methods used to manage any waste material arising from the construction of the facility. To ensure a holistic approach to sustainable development, consideration must also be given to these aspects of the development's life cycle.

3.7.4 The Earthworks Strategy

As previously noted, the use of borrow pits is supported by the MPA, and this is further recognised in the consultation material at paragraph 3.8.9.

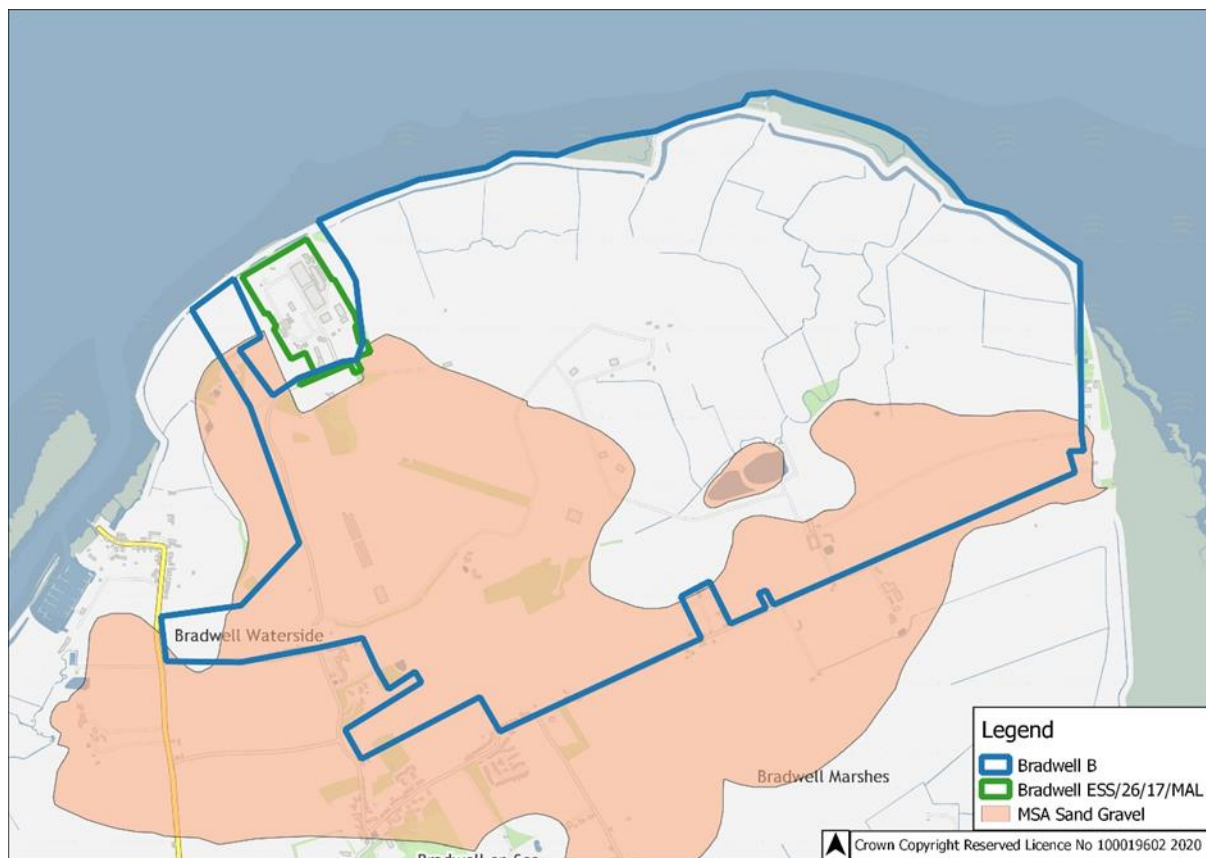
It is however important to note Paragraph 3.8.5, which states that 'Should excess material be generated during construction that cannot sustainably be re-used on-site, it would need to be re-used off site. We are aware of schemes, such as habitat creation being carried out by the RSPB at Wallasea Island, which may provide opportunities to utilise this material.'

The project at Wallasea Island has been completed and there is currently no planning permission for any further importation of restoration materials. Whilst this doesn't necessarily preclude further importation in the future, there would need to be a change of restoration scheme and the appropriate planning permission in place before further material could be accepted at this site.

3.7.5 Waste Matters

As touched on above, the proposed development of Bradwell B is also considered to have potential ramifications for ECC in its role as the Waste Planning Authority for Essex. Any future application for development on this site should contain an audit and associated management strategy for what is likely to be a considerable amount of waste arising from the development, particularly Construction, Demolition and Excavation (CDE) waste. Any such audit and waste management strategy should identify the composition and volumes of waste arising on a phased basis, which aligns with the phased delivery of the proposals, in the context of relevant known and indicative waste management capacity across each delivery phase. Future technical studies carried out to support any emerging project should include a Soil Management Plan and link to a Site Waste Management Plan (SWMP). The SWMP should ensure that unavoidable waste is managed in accordance with the waste hierarchy and other relevant legislative requirements and could detail information on the waste carriers and waste management facilities that would be used. The SWMP should be continually reviewed and updated as proposals progress.

Appendix One – Relationship between Proposed Development Site and Sand and Gravel Mineral Safeguarding Area



Waste Management

The proposed development has potential impacts on Essex County Council as the Waste Disposal Authority for Essex. The temporary accommodation of high numbers of staff on site and the influx of workers into the local area over an extended period of time during construction has the potential for significant local increases in municipal waste arisings, for collection and disposal. Any future application for development should contain a waste management strategy (in addition to the Site Waste Management Plan [SWMP] detailed in para. 3.7.5) detailing the volume and composition of municipal waste streams expected to be generated as a direct result of the development over the phases of construction. This strategy should ensure all waste is managed in line with the principles of the Resource and Waste Strategy for England and in accordance with all relevant legislation. It should detail how this waste is intended to be managed and consider all implications on the Local Authority Collected Municipal Waste (LACMW) operations and activities.

4 Sustainability: Transport

4.1 Transport

The Councils consider that the proposed Bradwell B NSIP will have significant impacts on the highway, rail and marine transportation networks, and consequently there is a need for a well-developed and evidenced transport strategy for the project. The Councils consider this is presently not clearly defined or evidenced in the Stage 1 Consultation.

The Councils recommend that further work is necessary to demonstrate that the approach to transportation of both goods and people is driven by a clearly defined transport strategy that integrates all modes of transport and that a range of potential transport scenarios have been examined. The Councils seek additional joint working to progress any transportation strategy

4.2 Transport Strategy Structure

A preferred possible structure could include the following:

Transport Strategy

- Vision, Outcomes sought
- Scenarios and their testing.
- Favoured approach.
- Measures of success

Existing Transport Context

Movement of Construction Workforce

- Overall approach - measures to minimise demand and impact linked to the delivery of the strategy
- Quantification of people that need to be moved, when and from where
- Workforce travel plan
- Sustainable modes (walking, cycling, bus, P&R, rail, sea)
- Personal car travel – managing demand

Movement of Freight

- Overall approach - measures to minimise demand and impact linked to strategy
- Quantification goods that need to be moved, when and from where
- Transport by sea
- Transport by rail
- Road transport (including freight consolidation etc)

Potential Transport interventions (referring back to the strategy)

- Sea
- Rail
- Sustainable modes including a Travel Plan
- Highway

4.3 Transport Strategy

The importance of a robust transport strategy cannot be underestimated to support the emerging proposals for Bradwell B. This requirement has been stressed by the transportation and highway authority in the limited engagement to date. It is noted that substantial transport strategy documents are in place for other NSIPs (power station developments), such as Hinkley Point C. Unfortunately, the Stage 1 consultation acknowledges that the transport strategy is emerging and requires further development. The Councils recommend further work is undertaken to identify a clear and integrated transport strategy for the movement of people and freight by highway, rail and seaborne modes, before any comments on specific proposals and mitigation can be provided. Clearly, the specific levels of movement of people and goods between individual modes, will have an impact on the type and scale of mitigation necessary.

The strategy should contain clearly defined outcomes and objectives and evidence that the strategy is driving decision making. The strategy should cover all aspects of transport of people and goods during full period of construction, including during any early work period, to minimise any impacts on transportation networks. The strategy should also consider transport requirements of the site during its operation.

The strategy should define:

- A clear Vision covering how transport will assist in delivering Bradwell B during early works, its construction and operation phases, and provide a transport legacy in the area.
- Clearly defined outcomes and objectives and an explanation of how success will be measured.
- The methodology to test alternative scenarios against the outcomes and objectives of the strategy; and to identify and explain the selection of the preferred strategy.
- The approach and each of the tested scenarios should consider the role of each mode; sea, rail and road land-based travel for both people and goods.
- The strategy will need to consider the quantity (and types of) materials and people requiring transport including variations over time during all phases of construction.
- The strategy should include clear targets for sustainable transport during construction and operational phases, and evidence to support mode share decisions based upon scenario testing.

The Councils have previously sought this information from BRB during early engagement but, to date, it has not been forthcoming.

The transport strategy objectives are identified in section 4.4 but are considered to lack clarity. The Councils require these objectives to be further developed and evidenced into a preferred transport strategy, as discussed above.

Once the preferred strategic approach has been identified it can provide the framework necessary for further assessment of more specific transport options and defining of modelling requirements.

It is important to note that before any meaningful modelling can take place the demand for travel, and the modal approach to the movement of people and goods, needs to be understood so that the appropriate extent and approach to modelling can be agreed. The Councils recommend that further discussions are undertaken to agree the scope and details of further transport modelling necessary once the strategy has been further developed.

The Councils have stressed in previous transport discussions prior to the Stage 1 Consultation that sustainable transport is the preferred choice for movement of goods and people. It will also be

important to consider other transport related matters such as carbon impacts, air quality, noise and impacts on the immediate, district and strategic transport networks in terms of development traffic (sea, rail and road) itself, and its impact on other journeys and uses of the transport networks. Construction of a low carbon power station should be seeking to minimise the carbon impacts of transport and construction.

4.4 Specific comments related to the consultation

Whilst the main feedback on the Stage 1 Consultation relates to the need for a developed transport strategy to be prepared, the Councils also have the following comments.

4.4.1 Working in Partnership with other Transport Authorities and Operators

Bradwell B is of such a scale and will have a far-reaching impact on transportation networks that any future transport strategy will need to involve a number of stakeholders and additional consultation with Highways England; Network Rail, Port and Maritime authorities as well as a number of bus and rail operators. The Councils recommend that a holistic working group is formed to agree the strategy and the overall approach to scenario planning. This way an agreed holistic approach will be arrived at which will help at DCO process moving forward.

ECC has made initial contacts with relevant officers at both Highways England and Network Rail and would be happy to assist with the development of these discussions.

4.4.2 Temporary workforce accommodation:

When the development works begin there will be a large number of contractors employed to undertake the work on Bradwell B and therefore early mitigation work on the local transport network will be necessary. It is therefore logical to provide temporary workforce accommodation on site to minimise daily traffic movements on the network. An accommodation capacity of 4500 of the non-home-based construction workers is proposed, and their impact on the transport network will need to be evidenced, and mitigated, as early as possible. It is very important to understand in this context what would the provision of additional on-site accommodation have to further reduce traffic movements.

4.4.3 The Highway Network

In the absence of any clear transport strategy it is not possible at this moment in time to provide definitive comments on either Strategic Routes 1 and 2, and the specific local mitigation improvements to junctions, bypasses or re-alignment improvements along those routes. The preferred route and necessary highway interventions can only be considered with further clarity through a clear strategy evidenced by the level of movements of goods and people, and the proposed mix of those movements by transport mode. Otherwise, it may lead to over engineered mitigation in specific locations that may not be necessary, and at an additional cost. However, with regards the overall scale of movement of goods and people it is certain that significant stress will be placed on the existing transport networks as consequence of the development. The following provides a high-level indication of existing pressures on the highway network, which will require further consideration within the context of the emerging transport strategy.

4.4.4 The Rural Road Network

The nature of the road network serving the Dengie Peninsular is not considered suitable for the movement of HGV traffic, being windy and narrow in nature preventing turning movements of HGVs. The Councils recommend further detailed discussion is required on specific proposals for the necessary enhancements to accommodate the anticipated traffic movements associated with the Bradwell B proposals to be identified. Previous smaller scale developments involving the construction of onshore wind farms in the vicinity of the site, which used the existing rural highway network, resulted in significant challenges over a twelve-month construction period.

4.4.5 Capacity Constraints on the Road Network: A414

4.4.5.1 A414 - Highway Mitigation Measures

Essex County Council has been proactive in identifying the necessary mitigation along the A414 Chelmsford to Maldon route corridor to accommodate growth identified in the adopted Maldon Local Development Plan (MLP) to 2029. The mitigation sought to minimise any impacts on the strategic highway network around Maldon and along the A414 to the A12 at junction 18. These mitigation measures are described below and include capacity upgrades to existing junctions along the A414 and enhancements to the existing public transport network serving the Maldon and Heybridge area. Whilst these improvements satisfied the Inspector that the Local Plan growth did not have a severe impact on the network, there would still be some additional delays experienced at Eves Corner, Danbury even with the installation of pre-signals to prioritise A414 traffic once growth has been delivered. There were a number of alternative mitigation options considered for the junction, including priority and signalised junction options, which either lead to delays for the minor routes and engineering issues inhibiting HGV movements. In conclusion, the installation of pre-signals was considered the only suitable solution.

Whilst the A414 is considered a strategic route connecting to the A12 it should be emphasised that it passes through the built-up area of Danbury, and delays are often experienced through vehicles taking access into driveways and residential roads. Delays can also occur due to the hilly and windy nature of the road through the centre of Danbury and slow-moving vehicles e.g. refuse vehicles and parked vehicles, and this would be exacerbated by any park and ride or HGV daily movements.

Consequently, the Bradwell B proposals would be likely to add significant pressures along this route and should be incorporated within any future modelling.

4.4.5.2 A414 – Eves Corner in Danbury (AQMA)

An Air Quality Management Area (AQMA) has been designated along the stretch of road between Gay Bowers Lane and Danbury Village Green and adjacent properties, and an Air Quality Action Plan is being prepared. Consequently, the movement of an average daily two-way HGV movements at peak of between 500-700 vehicles would be detrimental to the AQMA, and hence there is support for identifying a new route for HGV movements.

4.4.5.3 A414 – Danbury and Bicknacre

The Chelmsford Infrastructure Delivery Plan (EB018B) identifies the infrastructure required to support the growth proposed in the Local Plan, with reference to the proposed new Bradwell B power station, Bicknacre and on the A414, at Danbury, a route that links Chelmsford and Bradwell B

area. There will be potentially serious implications if, on top of the new housing that is permitted and proposed, the go ahead is given and construction starts on the new power station and the accompanying service traffic starts to operate.

ECC considers that no traffic movements should be directed via the B1418, Maldon Road, through Bicknacre and Danbury, to join the A414. Any traffic should be routed to join the strategic routes as soon as possible which in this case is the A130. There will be potentially serious implications if, on top of the new housing that is permitted and proposed, the go ahead is given and construction starts on the new power station and the accompanying service traffic starts to operate

4.4.5.4 A414 – 4 key junction improvements

ECC secured funding from the South East Local Economic Partnership (SELEP) Local Growth Fund for the following package of junction improvements along the A414 between Maldon and Chelmsford to accommodate growth in the MLP. Only the improvements at Oak Corner are to be completed and will be funded through s106 contributions from the strategic growth sites in the adopted MLP. In order of priority, the schemes were as follows.

(a)A414 / B1018 Limebrook Way, Maldon

The widening of Limebrook Way and A414 West approaches to the junction and widening of the A414 North exit arm. Widening provides two entry lanes on all four approaches to the junction. Additional left turn slips for both the A414 eastbound to A414 northbound (the higher priority), and Limebrook Way to A414 westbound have been provided.

(b)A414 / Little Baddow Road / Mayes Lane (Eves Corner), Danbury

Pre-signals have been installed on the minor approaches (Little Baddow Road and Mayes Lane) to the junction to provide additional capacity and improve peak time traffic operations on the A414. The benefits will be experienced as the growth in Maldon is delivered, and the situation is presently being monitored prior to their operation.

(c)A414 / Well Lane, Danbury

The approaches to the junction have been resurfaced to improve braking and approaches to junction.

(d)A414 / Spital Road, Maldon

Widening to provide a dedicated northbound lane at the roundabout and widening of the north and southbound approaches to the junction.

(e)A414 Oak Corner Junction, Maldon

This junction has been shown to operate above capacity in both peak periods in 2026 with the addition of traffic from proposed developments at Heybridge and South Maldon. The A414 is proposed to be one of the potential main routes for Bradwell B in the early phases and during construction with servicing vehicles, and is the route used by park and ride areas of search (2 and 4), and so capacity will be of utmost concern. Indicative mitigation measures have been identified at the junction, where there is land available for a range of mitigation options. Any option will be subject to

detailed design and safety audit. Mitigation will be funded by pooled s106 contributions from the strategic sites, of which all have planning consent, and most are under construction.

4.4.6 Constraints on the Road Network: A132

4.4.6.1 A132 – Role of the Route

The A132 is the primary route connecting the A130 to the north of South Woodham Ferrers (SWF); and is the main connection between SWF and the Strategic Road Network.

The A132 Burnham Road is the main route connecting the A130 to the north of South Woodham Ferrers to the Strategic Road Network. Whilst the A132 is not directly part of the Strategic Road Network, it plays a significant function as a Main Distributor in the Development Management Hierarchy (ECC Development Management Policy DM2). As such, the route is required to carry traffic efficiently and safely between major centres in the County.

4.4.6.2 A132 – A132 Route Based Strategy (RBS)

Essex Highways is preparing a Route Based Strategy and Integrated Transport Package for SWF and the A132, to consider future demands on the A132 and develop options to increase safety, increase the proportion of trips by sustainable travel modes and support the local economy. Implications of the development and operation of Bradwell B should be given due consideration in regard to HGV movements and other specialist service vehicles along the route.

The A132 and specific key junctions have already been identified as requiring improvements to mitigate the planned development of 1,000 new homes north of SWF in the Chelmsford Local Plan, which has been found 'sound', but not yet adopted by the City Council due to COVID-19. However, with the proposed Bradwell B, and potential vehicle and freight movements, the road condition issues will need to be further investigated and the necessary mitigation to compensate for this development will be required.

4.4.6.3 A132 Access to South Woodham Ferrers Stage 1A Baseline Report (Transport Consultancy March 2018)

Engineering constraints along the A132 route largely relate to the substandard elements of its alignment, although along the widened sections forward visibility is considered to be 'good'. Hayes Leisure Park also has a dedicated local road in parallel to the A132 for entry and egress. On Ferrers Road there is a number of private and business accesses, pedestrian crossings and inline bus stops together with street furniture (such as street lighting and communications units).

In terms of potential widening of the single carriageway for future traffic growth, constraints between Rettendon Turnpike roundabout and A132/Ferrers Road/Burnham Rd/Willow Grove roundabout primarily relate to the railway line to the east; properties and businesses on the west side of the corridor along with electricity pylons, which would only be able to be moved at significant cost.

There are sections of the A132 where widening could be achieved into the verges within the highway boundary, but some sections are limited by other physical constraints such as high embankments populated by trees and heavy vegetation near the railway line. Any changes to verges and associated landscaping will need assessment in terms of its impact on ecology, biodiversity and landscape impact.

The draining culverts also provide a constraint for alignment improvement and the need to provide increased width to these would also require improvements or replacements. Any improvement proposed to change the drainage culverts or the road embankments on approach to the drainage culverts may change the hydraulic arrangement for the streams, particularly during flooding events. Flood studies are likely to be required prior to any improvements are proposed at this location.

4.4.6.4 A132: Strategic Growth Site 7 – North of South Woodham Ferrers

The Chelmsford Local Plan covers the period 2021 – 2036 and allocates around 1,000 new homes; 1,000 sq. m business space and 1,900 sq. m retail to the north of South Woodham Ferrers.

The site is required to mitigate its impacts on the local and strategic road network, which may include appropriate road and junction highway improvements along Burnham Road (B1012), the roundabout junctions at the B1418, Ferrers Road and Rettendon Turnpike, and the A132 and local junctions between the Town and the A130. Multi-user crossings of the B1012 in South Woodham Ferrers which may include a bridge and/or at grade-controlled crossings are also considered necessary. Work is progressing on site master planning and consideration is being given to the housing having their active frontages front Burnham Road, in order to change the nature of the route, and improve connectivity to the existing town. Whilst this would be sympathetic to reducing the speed limit of the A132/B1012, the highway authority considers it should not enable any direct access from the route. The impact of some 500 – 700 HGV movements a day along this route will have an impact on securing safe crossing points from the new development to the town and its services.

Further consideration will also be required to any traffic movements from the development to the adjoining districts of Basildon, Rochford and Maldon. Any improvements to the existing highway required to mitigate the impact of development will be primarily focussed on junction enhancements, such as to the A132/B1012 Rettendon Turnpike, in order to improve the flow of traffic onto the strategic road network. These should not encourage through-traffic movements to use the local road network through neighbouring settlements such as Runwell and Wickford.

The Preferred Option Strategic and Local Junction Modelling report undertaken to inform the Chelmsford Local Plan identified the following junctions that will need to be mitigated in some form by the developers of SGS7, namely:

- A132/Willow Grove roundabout;
- Burnham Road/B1418 roundabout;
- and Burnham Road/Hullbridge Road junction (now converted into roundabout by Sainsbury's)

Furthermore, junction capacity improvements were also identified as being necessary at the Rettendon and Hawk Hill Roundabouts, linking with the A130.

The modelling also identified the following junction likely to be operating over capacity during at least one of the peak hours up to 2036.

- A130-A132 Runwell Road, South Woodham Ferrers

The following junctions were forecast to be nearing, at or over capacity by 2036, but were not considered for mitigation because of physical constraints at the junctions and the expectation that more people will be working from home, and developers will implement hard and soft measures to provide for and encourage the use of sustainable modes of travel.

- A132 – Burnham Road, South Woodham Ferrers
- B1418 – Burnham Road, South Woodham Ferrers

In light of the planned housing growth set out in the emerging Chelmsford Local Plan and other district's housings allocations, any additional Bradwell B traffic movements will need to be accounted for when considering infrastructure support, and the Councils recommend this is considered as part of the scheme modelling to inform the preferred transport strategy.

4.4.7 Proposed Rapid Transport Link Between Witham and Maldon.

A submission is currently being assessed by the Department of Transport for feasibility work under Restore your Railway Ideas Fund. The location of a new Maldon Terminus and mobility hub is proposed just outside of the park and ride Search Area 4 – north-west of Maldon. This should be expanded to include Elms Farm Park where the proposed Maldon Terminus Mobility Hub is proposed.

Restoration of the Maldon to Witham Branch Line connection has wide ranging socio-economic benefits that align with the emerging Bradwell B Transport Strategy to connect and move people to and from the Bradwell B site via Strategic Routes linking with main road and rail networks and bus, taxi and DART services. Such low carbon travel will align with the ethos of carbon free fuel generation at Bradwell B.

4.4.8 Potential Highway Works for 'Early Years'.

Without the identification of an overarching transport strategy and an understanding of the number and distribution of vehicles for workers and freight, the Councils consider it is difficult to comment on whether the traffic generated by Bradwell B could reasonably be accommodated on the existing highway network within the existing highway boundary or with the potential improvement options identified in the consultation. ECC have serious concerns that this could potentially impact negatively on the local community in terms of the resilience of the existing network during the construction phase, and particularly if construction of the main development site is to commence in advance of any 'up front' mitigation being provided.

The concept of an 'in and out routing loop' is understood but this would still impact heavily on the route between Latchingdon and Bradwell-on-Sea that would be required to accommodate two-way HGV movements. Further concern is highlighted with regards HGV movements along the A414 through Danbury given its hilly and windy nature, and likely impact on the free flow of other highway traffic. The requirement for a Construction Traffic Management Plan (that has the capability of being rigorously enforced) is essential and welcomed by the Councils.

4.5 Public Transport

The Stage 1 consultation pays little reference to the current limited number and frequency of passenger transport services in the area, with few peak hour services and poor supporting infrastructure. This impacts on accessibility for those who are dependent on such services and provides little incentive or opportunity to encourage a change from the car to more sustainable modes. The Councils recommend that BRB consider measures that would provide a lasting transport legacy to improve the existing 'transport challenges' in the area and improve its connectivity to other urban areas and key destinations within the district, and beyond.

4.6 Rail Network

The Councils recommend further work is undertaken to investigate the opportunities providing by rail for the movement of workers and freight, in order that the impact on the highway network can be minimised and potential legacy benefits assessed. A rail option feasibility study is requested. The following issues highlighted in the consultation are noted, but further discussion and investigation with Network Rail should be undertaken, as referenced in paragraph 4.2.14.

Paragraph 4.2.12 identifies the freight interchanges at Chelmsford and Southminster, with onward movements having to be undertaken by rail. Capacity issues along the A414 and within the urban area of Chelmsford do not lean themselves to additional freight movements. However, further investigation should be undertaken regarding Southminster and potential other new interchanges. Paragraph 4.2.13 acknowledges the route between London and Southminster via Wickford does not form part of Network Rail's "Strategic Freight Network". The consultation infers that detailed investigation has not been undertaken regarding the capability of the branch line in accommodating large freight trains without significant upgrade, including potential engineering reinforcement works, and a new longer passing loop to allow passenger and freight trains to pass each other. These should be further investigated prior to being dismissed as options.

Paragraph 4.2.14 infers that there are significant capacity constraints, particularly around Shenfield, which limit the availability of new freight paths, with limited scope to increase capacity.

Paragraph 4.2.15 considers there may be opportunities to move rail freight to existing interchanges co-located with port facilities, for onward transport to the site by sea.

Paragraph 4.2.16 identifies the potential to transport construction workers to site, subject to provision of 'rail and ride' bus services at key railway stations, such as at Southminster, which is acknowledged to be fully explored as part of future transport studies.

ECC has made initial contacts with relevant officers at Network Rail and would be happy to assist with the development of these discussions.

4.7 Proposed Park and Ride Locations

The principle of providing park and ride facilities during the construction phase of the project to intercept workforce trips by car reducing the amount of worker traffic on local roads to the main development site, and reduce potential environmental effects is supported (paragraph 4.5.14). Park and Ride is a concept supported by the highway authority.

In principle, areas of search 2, 3a and 3b are considered to be in locations that could intercept trips given their proximity to the strategic/main highway network, and thereby minimising impact on the local road network. However, these potential locations would result in additional traffic at locations which already experience highway capacity constraints, namely junction 18 A12 (site 2) and Rettendon Turnpike (sites 3a and 3b). Area of Search 2 would result in additional vehicle trips along the A414 which already experiences high levels of vehicle movements and an AQMA has been designated in Danbury. However, movements of park and ride buses would be preferable to private vehicles and so reduce the number of trips. The Councils recommend the route is included as part of the modelling to inform the preferred transport strategy, in order that appropriate mitigation is identified.

Area of Search 4 may encourage further vehicle trips along the B1019 between Hatfield Peverel and Maldon and B1022 between Colchester and Maldon which is not desirable given the distance from the strategic network, namely A12, junction 20B. As previously noted, other Areas of Search are located in close proximity to the strategic highway network. Is it anticipated that this site would serve Maldon and its local area or is it intended to intercept trips from the wider strategic road network?

Areas of Search 1a and 1b are located on the Dengie peninsula and are likely to encourage additional vehicle trips through the Dengie via the rural road network, passing through rural villages. In principle, a preferred strategy is to intercept vehicle as close to the strategic/main road network as is feasible. The Councils recommend all areas of search and their implications on the local and strategic network are incorporated into any future modelling.

In summary, the Councils have the following initial concerns regarding the Areas of Search, which will be informed and refined by additional modelling and the definition of a preferred transport strategy:

- Areas of Search 3a and 3b - the Rettendon Turnpike junction (A130/A132) is presently operating over capacity.
- Area of Search 2 – junction 18 A12, near to the existing Sandon park and ride site already experiences capacity issues, and is already being monitored, at the request of Highways England, regarding the operation of Sandon park and ride.
- Areas of Search 1a and 1b – the impact of vehicle trips from the strategic highway network via the rural network and villages.

4.8 Proposed Freight Management Locations

The Councils have similar initial concerns regarding the Areas of Search for freight management, which should also be informed and refined by the definition of a preferred transport strategy and subsequent modelling.

Area of Search 3, in principle the location of freight management locations in proximity to the strategic/main road network is supported. However, as previously stated there are existing highway capacity issues at the A130/A132 Rettendon Turnpike junction. Concerns also raised over structural integrity of the A132 and road capacity constraints around South Woodham Ferrers. As identified in the Chelmsford Local Plan transportation modelling work.

Areas of Search Options 1 and 2 are both located in the Dengie peninsula and are likely to encourage additional vehicle trips through the Dengie via the rural road network, passing through rural villages. In principle, a preferred strategy is to intercept vehicle as close to the strategic/main road network as is feasible.

4.9 Potential highway works for peak construction – HGV Strategic Routes 1 and 2:

Two strategic HGV route options have been proposed, that could be combined (in part), to move HGVs from the strategic road network to the main development site. At present, and without an overarching transport strategy and evidence to support marine and rail options for freight movement the Councils are not able to comment on the detail provided in the stage one consultation response.

However, the following factors, although not exhaustive, will need to be considered when determining the preferred route choice for freight movements by road:

- Number of residual HGV trips (including PSVs) that cannot be accommodated by marine or rail options.
- Number of residual private car trips.
- Condition of the existing road network and specific structures.
- Location of highway boundary and the ability to carry out necessary road widening.
- Accident data (total number and location).
- Asset Management issues, including whether any new routes would be adopted as public highway or remain as private haul routes? This has an impact on follow on maintenance costs.
- Creating a transport legacy are the new routes to be permanent or dismantled following the construction phase. Would either of the strategic route options provide the routing and infrastructure to serve any future spatial strategy to be identified in the review of the Maldon Local Plan.
- Potential reclassification of the road network through the Dengie Peninsula.
- Planning, environmental and economic impacts.

4.10 Marine Options

The Councils would strongly support the delivering freight to site by sea to be maximised, subject to appropriate consultation and mitigation on the marine environment, as it will help reduce HGV traffic on the local highway network.

The Councils strongly support marine options 1 and 3 on the basis that they have the capability of accommodating a wide range of bulk materials, thereby reducing the impact of HGVs on the highway network.

The Councils would like to understand better the potential of developing these marine options and the evidence that exist as to what constrains the volume of bulk material that can arrive via marine based transport. It is suggested that at least 50% of bulk materials can arrive by marine options but why is this not more? Fundamentally, the Councils need to understand the constraint on marine transport options before entering into detailed discussions regarding any proposed highway transport scenarios and any transport modelling.

4.11 Sustainable Transport

The Councils support references in paragraphs 4.5.30 and 31 to walking and cycling, and in particular:

To maximise the number of workers walking/cycling as part of the accommodation strategy
The preparation of a Construction Workforce Travel Plan to encourage the use of walking and cycling as far as practicable from the outset.

Any transport strategy will also be required to consider the implications on pedestrians and cyclists in terms of accessibility and safety to park and ride sites, and any strategic route that passes through, or nearby existing villages and existing public rights of way.

The Essex Cycle Strategy and Chelmsford and Maldon Cycle Action Plans are key policy documents that should be referenced in preparing the transport strategy, as they highlight the policy position of encouraging cycling for its health and wellbeing benefits and encouraging more sustainable and affordable travel options. The Action Plans identify the existing network and potential infrastructure improvements.

Infrastructure improvements to support the transition to zero carbon sustainable transport would also be welcomed.

4.12 Highway condition and structures

ECC, as highway authority, has previously provided BRB with current information regarding relevant structures and road condition. However, it is acknowledged that some assessments of structures are dated, and others have not been appropriately assessed. SCANNER is used to assess the condition of the road surface itself but does not cover its underlying layers. The latter is not often assessed, and while any assessment using SCANNER may appear satisfactory, it may not be a true reflection of the impact of traffic on the road condition in some locations.

ECC, as highway authority, acknowledge that there could be between 500-700 daily HGV movements during the construction phase, subject to further development of the transport strategy. It is strongly recommended that additional investigations are undertaken by BRB to consider the impact on the condition of the highway and its relevant structures.

The Councils welcome the acknowledgement of the additional transport related workstreams required to assist with reaching conclusions and informing a Stage 2 consultation, and would welcome the opportunity to engage further with the Bradwell B team

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List of Abbreviations

The Councils	Essex County Council and Maldon District Council
ECC	Essex County Council
MDC	Maldon District Council
The Project	The Bradwell B Nuclear Development Project
CGN	China General Nuclear Power Group
EDF	<u>Électricité de France</u>
BRB	CGN and EDF Partnership
DCO	Development Consent Order
SOS	Secretary of State
NSIP	National Strategic Infrastructure Project
NPS	National Policy Statement
NPPF	National Planning Policy Framework
NEET	Not in Education, Employment or Training
ESE	Employment, Skills & Education
IAG	Information, Advice & Guidance
CEIAG	Careers Education Information, Advice & Guidance
HE	Higher Education
FE	Further Education
STEM	Science, Technology, Engineering & Mathematics
ASEC	Asset Skills Enhancement and Capability
HGV	Heavy Goods Vehicle
PROW	Public Rights of Way
REPPiR	The Radiation (Emergency Preparedness and Public Information) Regulations
ONR	Office for Nuclear Regulation
EA	The Environment Agency
MCZ	Marine Conservation Zone
LoWS	Local Wildlife Sites
SPA	Special Protection Area
SAC	Special Area for Conservation

Ramsar Site	A site designated under the Ramsar Convention on Wetlands of International Importance
SSSI	Site of Special Scientific Interest
NERC	Natural Environment and Rural Communities
HRA	Habitats Regulation Assessment
EclA	Ecological Impact Assessment
EIA	Environmental Impact Assessment
PEIR	Preliminary Environmental Impact Assessment
AMAA	Ancient Monuments and Archaeological Areas Act
AOD	Above Ordnance Datum
RVAA	Residential Visual Amenity Assessment
GLVIA	Guidelines for Landscape and Visual Impact Assessment
ZTV	Zone of Theoretical Visibility
ZVI	Zone of Visual Influence
LVIA	Landscape and Visual Impact Assessment
ECA	Environmental Colour Assessment
EPOA	Essex Planning Officers Association
SuDS	Sustainable Drainage System
CIRIA	Construction Industry Research and Information Association
LFFA	Lead Local Flood Authority
RSPB	Royal Society for the Protection of Birds
MPA	Mineral Planning Authority
CDE	Construction, Demolition & Excavation
SMP	Soil Management Plan
SMWP	Site Waste Management Plan
SELEP	South East Local Economic Partnership
MLP	Maldon Local Development Plan
AQMA	Air Quality Management Area

Built-heritage impact assessment of the proposal for a new nuclear power station at Bradwell-on-Sea

April 2020



Front cover illustrations: *Photograph of St Peter's Chapel from the east and, at the bottom, a drawing of Weymark's Farm, by Tim Howson, based on an old photograph.*

This document was produced by Maldon District Council.

It was prepared by Tim Howson IHBC , Specialist –
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1. Introduction

- 1.1 The Government's National Policy Statement for Nuclear Power Generation (NPS EN-6) (2011) identifies Bradwell-on-Sea as a potentially suitable site for a new nuclear power station. There is an existing nuclear power station in Bradwell-on-Sea, developed between 1957 and 1962 on the northern part of what was Down Hall Farm. The existing power station closed in 2002. At the time of writing, the Bradwell Power Generation Company is publicly consulting on a proposal to develop a new nuclear power station – to be known as 'Bradwell B' – on land adjacent to the existing decommissioned power station (now referred to as 'Bradwell A'). Once the public consultation stages are complete, the Bradwell Power Generation Company intend to apply to the Secretary of State for a Development Consent Order for the construction and operation of Bradwell B together with the associated new roads, park-and-ride and freight facilities.

- 1.2 On the 4th of March 2020 the *Bradwell B Stage One Consultation Document* was published. This *Built-Heritage Impact Assessment*, which has been written to inform Maldon District Council's response to the stage one consultation, identifies which historic buildings in the area are likely to be affected by the proposals outlined in the consultation document. It provides a brief assessment of the significance of each of the buildings and the potential degree of harm posed to these buildings' significance. It highlights where there is a need for further information concerning built heritage. Where appropriate, suggestions are made for possible mitigation, although such suggestions do not necessarily imply that concerns may be easily overcome.

- 1.3 In terms of heritage designations, within the parish of Bradwell-on-Sea there are 2 scheduled monuments, 63 listed buildings, 1 conservation area, and numerous non-designated heritage assets. There are also many listed buildings outside of Bradwell-on-Sea, the settings to which could be affected by the proposals for new roads, road junctions, road widening, park-and-ride facilities and freight management facilities associated with the proposed power station. This *Built-Heritage Impact Assessment* is only concerned with 'built heritage'; standing buildings and structures which are either listed, within a conservation area or which qualify as non-designated heritage assets. The report does not address the impact on scheduled monuments and below-ground archaeology.

- 1.4 Section 2 of this document provides an overview of the historic buildings potentially affected, and summarises the statutory and policy considerations pertaining to the different categories of heritage asset. Section 3 provides an

assessment of the impact of the proposed development upon individual historic buildings. Section 4 draws together conclusions and recommendations.

2. Overview of historic buildings potentially affected by the proposal and the statutory and policy considerations

- 2.1 This assessment identifies over fifty historic buildings potentially affected by the proposals set out in the *Bradwell B Stage One Consultation Document*. The buildings within this group are relatively diverse in age and type, but there are common themes, each building reflecting aspects of the history of Bradwell-on-Sea and the Dengie Peninsula. Standing apart from all the other historic buildings in the group – both geographically and historically – is the Chapel of St Peter On The Wall (p.21), believed to have been built c.654 by St Cedd, isolated on the eastern tip of the Dengie peninsula, straddling the site of the western wall of a 3rd-Century Saxon Shore Fort. This somewhat unassuming chapel of stone and brick with a clay-tiled roof is one of the oldest churches in Britain. Its exceptional architectural and historic interest is acknowledged by its Grade I listed status; the highest possible grade of listing.
- 2.2 A large number of the buildings potentially affected by the proposals are isolated farmhouses (most grade II listed, but some locally listed), ranging in date from the 15th, 16th, 17th, 18th and 19th centuries, emphasising the long-held importance of agriculture to the rural economy of Bradwell and the Dengie peninsula. The early-19th-century threshing barns at East Hall Farm (p.27), Munkins (p. 34) and Moynes (p.71) were probably built in response to the embargoes imposed on the importation of grain during the period of hostilities from 1799-1815; a situation which caused grain prices to soar, countless grain-processing barns to be erected, and farmers to become wealthy. The Victorian brick shelter sheds at East Hall Farm exemplify the later shift towards cattle farming during the 1860s and 70s (pp. 29-31).
- 2.3 Roughly half of the historic buildings affected are cottages (most grade II listed, but some locally listed) dating from the mid-18th century to the early-19th century, testament to the boom in population in the late-Georgian period and the need to accommodate a rapid expansion of the labouring workforce. Many of these cottages occupy narrow strips of land alongside the highway; such wasteland becoming available for development following the gradual improvement and narrowing of roads.

- 2.4 Among the youngest of the historic buildings affected are those associated with Bradwell Bay WWII Airfield and the WWII coastal defences. During the Second World War the whole of the parish became a military zone; a significant period in Bradwell's more recent history. Although the WWII buildings are not nationally listed, they have local importance because of the architectural and historic interest. Each of the affected buildings is considered in more detail in Section 3.

Listed buildings

- 2.3 Most of the buildings affected by the power station proposals are listed buildings. Listed buildings are buildings of special architectural and historic interest. In accordance with section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, the Secretary of State must have special regard to the desirability of preserving any affected listed building or its setting or any features of special architectural or historic interest which it possesses. All of the affected listed buildings are grade II listed except for the Chapel of St Peter On The Wall, which is grade I listed, and Bradwell Lodge, which is grade II* listed.

Conservation areas

- 2.4 There is some potential for the proposal to impact upon the setting of the Bradwell-on-Sea Conservation Area. Conservation areas are 'areas of special architectural and historic interest, the character and appearance of which it is desirable to preserve and enhance'. Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* requires the Secretary of State to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

The National Planning Policy Framework

- 2.5 In July 2018, the Government published the updated National Planning Policy Framework ("NPPF") for England. The guidance contained within Section 16, 'Conserving and enhancing the historic environment', relates to the historic environment, and developments which may have an effect upon it. Heritage Assets are defined in Annex 2 of the NPPF as: 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).' Listed buildings and Conservation Areas are both designated heritage assets.
- 2.6 'Significance' is defined as 'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be

archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. The 'Setting of a heritage asset' is defined as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'

- 2.7 Paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. It emphasises that the weight given to an asset's conservation should be proportionate to its significance, and notes that this great weight should be given irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 2.8 Paragraphs 195 and 196 address the balancing of harm against public benefits. If a balancing exercise is necessary (i.e. if there is any harm to the asset), considerable weight should be applied to the statutory duty where it arises. Proposals that would result in substantial harm or total loss of significance should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss (as per Paragraph 195). Whereas, Paragraph 196 emphasises that where less than substantial harm will arise as a result of a proposed development, this harm should be weighed against the public benefits of a proposal, including securing its optimum viable use.

Non-designated heritage assets / locally-listed buildings

- 2.9 In addition to listed buildings there are many historic buildings which, although they may not meet the criteria for national listing, possess local value because of their architectural and historic interest. The NPPF and Policy D3 of the Maldon LDP refer to such buildings as 'non-designated heritage assets'. These assets are defined in Planning Practice Guidance as those 'identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets'. Planning Practice Guidance encourages Local Planning Authorities to identify 'non-designated heritage assets' against consistent criteria and notes that adding them to a 'local list' is a positive way of improving the 'predictability of the potential for sustainable development'. Maldon District Council is in the process of developing parish lists of local heritage assets based on an adopted selection criteria. One of these lists has recently been prepared for the parish of Bradwell-on-Sea and,

at the time of writing, is out to public consultation: https://www.maldon.gov.uk/info/20049/heritage_and_conservation/9675/parish_lists_of_local_heritage_assets . Paragraph 197 of the NPPF requires a balanced judgment for proposals that affect non-designated heritage assets, having regard to the scale of any harm or loss and the significance of the heritage asset.

2.10 The PPG refers to key elements of a building's special architectural or historic interest when assessing harm. If proposed works adversely affect a key element of the heritage asset's special interest, then those works could amount to substantial harm. It is the degree of harm rather than the scale of development that is to be assessed by the decision taker. Substantial harm is stated to be a high test that may not arise in many cases.

2.11 Harm may arise from works to the heritage asset or from development within its setting. Setting is stated to include the surroundings in which a heritage asset is experienced, and may be more extensive than its curtilage. A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

2.12 The Maldon District Local Development Plan (LDP) was approved by the Secretary of State on 21 July 2017. Policy D3 of the LDP concerns conservation and heritage assets and broadly reflects the requirements of the NPPF and the *Planning (Listed Buildings and Conservation Areas) Act 1990*. It states:

Development proposals that affect a heritage asset (whether designated or non-designated) and / or its setting will be required to:

1) Preserve or enhance its special character, appearance, setting – including its streetscape and landscape value - and any features and fabric of architectural or historic interest;

2) Be supported by a Heritage Statement which describes the asset's significance in sufficient detail to understand the potential impact of the proposal upon the significance of the heritage asset through the proposed work to it and / of its setting.

Development proposals which affect a heritage asset will also have to be in accordance with respective national policies and guidance in the National Planning Policy Framework.

When considering the impact of a proposed development on the significance of a designated heritage asset, the Council will give great weight to the asset's conservation. Any harm or loss will require clear and convincing justification.

Where a proposed development would lead to substantial harm to or total loss of significance of a designated heritage asset, it will be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: the nature of the heritage asset prevents all reasonable use of the site; no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use.

Where a proposed development would cause less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal, including securing its optimum viable use.

Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Nuclear Power Generation (EN-6)

- 2.13 The primary planning policy documents for the determination of a proposal for a new nuclear power station at Bradwell-on-Sea are the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Nuclear Power Generation (EN-6). Section 5.8 of EN-1 sets out policies in relation to the Historic Environment. These policies broadly reflect those in Section 16 of the NPPF. Paragraph 5.8.8 requires the applicant to include within its Environmental Statement a description of the significance of any heritage affected by the proposal and the contribution of their setting to that significance.
- 2.14 The map of Bradwell supporting the strategic site assessment – featured on p. 246 EN-6 – shows the allocated land not extending south of Weymarks River or Curds Grove. That nominated area of land is approximately 298 hectares. According to paragraph C.2.101 of Annex C to EN-6 some bodies questioned whether this area of land would be large enough, ‘particularly to accommodate interim waste stores’. In response to this concern, it was observed that the Office for Nuclear Regulation ‘has advised that this is of sufficient size and shape for the safe and secure operation of a new nuclear power station’.
- 2.15 Paragraphs C.2.91 to C.2.100 of Annex C to EN-6 summarise the conclusions of the ‘Appraisal of Sustainability’ concerning the potential ‘cultural heritage’ impact of the Bradwell site. Paragraph C.2.91 explains that the Appraisal of Sustainability ‘identified potential adverse effects on the settings of Othona Roman Fort and St Peter’s Chapel, other nearby scheduled monuments, listed buildings and the West Mersea Conservation Area, as well as on buried archaeology of potentially high importance’. The appraisal concluded that ‘the effects on the setting of Othona Roman fort and St. Peter’s Chapel would be of

exceptional significance if development occurs on the eastern side of the site' (para. C.2.92). The appraisal advised that 'detailed assessment, including consultation of the Essex Historic Landscape Characterisation, consideration of Conservation Areas and other heritage assets will be required at the project level Environmental Impact Assessment stage, should an application for development consent come forward' (para. C.2.92).

3. Assessment of the potential impact on individual historic buildings

- 3.1 In this section each historic building potentially affected by the power-station's proposals is considered individually. The buildings are presented in alphabetical order of their address. For each case, the aim has been to provide a summary of the building's significance, to identify any potential harm to this significance, to highlight the need for further information and, where appropriate, suggest possible mitigation measures. It must be emphasised that the assessment has been carried out rapidly, within a tight timeframe, on the basis of somewhat limited information. Many of the comments and conclusions may need to be adjusted once firmer proposals and details of assessments are provided by the developer.
- 3.2 The precise locations of the temporary park-and-ride and freight-management facilities are not clear from the consultation document. Figures 4.3 and 4.4 of the consultation document illustrate large circular 'search areas' for three potential park-and-ride locations and two potential freight-management facilities within the Maldon District. This built-heritage impact assessment has not identified every historic building potentially affected in these areas because there are so many.



Photograph of The Cottages, Green Lane, Althorne taken 30th of April 2015

Address:	Althorne, Green Lane, The Cottages
Heritage Status:	A grade II listed building, designated 30 th May 1986
<p>Description: This house is orientated at right angles to Green Lane, with its principal elevation facing west. It occupies a narrow triangular slip of land adjacent the highway. It is 1 ½ storeys in height, timber-framed and weatherboarded with a clay-tiled gambrel roof. Formerly a row of three cottages, it was converted into a single dwelling in the 20th century. Analysis of the building in 2015 during refurbishment established that the southern (right-hand) two cottages were built first, probably late in the 18th century, and the third (left-hand) cottage was added in the early-19th century. Each cottage comprised just one ground-floor room and one first-floor room and a rear lean-to.</p>	
<p>Summary of heritage significance: The listed building's heritage significance can be said to derive primarily from the fact that it is a reasonably well-preserved example of a row of vernacular Georgian cottages. The heritage asset also derives significance from its tranquil rural setting, within a well-maintained verdant garden beside a quiet country lane.</p>	
<p>Potential degree of harm to significance: Green Lane forms part of the proposed Strategic Route 2 which, according to paragraph 4.7.57 of the Bradwell B consultation document, 'could be subject to targeted improvements and/or widening'. The noise and vibrations associated with a considerable increase in the level of HGV traffic, coupled with the loss of trees and hedges for road widening, could detract from the tranquil rural setting of this listed building. The level of harm could be quite considerable depending upon the nature and design of the work.</p>	
<p>The need for further information: More detail is required on the design and detailing of the proposed roadworks in order to make an informed assessment. Specifically, which parts of Green Lane would be subject to widening, and what is the anticipated volume of HGV traffic?</p>	
<p>Possible mitigation measures: As part of the roadworks associated with Strategic Route 2, consideration could be given to realignment of the road to draw it away from the boundary with The Cottages.</p>	



Photograph of Warden's Farmhouse taken from the south on the 28th of June 2006 © IoE Mr Reginald Clark

Address:	Althorne, Green Lane, Warden's Farmhouse
Heritage Status:	A grade II listed building, designated 30 th May 1986
Description: This is a small 1 ½ storey house, dated by the list description to the 17 th century. It is a timber-framed building, clad in red brickwork in the 19 th century. It has a half-hipped gambrel roof clad in clay tiles. Its principal elevation faces south, with its back to Green Lane.	
Summary of heritage significance: The listed building's heritage significance can be said to derive primarily from the fact that it is a reasonably well-preserved example of a small 17 th -century house. The heritage asset also derives significance from its tranquil rural setting, beside a quiet country lane.	
Potential degree of harm to significance: Green Lane forms part of the proposed Strategic Route 2 which, according to paragraph 4.7.57 of the Bradwell B consultation document, 'could be subject to targeted improvements and/or widening'. The noise and vibrations associated with a considerable increase in the level of HGV traffic, coupled with the loss of trees and hedges for road widening, could detract from the tranquil rural setting of this listed building. The level of harm is likely to be limited bearing in mind that the house is set back from the road with its principal elevation facing away from the highway. The precise degree of harm will depend upon the nature and design of the work.	
The need for further information: More detail is required on the design and detailing of the proposed roadworks in order to make an informed assessment. Specifically, which parts of Green Lane would be subject to widening, and what is the anticipated volume of HGV traffic?	



Three stitched-together photographs taken on the 22nd of May 2014 from the top of the tower to the Church of St Thomas, Bradwell, looking north-east in the direction of the site for Bradwell B

Address:	Bradwell-on-Sea Conservation Area
Heritage Status:	The conservation area was designated on the 15 th of July 1969
<p>Description: The Bradwell-on-Sea Conservation Area is a small and remarkably unspoilt hamlet centred upon the 14th-century Church of St Thomas (listed grade II*), extending along South Street, High Street and East End Road. It is relatively unchanged from its 19th-century appearance. Most of the buildings are listed and very well preserved. Late-20th-century housing has been accommodated to the east of the village, outside of the conservation area. The village possesses a special collection of historic (mostly vernacular) buildings. The earliest are medieval timber-framed buildings such as Nos 9&11 High Street, White Lyons, New Hall, Bradwell Lodge and the recently restored cross-wing at the King's Head. There are three terraces of Georgian cottages with gambrel roofs, some good two-storey Victorian cottages, and an attractive Victorian school.</p>	
<p>Summary of heritage significance: The special character and appearance of the conservation area is described in detail in the <i>Bradwell-on-Sea Conservation Area Review and Character Appraisal</i>, which was written in 2006 and adopted by MDC in 2007 following public consultation. Briefly, the significance of the conservation area derives primarily from the high survival of well-preserved historic vernacular buildings within it. It is a remarkably unspoilt hamlet. It is the best-preserved conservation area in the Maldon District. It has a tranquil and quiet character, relatively cut off from its surroundings by the vegetation and fields around it.</p>	
<p>Potential degree of harm to significance: The consultation document observes that 'views out of the conservation area towards the main development site are constrained by planting and more modern development outwith [sic] the conservation area along East End Road, although some views are possible, particularly along High Street' (para. 3.2.23). The composite photograph above, taken from the top of the church tower, illustrates some of the screening in place. Views of the new power station from the conservation area are likely to be limited. However, careful analysis of the potential visual impact is required before firm conclusions can be drawn. It is possible that parts of the station will be seen from the gardens of properties on the east side of High Street. Wireframe photographic mock-ups should be prepared from agreed locations throughout the village.</p> <p>Part of the village's special character derives from its quietness, which could be harmed by the noise of construction work and the operation of the station.</p>	
<p>The need for further information: Wireframe photographic mock-ups would be useful to help assess to what extent any part of the power station would be visible from within the conservation area. Noise assessments should be undertaken to determine the level of noise from construction work and the operation of the power station likely to be audible within the conservation area.</p>	



Photograph of The Former Queen's Head, taken 4th March 2020

Address:	Bradwell-on-Sea, Bradwell Road, The Former Queen's Head
Heritage Status:	A grade II listed building, designated in 1985
Description: The Former Queen's Head Public House is a 2-storey, rendered brick building with hipped slate roofs and a symmetrical arrangement of front sash windows to the main block. The central round-headed front doorway is accessed by a flight of five steps from left and right. It is a typical late-Georgian building.	
Summary of heritage significance: The building's heritage significance can be said to derive the fact that it is a reasonably well-preserved example of a Georgian public house, its elegant proportions, the quality of its materials and detailing, and its prominent location at the road junction.	
Potential degree of harm to significance: Paragraph 4.7.43 of consultation document states '[a]t Mill End, the Strategic Route 1 could be widened and/or realigned via a new section of new off-line road to its immediate south to pull the carriageway away from the existing listed properties which currently front directly onto the road. The existing junction with the B1021 could also be reconfigured to tie into the realigned road'. It is assumed that the listed buildings referred to here are The Former Queen's Head and Oak Cottage. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced. Widening or realignment of the road is likely to conflict with the rural character of the building's setting, but drawing the traffic away from the buildings through road realignment would reduce the level of noise and vibration experienced by the occupants and the risk for damage to the building by accidents. The level of harm would fall below the high threshold of 'substantial harm', but could nonetheless be quite considerable depending upon the nature and design of the work.	
The need for further information: More detail is required on the design of the proposed roadworks in order to make an informed assessment.	
Possible mitigation measures: Drawing the traffic away from the buildings through road realignment would reduce the level of noise and vibration experienced by the occupants and the risk for damage to the building by accidents.	



Left-hand photograph taken 4th March 2020

Right-hand photograph reproduced from the Kevin Bruce Archive

Address:	Bradwell-on-Sea, Bradwell Road, Oak Cottage
Heritage Status:	A grade II listed building, designated in 1985
Description: Oak Cottage is an 18 th -century roadside cottage. It is 1 ½ storeys in height, originally with just two rooms on each floor, and has a timber-framed structure mainly of elm. Old photographs show that it used to be thatched, but it now has a slate roof.	
Summary of heritage significance: The significance of this listed building relates to its age, the fact that it represents a good example of a humble vernacular cottage, its reasonable state of preservation, the quality of its timber-framed construction and its prominent position, alongside the former Queen's Head, beside the junction between Bradwell Road and Mill End.	
Potential degree of harm to significance: Paragraph 4.7.43 of consultation document states '[a]t Mill End, the Strategic Route 1 could be widened and/or realigned via a new section of new off-line road to its immediate south to pull the carriageway away from the existing listed properties which currently front directly onto the road. The existing junction with the B1021 could also be reconfigured to tie into the realigned road'. It is assumed that the listed buildings referred to here are The Former Queen's Head and Oak Cottage. The intensification in use of this road will affect the setting of this listed building and how it is experienced. Widening or realignment of the road is likely to conflict with the rural character of the building's setting, potentially requiring the loss of established vegetation on the south side of the road, but drawing the traffic away from the listed buildings through road realignment would reduce the level of noise and vibration experienced by the occupants and the risk for damage to the building by accidents. A vehicle crashed into the garden wall of Oak Cottage in 2015. Being exposed on a slight bend in the road, this property is particularly vulnerable to this sort of incident. Overall, level of harm could be quite considerable depending upon the nature and design of the work.	
The need for further information: More detail is required on the design and detailing of the proposed roadworks in order to make an informed assessment.	
Possible mitigation measures: Drawing the traffic away from Oak Cottage through road realignment and/or the imposition of a lower speed limit would reduce the level of noise and vibration experienced by the occupants and the risk for damage to the building by accidents.	
Possible heritage benefits to offset harm: Road realignment could make Oak Cottage less vulnerable to damage from traffic collisions.	



This old photograph from the Kevin Bruce Archive shows a row of (probably late-18th-century) cottages which used to occupy a slip of land opposite the Queen's Head, on the western side of the junction between Mill End and Maldon Road. Ironically, it is said to have been demolished around the second quarter of the 20th century to make way for highway improvements which were not implemented (Kevin Bruce, pers. comm.).



Photograph of Timbercot taken from the public footpath to the south on the 12th of March 2020

Address:	Bradwell-on-Sea, Bradwell Waterside, Timbercot
Heritage Status:	A grade II listed building, designated in 1986
<p>Description: This is a 1 ½ storey timber-framed and weatherboarded cottage with a half-hipped gambrel roof clad in clay tiles. It most likely dates from the second half of the 18th century. It was extended to the right (east) by one bay c.1996 in a style which reflects the original. The primary building would originally have contained two main rooms on both floors. According to the list description a 'later and now demolished Dame School was attached to the right', in the position of the 1990s extension.</p>	
<p>Summary of heritage significance: The significance of this listed building relates to its age, the fact that it represents a good example of a humble vernacular cottage, its reasonable state of preservation, the quality of its materials and construction and its idyllic setting. The cottage is situated within a verdant and well-maintained garden, set apart from the main road, accessed by a narrow footpath, with open views across the arable field to the east.</p>	
<p>Potential degree of harm to significance: Figure 3.34 of the consultation document shows the 'Temporary workers' Accommodation' adjoining the eastern boundary of Timbercot. Figure 5.2 suggests that there would be a 'Caravan Area' to the east of the boundary with Timbercot. Paragraph 5.7.5 explains that caravans are likely to be relied upon heavily to house workers during the early stages of construction, and that hardstanding will need to be provided for the caravans. Figure 5.2 shows that to the east of the 'Caravan Area' would be the 'Campus Area' which, according to paragraph 5.7.17 would include multi-storey buildings 'up to six storeys in height'. Such buildings are likely to be prominently visible from Timbercot due to the limited existing vegetative screening and the way in which the land slopes upwards to the east. The appearance of – and the noise generated by – the proposed caravan area and multi-storeyed accommodation buildings may cause considerable harm to the significance of Timbercot, by eroding its idyllic setting. While the impact would be temporary, it would be for a significant period of time – between 9 and 12 years.</p>	
<p>The need for further information: More detail is required on boundary treatments, the layout of the caravan area and the design of the multi-storey blocks.</p>	
<p>Possible mitigation measures: The proposal could be screened through planting, although this would cause some harm in its own right by severing views across the open field. Planting will also take several years to become established.</p>	



Photograph of Timbercot, taken 12th March 2020, looking east towards the proposed caravan area



Photograph of Timbercot, taken 12th March 2020, looking west from the site of the proposed caravan area.



Photograph taken 12th March 2020

Address:	Bradwell-on-Sea, Bradwell Waterside, Peakes
Heritage Status:	Non-designated heritage asset / locally listed
<p>Description: This farmhouse is composed of two ranges on an L-plan, built of yellow stock bricks embellished with horizontal bands of red brick. It is thought that the range aligned west-east was built in the 1870's while the range aligned north-south was added to the east end c.1912. The bay windows, with carved stone capitals, date from the phase of extension and renovation in c.1912. The house was built for Clement Parker, one of the more important sailing barge owners and a prominent local farmer.</p>	
<p>Summary of heritage significance: This building has local architectural interest as a handsome and well-preserved Victorian and Edwardian Farmhouse. It has local historic interest for its association with Clement Parker. It derives some significance from its relatively secluded settings, its grounds surrounded on three sides by arable fields.</p>	
<p>Potential degree of harm to significance: Figure 3.34 of the consultation document shows the 'Temporary workers' Accommodation' area wrapping around the garden to Peakes. Figure 5.2 suggests that there would be a 'Caravan Area' to the east of the boundary with Peakes, and that the land adjoining the north and west boundary would be 'Sports Facilities'. Paragraph 5.7.5 explains that caravans are likely to be relied upon heavily to house workers during the early stages of construction, and that hardstanding will need to be provided for the caravans. The proposals may result in some harm to the setting of Peakes through erosion of its secluded setting.</p>	
<p>The need for further information: More information is required on the layout of the caravan area and the nature of the sports facilities to make an informed assessment of the proposal.</p>	



Photograph taken on the 12th of March 2020 of Peakes from the sea wall footpath to the north-west



Photograph taken on the 12th of March 2020 of Peakes from the sea wall footpath to the north-west



Photograph showing St Peter's Chapel from the east, taken on 12th March 2020

Address:	Bradwell-on-Sea, East End Road, St Peter's Chapel
Heritage Status:	A grade I listed building, designated in 1959. The chapel stands on the archaeological remains of a Saxon Shore Fort, the latter designated a scheduled ancient monument in 1929 (and considered in a separate report by Place Services). The chapel is excluded from the scheduling.
<p>Description: This church stands astride the west wall of a Roman Fort, one of a series of Saxon Shore Forts built in the late 3rd century to guard against attacks by sea rovers. Only one fragment of the fort wall remains visible, hidden in the vegetation to the south of the church and increasingly eroded by badgers.</p> <p>The chapel – constructed using masonry salvaged from the Roman Fort – is in all probability the church recorded to have been built here by St Cedd c.654, making it among the oldest churches to survive in Britain. It consists now of only the imposing nave, but the existence of a west porch and an apsed chancel as wide as the nave has been ascertained. In addition, there was probably a porticus, (a side chamber), to either side of the chancel, overlapping the junction with the nave. The chancel was separated from the nave by a tall arcade, just as at the contemporary churches at Reculver and St Pancras, Canterbury. In the responds of the north and south arches, Roman brick can be recognised. The west doorway is original apart from the lintel. Above the west door is a round-headed window, its arch turned with Roman bricks. There were two windows on both the north and south walls of the nave. These windows have been quite altered but have original jambs and splays.</p> <p>After a period of use as a barn, when large entrances were made in the north and south walls, the chapel was repaired by the Office of Works and re-consecrated in 1920.</p>	
<p>Summary of heritage significance: As one of the oldest churches in Britain, St Peter's Chapel has exceptional archaeological value. The chapel possesses exceptional historical value in that it illustrates vividly the evangelisation of Saxon England. In terms of architectural interest, although reduced from what it once was, as a substantial building of stone, the church was an extraordinary building for the period in which it was built. Aesthetically, the manner in which St. Peter's Chapel stands in the open and bare landscape – and seascape – around it lends it a very particular beauty. The chapel's isolated, open and remote coastal setting is a vitally important aspect to the way it is experienced, and its significance appreciated. Although Bradwell A is visible from the chapel, it is sufficiently distant that its intrusion into the monument's setting is slight. Approaching the chapel from the west, along a footpath aligning with a Roman road, one is barely aware of the presence of the existing power station to the north-west. The wind farm to the south-west, granted permission on appeal in 2010 at Hockley Farm, has had a greater impact upon the Chapel's setting. The wind farm is a noticeable modern intrusion into views of and from the chapel, and has caused harm to the</p>	

chapel's setting. The presence of the wind farm makes the chapel more (not less) sensitive, because the cumulative impact of additional nearby development could further detract from the chapel's landscape setting, compounding the harm it has already recently suffered.

Potential degree of harm to significance: The Bradwell B consultation document explains that one of the factors influencing the decision to position the power station on land to the south and west of the site was the potential to impact upon 'the Chapel of St Peter-on-the-Wall and Roman Shore Fort of Othona which are located to the east of the site' (paragraph 3.3.48). Nonetheless, the proposed power station will inevitably be much more prominently visible from St Peter's Chapel than Bradwell A because of its closer proximity to the grade I listed building and its much greater scale. The wind turbines, while noticeable within the chapel's setting, are relatively slender and ephemeral structures. By contrast, the buildings associated with new power station would represent the introduction of massive buildings which have a much more bulky and solid presence. A new power station would inevitably compound the harm caused to the setting of St Peter's Chapel by the wind turbines. Figure 3.27 provides a photographic mock-up showing how the station – a vast industrial complex – would appear in views from the chapel. What would perhaps be more useful, to an assessment of the impact, would be to see similar photographic mock-ups showing how Bradwell B might appear in views of the chapel (like the view in the photograph above) both during and after construction.

The consultation document comments that, '[i]f appropriate, it should be possible to screen views from the Chapel to minimise visual effects' (paragraph 3.4.16). Later in the document it states:

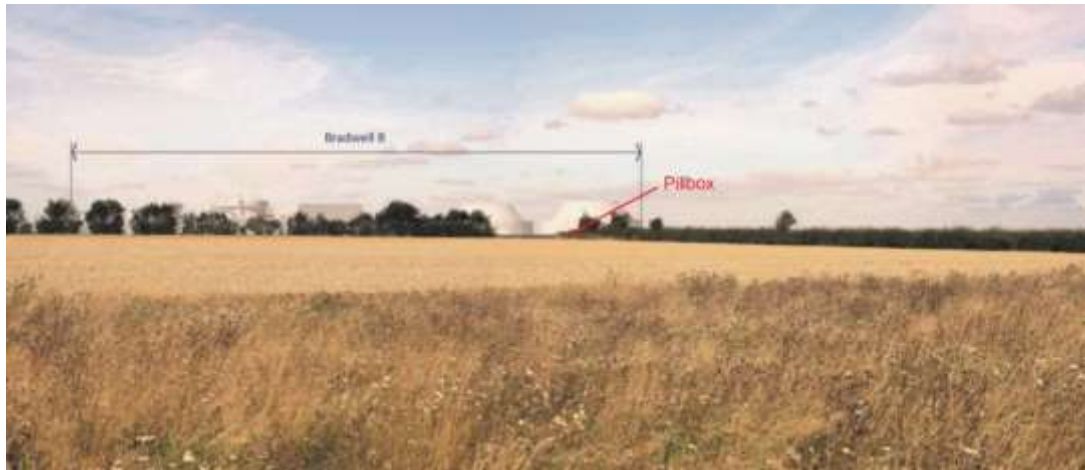
The area between East Hall Farm and the Chapel of St Peter-on-the-Wall would be subject to ground remodelling to beneficially re-use surplus spoil that would be excavated within the site during early construction. This remodelling would seek to reflect existing ground contours, and ensure the land would not be over steepened, giving careful consideration to the setting of The Chapel of St Peter-on-the-Wall. An acceptable threshold level would be established as part of the heritage impact assessment in consultation with stakeholders, and land would not be raised above this threshold' (para. 3.5.8).

Raising ground levels in this manner, on land immediately adjacent to the chapel, poses the risk of a considerable permanent impact upon the monument's setting. It seems likely that the introduction of surplus spoil would lead to the loss of established trees and hedgerows which already provide natural screening, and result in a contrived and artificial landscape character. The document acknowledges 'that there are limits to how much material could sustainably be re-used on site without causing negative environmental impacts, for example in relation to the setting of designated heritage assets'.

Construction of Bradwell B is estimated to take between 9 and 12 years to complete (para. 3.7.1). During that time, Fig. 3.34 shows that the land within the development south and east of Weymarks River will be used for 'soil / spoil storage and redistribution'. Millions of cubic metres of soil would be piled in this area, which would inevitably have a radical impact upon on the character of the landscape close to St Peter's Chapel. Although the huge mounds of soil would only be visible from the chapel temporarily, 9-12 years is a significant period of time, during which the effect upon the setting this grade I listed building could be severe.

The need for further information: Photographic mock-ups should be prepared showing how Bradwell B would appear in views of the chapel from the east. Much more information is needed on the proposal to raise the ground levels of the fields in the vicinity of the chapel.

To date, there has been very limited archaeological analysis of St Peter's Chapel and the Saxon Shore Fort. Some investment by the Bradwell Power Generation Company into archaeological analysis could lead to a refined understanding of both monuments.



Photographic mock-up featured in the Bradwell B Stage 1 Consultation Document, showing how the power station may appear in views from St Peter's Chapel. Annotation added to highlight position of the WWII pillbox at the gated entrance to the Othona Community



Photograph of St Peter's Chapel taken 12th March 2020 from the south-east, looking towards the site of the proposed new nuclear power station. Annotation added to highlight position of the WWII pillbox at the gated entrance to the Othona Community, and aid comparison with the above mock-up



Photograph of St Peter's Chapel taken 12th March 2020 from the east, looking towards the site of the proposed new nuclear power station



Photographs of East Hall Farm from the south along the access track, taken 12th March 2020, stitched together and annotated to highlight key buildings

Address:	Bradwell-on-Sea, East End Road, East Hall Farmhouse
Heritage Status:	A grade II listed building, designated in 1986
<p>Description: This is the mansion house to the manor of East Hall, the Domesday manor of Effecestra. For many centuries the manor belonged to New College, Oxford. It is a two-storeyed rendered house, comprising a timber-framed range to the south and a parallel rendered brick range to the north, both roofed with clay tiles. The main part of the southern range incorporates a timber-framed 3-bay high-end cross-wing of c.1500, which is all that remains of a once larger house which would have continued to the north. The medieval house faced west, but the house now faces south. From the outside it can be seen that the eastern (formerly rear) end of the roof has a hip and gablet, which is probably original but the roof structure has not been inspected to confirm this. There is a stair trap in the north-east corner of the eastern bay. This rear bay was accessed from the missing open hall by a doorway on the north elevation with a four-centre arched head (illustrated on p.26 below). The large scale of the cross-wing shows that it formed part of a late-medieval manor house of considerable status. The cross-wing was extended by an additional bay to the west in the 17th or 18th century. The brick rear range replaced an earlier lean-to in or soon after 1856 according to a letter held in the New College Archives. All the windows in the property are modern. The building was divided into three cottages in the 19th century and is now a pair of houses.</p>	
<p>Summary of heritage significance: The heritage significance of East Hall Farmhouse derives primarily from the fact that it incorporates a substantial and good-quality timber-framed cross-wing of c. 1500. Its early origins are not obvious from the outside, apart from the hip-and-gablet form of its roof. The later extensions are of comparatively limited architectural merit. The adjacent historic farm buildings (three of which are separately grade II listed) complement the setting and understanding of the farmhouse. The isolated position of the farmhouse, surrounded by a remarkably open, flat and expansive agricultural landscape which it has farmed for many centuries, is an important aspect of its setting and significance.</p>	
<p>Potential degree of harm to significance: The four grade II listed buildings at East Hall Farm would fall within the main 'development site'. Paragraph 3.2.4 of the consultation document remarks that '[a]t this stage, we anticipate that East Hall Farm would be retained during the development of the Bradwell B Project'. The qualification of 'at this stage' is slightly worrying. There seems absolutely no need to demolish this important group of buildings. Later in the consultation document there is a more reassuringly unequivocal statement that 'these designated heritage assets would be retained during the development. We would also aim to protect and enhance their settings following construction' (paragraph 3.2.22). It is understood that the Bradwell Power Generation Company intends to acquire the buildings at East Hall Farm – which raises the question of what use these buildings will be put to in the future.</p>	
<p>The consultation document indicates that the landscape surrounding East Hall Farm will change quite radically. Much of the land which it has farmed for centuries would not return to agricultural use. The proposal to raise ground levels of the surrounding land using surplus spoil excavated from the site</p>	

during construction could result in the loss of established trees and hedgerows which already provide some natural screening and result in a rather contrived and artificial landscape character.

Construction of Bradwell B is estimated to take between 9 and 12 years to complete (para. 3.7.1). During that time, Fig. 3.34 shows that the land surrounding East Hall Farm will be used for 'soil / spoil storage and redistribution'. Millions of cubic metres of soil would be piled in this area, which would inevitably have a radical impact upon the character of the landscape setting of East Hall Farm. Although the huge mounds of soil would only be in place temporarily, 9-12 years is a significant period of time, during which the effect upon the setting this group of grade II listed buildings could be severe.

The need for further information: Photographic mock-ups should be prepared showing how East Hall Farm would appear in long views in the context of the proposed development. Much more information is needed on the proposal to raise ground levels of the fields in the vicinity of the listed buildings. How would the spoil be stored during construction on the land surrounding East Hall Farm? What will be height of the mounds and how would they be profiled?

As an important medieval timber-framed building, which would be directly impacted by the proposals, the history and evolution East Hall Farm House would benefit from being researched in more detail.



Photograph of East Hall Farmhouse from the south-east, taken 16th July 2015



Photograph of the interior of Easthall Farmhouse, taken 16th July 2015, showing original timber framing, a blocked stair trap, and a doorway with a four-centre-arched head.



Photograph of the threshing barn at Easthall Farm from the south, taken 22nd May 2012

Address:	Bradwell-on-Sea, East End Road, Barn approx. 15 metres west of Easthall Farmhouse
Heritage Status:	A grade II listed building, designated in 1986
<p>Description: This timber-framed and weatherboarded threshing barn dates from the early-19th century. In a survey of 1844 by John Oxley Parker it was described as an 'excellent double barn. Timber and thatched, one floor of oak plank and the other of stone with [granaries] between the porches, slated'. The roofs were clad in corrugated asbestos sheets prior to listing in the 20th century. The barn is of nine bays and has two waggon porches facing south. The roof structure has butt purlins and queen struts. There are bolted hanging knees to tie beams. Two bays of the barn are occupied by a loft/granary floor.</p>	
<p>Summary of heritage significance: This threshing barn was built in response to the embargoes imposed on the importation of grain during the period of hostilities from 1799-1815; a situation which caused grain prices to soar, countless grain-processing barns to be erected. The very large scale of the barn reflects the wealth and ambition of its owners. It is a good quality example of timber-framed construction for its date. It shares group value with the historic farmhouse and separately listed brick shelter sheds. It derives some significance from its landscape setting, within the farmland it was intended to serve.</p>	
<p>Potential degree of harm to significance: As described above in relation to East Hall Farmhouse, the proposed power station and landscaping works pose the potential to harm the setting and significance of this group of listed buildings.</p>	
<p>The need for further information: Photographic mock-ups should be prepared showing how East Hall Farm would appear in long views in the context of the proposed development. Much more information is needed on the proposal to raise ground levels of the fields in the vicinity of the listed buildings.</p>	



Internal view of the threshing barn at Easthall Farm from the south, taken 16th July 2015



Photograph of the byres and stable ranges approx. 25 metres south west of Easthall Farmhouse, taken 16th July 2015

Address:	Bradwell-on-Sea, East End Road, byres and stable ranges approx. 25 metres south west of Easthall Farmhouse
Heritage Status:	A grade II listed building, designated in 1986
Description: A single-storey brick byre and stable range on an L-plan enclosing part of a stock yard to the south of the threshing barn. It was built c.1861 according to a letter and plans held in the New College Archives.	
Summary of heritage significance: This is a good quality and well-preserved example of a Victorian shelter shed, reflecting the general shift in focus to cattle farming in the 1860s.	
Potential degree of harm to significance: As described above in relation to East Hall Farmhouse, the proposed power station and landscaping works pose the potential to harm the setting and significance of this group of listed buildings.	
The need for further information: Photographic mock-ups should be prepared showing how East Hall Farm would appear in long views in the context of the proposed development. Much more information is needed on the proposal to raise ground levels of the fields in the vicinity of the listed buildings.	



Photograph of the byres and stable ranges approx. 40 metres south west of Easthall Farmhouse, taken 22nd May 2012

Address:	Bradwell-on-Sea, East End Road, byres and stable ranges approx. 40 metres south west of Easthall Farmhouse
Heritage Status:	A grade II listed building, designated in 1986
Description: A single-storey brick byre and stable range on an L-plan enclosing part of a stock yard to the south of the threshing barn. It was built c.1861 according to a letter and plans held in the New College Archives.	
Summary of heritage significance: This is a good quality and well-preserved example of a Victorian shelter shed, reflecting the shift in focus to cattle farming in the 1860s and 70s.	
Potential degree of harm to significance: As described above in relation to East Hall Farmhouse, the proposed power station and landscaping works pose the potential to harm the setting and significance of this group of listed buildings.	
The need for further information: Photographic mock-ups should be prepared showing how East Hall Farm would appear in long views in the context of the proposed development. Much more information is needed on the proposal to raise ground levels of the fields in the vicinity of the listed buildings.	



Internal view of the western byre at Easthall Farm, illustrating the pine roof structure, taken 16th July 2015



Internal view of the western byre at Easthall Farm, illustrating the original elm manger, taken 16th July 2015



Photograph of Munkins Cottage from the south, taken 19th August 2004

Address:	Bradwell-on-Sea, East End Road, Munkins Cottage
Heritage Status:	A grade II listed building, designated in 1986
Description: A two-storey timber-framed and rendered house with a cross-wing to the east. The list description suggest that house is 17 th century or earlier, although it was clearly not subject to an internal inspection. The cross-wing may be medieval, while the remaining section is possibly post-medieval. A true understanding of the building's age would only be possible with an internal inspection.	
Summary of heritage significance: The significance of this listed building derives from its probable antiquity, traditional form, materials and landscape setting.	
Potential degree of harm to significance: The option to have a temporary workers accommodation campus on land south of East End Road (Option 3 in Figure 5.1) would probably have had significant impact upon the setting of this listed building. The fact this option has been discounted is to be welcomed (para. 5.7.13). The power-station development may affect views of and from this listed building.	
The need for further information: Photographic mock-ups should be prepared showing how the power-station development would appear in views of and from the listed buildings	



Left-hand photograph of Munkins Farmhouse from the south, taken 28th March 2002



Right-hand photograph taken August 1921 by the RCHME

Address:	Bradwell-on-Sea, East End Road, Munkins Farmhouse
Heritage Status:	A grade II listed building, designated in 1953
Description: The form of this timber-framed building, comprising a pair of gabled cross-wings flanking a central hall range, strongly implies that it is a complete medieval house. Unfortunately, it has not been the subject of an internal inspection, so its true antiquity and significance is not completely understood. The first mention of Munkins in documents is 1285 (O'Connor, 2006, p. 8).	
Summary of heritage significance: The significance of this listed building derives from its probable antiquity, traditional form, materials and landscape setting. Considerable harm was caused to the listed building's setting the Hockley Wind Farm which is located immediately to the south.	
Potential degree of harm to significance: The option to have a temporary workers accommodation campus on land south of East End Road (Option 3 in Figure 5.1) would probably have had significant impact upon the setting of this listed building. The fact this option has been discounted is to be welcomed (para. 5.7.13). The power-station development may affect views of and from this listed building.	
The need for further information: Photographic mock-ups should be prepared showing how the power-station development would appear in views of and from the listed building	



Photograph of the barn to the south-west of Munkins Farmhouse, taken 28th of March 2002

Address:	Bradwell-on-Sea, East End Road, Barn approx. 25 metres south-west of Munkins Farmhouse
Heritage Status:	A grade II listed building, designated in 1986
Description: This timber-framed and weatherboarded 5-bay threshing barn dates from the early-19 th century. The roofs were clad in corrugated asbestos sheets prior to listing in the 20 th century.	
Summary of heritage significance: This threshing barn was most likely built in response to the embargoes imposed on the importation of grain during the period of hostilities from 1799 1815; a situation which caused grain prices to soar, countless grain-processing barns to be erected. It is a reasonable example of this type and age of barn. It shares group value with Munkins Farmhouse. It derives some significance from its landscape setting, within the farmland it was intended to serve.	
Potential degree of harm to significance: The option to have a temporary workers accommodation campus on land south of East End Road (Option 3 in Figure 5.1) would probably have had significant impact upon the setting of this listed building. The fact this option has been discounted is to be welcomed (para. 5.7.13). The power-station development may affect views of and from this listed building.	
The need for further information: Photographic mock-ups should be prepared showing how the power-station development would appear in views of and from the listed building	



Left-hand photograph, taken 12th March 2020, shows the entrance to an existing track which would appear to align with the proposed secondary access to Bradwell B.

Right-hand photograph, taken in the 1970s by Kevin Bruce, shows the WWII concrete 'dragon's teeth' which survive in the hedge to the right (east) of the track entrance

Address:	Bradwell-on-Sea, East End Road, Dragons teeth at entrance
Heritage Status:	Non-designated heritage asset
Description: A row of anti-tank concrete 'dragon's teeth' dating from WWII.	
Summary of heritage significance: A valuable remnant from the Second World War, which was a significant period in Bradwell's recent history.	
Potential degree of harm to significance: Figure 3.23 of the consultation document shows the indicative location and alignment of a secondary access to Bradwell B off East End Road, for use in emergencies. The loss of the dragon's teeth would be regrettable. The erection of a fence along this part of the development site boundary would detract from the setting of this feature.	
The need for further information: More information on the precise position of the secondary access is required.	
Possible mitigation measures: If and when the secondary access is created, the dragon's teeth should be retained.	
Possible heritage benefits to offset harm: Consideration might be given to the installation of an interpretation board which highlights the significance of the dragon's teeth.	



Left-hand photograph of Cricketers Cottage from the south, taken 12th March 2020

Right-hand photograph taken 12th March 2020 from Cricketers Cottage looking south, showing how Curds Grove effectively screens Bradwell A from view.

Address:	Bradwell-on-Sea, East End Road, Cricketers Cottage
Heritage Status:	A grade II listed building, designated in 1986
Description: This is a mid-18 th century, 1 ½ storey, timber-framed and rendered cottage with a clay-tiled gambrel roof. Its principal elevation faces south, with its back to East End Road. The rear roof-slope sweeps down in 'cat-slide' form over a single-storey lean-to with low eaves and small windows.	
Summary of heritage significance: Cricketers Cottage has significance as a classic example of a humble vernacular Georgian cottage. It is remarkably well preserved, having a good quality timber-frame, a wonderful fireplace in the hall with evidence for bread ovens, the original stairs and several historic doors. Its secluded position, surrounded by an expansive flat landscape, is an important part of the way in which the cottage is experienced, and its significance appreciated.	
Potential degree of harm to significance: The power-station development has the potential to affect views of and from this listed building. The loss of Curds Grove would be particularly regrettable since this provides established screening of the site, and any replacement planting will take many years to become established.	
The need for further information: Photographic mock-ups should be prepared showing how the power-station development would appear in views of and from the listed building. Will the site boundary along East End Road need to be fenced?	
Possible mitigation measures: Retain Curds Grove.	



Photograph of Bradwell Lodge from the south taken on the 22nd of February 2018

Address:	Bradwell-on-Sea, High Street, Bradwell Lodge
Heritage Status:	A grade II* listed building, designated in 1953
<p>Description: Bradwell Lodge was formerly the parish rectory. The earliest part is a large but much altered timber-framed cross-wing dating from the late-15th or early-16th century. This wing was extended in the mid-16th century and in the mid-18th century. The house was transformed in 1781-3 when its owner – the Rev. Henry Bate Dudley – added an elegant villa to the south of the older house, to designs by the Essex architect John Johnson. On the roof of the villa is an unusually large belvedere or observatory affording extensive view across the flat landscape.</p>	
<p>Summary of heritage significance: The most important of this building is the elegant and high-quality late-18th century addition by John Johnson, although the older parts – particularly the late-medieval crosswing – are also of architectural interest. The building has historical interest for its role as the parish rectory and for its association with the journalist Rev. Henry Bate Dudley. Bate Dudley was the driving force behind the reclamation of 250 acres of land from the sea and draining the marshy glebe land for improved agriculture (Robinson, 2009, p. 84). The results of these endeavours could be viewed from the belvedere which crowns his villa. The Lodge was also the home for many years of the prominent Labour M.P. Tom Driberg.</p>	
<p>Potential degree of harm to significance: The proposed power station would be clearly visible from the belvedere on top of Bradwell Lodge, which would affect the experience of this important part of the building. However, the views of the landscape from the Belvedere have already been affected by Bradwell A and the Hockley wind farm. The impact of the proposed power station upon the overall significance of Bradwell Lodge would be limited.</p>	



Photograph taken from the Belvedere to Bradwell Lodge on 22nd of February 2018 looking north in the direction of Bradwell A



Photograph taken from the Belvedere to Bradwell Lodge on 22nd of February 2018 looking south-east in the direction of Hockley wind farm



Left-hand historic photograph of Mote Cottage, courtesy of the Kevin Bruce Archive

Right-hand photograph of Mote Cottage taken 28th of March 2002

Address:	Bradwell-on-Sea, Maldon Road, Mote Cottage
Heritage Status:	A grade II listed building, designated 5 th of August 1986
<p>Description: A Victorian, two-storey, timber-framed, weatherboarded and slate-roofed house. The front sash windows have moulded surrounds and with pelmets supported on brackets. There is a 20th-century parallel rear range of similar style and materials to the original. This was at one time the home of the author S. L. Bensusan (1872-1958) who immortalised Bradwell and its inhabitants in his early books.</p>	
<p>Summary of heritage significance: This is a handsome Victorian weatherboarded house. Its close proximity to the edge of the road suggests it was developed on waste of the manor, probably replacing an earlier cottage on the site.</p>	
<p>Potential degree of harm to significance: Paragraph 4.7.42 of the consultation document observes that some residential properties along this stretch of Maldon Road (which would become Strategic Route 1) are positioned close to the edge of the highway and notes that 'existing carriageway widths are likely to act as a constraint. On this basis the section of highway between Steeple and Mill End could be subject to targeted improvements and/or carriage widening'. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building and how it is experienced. Widening or realignment of the road is likely to conflict with the rural character of the building's setting, but drawing the traffic away from the buildings through road realignment would reduce the level of noise and vibration experienced by the occupants and the risk for damage to the building by accidents. The level of harm would fall below the high threshold of 'substantial harm', but could nonetheless be quite considerable depending upon the nature and design of the work.</p>	
<p>The need for further information: More detail is required on the design of the proposed roadworks in order to make an informed assessment.</p>	
<p>Possible mitigation measures: Drawing the traffic away from the listed building through road realignment should be considered in order to reduce the level of noise and vibration experienced by the occupants.</p>	



Left-hand historic photograph of Cobbetts, courtesy of the Kevin Bruce Archive

Right-hand photograph taken 28th of March 2002

Address:	Bradwell-on-Sea, Maldon Road, Cobbetts
Heritage Status:	A grade II listed building, designated 5 th of August 1986
Description: A pair of late-18th-century, timber-framed, weatherboarded and thatched cottages, converted into a single dwelling in the 20 th century. The cottages were developed on roadside slips of land which were waste of the manor.	
Summary of heritage significance: A classic example of a pair of vernacular Georgian wayside cottages	
Potential degree of harm to significance: Paragraph 4.7.42 of the consultation document observes that some residential properties along this stretch of Maldon Road (which would become Strategic Route 1) are positioned close to the edge of the highway and notes that 'existing carriageway widths are likely to act as a constraint. On this basis the section of highway between Steeple and Mill End could be subject to targeted improvements and/or carriage widening'. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building and how it is experienced. Widening or realignment of the road is likely to conflict with the rural character of the building's setting, but drawing the traffic away from the buildings through road realignment would reduce the level of noise and vibration experienced by the occupants and the risk for damage to the building by accidents. The level of harm would fall below the high threshold of 'substantial harm', but could nonetheless be quite considerable depending upon the nature and design of the work.	
The need for further information: More detail is required on the design of the proposed roadworks in order to make an informed assessment.	
Possible mitigation measures: Drawing the traffic away from the listed building through road realignment would reduce the level of noise and vibration experienced by the occupants. The close proximity of the cottages to the road-edge reflects the historic development pattern, which would be eroded through such mitigation measures. But road realignment would result in less harm overall than the impact of the heavy volume of traffic to and from the power station.	



Photograph of Goodgrooms taken on the 12th of March 2020

Address:	Bradwell-on-Sea, Maldon Road, Goodgrooms
Heritage Status:	A grade II listed building, designated in 1986
<p>Description: The earliest mention of Goodgrooms (Goodgromes) in documents is 1443 (O'Connor, 2006, p. 8). Inspection of the house in 2017 established that the earliest part is the south end of the front range, which represents a timber-framed, 2-cell, lobby-entrance house, built in the mid-late 17th century. In the late-18th century, a 2-bay in-line extension was added to the north of the original house and the property was subdivided into three cottages. In the 20th century the building was converted back to a single dwelling. At the time of writing, some 20th century ranges are being enlarged to provide additional accommodation.</p>	
<p>Summary of heritage significance: The significance of the listed building derives mainly from its age, structure, well-preserved condition, numerous period features, traditional materials and detailing. The most significant part of this listed building is the 17th-century house. The Georgian extension is also of considerable significance, whereas the 20th-century additions are only of moderate value. The building's picturesque character owes something to the accretive fashion in which the building has developed over the centuries. The building's tranquil rural setting, surrounded by fields and fronting onto a quiet narrow road, complements its significance.</p>	
<p>Potential degree of harm to significance: Strategic Route 2 would pass through the field to the west of the house, merging with the narrow road which links Maldon Road to Waterside Road. This new road would detract from the listed building's tranquil rural setting.</p>	
<p>The need for further information: More detail is required on the design of the proposed roadworks in order to make an informed assessment.</p>	



Left-hand photograph of Bluehouse Cottages from the south-west, taken 12th March 2020

Right-hand photograph of post inside Bluehouse Cottage, carved with a heart and the date 1691

Address:	Bradwell-on-Sea, Maldon Road, Bluehouse Cottages
Heritage Status:	A grade II listed building, designated in 1986
<p>Description: This is a timber-framed and weatherboarded building with a clay-tiled gambrel roof, two-storeys in height plus a habitable attic storey. There is a house on the site, depicted on a map of 1680 (a detail of which is reproduced below). That house was probably replaced by the existing one in 1691, since the date 1691 is carved into a post inside the Bluehouse Cottage. The building was acquired in the 18th century for use as a parish workhouse. Floor plans survive from 1844 showing a programme of remodelling to create more rooms. The building is now a pair of houses; Bluehouse Cottage to the west, and the Bakekhouse to the east.</p>	
<p>Summary of heritage significance: The building has architectural interest as one of very few firmly-dated late-17th-century buildings in this part of Essex. It is an attractive and well-preserved example of vernacular architecture. The building has historic interest for its role as a parish workhouse. The building's tranquil rural setting, surrounded by fields and fronting onto a quiet narrow road, complements its significance. The map of 1680 shows that the land to the west of the listed building (now the garden to Bluehouse Cottage) was at that time an orchard.</p>	
<p>Potential degree of harm to significance: It would appear that Strategic Route 2 would pass through the garden to Bluehouse Cottage, along its western boundary. The introduction of a road at this location would be severely detrimental to the setting of the listed building.</p>	
<p>The need for further information: More information is needed on the precise position, width and design of the proposed road</p>	
<p>Possible mitigation measures: The degree of harm to Bluehouse Cottages would be reduced if the proposed road could be located further to the west, outside the garden of the listed building. However, it should be borne in mind that this would bring the road closer to Orplands, and increase the level of harm to that non-designated heritage asset.</p>	



Stitched-together photograph of Bluehouse Cottages from the south-west, taken 12th March 2020, annotated to indicate the approximate position of Strategic Route 2.



Detail of a map dated 1680 showing that the present garden to the west of Bluehouse Cottage was at that time an orchard. Reproduced from the Kevin Bruce Archive.



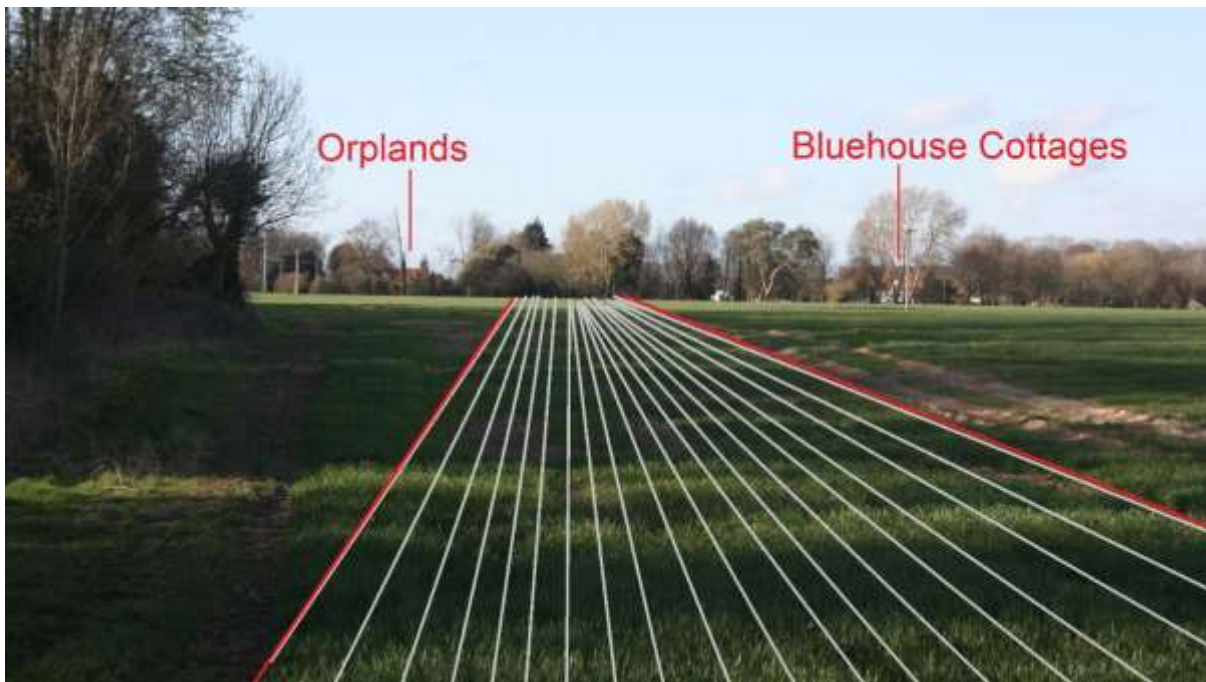
Photograph of Orplands taken March 2012

Address:	Bradwell-on-Sea, Maldon Road, Orplands
Heritage Status:	A non-designated heritage asset.
<p>Description: Orplands is known to have existed since the 15th century, but the farmhouse was rebuilt in the Victorian period. It is constructed of yellow brick and roofed with clay tiles. The front range is two-storeys in height with a gabled cross-wing at the left-hand (western) end. The bargeboards have a pierced foliate decoration. The front and side doorways are framed by elaborate arched openings with carved stone responds. On the front elevation there are square bay windows with dentilled brick cornices. The windows are painted timber sashes with a single pane of glass to both the upper and the lower sash.</p>	
<p>Summary of heritage significance: This is a substantially complete Victorian farmhouse of very good local architectural interest, displaying high quality materials and detailing.</p>	
<p>Potential degree of harm to significance: Strategic Route 2 would pass through the field immediately to the east of this farmhouse. Although the distance and intervening vegetation would limit any harm to the setting of Orplands, the impact would be increased if the new road was positioned further west in an effort to reduce the effect on the grade II listed Bluehouse Cottages and Goodrooms.</p>	
<p>The need for further information: More information is needed on the precise position, width and design of the proposed road</p>	



Photograph of Curry Farm from the south, taken 12th March 2020

Address:	Bradwell-on-Sea, Mill End, Curry Farm
Heritage Status:	A non-designated heritage asset
Description: A remarkably well-preserved late-18 th -century brick farmhouse with a hipped clay-tiled roof. The house retains most of its original windows and the interior is also very little altered. The earliest mention of Curry's in documents is 1262 (O'Connor, 2006, p. 8).	
Summary of heritage significance: This is a good example of a well-preserved Georgian farmhouse. It is an secluded location, surrounded by woodland, and the peaceful atmosphere of its grounds is an important aspect of its setting.	
Potential degree of harm to significance: Strategic Route 2 would run along the southern and eastern boundaries of the woodland surrounding Curry Farm. While the established woodland would limit any visual impact upon the farmhouse, the considerable vehicular activity would generate noise that would detract from the peaceful quality of the historic building's setting.	
The need for further information: More information is needed on the precise position, width and design of the proposed road	



Photograph taken 12th March 2020 in the field to the east of Curry's Farm looking north, annotated to show the approximate route Strategic Route 2.



Photograph taken 12th March 2020 in the field to the south-east of Curry's Farm looking west in the direction of Strategic Route 2, which would run parallel with the southern edge of Curry Farm's woodland



Photograph taken 12th March 2020 of Truscot (in the foreground) and Trusses.

Address:	Bradwell-on-Sea, Waterside Road, Truscott
Heritage Status:	A grade II listed building, designated in 1986
Description: A pair of late-Georgian cottages on a roadside slip of land which was 'waste of the manor', converted into a single dwelling in the 20th century. The building is timber framed but has a brick façade. It is 1 ½ storeys in height with a clay-tiled gambrel roof. The long, narrow roadside plot appears to survive in its original form.	
Summary of heritage significance: A classic example of a pair of vernacular Georgian wayside cottages. The quite rural surroundings of the listed building are an important part of how the building and its significance is experienced. Truscott shares group value with the adjacent row of wayside cottages; Trusses.	
Potential degree of harm to significance: Figures 3.34 and 5.1 of the consultation document show the field behind (to the east of) and the field opposite (to the west of) this listed building designated as potential sites for temporary workers accommodation. Waterside Road would become part of Strategic Route 1, with all vehicular traffic for the power station travelling along this stretch of road. The field to the north-east of the junction between Trusses Road and Waterside Road will become the entrance 'plaza' to the power-station site, with a new junction required to the access road which will pass diagonally through the plaza. Each of these works is likely to radically alter and detract from the immediate rural surroundings of this listed building, resulting in harm to its significance.	
The need for further information: More information is needed in relation to each of the proposals identified above.	
Possible mitigation measures: Drawing the traffic away from the listed building through road realignment could reduce the level of noise and vibration experienced by the occupants. The close proximity of the cottages to the road-edge reflects the historic development pattern, which would be eroded through such mitigation measures. But road realignment may result in less harm overall than the impact of the heavy volume of traffic to and from the power station.	



Photograph of the rear of Truscott, taken 29th August 2018 from the field to the east of it



Photograph of Truscott and Trusses, taken 29th August 2018 from Woodyards Road to the south-east



Photograph of Trusses taken 12th March 2020

Address:	Bradwell-on-Sea, Waterside Road, Trusses
Heritage Status:	A grade II listed building, designated in 1986
<p>Description: A row of three late-Georgian cottages on a roadside slip of land which was 'waste of the manor', converted into a single dwelling in the 20th century. The building is timber framed but has a later brick skin. It is 1 ½ storeys in height with a clay-tiled gambrel roof. The original plot was enlarged in the 20th century.</p>	
<p>Summary of heritage significance: A classic example of a row of vernacular Georgian wayside cottages. The quite rural surroundings of the listed building are an important part of how the building and its significance is experienced. Trusses shares group value with the adjacent row of wayside cottages; Truscott. This was the final home of the internationally renowned artist Frederick Hans Haagensen where he had his studio.</p>	
<p>Potential degree of harm to significance: Figures 3.34 and 5.1 of the consultation document show the field behind (to the east of) and the field opposite (to the west of) this listed building designated as potential sites for temporary workers accommodation. Waterside Road would become part of Strategic Route 1, with all vehicular traffic for the power station travelling along this stretch of road. The field to the north-east of the junction between Trusses Road and Waterside Road will become the entrance 'plaza' to the power-station site, with a new junction required to the access road which will pass diagonally through the plaza. Each of these works is likely to radically alter and detract from the immediate rural surroundings of this listed building, resulting in harm to its significance.</p>	
<p>The need for further information: More information is needed in relation to each of the proposals identified above.</p>	
<p>Possible mitigation measures: Drawing the traffic away from the listed building through road realignment may reduce the level of noise and vibration experienced by the occupants. The close proximity of the cottages to the road-edge reflects the historic development pattern, which would be eroded through such mitigation measures. But road realignment may result in less harm overall than the impact of the heavy volume of traffic to and from the power station.</p>	



Composite photograph of the site of the proposed power-station entrance 'plaza', taken 12th March 2020 from the junction between Waterside Road and Trusses Road



Photograph of Down Westwick from the south-west, taken 12th March 2020

Address:	Bradwell-on-Sea, Waterside Road, Down Westwick
Heritage Status:	A grade II listed building, designated in 1986
<p>Description: A two-storey timber-framed and weatherboarded house with a clay-tiled roof. This house appears to consist of a hall, in-line service end and parlour cross-wing. The hall has late-16th-century heavy first-floor joists, all chamfered with lambs tongue stops. This has the character of a floor inserted into an open hall, but the external walls have been altered / concealed to the extent that it is impossible to tell. The roof has been rebuilt but incorporates at least one smoke-blackened rafter from a medieval open hall. The house retains numerous other later period architectural features.</p>	
<p>Summary of heritage significance: The significance of this listed building can be said to derive from its age, the quality of its materials and construction, its vernacular character and its picturesque and isolated rural position.</p>	
<p>Potential degree of harm to significance: Paragraph 3.2.24 of the consultation document cites Down Westwick as a listed building potentially affected by the proposals. Figure 5.3 indicates that a field to the north-east of Down Westwick may be the site of temporary workers' accommodation. However, the distance and intervening vegetation, coupled with the way in which Down Westwick sits within a dip in the landscape, makes it unlikely that there would be any discernible impact on the setting or significance of this listed building.</p>	



Photograph of Woodyards taken 28th September 2018

Address:	Bradwell-on-Sea, Waterside Road, Woodyards
Heritage Status:	A non-designated heritage asset
<p>Description: This two-storey, timber-framed and weatherboarded house is older than it appears from the outside. The house was first constructed in the second half of the 18th century as a pair of 1 ½ storey cottages. In the second half of the 19th-century the building was converted to a single dwelling and heightened to a full 2 storeys. A brick lean-to at the rear bears a date of 1881, which is probably a bit later than the Victorian rebuilding. The name of the house derives from Charlie Woodyard who was a local coal merchant.</p>	
<p>Summary of heritage significance: This 18th and 19th-century house is very well preserved, displaying good quality vernacular materials and detailing. There is a good survival of multi-paned sash windows and old internal doors. The building's tranquil and rural setting contributes to an appreciation its significance.</p>	
<p>Potential degree of harm to significance: Figure 3.34 shows the field adjacent (to the east of) this locally listed building designated as 'Potential Expansion Area for Temporary Workers' Accommodation'. The development of this land for workers accommodation (presumably caravans) would detract from the tranquil rural setting of the construction work (estimated to be between 9 and 12 years).</p>	
<p>Possible mitigation measures: Planted screening could help mitigate the impact of the caravan site, although planting would take a long time to become established.</p>	



Photograph of the meadow to the east of Woodyards, taken 20th January 2020 from the road looking north-east



Photograph of The Old Cottage, taken 12th March 2020

Address:	Bradwell-on-Sea, Waterside Road, The Old Cottage
Heritage Status:	A grade II listed building, designated in 1986
Description: The main part of this house is a small late-medieval timber-framed cross-wing. Photographs taken during the 1970s while it was being re-tiled show that the original roof is well preserved and of crown-post construction. The windows and extensions are all later and of comparatively limited architectural interest.	
Summary of heritage significance: The significance of this listed building derives primarily from the antiquity of its original structure. It is also of interest as a small medieval house, which tend to survive in far fewer numbers than larger medieval houses. The comparatively large 20 th -century houses immediately to the north of The Old Cottage have a somewhat overbearing relationship with this diminutive medieval house, but it remains an attractive and memorable feature along Waterside Road and in the long views from Trusses Road.	
Potential degree of harm to significance: Figure 3.34 shows the 'Entrance Plaza' adjoining the southern boundary to The Old Cottage, and land to the west on the opposite side of Waterside Road is designated a 'Potential Expansion Area for Temporary Workers' Accommodation'. Para. 3.7.9 states: 'An entrance plaza at the primary entrance would allow for controlled and secure access into and out of the site. Our designs for this area are in the early stages, and this will be a key area for ongoing design development following Stage One consultation'. This information on what the plaza will consist of is thus quite vague. Para. 3.7.12 says access 'would be limited to security checkpoints within the entrance plaza', suggesting the area would need to incorporate fencing. The appearance of – and the noise generated by – the proposed caravan area and the 'Entrance Plaza' may cause notable harm to the significance of The Old Cottage, by eroding its rural setting. While the impact of the temporary accommodation would be temporary, it would be for a significant period of time – between 9 and 12 years.	
The need for further information: More information is needed in relation to the 'Entrance Plaza' to assess the impact it would have on the setting of The Old Cottage.	
Possible mitigation measures: Planted screening could help mitigate the impact of the development but would take a long time to become established.	



Photograph of The Old Cottage from Trusses Road, taken 12th March 2020



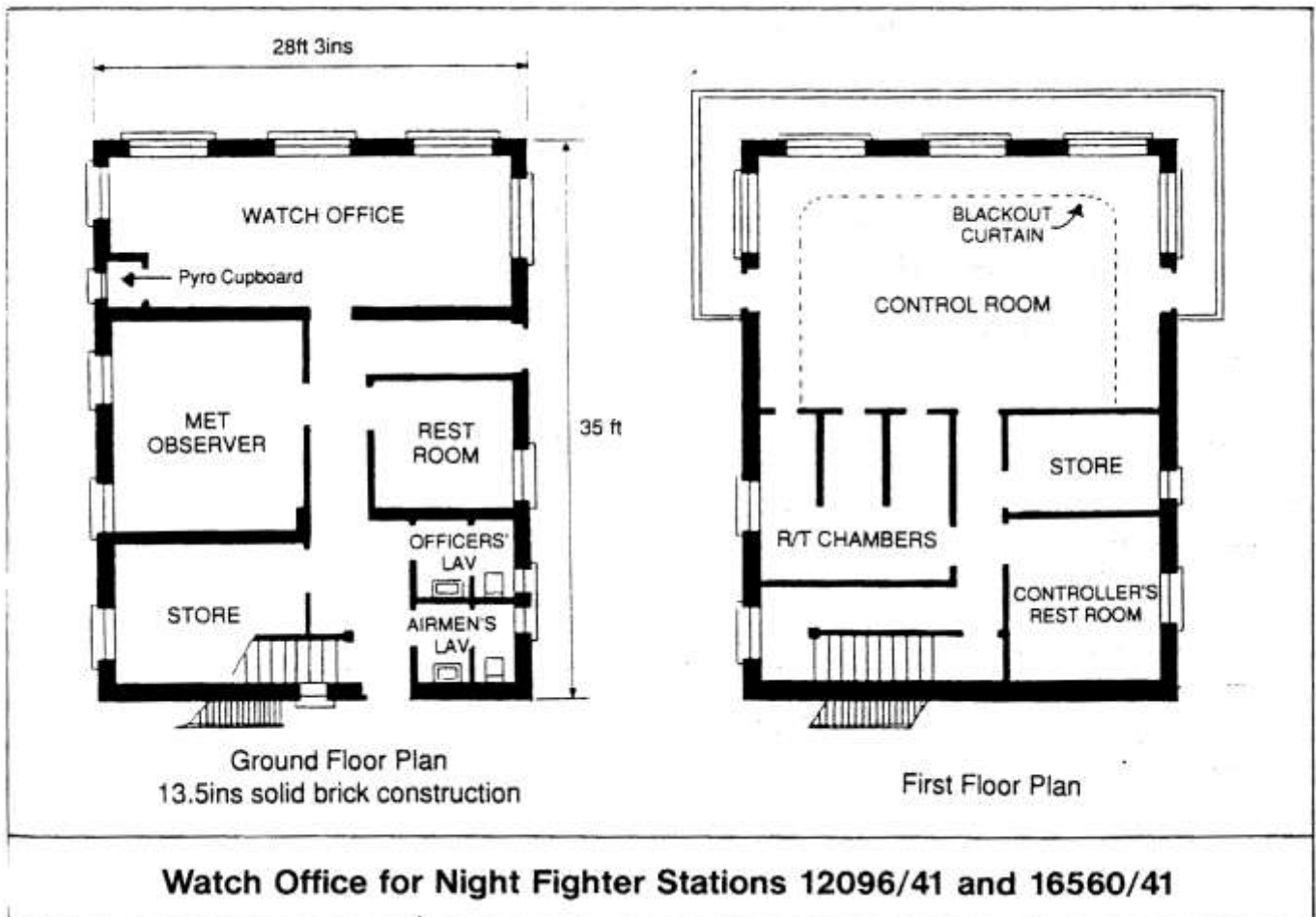
Photograph of The Old Cottage from the field to the south, taken 24th September 2015



Left-hand photograph of The Control Tower, taken 20th January 2020

Right-hand photograph, taken prior to residential conversion, reproduced with permission from Kevin Bruce

Address:	Bradwell-on-Sea, Weymarks Road, Bradwell Bay WWII Airfield, The Control Tower
Heritage Status:	A non-designated heritage asset
Description: This rendered brick Control Tower oversaw operations at Bradwell Bay airfield during WWII and was later converted to a residence. The roof-top observatory has been rebuilt but the basic form of the building has been preserved.	
Summary of heritage significance: The Control Tower, along with the Station HQ and the four Blister hangars are important to the history and heritage of Bradwell Bay airfield. The military historian Fred Nash has observed that “although they are all that remains of the 300+ buildings and structures that stood on the airfield they were, and are, of major significance in the hierarchy of airfield architecture” (Nash, 2010). The Control Tower is the most iconic building to survive from Bradwell Bay airfield.	
Potential degree of harm to significance: It is proposed to demolish this building.	
The need for further information: The building should be subject to detailed research and investigation as soon as possible to achieve a full understanding of its significance.	
Possible mitigation measures: Efforts should be made to retain this building, if at all possible. If demolition is unavoidable the building must be properly recorded. Paragraph 5.8.19 of NPS EN-1 states ‘A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given’.	
Possible heritage benefits to offset harm: If preservation <i>in-situ</i> is not possible, consideration could be given to re-erecting The Control Tower in replica, perhaps near to the war memorial, where it could serve as an educational facility recording and commemorating the WWII history of the area.	



Original floor plan of The Control Tower, reproduced from Francis, 1993



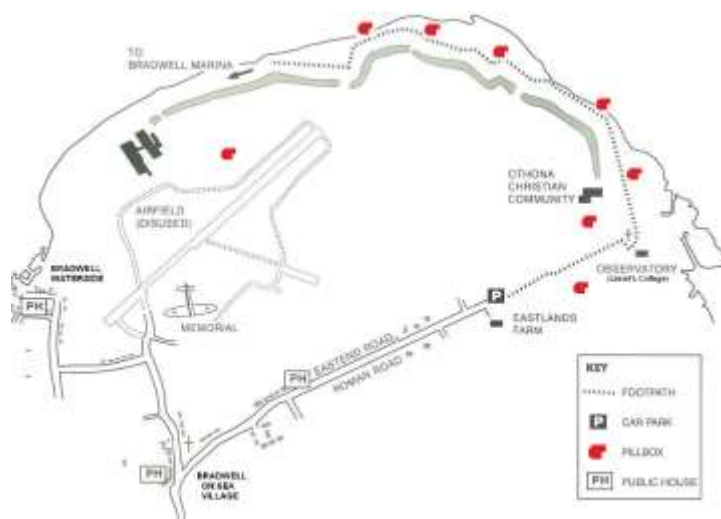
Photographs of the Bradwell Bay Station Headquarters from the west. Above taken 20th January 2020, below undated from the Kevin Bruce Archive

Address:	Bradwell-on-Sea, Weymarks Road, Bradwell Bay WWII Airfield, Station Headquarters
Heritage Status:	A non-designated heritage asset
Description: The Station HQ survives to the rear (south) of the Control Tower. It is a long single-storey building which appears to have been repurposed as a workshop.	
Summary of heritage significance: The Station HQ, along with the Control Tower and the four surviving Blister hangers are important to the history and heritage of Bradwell Bay airfield. Fred Nash has observed that “although they are all that remains of the 300+ buildings and structures that stood on the airfield they were, and are, of major significance in the hierarchy of airfield architecture” (Nash, 2010).	
Potential degree of harm to significance: It is proposed to demolish this building.	
The need for further information: The building should be subject to detailed research and investigation as soon as possible to achieve a full understanding of its significance.	
Possible mitigation measures: Efforts should be made to retain this building, if at all possible. If demolition is unavoidable the building must be properly recorded. Paragraph 5.8.19 of NPS EN-1 states ‘A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given’.	



Photograph showing three of the four blister hangars, taken 20th January 2020.

Address:	Bradwell-on-Sea, Weymarks Road, Bradwell Bay WWII Airfield, Blister hangars
Heritage Status:	Non-designated heritage assets
Description: During WWII there were twelve Blister hangars dispersed across the airfield, of which only four survive. They are each approximately 90 feet in span x 60 feet in length. Three of the hangars have a corrugated asbestos roof, while the fourth has a corrugated iron roof.	
Summary of heritage significance: The four surviving Blister hangars, along with the Control Tower and the Station HQ are important to the history and heritage of Bradwell Bay airfield. The military historian Fred Nash has observed that “although they are all that remains of the 300+ buildings and structures that stood on the airfield they were, and are, of major significance in the hierarchy of airfield architecture” (Nash, 2010).	
Potential degree of harm to significance: These buildings would be demolished.	
The need for further information: The hangars should be subject to detailed research and investigation as soon as possible to achieve a full understanding of their significance.	
Possible mitigation measures: Efforts should be made to retain this building, if at all possible. If demolition is unavoidable the building must be properly recorded. Paragraph 5.8.19 of NPS EN-1 states ‘A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given’.	



Left-hand photograph by Kevin Bruce of the pillbox at the gated entrance to the Othona Community, undated

Right-hand map showing approximate number and position of WWII pillboxes in Bradwell

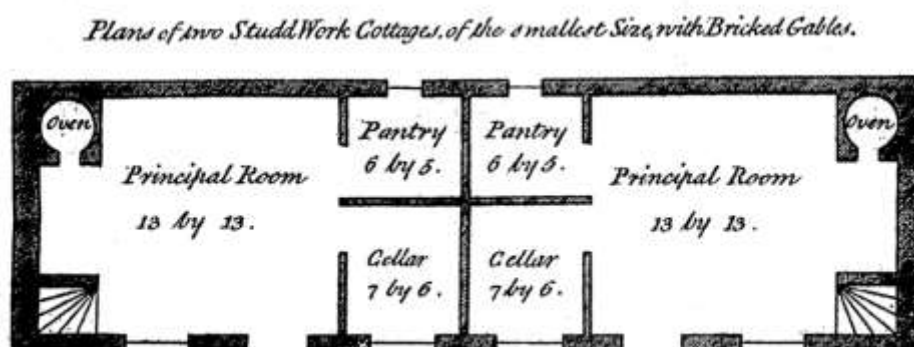
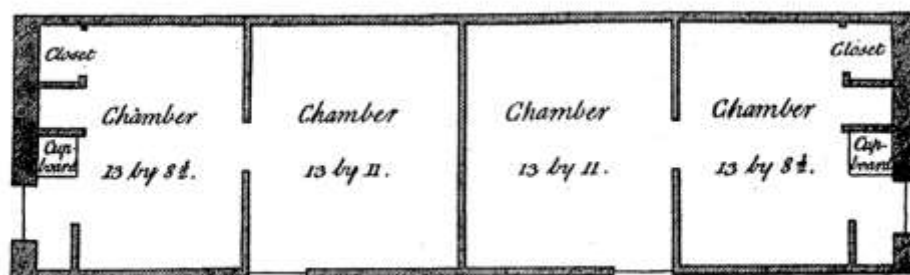
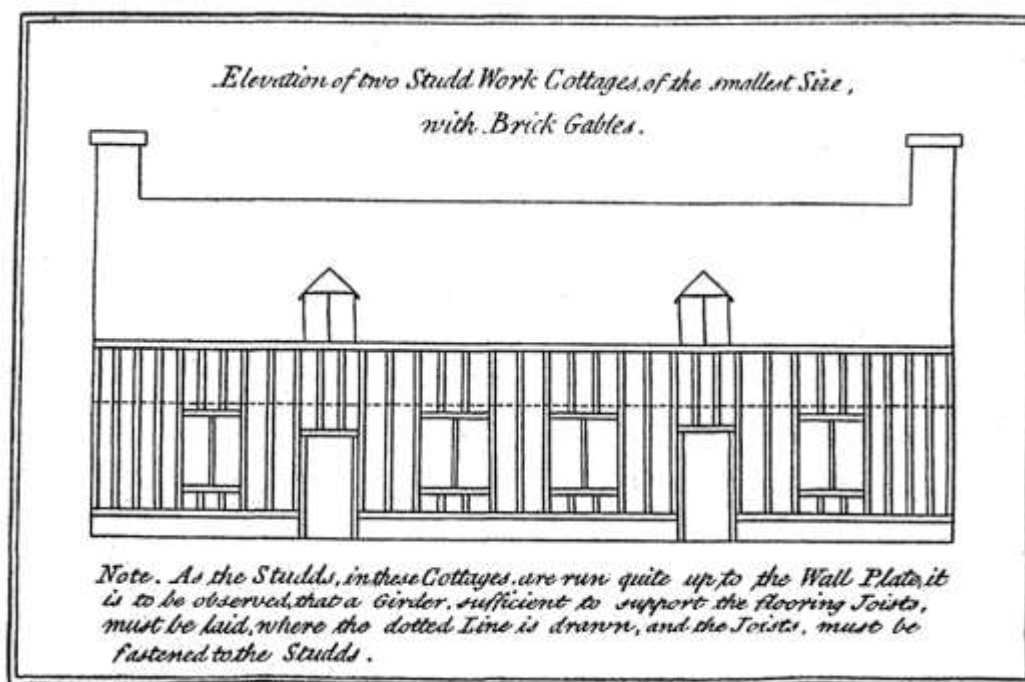
Address:	Bradwell-on-Sea, various pillboxes
Heritage Status:	Non-designated heritage assets
Description: Several WWII concrete pillboxes on the sea wall and in the vicinity of the sea wall.	
Summary of heritage significance: These little structures are potent reminders of the threat of invasion posed during World War II.	
Potential degree of harm to significance: The pillbox highlighted on the map above which is closest to Bradwell A would be lost. The proposed 'uplift of land levels' between East Hall Farm and St Peter's Chapel makes it likely that the pillbox at the gated entrance to the Othona Community may also be lost (para. 3.5.9).	
The need for further information: The precise number and distribution of pillboxes in and around the development site needs to be ascertained. Which pillboxes will be lost as part of the construction work?	



Left-hand photograph of Pear Tree Cottages, taken 20th January 2020 6161

Right-hand historic photograph, showing a man having his hair cut outside the right-hand cottage, reproduced with permission from Kevin Bruce

Address:	Bradwell-on-Sea, Weymarks Road, Pear Tree Cottages
Heritage Status:	A non-designated heritage asset
Description: This pair of late-Georgian cottages was built to house agricultural workers at Weymarks Farm. It was converted into a single dwelling in the 20 th century. The building is 1 ½ storeys in height with a clay-tiled gambrel roof. The roof sweeps down in 'cat-slide' form at the back over rear lean-tos.	
Summary of heritage significance: Apart from replacement windows, the cottages appear to be well preserved, but have not been the subject of an internal investigation. They are a good example of Georgian agricultural workers' cottages servicing an isolated farm. If it were not for the modern replacement windows, the cottages may have qualified for statutory listing.	
Potential degree of harm to significance: It is proposed to demolish this building.	
The need for further information: This building should be subject to detailed research and investigation as soon as possible to achieve a full understanding of its significance. Maldon District Council's Conservation and Heritage Specialist has particular expertise in relation to buildings of this type and could assist with the study and interpretation of the building (Howson, 2020). Careful, supervised exploratory opening-up inside the cottages, to expose original structure and features such as fireplaces would help gain a fuller understanding of the building's original design and later development.	
Possible mitigation measures / heritage benefits: If demolition is unavoidable, the building should be carefully recorded before and during demolition. Timber-framed structures are capable of being dismantled and re-erected more easily than any other type of construction. Consideration should be given to the re-erection of the cottages elsewhere, possible for use as educational facilities, to illustrate the living conditions of Georgian farm workers. There are many timber-framed buildings which have been salvaged and reused in this way to good effect at the Weald and Downland Museum and elsewhere.	



The above design for semi-detached cottages was published by Nathaniel Kent in 'Hints to Gentlemen of Landed Property' in 1775. They are of the same type as Pear Tree Cottages. Kent wrote that these cottages should contain 'a warm, comfortable, plain room for the inhabitants to eat their morsel in; an oven to bake their bread; a little receptacle for their small beer and provision, and two wholesome lodging apartments, one for the man and his wife, the other for his children'.



Left-hand photograph of Weymarks Farm, taken 20th January 2020

Right-hand photograph of Weymarks Farm in the 1970s, reproduced from the Kevin Bruce Archive

Address:	Bradwell-on-Sea, Weymarks Road, Weymarks Farm
Heritage Status:	None
Description: The earliest mention of Weymarks in documents is 1235 (O'Connor, 2006, p. 8). The present house is a timber-framed and rendered, two-storey farmhouse, with a slated roof. It would appear to date from the mid-19 th century. The house has been abandoned and is in a ruinous condition.	
Summary of heritage significance: The house has some moderate architectural interest as an example of a modest mid-19 th -century timber-framed farmhouse.	
Potential degree of harm to significance: The building will be demolished.	
Possible mitigation measures: It may be worthwhile recording the building during demolition.	



Photograph of Thatch Cottage, taken 30th August 2012

Address:	Latchingdon, Burnham Road, Thatch Cottage
Heritage Status:	A grade II listed building, designated in 1986
Description: Thatch Cottage was built in the 18th century on a slip of roadside waste. It is a timber-framed building of one storey with a habitable attic and a thatched roof. Parts of the timber-framed structure have been exposed externally, although originally the framing would have been covered. The house has been extended in the 20th century, in a complementary manner with a thatched roof.	
Summary of heritage significance: This is a good example of a humble labourer's dwelling retaining numerous period features of interest.	
Potential degree of harm to significance: The setting of Thatch Cottage could be affected by the proposed new road Route 2 which would run to the south of the listed building and merge with Burnham Road immediately to the east of it. The consequence of this is that the cottage would become flanked by two roads; the existing one to the north of it and a new one to the south.	
The need for further information: More information is needed on the precise alignment of Strategic Route 2 to assess the impact on this listed building.	



Left-hand photograph of London Hayes from the north taken by the RCHM in 1921

Right-hand photograph of London Hayes from the south-west taken in 1986 by John McCann, listing inspector

Address:	Latchingdon, Cold Norton Road, London Hayes
Heritage Status:	A grade II listed building, designated in 1953
<p>Description: This timber-framed and rendered house consists of a two-storey gabled cross-wing facing south and an 18th-century wing of one storey and attics. The two-storey cross-wing dates from the late-16th century and incorporates high-status original features, such as carved doorways, blocked moulded-mullion windows and close studding. What survives now is thought to be one part of a much larger house. The house is in an isolated position and this author has not had the opportunity to visit it.</p>	
<p>Summary of heritage significance: The significance of this house would appear to derive primarily to its age and high-status original architectural features. Its isolated location may be considered to form an important aspect of the way the building and its significance is experienced.</p>	
<p>Potential degree of harm to significance: The setting of London Hayes could be affected by the proposed new road Strategic Route 2, Western Section, Option 2, which would appear to run very close to it. The noise and visual impact associated with a new road could detract from the listed building's tranquil rural setting.</p>	
<p>The need for further information: More information on the precise position of the proposed road is needed to assess the impact on the setting of the listed building.</p>	
<p>Possible mitigation measures: The alignment of the proposed road could be drawn away from London Hayes to help reduce its impact.</p>	



Left-hand photograph taken of the Huntsman and Hounds around 1920 (Kevin Bruce Archive)



Right-hand photograph taken 30th April 2015

Address:	Latchingdon, Green Lane, The Huntsman and Hounds Public House
Heritage Status:	A grade II listed building, designated 18 th of November 1983
Description: A timber-framed and thatched pub dating from the 18 th century.	
Summary of heritage significance: A handsome example of Georgian vernacular architecture in a rural location.	
Potential degree of harm to significance: Green Lane forms part of the proposed Strategic Route 2 which, according to paragraph 4.7.57 of the Bradwell B consultation document, 'could be subject to targeted improvements and/or widening'. The noise and vibrations associated with a considerable increase in the level of HGV traffic, coupled with the loss of trees and hedges for road widening, could detract from the peaceful rural setting of this listed building. The level of harm would fall below the high threshold of 'substantial harm', and is likely to be limited bearing in mind that the pub is set back from the road. The degree of harm will depend upon the nature and design of the work.	
The need for further information: More detail is required on the design and detailing of the proposed roadworks in order to make an informed assessment. Specifically, which parts of Green Lane would be subject to widening, and what is the anticipated volume of HGV traffic?	



Photograph of Snoreham Hall from the east, taken 12th March 2020

Address:	Latchingdon, Rectory Lane, Snoreham Hall
Heritage Status:	A grade II listed building, designated in 1986
Description: A late-16 th -century timber-framed and rendered farmhouse.	
Summary of heritage significance: The significance of this listed building derives primarily for its 16th-century timber-framed structure which, according to the list description, survives large <i>in-tact</i> .	
Potential degree of harm to significance: The setting of Snoreham Hall could be affected by the proposed new road Route 2, Western Section Option 2, which would traverse the field to the south of it. The noise and visual impact associated with a new road could detract from the listed building's tranquil rural setting.	
The need for further information: More information on the precise position of the proposed road is needed to make an informed assessment of its likely impact on the setting of this listed building.	



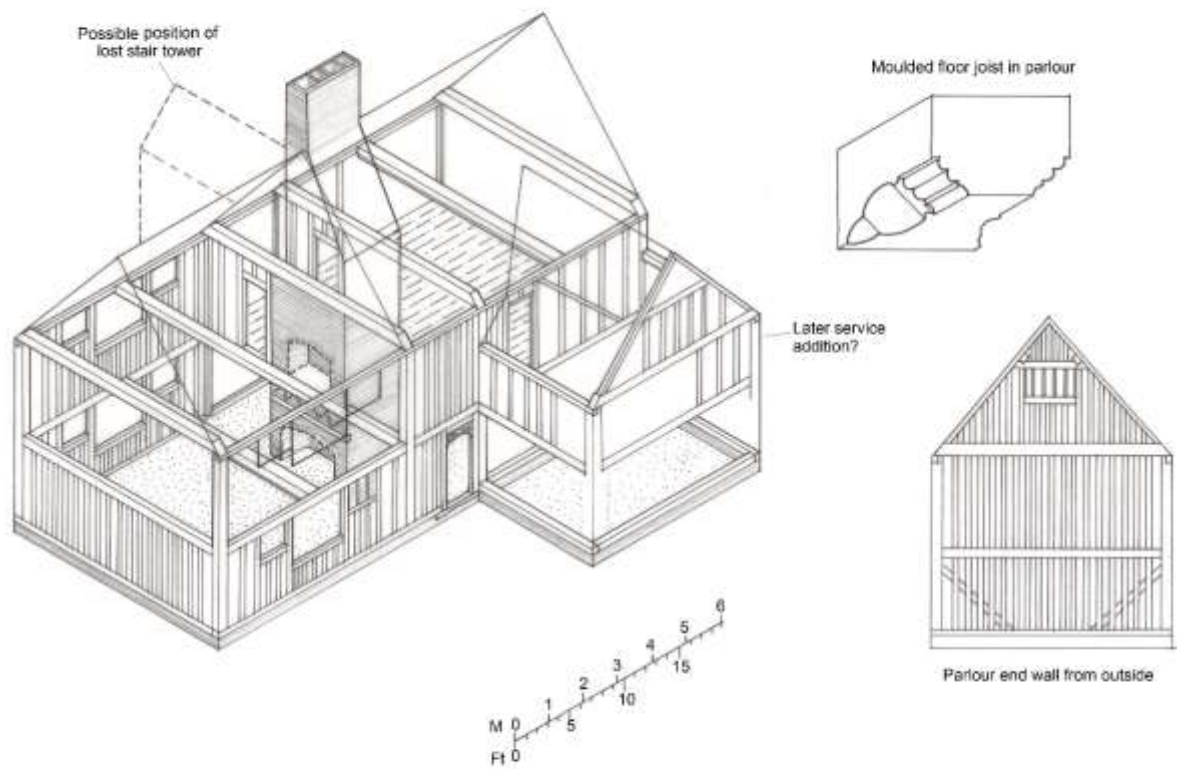
Photograph of Gallants from the south, taken 16th November 2010

Address:	St Lawrence, Southminster Road, Gallants
Heritage Status:	Grade II listed, designated 5 th of August 1986
Description: This is a mid-18th-century cottage. It is timber framed and weatherboarded with a half-hipped gambrel roof clad in clay tiles.	
Summary of heritage significance: Gallants is a well-preserved example of a vernacular Georgian cottage. It derives some significance from its tranquil rural setting beside a quiet country lane.	
Potential degree of harm to significance: The noise and visual impact associated with a new road could detract from the listed building's tranquil rural setting.	
The need for further information: More information on the precise position of the proposed road is needed to make an informed assessment of its likely impact on the setting of this listed building.	



Photograph of Moynes taken 20th July 2013

Address:	St Lawrence, Southminster Road, Moynes Farmhouse
Heritage Status:	Grade II listed, designated 10 th of January 1953
<p>Description: This is a late-16th-century timber-framed and weatherboarded farmhouse occupying a moated site in an isolated location. It retains an original chimney stack and a high-status timber-framed structure, including a heavily moulded ceiling joist, moulded-mullion windows, an original carved doorway and carved panelling bearing the date 1595 which is plausibly the date of the present building</p>	
<p>Summary of heritage significance: The significance of this house would appear to derive primarily to its age and high-quality original architectural features. Its isolated and tranquil rural location, accessed via a private track, is an important aspect of the way the building and its significance is experienced.</p>	
<p>Potential degree of harm to significance: The setting of Moynes Farmhouse would potentially be affected by the proposed new road Route 2, Options 2 and 3. The noise and visual impact associated with a new road may detract from the listed building's tranquil rural setting.</p>	
<p>The need for further information: More information on the precise position of the proposed road is needed to assess the impact on the setting of the listed building.</p>	



Interpretive drawings of Moyne by Tim Howson, 2013.



Photograph of 'Barn approximately 50 metres east of Moynes Farmhouse' taken from the south-west on the 29th of June 2006 © IoE Mr Reginald Clark

Address:	St Lawrence, Southminster Road, 'Barn approximately 50 metres east of Moynes Farmhouse'
Heritage Status:	Grade II listed, designated 20 th December 1983
Description: An early-19th-century timber-framed and weatherboarded threshing barn converted to residential use in the late-20th century.	
Summary of heritage significance: This threshing barn was most likely built in response to the embargoes imposed on the importation of grain during the period of hostilities from 1799 1815; a situation which caused grain prices to soar, countless grain-processing barns to be erected. It is a reasonable example of this type and age of barn. It shares group value with Moynes Farmhouse. It derives some significance from its landscape setting, within the farmland it was intended to serve.	
Potential degree of harm to significance: The setting of this listed building would potentially be affected by the proposed new road Route 2, Options 2 and 3. The noise and visual impact associated with a new road may detract from the listed building's tranquil rural setting.	
The need for further information: More information on the precise position of the proposed road is needed to assess the impact on the setting of the listed building.	



Photograph of Lower Farmhouse taken from the north-west on the 12th March 2013

Address:	Steeple, Maldon Road, Lower Farmhouse
Heritage Status:	Grade II listed, designated 5 th August 1986
Description: A pair of two-storey, timber-framed and weatherboarded cottages, probably dating from the 18th century. The cottages were converted into a single dwelling in the 20th century. According to the list description the building is 'virtually unaltered' internally.	
Summary of heritage significance: The significance of this listed building derives primarily from the fact it is a particularly well-preserved pair of cottages.	
Potential degree of harm to significance: The proposed road works will potentially result a fourway junction in the immediate vicinity of Lower Farmhouse between Strategic Route 1, the bypass to the south of Steeple, and Strategic Route 2 Eastern Option 1. The noise and visual impact associated with a new road has the potential to cause harm to the listed building's setting.	
The need for further information: More information on the precise positions of the proposed road is needed to assess the impact on the setting of the listed building.	



Photograph of Thatched Cottage taken 13th November 2001

Address:	Steeple, The Street, Thatched Cottage
Heritage Status:	Grade II listed, designated 5 th August 1986
Description: This single-storey, timber-framed and rendered, thatched cottage, was built as a pair of houses in the 18th or early-19th century on a slip of roadside waste, and was converted to a single dwelling in the 20th century.	
Summary of heritage significance: This is a well preserved and picturesque roadside cottage.	
Potential degree of harm to significance: Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume or HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced.	



Photograph of Church of St Lawrence and All Saints, taken 24th October 2010

Address:	Steeple, The Street, Church of St Lawrence and All Saints
Heritage Status:	Grade II listed, designated 5 th August 1986
Description: a parish church built in 1884 to designs by F. Chancellor, re-using some materials from demolished old church.	
Summary of heritage significance: A fine Victorian parish church and a highly attractive feature in the street-scene.	
Potential degree of harm to significance: Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume of HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced.	



Left-hand historic photograph from the Kevin Bruce Archive

Right-hand photograph of Anchor Cottage, Sun Cottage and The Bakery, taken 6th July 2011

Address:	Steeple, The Street, Anchor Cottage, Sun Cottage and The Bakery
Heritage Status:	Grade II listed, designated 5 th August 1986
Description: Georgian cottages developed on roadside strips that were waste of the manor	
Summary of heritage significance: Fine examples of Georgian vernacular architecture making a very positive contribution to the character of the streetscene	
Potential degree of harm to significance: Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume of HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced.	



Ash Cottage in August 2009, image from Google Streetview

Address:	Steeple, The Street, Ash Cottage
Heritage Status:	Grade II listed, designated 5 th August 1986
Description: A Victorian timber-framed and weatherboarded cottage	
Summary of heritage significance: An attractive Victorian weatherboarded cottage and a positive feature in the street-scene.	
Potential degree of harm to significance: Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume of HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced.	



Photograph of Pump House and Adjoining Cottages, taken 9th of July 2010

Address:	Steeple, The Street, Pump House and Adjoining Cottages
Heritage Status:	Grade II listed, designated 5 th August 1986
Description: A Victorian row of three timber framed and weatherboarded houses; one of two storeys and the other two single-storeyed.	
Summary of heritage significance: An attractive example of a row of Victorian weatherboarded cottages and a positive feature in the street-scene	
Potential degree of harm to significance: Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume of HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced.	



Photograph of Steeple Stores featured on the Rightmove website in 2017

Address:	Steeple, The Street, Steeple Stores
Heritage Status:	Grade II listed, designated 5 th August 1986
Description: A row of three Georgian timber-framed and weatherboarded 1 ½ storey cottages with a clay-tiled gambrel roof.	
Summary of heritage significance: A good example of Georgian vernacular architecture and a positive feature in the street-scene.	
Potential degree of harm to significance: Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume of HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced.	



Rosedene and other nearby grade II listed houses, image from Google Streetview March 2009

Address:	Steeple, The Street, Rosedene, Mizzens Cottage, The Cottage, and Hipseys Cottage
Heritage Status:	All individually grade II listed, designated 5th August 1986
Description: These are all cottages developed close to the edge of the road between the mid-18th century to the mid-19th century.	
Summary of heritage significance: These are a fine group of vernacular cottages	
Potential degree of harm to significance: Unless a bypass is built, The Street would become part of Strategic Route 1, resulting in a huge increase in the volume or HGV traffic. The intensification in the use of this road, and the consequent increase in noise and vibration levels, will affect the setting of this listed building how it is experienced. The road is very narrow and there is no capacity for road widening because there are listed buildings either side	



Photograph of High House Farmhouse taken from the east on the 18th of April 2018

Address:	Tillingham, Southminster Road, High House Farmhouse
Heritage Status:	Grade II listed, designated 5 th of August 1986
Description: An 18th century 1 ½ storey brick house with a clay-tiled gambrel roof.	
Summary of heritage significance: A particularly handsome example of a vernacular Georgian house. The listed house shares 'group value' with the three separately listed historic agricultural buildings to the south of it. The isolated location of the house, surrounded by large arable fields, is an important aspect of its setting and the way it is experienced.	
Potential degree of harm to significance: The setting of High House Farmhouse would potentially be affected by the proposed new road Route 2, Option 3, which would pass through fields to the west of it. The new road would be prominent in views of and from this listed building.	
The need for further information: More information on the precise route of the proposed road is need to assess its impact on the setting of this listed building.	



Photograph taken 18th of April 2020 looking through western first-floor window of High House Farmhouse towards the proposed new road

4. Conclusions and recommendations

- 4.1 This Built-Heritage Impact Assessment has identified over fifty historic buildings, along with the Bradwell-on-Sea conservation area, potentially affected by the proposals for a new power station at Bradwell-on-Sea. No attempt has been made to assess which historic buildings might be affected by the planned park-and-ride and freight-management facilities since the 'search areas' indicated in the consultation document are so wide, containing very many listed buildings.
- 4.2 The information contained in the stage one consultation document is quite limited in certain respects, meaning that the true impact on many of the historic building is difficult to gauge. As more information emerges, it will be possible to make more meaningful assessments. Clarification on the precise position of new roads and road-widening measures, for example, would help enable a clearer understanding of the potential impact on many of the historic buildings in this report. Throughout this report recommendations have been made for the preparation of photographic mock-ups of key views, which may prove a useful tool in assessing the impact on particular buildings.
- 4.3 There are several historic buildings on the development site which would be demolished; namely Pear Tree Cottages (p.61), The Control Tower (p.56), the Station Headquarters (p.58), the four blister hangars (59) and probably two pillboxes (60). Although not nationally listed, these structures qualify as non-designated heritage assets because of their local architectural and historic interest. These buildings should be subject to detailed research and investigation as soon as possible to achieve a full understanding of their significance.
- 4.4 There is considerable cause for concern about the impact of the development upon the setting of St Peter's Chapel, arguably the most important historic building in the Maldon District, and certainly the oldest by many centuries (p.21). The proposed power station will inevitably be much more prominently visible from St Peter's Chapel than Bradwell A because of its closer proximity to the grade I listed building and its much greater scale. The proposal to store millions of cubic metres of soil / spoil on land close to the chapel during the construction of the power station, and to then use that soil for ground remodelling, could radically alter the chapel's landscape setting. It is important to remember that this soil storage and ground remodelling would take place on land beyond the south-eastern boundary of the site originally allocated for a new nuclear power station. The map of Bradwell supporting the strategic site assessment – featured on p. 246 of National Policy Statement for Nuclear Power Generation (EN-6) – shows the allocated land not extending south of

Weymarks River or Curds Grove. In summarising the conclusions of the 'Appraisal of Sustainability' concerning the potential 'cultural heritage' impact of a power station at this location, it was stated that 'the effects on the setting of Othona Roman fort and St. Peter's Chapel would be of exceptional significance if development occurs on the eastern side of the site' (para. C.2.92, Annex C to NPS (EN-6)). The current proposal for substantial earthworks beyond the south-eastern boundary of the original site allocation, so close to the scheduled shore fort and grade I listed Saxon chapel, would seem to conflict with the conclusions of the strategic site assessment.

- 4.5 The power station and the suggested earthworks are also expected to have a major impact upon the group of four grade II listed buildings at East Hall Farm (p.24). The introduction of a road through the garden of Bluehouse Cottage would be severely detrimental to the setting of this grade II listed building, and the position or need for this road should be re-evaluated (p.43).
- 4.6 The proposed workers accommodation could have a dramatic effect upon the settings of grade II listed building to the west of the site; particularly Timbercot (p.17), The Old Cottage (p.54), Trusses (p.49) and Truscott (p.47). It may also impact the setting of Peakes (p.19) and Woodyards (p.52), which are non-designated heritage assets. While the harm caused by caravans and accommodation blocks would be temporary, limited to the duration of the construction phase, this is estimated to last between 9 and 12 years which is a significant period of time.
- 4.7 Many of the historic houses identified in this report are built close to the edge of the road, reflecting their development on narrow roadside strips of land. Their close proximity to the road means they are vulnerable to the noise and vibration that would be generated by the increased volume of HGV traffic, something that would affect the way these buildings are experienced and appreciated. In some instances, it may be possible to realign the road away from the front of the listed building, but that is not practical in every case. Along certain parts of The Street, Steeple, there are listed cottages directly opposite one another, either side of a narrow road, making any road widening impossible (p.79). A bypass around Steeple would therefore be vital to avoid unacceptable harm to several listed buildings.
- 4.9 One of the stated aims of the Bradwell B Project is to '[a]void significant adverse environmental effects from the Bradwell B Project where practicable, and where these are unavoidable, work to mitigate or compensate them. We are also looking for opportunities to provide enhancement where possible'. It is stated that '[w]e will also consider measures to enhance the setting of the RAF

Bradwell Bay War Memorial to deliver a heritage legacy benefit from the Project' (paragraph 3.10.12). The Bradwell B project will inevitably result in notable loss of and harm to local heritage, in conflict with the requirements of section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, section 16 of the NPPF, section 5.8 of the NPS (EN-1) and policy D3 of the Maldon Local Development Plan. How might this harm be compensated, and what might the 'heritage legacy benefit', referred to in the consultation document, actually consist of (besides some landscaping around the 1990s war memorial)?

- 4.10 Two of the buildings facing demolition – The Control Tower (p.56) and Pear Tree Cottages (p.61) – are of particular architectural and historic interest and might merit being carefully dismantled and re-erected, possibly in the vicinity of the modern war memorial. A fund could be established for the repair / enhancement of listed buildings in and around Bradwell-on-Sea. Dilapidated and redundant listed buildings on the Maldon District Heritage at Risk Register could be targeted for funding to secure their repair and sensitive reuse - https://www.maldon.gov.uk/info/20049/heritage_and_conservation/9673/heritage_at_risk_register .
- 4.11 No discussions were held with the Local Planning Authority in relation to listing buildings or conservation areas in advance of the Stage 1 Consultation. The developer should engage with Maldon District Council alongside Essex County Council and Historic England at an early stage to ensure that the historic environment is fully assessed as part of a wider baseline and impact-assessment prior to the formation of firm proposals for the main site and associated development.

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APPENDIX 2: BRB Stage 1 Consultation Main Document Questions

	Main Development Site
	<i>We believe that these are the key environmental considerations that should be taken into account as we develop our proposals for the Bradwell B Project but we would like to know if you agree with this interpretation and if there are any other matters we should consider. [Page 43]</i>
	Response:
	The main environmental context of the main site listed in paragraph 3.2.1 would benefit from explicitly including a reference to local residents and communities rather than incorporating comment under other headings. Broadly however the headings highlight the key environmental considerations that need to inform the contextual analysis of the site. At this early stage of consultation there is an absence of evidence and supporting information to enable the Councils to provide detailed comment. It is acknowledged that BRB will be undertaking detailed assessments in due course and a formal Environmental Assessment will be prepared. The Councils will welcome engagement with BRB as detailed baseline assessments for the main site are prepared.
	<i>Safety, efficiency and other technical considerations will inform the preferred proposal for key elements of the main development site masterplan and therefore there is limited ability for these choices to be influenced by consultation. However, we are interested in your views on our initial design process and the emerging design principles that we will use to determine the location and design of these components. [Page 51]</i>
	Response:
	The Stage 1 Consultation provides inadequate information for the Councils to provide comment on BRB's initial design process. It is considered that BRB's emerging design proposals need further refinement in both how the design principles are address together with a method establishing how these will be measured and improved through development. The Councils ask that the design approach be informed by the National Infrastructure Commission design principles.
	<i>We are interested in your views on the information that has informed our understanding of the main development site and the local area, which is shaping our current thinking. [Page 65]</i>
	Response:
	At this early stage of consultation there is an absence of evidence and supporting information to enable the Councils to provide detailed comment. It is acknowledged that BRB will be undertaking detailed assessments in due course and this will provide a firmer basis for design decisions. The Councils will welcome engagement with BRB as detailed baseline assessments for the main site are prepared.
	<i>We welcome your feedback on the design principles described above and if there are any other matters that we should consider. [Page 75]</i>
	Response:
	It is considered that BRB's emerging design proposals need further refinement in both how the design principles are address together with a method establishing how these will be measured and improved through development. The Councils ask that the design approach be informed by the National Infrastructure Commission design principles.

2	Transport
	<i>We welcome your feedback on the six search areas described above and invite suggestions for sites within or around them that meet the functional and operational requirements for the park and ride facilities. [Page 103]</i>
	Response:
	<p>The Councils consider a well-developed transport strategy covering all aspects of the movement of both people and goods to be essential for the management of the project. Once the strategy has been developed it can provide the framework necessary for further assessment of more specific transport options and define modelling requirements necessary to inform the selection of suitably located P&R sites including design, capacity and constraints on the highway network.</p> <p>Moving forward, there will be a need to consider how bus services will serve the Bradwell B site from the surrounding settlements as well as from Park and Ride sites, involving early approaches to bus companies who are best situated to provide these new services. Services should be up and running for the construction phase to transport construction workers from accommodation to the construction site. Bus stop locations will need to be identified on the basis of need and this could be part of the development of the Strategic Route development work.</p> <p>The six broad search areas are largely located beyond defined settlements and are subject to policies of development restraint. The planning justification for the development would therefore need to be evidence based and at the Stage 1 Consultation does not provide adequate information for detailed comments to be made at this stage.</p> <p>Detailed assessments of potential sites' environmental constraints will also need to inform the selection of sites. The Councils will welcome engagement with BRB as detailed baseline assessments for the Associated Development sites are prepared.</p>
	<i>We would welcome your views on whether we have identified the right search areas for Freight Management Facilities and invite suggestions for sites within or around them that meet the characteristics described above. [Page 107]</i>
	Response:
	<p>The Councils consider a well-developed transport strategy covering all aspects of the movement of both people and goods to be essential for the management of the project. Once the strategy has been developed it can provide the framework necessary for further assessment of more specific transport options and define modelling requirements necessary to inform the selection of suitably located freight management facilities including design, capacity and constraints on the highway network.</p> <p>The three broad search areas for Freight Management Facilities are also located beyond defined settlements and are subject to policies of development restraint. The planning justification for the development would therefore need to be evidence based and at the Stage 1 Consultation does not provide adequate information for detailed comments to be made at this stage.</p> <p>Detailed assessments of sites' environmental constraints will also need to inform the selection of sites. The Councils will welcome engagement with BRB as detailed baseline assessments for the Associated Development sites are prepared.</p>

	<i>Do you have views on the proposed options for intervention along strategic route 1 in the western section described above. In particular do you have any views on the option to bypass Latchingdon as an alternative to upgrading/improving the existing road through the village? [Page 115]</i>
	<i>Do you have views on the proposed options for intervention along Strategic Route 1 in the eastern section described above. In particular do you have any views on the option to bypass Mayland and Steeple as an alternative to upgrading/improving the existing road through the villages, and in the case of Steeple potentially delivering localised highway realignment? [Page 116]</i>
	<i>Do you have any views on the proposed options for intervention along Strategic Route 1 in the Bradwell section described above? [Page 118]</i>
	<i>Do you have any views on the proposed options for intervention along Strategic Route 2 in the western section described above? In particular we would welcome your views on the options presented as alternatives to use of the existing improved/ upgraded road? [Page 119]</i>
	<i>Do you have any views on the proposed options for intervention along Strategic Route 2 in the eastern section described above? In particular we would welcome your views comparing the three off-line new road options (Eastern Section Options 1-3) that connect back into Route 1 at Maldon Road or ways in which they could be improved. [Page 122]</i>
	Response:
	<p>The Stage 1 Consultation does not provide sufficient information for detailed comments to be made at this stage.</p> <p>The Councils consider a well-developed transport strategy covering all aspects of the movement of both people and goods to be essential for the management of the project. Once the strategy has been developed it can provide the framework necessary for further assessment of more specific transport options including highway traffic modelling to inform the route selection and suitability of highway proposals. The potential advantages and disadvantages of bypasses and other highway interventions will need to be assessed in detail once sufficient information is available. Whilst the well-developed integrated transport strategy must come first, MDC supports in principle highway proposals based upon the Strategic Route 1 (Blue route) within the Maldon District, including consideration of the proposed bypasses.</p> <p>Once the Strategic Route(s) have been identified, the opportunity to develop facilities for sustainable modes of transport must be taken in order that the routes are as attractive to alternative transport, particularly to cycles and bus use. Any bus stops must be fully accessible and provide in some cases interchange facilities where cyclists in particular can leave their cycles securely parked and use the buses serving that particular stop. There must be the facility somewhere on these routes to provide electric vehicle charging points to give potential users the confidence to use electric vehicles.</p> <p>The Councils will welcome discussions going forward to ensure a beneficial legacy for the area.</p>
	Jobs and People
	<i>Do you have any views on our selection principles for Project- provided accommodation? Is there anything else that you think should be considered? [Page 132]</i>
	Response:
	The environmental considerations identified for the comparison of the sites proposals are only broadly described and will need to be supported by detailed evidence and assessment. The magnitude and significance of any constraint could then be assessed to inform the relative

	advantages and disadvantages of the shortlisted sites. The Councils will welcome detailed discussions on the location of project provided accommodation going forward.
	<i>We would welcome your views on whether we have identified the right search area and potential sites for a temporary workforce campus or whether improvements to these could be made. [Page 134]</i>
	Response:
	The functional benefits of having a temporary workforce campus close to the construction site is recognised but at this early stage there has not been sufficient environmental information provided to enable detailed comment on the suitability of the search areas identified. The Councils will welcome detailed discussions going forward.
	<i>We would welcome your views on the two scenarios and the zoning diagram that have been presented and whether improvements to these arrangements could be made. [Page 137]</i>
	Response:
	The Councils consider that further environmental information is required to ascertain the suitability of the sites before detailed comments are provided on the two scenarios presented in the Stage 1 Consultation. The Councils will welcome detailed discussions going forward.

AGENDA ITEM 5

Report title: Coronavirus Outbreak – Phased Reopening of Libraries		PSEG/06/20
Report to: Place Services and Economic Growth Policy and Scrutiny Committee		
Report author: Juliet Pirez, Head of Libraries		
Date: 25/06/20		For: Discussion
Enquiries to: Juliet.pirez@essex.gov.uk		
County Divisions affected: All Essex		

1. Purpose of Report

- 1.1 To update the Committee on the safe reopening of Essex Libraries

2. Background

- 2.1 A draft CMA is appended (Appendix A) outlining proposals for a phased reopening of Essex Libraries.

3. Session Aims

- 3.1 Members are asked to discuss the draft CMA, providing feedback and recommendations.

4. List of Appendices

- 4.1 Appendix A: Draft CMA: Coronavirus Outbreak – Phased Reopening of Libraries

Forward Plan reference number: Not applicable

Report title: Coronavirus Outbreak – Phased Reopening of Libraries	
Report to: Councillor Susan Barker – Cabinet Member for Customer, Corporate, Culture and Communities	
Report author: Suzanna Shaw, Director of Customer Services	
Date:	For: Decision
Enquiries to Juliet Pirez, Head of Libraries – juliet.pirez@essex.gov.uk	
County Divisions affected: All Essex	

1. Purpose of Report

- 1.1 Following the Coronavirus outbreak, and in line with Government advice, all Essex Libraries have been closed since 21 March 2020.
- 1.2 Step 3 of the Government’s “Our plan to rebuild: The UK Government’s COVID-19 recovery strategy”, allows some of the remaining businesses and premises that have been required to close during the crisis, to reopen from 4 July 2020. This includes public libraries.

In order to be able to fully prepare and plan for the reopening of libraries, the service is, therefore, planning to reopen libraries from the week beginning Monday 6th July.

- 1.3 This report asks the Cabinet Member to consider a phased reopening of Essex Library service, spanning from Monday 6th July to 3rd August 2020 so that the service can take a careful and considered approach to the reopening of libraries and;
 - ensure that social distancing measures are in place and continue to be appropriately managed. All staff will need to follow the PHE guidance, in line with other ECC departments, and ensure they are practising good hand hygiene and social distancing to minimising the risk of infection.
 - ensure the service stays in line with Corporate and Government guidance, and supports key public health messages
 - is ready to support the registration service by prioritising the opening of the 16 libraries that have registration offices within them
 - is adaptable and flexible as the situation may continue to change,
 - support our customers by communicating facts to them clearly and effectively
 - ensure that the appropriate Health and safety measures are in place to protect the health of staff and the wider population.
 - work with HR and trade unions to ensure that appropriate actions are taken to address any concerns about staff safety and wellbeing, and
 - enable as many staff as possible to work partly from home, eg if they are in a role where this is possible, subject to a requirement to provide visible leadership

2. Recommendations

- 2.1 That the Director of Customer Services be authorised to reopen 60 libraries controlled by Essex County Council in phased tranches 1-2 on Monday 6th July and Monday 20th July 2020 in accordance with the table below.

Tranche 1	Tranche 2	Tranche 3a	Tranche 3b
w/c 6 July	w/c 20 July	w/c 3 August (subject to review)	To be reviewed
16 libraries	44 libraries	6 libraries	8 libraries

- 2.2 That the 16 libraries (**appendix one**) that house the registration offices are the first tranche of libraries to reopen on 6 July 2020.
- 2.3 That a further 44 libraries (tranche 2) open week beginning 20 July 2020 (**appendix two**)
- 2.4 That the final remaining 14 libraries (tranches 3a and 3b) are regularly reviewed, in line with Government guidance, in order to assess the feasibility of reopening them if social distancing measures are relaxed or we can find a way considered safe to reopen them after considering government guidance and taking necessary advice.
- 2.5 That the Director, Customer be authorised to reopen libraries in tranche 3a during the week beginning 3 August 2020 or so soon thereafter as this may be possible, given that these sites are more than three miles from other libraries (**appendix three**).
- 2.6 That the Director, Customer be authorised to reopen libraries in tranche 3b as soon as possible (**appendix three**).
- 2.7 That all libraries will close no later than 5pm.
- 2.8 Authorise the Director, Customer to, at any time during the next six months, take any action to:
- Extend opening hours of any library where this is considered safe to do so.
 - Temporarily close some or all libraries where it is considered necessary to do so in order to avoid a risk of spread of coronavirus or comply with government advice.
 - Re-open any library which has been temporarily closed.
- 2.9 Agree that the principles in the Recovering Libraries Plan (**appendix five**) be approved as an initial guidance, recognising that the situation is likely to change frequently and rapidly, meaning that it is likely to become out of date very soon.

3. Summary of issue

- 3.1 In March 2020 the Coronavirus Act 2020 was enacted. That included extensive powers to enforce to ban events and gatherings and close premises. In addition, on 23 March 2020 the Government advised that all libraries should close. In Essex the Cabinet Member decided to close all libraries from Friday 20 March 2020.
- 3.2 The Council is under a statutory duty to provide a library service. Closing libraries during the Coronavirus Pandemic has meant that communities have been temporarily deprived of a valuable local resource, and, whilst online resources have proven to be extremely popular, and demand for electronic publications has outstripped supply in some cases, it is important that we move to reopening our libraries as soon as possible. Reopening our libraries in a safe and controlled way will be welcomed by many residents of Essex.

3.3 Nationally, public libraries are working together using support and advice co-ordinated through Libraries Connected (**appendix six**) Most authorities are now planning to re-open libraries, taking a phased approach to opening sites and the services that will be on offer. For example:

- Newcastle are opening their fourteen community libraries and hubs in July
- Oxfordshire is likely to reopen between thirteen and forty-four libraries in their first tranche.
- Surrey are also opening libraries in tranches and have created a priority list of reopening branches.
- Kent County Council, which has ninety-nine libraries is also taking a phased approach to libraries with a limited number reopening at first, potentially one library per district
- Hertfordshire are currently scoping offering a limited service only and risk assessing other services provided by their libraries

3.7 A plan has been produced (**appendix six**) which gives the currently recommended approach for reopening libraries. It should be recognised that the position is subject to change.

4. Reopening Libraries Recovery Plan

4.1 Accordingly, the Cabinet member is asked to consider reopening Essex libraries according to the Libraries Recovery Plan. (**appendix six**). Please also see summary below.



4.2 The Libraries Recovery plan recommends that 60 libraries are opened over a phased reopening period between the week beginning 6 July 2020 and the week beginning 20th July 2020. This will ensure that the service can adequately prepare libraries and resolve any issues that become apparent, such as social distancing measures, extra precautions or working processes. The following approach has been taken:

Tranche 1 – key sites from which registration services are delivered. (**appendix one**)

Tranche 2 – all libraries apart from the 14 smallest/where difficulties have been identified. (**appendix two**)

Tranche 3a – all other libraries which are more than 3 miles from any other library (**appendix three**)

Tranche 3b – all other libraries (**appendix three**)

- 4.3 The planned phased reopening assumes that minimum staffing availability will be available. This should improve as redeployed staff return to the service, social distancing measures relax, children return to school, etc.
- 4.4 A phased reopening will ensure both staff and customers are aware of the level of service restrictions that will need to be implemented in each library until social distancing measures set by the government can be relaxed.
- 4.5 The level of service that can be offered in line with social distancing measures will mean only a very limited level of service will be provided i.e. returns, borrowing, limited browsing, and the registration services which will be available in the 16 libraries when face to face appointments are allowed again.
- Fundamental parts of what would normally be considered part of the 'core offer' for the service will not be available, i.e. a place to meet, sit, study and read, group events and activities, access to public computers.
 - E resources, such as ebooks, and e audio books will continue to be available for customers to borrow whilst physical visits to libraries are restricted
 - Other services provided will also not be possible – eg recycling bags, booksales
 - The service offer will be proportionate to the number of staff who can safely be on duty to provide that service as well as the number of customers who can be present in the library at any one time
 - There will be a higher dependency on the self-service facilities – for items that are borrowed and returned, cash transactions, etc.
- 4.6 It is proposed that all libraries close no later than 5pm in order to:
- protect core opening hours between 9 to 5pm
 - maintain adequate staffing levels at each library that is open; and
 - avoid the need for staff to use public transport late at night
- 4.7 Other services, such as the mobile library service and the home library service will be regularly reviewed in order to assess how soon we can reopen them, in accordance with government guidance and after taking necessary advice.

5. Other Options

- 5.1 **Leave libraries closed.** If we do this then, the community will continue to be deprived of a resource and there may be an increase in social isolation. We are also paying staff 100% of their salaries, the majority of whom can work, but are at home.
- 5.2 **Open as many libraries as possible from week beginning 6 July** - this is possible but may be a slightly more risky approach than a phased reopening, mainly due to uncertain staffing levels at the beginning of July when we plan to reopen libraries (eg staff who may still have childcare issues, who have underlying health issues, booked annual leave, sickness, etc). It would also reduce the ability to learn from our experiences with the initial openings.

6. Issues for consideration

- 53 FTE members of staff have been redeployed to other areas such as Community Shielding, the Registration service, and Essex Welfare Service, and they will need to be recalled
- 54 FTE members of staff are currently unable to work due to childcare issues underlying health conditions, living with a vulnerable person, etc
- Most libraries in tranches 3a and 3b are quite small which makes social distancing measures difficult to comply with. Two of the fourteen libraries are based in shared locations, eg a school and a college, which makes opening the library separately difficult to manage. All libraries in these tranches all generally have less usage than other libraries nearby, and some are in areas where staffing shortages are currently particularly acute due to the number of staff unavailable to return to work due to self-isolating restrictions. It is, however, likely that staffing issues will improve over the next few weeks.
- We need to liaise with our partners and organisations who lease space in our libraries to inform them that we are reopening and to assess their plans to return to their libraries.

7 Financial implications

- 7.1 Seven library staff have been furloughed since 20 March whilst libraries have been closed, however they have been brought back off furlough on 5 June. Therefore the reopening of libraries will not have an impact on any government funding related to the furlough scheme.
- 7.2 Should all the staff who have been re-deployed to other critical areas be required back to support libraries there may be an impact on those services, who may need to identify alternative staff if the work is still required.
- 7.3 As a result of the amended service offer it is not anticipated that the reopening of libraries will result in income generating activities re-commencing for some time. The impact of this will be a pressure on the budget of approximately £80,000 per month (due to no adhoc room hire, fines amnesty continuing, no refreshments etc). This pressure will be funded from the emergency funding issued to local authorities to support the response to the Coronavirus pandemic if there is sufficient available, if not other mitigations will have to be sought.

8 Legal implications

- 8.1 The Council also has a statutory duty to provide a comprehensive and efficient library service. However, that does not amount to an overriding duty to keep all libraries open at all time and we need to ensure that the service is restarted in a safe way.
- 8.2 At present a visit the library is not a lawful reason for leaving the home and the Council would be well advised not to reopen any libraries unless this changes. It is noted that this may well change by 4 July, but the situation will need to be kept under review, and it may not be possible to re-open libraries in accordance with the proposal.

9. Equality and Diversity implications

- 9.1 The Public Sector Equality Duty applies to the Council when it makes decisions. The duty requires us to have regard to the need to:
- a. Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act. In summary, the Act makes discrimination etc. on the grounds of a protected characteristic unlawful
 - b. Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - c. Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
- 9.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, gender, and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).
- 9.3 Closure of libraries would ordinarily have a disproportionate impact on women, young people and old people, so a phased reopening of libraries across the county will ensure that library service is available to these groups again.

10 List of appendices

Appendix one – list of 16 libraries with registration services
 Appendix two - full list of libraries in tranches
 Appendix three - 14 libraries in tranche 3a and 3b
 Appendix four - list of libraries and their opening hours
 Appendix five – Libraries recovery plan
 Appendix six - Libraries Connected's 9 Principles for reopening libraries

11 List of Background papers

[working-safely-during-covid-19-shops-branches-v1.1-250520.pdf](https://www.southgloucester.gov.uk/media/250520/working-safely-during-covid-19-shops-branches-v1.1-250520.pdf)

I approve the above recommendations set out above for the reasons set out in the report.	Date
Councillor Susan Barker, Cabinet Member for Customer, Corporate, Culture and Communities	

In consultation with:

Role	Date
Margaret Lee, Executive Director for Corporate and Customer Services	
Executive Director for Finance and Technology (S151 Officer)	
Stephanie Mitchener on behalf of Nicole Wood	
Director, Legal and Assurance (Monitoring Officer)	
Paul Turner	

Libraries Recovery plan summary



- Our plan is to open as many libraries as possible, from the W/B 6th July. We will ensure that we prioritise the 16 Libraries with Register offices in them so that we can deliver face to face registrations for births and Notices of Marriages (when advised this is possible by the Government and GRO). (Saffron Walden, Uttlesford is a registration office but not in a library)

The 16 libraries are listed below.

Office location	District	Number of Registration Offices
Chelmsford	Chelmsford	3
Colchester	Colchester	3
Harlow	Harlow	3
Benfleet	Rochford & Castle Point	1
Billericay	Basildon	1
Braintree	Braintree	1
Brentwood	Brentwood	1
Clacton	Tendring	1
Dunmow *	Uttlesford	1
Epping	Epping Forest	1
Harwich	Tendring	1
Maldon	Maldon	1
Rayleigh	Rochford	1
Rochford	Rochford	1
Witham	Braintree	1
Basildon**	Basildon	3

*Dunmow Registration Office will temporarily have revised opening hours to cover appointments normally offered at Uttlesford District Council Offices in Saffron Walden, which is to remain closed until further notice. Dunmow library's usual opening hours will not be affected by this change.

**awaiting a decision from Basildon Council about whether the library can reopen to the public as it is in their open plan building and the main entrance is not owned by ECC. If it is not possible to open the library, Freyns Library will accommodate registration services instead.

Appendix 2

Tranche 1	Tranche 2	Tranche 3a	Tranche 3b
open w/c 6th July	open w/c 20th July	away from nearest library	Under 3 miles from nearest library
Basildon **	Brightlingsea	Great Wakering	Debden
Billericay	Broomfield	Kelvedon	Holland on Sea
Braintree	Buckhurst Hill	Silver End	Fryerns
Brentwood	Burnham-on-Crouch	Southminster	Mark Hall
Chelmsford	Canvey Island	Stock	Stanway
Clacton	Chigwell	Thaxted	Vange
Colchester	Chipping Ongar		West Clacton
Dunmow #	Coggeshall		Wickham Bishops
Epping	Danbury		
Harlow	Earls Colne		
Harwich	Frinton		
Maldon	Galleywood		
Rayleigh	Great Baddow		
Rochford	Great Parndon		
South Benfleet	Great Tarpots		
Witham	Greenstead		
	Hadleigh		
	Halstead		
	Hatfield Peverel		
	Hockley		
	Hullbridge		
	Ingatestone		
	Laindon		
	Loughton		
	Manningtree		
	North Melbourne		
	North Weald		
	Old Harlow		
	Pitsea		
	Prettygate		
	Saffron Walden		
	Shenfield		
	Sible Hedingham		
	South Woodham Ferrers		
	Springfield		
	Stansted		
	Tiptree		
	Tye Green		
	Waltham Abbey		
	Walton		
	West Mersea		
	Wickford		
	Wivenhoe		
	Writtle		

Due to Saffron Walden Registration Office not being able to reopen yet, additional hours will be added at Dunmow Registration Office (not affecting library opening hours)

** Ongoing discussions with Bas Centre about reopening the building. If building not ready to open, we will move registration appointments to Fryerns Library.

Libraries Recovery plan summary



We have identified 14 libraries that will need to open during a later phase, when it is safe to open them. This is mainly due to the practicalities of implementing social distance measures within them. The full list of reasons is below, alongside the libraries. The libraries (tranche 3a) are more than 3 miles away from another library so will be prioritised to open first

Tranche 3a			
Library	District	Rationale	Nearest alternative
Silver End	Braintree	Small library, the physical layout may make it harder to comply with social distancing guidelines and low use than other libraries in district	Witham Library is 4.2 miles away, Braintree Library is 4.6 miles away.
Southminster	Maldon	Small library, the physical layout may make it harder to comply with social distancing guidelines and low use than other libraries in district	Burnham Library is 3.0 miles away
Kelvedon	Braintree	Small library, the physical layout may make it harder to comply with social distancing guidelines and low use than other libraries in district	Witham Library is 3.4 miles away, Tiptree Library is 4.0 miles away.
Thaxted	Uttlesford	Small library, the physical layout may make it harder to comply with social distancing guidelines and low use than other libraries in district. Staffing shortages are particularly acute in this district	Dunmow Library is 6.4 miles away.
Great Wakering	Rochford	Small library, the physical layout may make it harder to comply with social distancing guidelines and lower use than other libraries in district	Rochford Library is 5.9 miles away.

Agenda item 5

Stock	Chelmsford	Shared entrance with primary school identified as a concern.	Billericay Library is 3.3 miles away, Galleywood Library is 3.2 miles away.
Tranche 3b			
Holland	Tendring	Small library, the physical layout may make it harder to comply with social distancing guidelines and low use than other libraries in district	Clacton Library is 2.0 miles away.
Fryerns	Basildon	Lower use than other libraries in district. Staffing shortages are particularly acute in this district.	Basildon Library is 1.6 miles away, Pitsea Library is 2.2 miles away.
Debden	Epping Forest	Likely to remain closed as located within New City College which is not planning to reopen.	Loughton Library is 1.0 miles away. Chigwell Library is 2.3 miles away.
Vange	Basildon	Small library, the physical layout may make it harder to comply with social distancing guidelines and lower use than other libraries in district. Staffing shortages are particularly acute in this district	Basildon Library is 2.0 miles away, Pitsea Library is 1.4 miles away.
West Clacton	Tendring	Lower use than other libraries within district.	Clacton Library is 2.4 miles away.
Wickham Bishops	Maldon	Small library, the physical layout may make it harder to comply with social distancing guidelines and lower use than other libraries in district. Staffing shortages are particularly acute in this district	Witham Library is 2.9 miles away, Maldon Library is 4.1 miles away.

South Essex

Office	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Basildon							
BASILDON	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	Closed
PITSEA	Closed	09.00 - 18.00	09.00 - 18.00	Closed	09.00 - 17.00	09:00 – 17:00	Closed
BILLERICAY	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09:00 – 17:00	Closed
WICKFORD	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09:00 – 17:00	Closed
VANGE	10.00 - 16.00	10.00 - 16.00	Closed	10.00 - 16.00	Closed	10:00 – 16:00	Closed
FRYERNS	Closed	10.00 - 16.00	Closed	10.00 - 16.00	10.00- 16.00	10:00 – 16:00	Closed
LAINDON	09.00 - 18.00	09.00 - 18.00	Closed	09.00- 19.00	09.00 - 14.00	09:00 – 17:00	Closed
Castle Point							
CANVEY	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09:00 – 17:00	Closed
BENFLEET	Closed	09.00 - 17.30	09.00 - 17.30	Closed	09.00 - 17.30	09:00 – 17:30	Closed
HADLEIGH	09.00 - 17.30	09.00 - 17.30	Closed	09.00 - 17.30	09.00 - 17.30	09:00 – 17:00	Closed
GREAT TARPOTS	09.00 - 17.30	09.00 - 17.30	Closed	09.00 - 17.30	Closed	09:00 – 17:30	Closed
Rochford							
RAYLEIGH	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09:00 – 17:00	Closed
HULLBRIDGE	Closed	09.00 - 13.00	13.00 - 17.00	13.00 - 17.00	Closed	09:00 – 13:00	Closed
HOCKLEY	Closed	09.00 - 17.30	Closed	09.00 - 17.30	09.00 - 17.30	09:00 – 17:30	Closed
ROCHFORD	Closed	09.00 - 17.30	Closed	09.00 - 17.30	09.00 - 17.30	09:00 – 17:30	Closed
GREAT WAKERING	Closed	09.00 - 13.00	Closed	13.00 - 17.00	13.00 - 17.00	09:00 – 13:00	Closed
Maldon							
SOUTHMINSTER	09.00 - 13.00	Closed	13.00 - 17.00	13.00 - 17.00	Closed	09:00 – 13:00	Closed
WICKHAM BISHOPS	14.00 - 18.00	Closed	14.00 - 18.00	Closed	Closed	09:00 – 13:00	Closed
MALDON	09.00 - 19.00	09.00 - 19.00	Closed	09.00 - 19.00	09.00 - 19.00	09:00 – 17:00	Closed
BURNHAM	Closed	10.00 - 16.00	Closed	10.00 - 16.00	10.00 - 16.00	10:00 – 16:00	Closed

Mid Essex

Office	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Chelmsford							
CHELMSFORD	09.00 - 18.30	09.00 - 18.30	09.00 - 18.30	09.00 - 18.30	09.00 - 18.30	09:00 – 17:00	13:00 – 16:00
SWF	Closed	09.00 - 19.00	09.00 - 13.00	09.00 - 18.00	09.00 - 18.00	09:00 – 17:00	Closed
GREAT BADDOW	09.00 - 17.30	Closed	09.00 - 17.30	09.00 - 17.30	Closed	09:00 – 17:30	Closed
WRITTLE	09.00 - 13.00	13.00 – 17.00	09.00 - 13.00	13.00 - 17.00	Volunteer Run	09:00 – 13:00	Closed
BROOMFIELD	13.00 - 17.00	Closed	09.00 - 13.00	13.00 - 17.00	Closed	09:00 – 13:00	Closed
DANBURY	Closed	Closed	13.00 - 17.00	09.00 - 13.00	13.00 - 17.00	09:00 – 13:00	Closed
STOCK	Closed	14.00 - 18.00	Closed	09.00 - 12.00 & 14.00 - 18.00	Closed	09:00 – 12:00	Closed
NORTH MELBOURNE	Closed	09.00 - 17.00	Closed	Closed	09.00 - 17.00	09:00 – 17:00	Closed
SPRINGFIELD	Volunteer Run	Volunteer Run	Volunteer Run	Volunteer Run	Volunteer Run	Volunteer Run	Closed
GALLEYWOOD	Closed	13.00 - 17.00	Closed	09.00 - 13.00	13.00 - 17.00	09:00 – 13:00	Closed
Braintree							
BRAINTREE	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09.00 - 17.00	09:00 – 17:00	Closed
WITHAM	09.00 - 19.00	09.00 - 19.00	09.00 - 19.00	09.00 - 19.00	09.00 - 19.00	09:00 – 17:00	Closed
HATFIELD PEVEREL	Closed	13.00 - 17.00	09.00 - 13.00	13.00 - 17.00	Closed	09:00 – 13:00	Closed
HALSTEAD	09:00- 17:00	09.00 - 18.00	Closed	09.00 - 18.00	09.00 - 17.00	09:00 – 17:00	Closed
KELVEDON	13.00 - 18.00	Closed	Closed	13.00 - 18.00	Closed	09:00 – 13:00	Closed
SIBLE HEDINGHAM	09.00 - 13.00	13.00 - 17.00	Closed	13.00 - 17.00	Closed	09:00 – 13:00	Closed
SILVER END	Closed	14.00 - 18.00	Closed	14.00 - 18.00	Closed	09:00 – 13:00	Closed
COGGESHALL	Closed	13.00 - 17.00	Closed	09.00 - 13.00	13.00 - 17.00	09:00 – 13:00	Closed
EARLS COLNE	Closed	13.00 - 17.00	Closed	09.00 - 13.00	13.00 - 17.00	09:00 – 13:00	Closed

NORTH ESSEX

Colchester	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
COLCHESTER	09.00 - 18.30	09.00 - 18.30	09.00 - 18.30	09.00 - 18.30	09.00 - 18.30	09:00 – 17:00	13:00 – 16:00
PRETTYGATE	Closed	09.00 - 18.00	09.00 - 18.00	Closed	09.00 – 17.00	09:00 – 17:00	Closed
GREENSTEAD	09.00 - 17.00	09.00 - 17.00	Closed	09.00 -17.00	Closed	09:00 – 13:00 & 14:00 – 17:00	Closed
WEST MERSEA	Closed	09.30 - 12.30 & 14.00 - 19.00	Closed	09.30 - 12.30 & 14.00 - 17.00	09.30 - 12.30	09:30 – 12:30 & 14:00 – 17:00	Closed
TIPTREE	14.00 - 17.00	10.00 - 13.00 & 14.00 - 17.00	Closed	10.00 - 13.00 & 14.00 - 19.00	Closed	09:00 – 13:00	Closed
STANWAY	09.00-13.00	13.00-17.00	Closed	13.00-17.00	Closed	09:00 – 13:00	Closed
WIVENHOE	Closed	14.00-19.00	Closed	14.00-19.00	10.00-13.00	10:00 – 13:00 & 14:00- 17:00	Closed
Tendring							
CLACTON	09:00 – 17:00	09.00-17.00	09.00 -17.00	09.00-17.00	09.00-17:00	09:00 – 17:00	Closed
BRIGHTLINGSEA	Closed	14:00- 16:30	10.00-13.00 & 14:00 – 17:00	10.00-13.00	14:00 – 18:30	10:00 – 16:00	Closed
HOLLAND	13:00 – 17:00	Closed	09:00- 13:00	13:00 – 17:00	Closed	09:00 – 13:00	Closed
MANNINGTREE	Closed	09.30-13.00 & 14.00-18.00	09.30-13.00	14.00-19.00	09.30-13.00 & 14.00-18.00	09:00 – 17:00	Closed
WALTON	13.00-17.00	Closed	13.00-17.00	09.00-13.00	Closed	09:00 – 13:00	Closed
WEST CLACTON	09.00-15.00	09.00-17.00	09.00-15.00	09.00-17.00	09.00-15.00	09:00 – 13:00	Closed
FRINTON	Closed	09.00-18.00	Closed	09.00-18.00	09.00-17.00	09:00 - 17:00	Closed
HARWICH	09.00-18.00	09.00-18.00	Closed	09.00-17.00	09.00-17.00	09:00 – 17:00	Closed

WEST ESSEX

Office	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	
Epping							
CHIPPING ONGAR	Closed	09.00-18.00	09.00-18.00	Closed	09.00-17.00	09:00 – 17:00	Closed
LOUGHTON	09.00-17.00	09.00-17.00	09.00-17.00	09.00-17.00	09.00-17.00	09:00 – 17:00	Closed
WALTHAM ABBEY	09.00-17.30	09.00-17.30	09.00-17.30	Closed	09.00-17.30	09:00 – 17:00	Closed
EPPING	09.00-17.30	09.00-17.30	Closed	09.00-17.30	Closed	09:00 – 17:30	Closed
CHIGWELL	Closed	09.30-18.00	Closed	09.30-13.00	13.30-18.00	09:30 – 17:00	Closed
DEBDEN	Closed	13.00-17.00	Closed	13.00-17.00	09.00-13.00	09:00 – 13:00	Closed
BUCKHURST HILL	Self Service	09.30-17.00	Self Service	09.30-17.00	Closed	09:00 – 17:00	
NORH WEALD	Self Service	14.00-17.00	Self Service	10.00-19.00	Self Service AM	09:00 – 13:00	Closed
Brentwood							
SHENFIELD	09.00-17.30	09.00-17.30	09.00-17.30	Closed	09.00-17.30	09:00 – 17:00	Closed
BRENTWOOD	09.00-18.00	09.00-18.00	09.00-13.00	09:18:00	09.00-18.00	09:00 – 17:00	Closed
INGATESTONE	13.00-17.00	Closed	09.00-13.00	13.00-17.00	Closed	09:00 – 13:00	Closed
Harlow							Closed
GREAT PARNDON	09.00-18.00	Closed	09.00-18.00	09.00-17.00	Closed	09:00- 17:00	Closed
MARK HALL	Closed	13.00-17.00	09.00-13.00	13:00 - 17:00	Closed	09:00 – 13:00	Closed
OLD HARLOW	10.00-16.00	Closed	12.00-18.00	Closed	10.00-16.00	10:00- 16:00	Closed
HARLOW	09.00-19.00	09.00-19.00	Closed	09.00-19.00	09.00-19.00	09:00-17:00	Closed
TYE GREEN	Closed	10.00-16.00	Closed	10.00-16.00	10.00-16.00	10:00 – 16:00	Closed
Uttlesford							
DUNMOW	09.00-18.00	09.00-18.00	09.00-17.00	09.00-17.00	09.00-17.00	09:00 -17:00	Closed
SAFFRON WALDEN	09.00-18.00	09.00-18.00	09.00-13.00	09.00-18.00	09.00-18.00	09:00 – 17:00	Closed

STANSTED	Closed	09.00-13.00	14.00-17.00	14.00-18.00	Closed	09:30 – 17:00	Closed
THAXTED	Volunteer Run	14.00-17.00	Closed	14.00-17.00	09.00-16.00	09:30 – 12:30	Closed

DRAFT

Phased Reopening Recovery Plan for Essex Libraries



In line with government instructions, all Essex Libraries have been closed since 21 March 2020 as part of the response to the Covid-19 pandemic. Libraries are closed in order to:

- Reduce non essential travel and movement
- Reduce people congregating in places other than their homes or key-worker settings
- Reduce the risk to staff

Whilst details of how and when lockdown arrangements will end are likely to vary widely, based on the medical, political, economic and demographic context at the time, it is important to try and anticipate this as far as we can in order to:

- have the smoothest possible reopening, when it happens
- make best use of the closed time given that we do have staff available to undertake work while libraries are closed
- ensure that any virus related risks continue to be appropriately managed and we stay in line with guidance, supporting key public health messages
- be ready to be adaptable and flexible as the situation may continue to change, in terms of restrictions tightening or loosening in small steps either way
- be able to continue to deliver our current 'digital only' service without interruption
- be able to support our customers well by communicating facts to them clearly and effectively

Policy statement

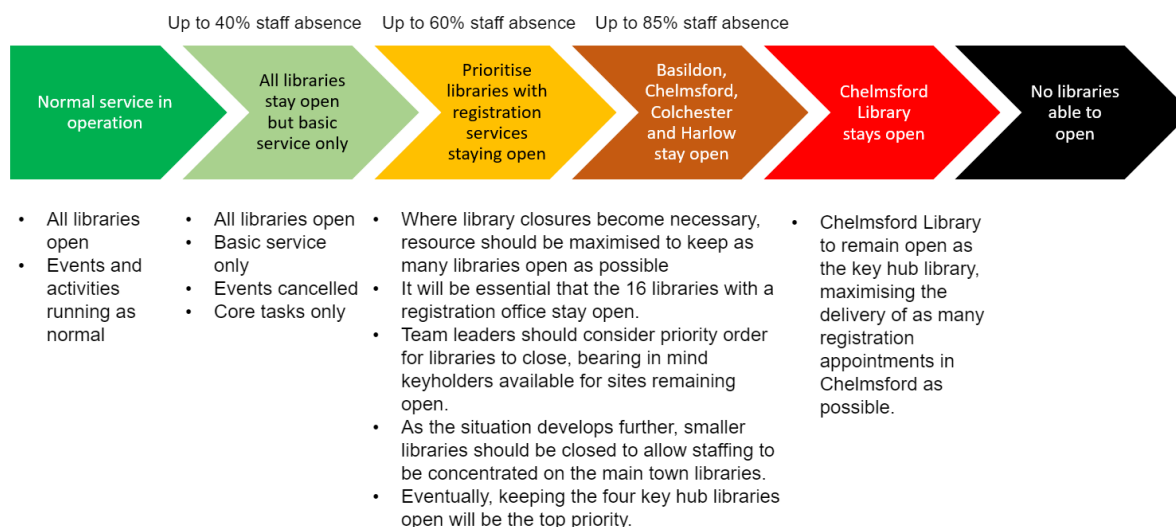
At the point at which libraries are considered for reopening, there will be factors preventing an immediate return to a full business as usual environment, especially around the workforce, premises issues and the level of service offer that can be provided. The amount of risk around these has been explored during the lockdown period, including some scenario planning.

In all scenarios, the core principles laid out in the Essex Libraries Business Continuity Plan remain appropriate. These principles outline the approach the service takes in scenarios in which the service offer needs to be reduced from the normal service offer, notably a priority ordering of which sites should be opened. The below summary gives an indication of what proportion of the staff would be required at each stage of the plan.

The Essex Libraries Business Continuity Plan identifies the importance of keeping the 16 libraries co-located with registration offices open wherever possible and this principle underpins the recommendations in the remainder of this document. In addition to this overarching objective, this document acknowledges that a similar recovery plan is in place for Essex Registration Service (ERS) and that it will be important for the reopening of libraries

and registration services to happen in tandem, maximising appointment availability. This could include essential changes to the internal layout of buildings, use of office/meeting spaces and temporary changes to opening hours that may be required in support of ERS.

Libraries – Normal Business Continuity Plan



A checklist for managers and staff to follow has been developed that should be used when reopening either individual libraries or a significant part of the service in one go.

When libraries reopen following the lockdown period, the service will not be returning to business as usual. There are likely to be long term changes to how the library service is offered, either required or desired. At the bottom of this plan, we explore some of the immediate considerations once libraries have returned to a stabilised form of BAU.

Context: national picture

Nationally, public libraries are working together using support and advice co-ordinated through Libraries Connected (the national libraries charity representing the public library network). Most authorities are now actively planning to reopen libraries, taking a phased approach to opening sites and the services that will be on offer. For example:

- Kent County Council, which has ninety-nine libraries is also taking a phased approach to libraries with a limited number reopening at first, potentially one library per district.
- Hertfordshire are currently scoping offering a limited service only and risk assessing other services provided by their libraries.
- Newcastle are opening their fourteen community libraries and hubs in July.
- Oxfordshire is likely to reopen between thirteen and forty-four libraries in their first tranche.
- Surrey are also opening libraries in tranches and have created a priority list of reopening branches.

Libraries Connected have been supporting local library authorities by sharing approaches between authorities via forums and by producing a Recovery Toolkit generated by Heads of Service working with members of their teams. This sets out nine key principles for authorities to consider:

Staff, user and volunteer safety is paramount. All planning should be based on risk assessments, carried out with staff, unions and health and safety teams. It must take account of public health guidance and be frequently revisited as risks evolve.	This is set out throughout the document below.
Re-opening will be a phased process based on risk management, availability of staff and resources, and local priorities of need.	This is set out throughout the document below, beginning here .
Vulnerable and disadvantaged users may not be able to physically access libraries while the pandemic remains, so thought should be given to meeting their needs through alternative arrangements.	This is set out later in the document, especially around the offer from the home library service , the mobile library service and the home delivery of reservations .
Planning should anticipate the need to withdraw or suspend services, should public health and government guidance require it, or if there is a shortage of staff and resources.	This is set out throughout the document. A summary of services normally offered across the service that are temporarily suspended are shown here . There is a summary of non-core services and whether these are withdrawn or suspended here .
The practicalities and priorities for reopening will differ for each library service, and careful planning is needed down to branch level.	This is set out throughout the document below.
Planning should take into account preparation time for new procedures, spaces and workflows, and for staff training.	This is referred to throughout the document, but a detailed list of tasks to be carried out during the transition period before reopening is set out here .
Clear communication is essential to manage public expectations of the service and behaviour within the library buildings.	
The situation is changing fast and detailed advice will also change over time, so any plans should be flexible and take account of updated guidance and context. Once in delivery, revised arrangements should be reviewed regularly.	This principle is referred to at various points below.
Library buildings should reopen with the foundations to reshape into the form that best meets the future needs of society, and their communities, and learn from this period of enforced change without being limited by it.	<p>There is an awareness of the need to review and reshape some of our services, both in this document and the supporting documentation.</p> <p>For example, we are aware of the need to make our continuity arrangements for home library service customers more robust; we also know we will need to monitor changes to customer behaviour arising from the lockdown period, such as the increase in loans of e-books and other online content.</p>

Please refer to:

<https://www.librariesconnected.org.uk/news/safety-first-recovery-library-services>

Easing of lockdown: phased opening of non-essential services whilst maintaining social distancing

Libraries were originally in line with many shops and businesses as well as other public services that had been declared 'non essential' during the lockdown phase. In its Covid-19 roadmap, the government confirmed that libraries were considered as part of Step 3, which will be considered by the Recreation and Leisure Taskforce. The government's planning assumption was that this step would be no earlier than 4 July and subject to further detailed scientific advice, provided closer to the time, on how far we can go. They have given a steer that the country will not return immediately to business as usual and that the reopening of public buildings such as libraries will be phased and follow a conditional approach, with different types of non-essential services opening gradually and proportionately.

However, the latest Government guidance "Working safely during COVID-19 in shops and branches" was updated on 25 May 2020, and listed libraries under this category, which means they can reopen from Monday 15th June 2020.

In order to be able to fully prepare and plan for the reopening of libraries, the service is planning to continue to work towards the original date advised by the Government and reopen libraries from the week beginning Monday 6th July.

This makes some aspects of the decision-making process easier, but others harder. On the positive side, we have a sensible amount of time to plan, mobilise and implement, since not only do local authorities have discretion over what, when and how much they will reopen services, but it is also easier to justify taking time to put in place appropriate steps to ensure the safety of staff and customers – such as social distancing.

On the other hand, implementing social distancing will be challenging across such a large and extensive library network as exists in Essex; and there might be a bigger gap between expectations of both staff and customers about what level of service we should be providing, where and how much. This will particularly be the case if other neighbouring authorities (e.g. Suffolk, Southend, Thurrock) make different decisions and follow different timescales to us.

Key areas we have considered

1) Social distancing

This is probably the most significant factor influencing the recommencement of services, as this has an impact on most of the secondary factors for consideration including workforce requirements, which premises are suitable to be used and what the service offer looks like. The impact of social distancing is explored in more detail separately below.

2) Amount of notice

We have several weeks to mobilise. More detail is included later in this document on the Transition Period (getting ready stage) but to summarise:

- Premises declared open and staff can access.
- Each site to be individually assessed for social distancing requirements using generic risk assessment.
- Libraries to receive quality clean by MITIE.
- Any building or IT issues that are presented when staff go back into library can be reported and dealt with.

- All libraries to complete stock take.
- Staff to undertake presentation audit to ensure library is well presented.
- Items and monies left in quarantine prior to lockdown can be processed and cleared.
- Basic admin tasks cleared to allow staff to focus on high level of customer traffic upon reopening.

3) Workforce

There are various reasons why workforce availability will be limited at the point at which libraries are scheduled to reopen.

- It is highly likely that other parts of the business (ECC) won't have returned to normal. A significant number of library staff have been redeployed during lockdown and the activity they are doing is expected to carry on. In addition many of those redeployed are in critical roles such as supervisors and team leaders and are key to implementing the steps necessary to reopen. More specifically there may be a need to prioritise how staff are used amidst varying priorities that overlap, especially for library staff who have been redeployed to undertake work for ERS.
 - We have already considered the impact of those staff redeployed being absent. Decisions were made to pull team leaders back from redeployment by 26th May 2020, library supervisors by 2nd June 2020 and staff able to return to work but previously redeployed outside of the library service and ERS began to return on 1st June 2020.
- There will still be a significant proportion of the workforce missing for other reasons (this may also be influenced by wider measures announced by government before July):
 - Existing sickness
 - The staff member shielding or in at risk group
 - The staff member living with someone shielding or in at risk group
 - Caring responsibilities
 - Childcare issues where nurseries haven't reopened and children have either not returned to school or have only returned to school part time.
 - Anxiety from staff about reopening may lead to new occurrences of sickness
 - Volunteers at community supported libraries may not want to return to work.
 - Resignations during closure period and no recruitment has taken place.
 - ODP have confirmed that library staff recruitment can recommence and this is now starting to take place again.
- Any of the above, especially unanticipated new occurrences of sickness, may mean staff with critical skills are missing from the service, e.g. unavailability of both mobile library supervisors and we had no one with an HGV licence.
- With some staff continuing to be absent, team leaders are reviewing their BC measures and rotas to ensure there is no disruption to service when libraries reopen, e.g. reviewing keyholders able to open each building.
- We will be restricting leave granted during the first few weeks of reopening, apart from in exceptional circumstances, to ensure maximum available workforce to be deployed.
- Current staff availability indicates the issues above are polarised in certain parts of the county and so some of the available staff will need to be asked to work further away from home than normal as more libraries reopen. This is being considered now by team leaders as part of their staff scheduling.
- The methods employed during lockdown to contact staff remotely (either via formal cascade or local contact methods such as WhatsApp groups) have been effective in getting comms out to staff quickly when it has been needed.

- We are considering the use of peak relief staff to maximise the number of libraries that can open and cover staff leave and sickness; however this would be at a cost to the service.
- We are looking at opportunities to make use of volunteers to support parts of the service when it reopens, especially widening the pool of home library service volunteers as well as using volunteers to help queue management at libraries.
- Because we have some local discretion as to the service offer and speed of reopening, we are tailoring the service offer and number of libraries that can open based on workforce availability – we will be regularly reviewing the service offer with a view to enhancing it.

4) Premises

- Although there had initially been concerns that premises checks would not have been able to take place while libraries were declared closed, MITIE have confirmed that all libraries can be accessed straight away and essential checks have been carried out. A timeline has been agreed for staff to recommence some of these regular premises checks from MITIE.
- MITIE only require a week's notice to recommence cleaning at all sites. They have also confirmed that a 'deep clean' is not thought necessary.
- Some of the libraries are in third party premises, where we anticipate there will still be restrictions in place, e.g. schools, colleges, council offices. Discussions are taking place with the relevant stakeholders to discuss additional control measures and impact.
- See below for comments about social distancing.

5) Customer and Member expectations

- We are providing clarity and rationale around the available service offer and phased reopening for Members. A CMA has been prepared and the decision is scheduled to be reviewed by Scrutiny Committee.
- A comms plan for the recommencement of services is being prepared finalised. Clarity about the level of service offer will be important to manage customer expectations, especially to mitigate customers queuing outside libraries to gain access only to find temporary changes to the service offer.

6) Technology

- No libraries will be accepting cash payments by customers face to face. Existing methods of accepting cash payments through self-service machines will be permitted, as will online payments through the library catalogue,
- Options are being explored to accelerate existing proposals for chip and pin readers in libraries, including contactless payments.
- A new library app is currently being tested by staff prior to a public launch. When available, it will enable customers to renew items and access their library account, access the library catalogue etc.

Impact of implementing social distancing arrangements

The necessity to implement social distancing guidelines, of which the current guidelines suggested by government is a safe distance of 2 metres, is the core requirement of the recovery plan. This greatly impacts the level of service we will be offering, at least initially, particularly in smaller libraries. Changes to the layout will be required at every library. Consideration is also being given to partners and other building occupants who likewise need to implement social distancing arrangements, including registration appointments.

A risk assessment will be undertaken at each library to review operating procedures. This is a generic document, which contains some actions that will be required at every library, as well as measures that may be implemented on a site by site basis, such as reducing the size of the area that staff need to control and only opening certain parts of the building/certain floors (at the same time registration appointments may need to spread out on the library lending floors if social distancing arrangements cannot be made in their existing office spaces).

The library service is also working closely with colleagues from the Corporate Health and Safety and Property teams within Essex County Council as well as our facilities management partner MITIE to mirror any corporate measures that are introduced in the wider ECC property estate.

The suggested approach to social distancing is detailed below.

What will the service offer look like?

The level of service that will be offered will be influenced by all the areas highlighted above, but the necessity to implement social distancing measures of 2 metres is the most significant, as it will require considerable changes to be made to our spaces and our service offer in a short space of time. This will mean only a very limited level of library service will be provided (set out below) alongside the registration services which will be available in the 16 co-located libraries.

Headline principles

- The service offer will not look like business as usual.
- Local circumstances at each library will influence some details of the available offer.
- Fundamental parts of what would normally be considered part of the 'core offer' for the service will not be available, i.e. a place to meet, sit, study and read, access to public computers.
- There will be no events and activities running.
- Some other services not part of the 'core offer' will also not be running e.g. booksales.
- The service offer will be proportionate to the number of staff who can safely be on duty to provide that service as well as the number of customers who can be present in the library at any one time
- There will be a higher dependency on the self-service facilities – for items that are borrowed and returned, cash transactions, etc.
- We may be able to increase the service offer over time.
- Customers will be encouraged to visit alone where possible, unless they need specific assistance. Customers who are accompanied by children will be reminded that they are responsible for supervising them at all times and should follow social distancing guidelines.

Details of service offer

1. Access to the lending stock available for browsing and borrowing via self service machine only.
2. Customers can return existing items
3. Customers can collect reserved items placed before the service went into lockdown, but will not be able to place new reservations at the moment (see also further down in this document regarding reservations).
4. Browsing time in the library will be time limited.
5. A member of staff will be required to manage customer numbers entering the building at the library entrance.
6. Routing arrangements around the space will have been implemented in advance and, where possible, consideration given to using separate entrance and exits.
7. Seating areas will be removed to prevent customers staying in the library for too long (where they cannot be removed they will be taped off).
8. There will currently be no access to computers for customer use.
9. The number of customers allowed into the library at any one time will need to make allowance for registration customers attending appointments where the library contains a registration office. This will further limit the number of customers who can be undertaking library activity (unless a separate entrance can be made available).

Key issues for local consideration

- Library layout as a whole.
- Splitting entrance and exit points where possible.
- Creating agreed routes around the library, using tensa barriers, tape on the floor mapping out a route, bespoke signage or similar to control customer flow.
- Removing furniture that encourages people to congregate or stay for extended periods of time (space elsewhere in the building may be needed to do this).
- Changing or spacing out registration appointment waiting areas.
- Reposition drop boxes for customers to use to return items outside the main library building (to save them having to enter the building). This could be existing external furniture or could be done by moving a self-service return box outside the library – this will be considered as part of the risk assessment for each site.
- A regular, consistent, ongoing supply of sanitisers will be essential.
- Areas with high traffic touching, particularly self service machines as well as door knobs, automatic door push buttons etc, will need to be cleaned regularly. Antibacterial wipes and/or sprays have been purchased to enable staff to do this.
- Creating space for returned items to be quarantined for up to 72 hours (additional trugs, trolleys etc will be needed to accommodate this). Similar arrangements for cash returned via self service.
- Some of the public library space may need to be given over to registration service because using existing offices spaces for appointments may not comply with social distancing arrangements.
- Where libraries are in shared spaces with other partners or tenants, the risk assessment will need to take into account needs and requirements of those other building occupiers.
- Discussion has been had by library management team with Contact Centre colleagues regarding the reopening of the Libraries Enquiries phone line.

The following services normally offered during business as usual will not be available:

- As stated above, events and activities will not run, e.g. baby and toddler rhymetime, bookgroups held in the library.
- Library staff will not be proactively manning Hello Desks or Information Points, but will assist customers where it is absolutely not possible for self service machines to be used.
- Hard copy newspapers and magazines will not be provided.
- Public computers will not be available; there will also not be printing facilities for customers.
- Use of photocopiers and scanners will also not be available.
- Customers will not be able to stay for an extended period of time to read or study,
- Adhoc room hire will not be offered, either because the spaces are not suitable for social distancing; the spaces are being prioritised for use by the Service (e.g. for book quarantining or registration appointments); or will require additional cleaning.
- The Summer Reading Challenge has already moved to an online service for 2020.
- No refreshments will be offered and cafes will remain closed.
- Not checking in registration customers arriving for an appointment as per current arrangement.
- There will temporarily be no access to toilets or baby changing facilities for customers.
- Details of other services offered at some of the libraries across the service and whether they will be available or not are shown in the table [here](#).

The interim measures implemented since libraries closed in March will continue to be in place:

- Longer loan periods.
- Higher number of items that can be loaned.
- The fines amnesty that ran during March 2020 will continue until all libraries have reopened.
- Payments will only be taken through self service equipment or online. No cash taken face to face by library staff. Cash returned through self service machines will be quarantined for 72 hours.
- Enhancements to e-library service such as improved range of e-books
- Improved access to online subscriptions such as Ancestry and Find My Past may remain, subject to agreement with individual suppliers.
- Content being added to the library website and social media channels will continue, including virtual library events such as baby and toddler rhymetime, 1 minute book reviews.
- The suspension of the ability to request items and place reservations, implemented before the service went into lockdown, will continue on a temporary basis.

In some locations, the risk assessment may conclude that additional steps are required on top of the ones above, either because it is not physically possible or is impractical to make changes to maintain social distancing.

Staff requirements

- A minimum of two members of staff will be required at every library to ensure one member of staff is available to manage the number of customers entering the library.
- In larger, busier libraries, in reality it is likely that more than two members of staff will be required to support customers and carry out administrative tasks.

- It should be noted that the minimum staff headcount in some libraries will have to increase from the normal business-as-usual minimum staffing number to accommodate this additional staffing requirement.

Opening hours

Under the normal Essex Libraries Business Continuity Plan, the intention is always to try and maintain the existing advertised opening hours across all 74 libraries. This will be challenging to achieve in post-lockdown circumstances in light of workforce, premises and social distancing considerations.

We have considered a number of options around the opening hours of libraries and our chosen model is explained in full below. We have chosen this option because we believe it provides least disruption to customers, will be understood by the majority of customers and will allow staff time to be used to maximise the number of libraries that can open.

Maintain the existing opening hours, except that libraries that currently close later than 5pm on certain days would close at 5pm.

Pros and cons

- Many retail settings have allowed for earlier start and finish times.
- We hope this is a straightforward and consistent message across the county for people to understand as it doesn't make any changes to regular open days/patterns.
- Closing at 5pm will allow the staffing normally used after 5 to be used at other times, maximising the number of libraries that can open, instead of longer opening hours at fewer libraries.
- Will help to address public transport issues for some staff members.
- Most partners using libraries, including registration services, generally already finish at 5pm.
- Libraries are generally quieter after 5pm.
- Detailed staff scheduling in advance will still be required to address other challenges such as Sunday working and lunchtimes.
- There may still be challenges maintaining these hours following the completion of risk assessments by staff in certain locations.
- Any reductions in opening hours do carry potential reputational risk, as well as not meeting certain types of customers' expectations, but at least these will be communicated clearly and upfront accompanied by a rationale.
- Our comms may not reach all customers and therefore some won't be aware of the partial reopening plans, potentially causing anxiety and distress.
- Disproportionately affects certain customers who can't access libraries during the day.
- Some libraries have high percentage of opening hours after 5pm.
- The opening hours of the registration offices inside the libraries may be increased (see below note specifically about Dunmow Registration Office).

Opening hours provided by partners and volunteers

In normal business-as-usual times, a number of libraries have hours when the library is available outside ECC advertised opening hours, either manned by partners or volunteers; or available in self-service only mode. In addition to this, ECC already provides volunteers who exclusively run Springfield Library and extend the opening hours at Writtle Library.

We already expect that these opening hours will take longer to restore, because decisions made by individual volunteers or partners will be outside ECC's control. It is important therefore to recognise that in libraries where this applies, we are expecting a reduction in the extended opening hours over and above the option chosen above; however this is likely to change and be reviewed through the duration of the phased opening.

ECC has considered addressing this issue in certain locations by recruiting more volunteers through the current business-as-usual process, but this would take time and staff resource to put in place that is currently being prioritised to open libraries. Even if we were to do this, we could not be certain about the level of interest from prospective volunteers.

Risks

- Queue management:
 - Creating queues outside library entrances on the public highway (and the fact that the library service may not have the right to place barriers/social distancing markers outside its own property).
 - Queues being mixed up with neighbouring properties.
 - Managing expectations of the queue and potential disruptive behaviour from customers.
 - Supporting disabled customers in the queue.
 - Libraries where there is nowhere safe to queue – in these cases we are considering a raffle ticket style system to call customers in one at a time.
- Key touch points such as self service machines and entrance doors/buttons will need to be cleaned regularly, which relies on an ongoing regular supply of wipes or sprays.
- Anxiety from staff may lead to increased levels of sickness. If this reached a high level, it may be difficult to maintain the opening hours and service offer consistently.
- Variation in service offer and phased approach to opening might attract negative publicity, reputational risk, complaints etc.
- Potential impact in service if self service machines breakdown and cannot be used.
 - Stansted Library is waiting for its self service machine to be configured for use.
 - 6 libraries currently do not have self service machines. The service is moving machines from other locations.
- Cost implications of introducing additional cleaning and equipment.
- Lost income from room hire, printing and copying facilities, extending the fines amnesty.
- Continuing to provide additional content to maintain enhanced online offer, e.g. virtual events and social media content, alongside the face to face service offer will require simultaneous additional resource we may not have the staff capacity to do so as the phasing is extended.

Some examples of where we already anticipate some challenges with being able to offer a service at all include:

- Debden Library – located within college setting. The library cannot reopen if the college has not reopened.
- Springfield Library – community run by ECC volunteers. We already anticipate an increased reluctance by volunteers to provide a service and/or they may not do so consistently. The library normally operates on a Monday in self service only mode provided by Springfield Parish Council – we have agreed that the library will not be able to run in self service mode at the current time.

- Stock Library – within Primary School, shared entrance. A discussion needs to be held with the school about the risks of library customers using the same entry and exit point as school teachers, parents and pupils.

DRAFT

Detail of phased reopening of libraries

Service managers have reviewed the anticipated level of staff available when libraries are expected to reopen. The service has also reviewed its prioritisation order for libraries across the county as already considered under the normal Essex Libraries Business Continuity Plan. This retains the understanding that libraries co-located with registration offices have highest priority for reopening.

Taking this into account and the proposals outlined above, we are currently confident that when all necessary work has been undertaken to get the libraries ready to open, we can open 60 of the 74 libraries starting on 6th July. It is proposed that this will follow a phased approach, beginning with the 16 libraries co-located with registration offices, and all libraries closing no later than 5pm as outlined above.

The remaining 14 libraries will need additional considerations to be made before being ready to reopen. They will require additional workforce capacity to have returned to the service; and it should be noted that 8 of the libraries have been identified as extremely small and will struggle to be able to open whilst there remains the requirement for social distancing requirement at 2 metres. Further consideration or reduction in service offer may be required to open these libraries unless there are changes to government advice in the intervening period.

The planned phasing of opening libraries is outlined below:

Tranche 1	Tranche 2	Tranche 3a*	Tranche 3b**
w/c 6th July	w/c 20th July	w/c 3 rd August (or as soon as possible thereafter)	
		3 miles or more away from nearest lib	Under 3 miles from nearest lib
Basildon ***	Brightlingsea	Great Wakering	Debden
Billericay	Broomfield	Kelvedon	Holland
Braintree	Buckhurst Hill	Silver End	Fryerns
Brentwood	Burnham-on-Crouch	Southminster	Mark Hall
Chelmsford	Canvey Island	Stock	Stanway
Clacton	Chigwell	Thaxted	Vange
Colchester	Chipping Ongar		West Clacton
Dunmow #	Coggeshall		Wickham Bishops
Epping	Danbury		
Harlow	Earls Colne		
Harwich	Frinton		
Maldon	Galleywood		
Rayleigh	Great Baddow		
Rochford	Great Parndon		
South Benfleet	Great Tarpots		
Witham	Greenstead		
	Hadleigh		
	Halstead		
	Hatfield Peverel		
	Hockley		
	Hullbridge		

	Ingatestone		
	Laindon		
	Loughton		
	Manningtree		
	North Melbourne		
	North Weald		
	Old Harlow		
	Pitsea		
	Prettygate		
	Saffron Walden		
	Shenfield		
	Sible Hedingham		
	South Woodham Ferrers		
	Springfield		
	Stansted		
	Tiptree		
	Tye Green		
	Waltham Abbey		
	Walton		
	West Mersea		
	Wickford		
	Wivenhoe		
	Writtle		
<p># Due to Uttlesford Council Offices not being ready to open yet, Saffron Walden Registration Office is not expected to be able to open. Additional hours will be added at Dunmow Registration Office (not affecting library open hours)</p> <p>*** Ongoing discussions with Bas Centre about reopening Basildon Hub. Although it is expected registration appointments will recommence, if the library is not yet fully able to open, we will provide an alternative service from Fryerns Library.</p>			

More detail about the 14 libraries in tranche 3 is provided below. Tranche 3a libraries are 3 miles or more from an alternative library earlier in the phasing; Tranche 3b libraries are less than 3 miles from the next nearest library. It is proposed that those in 3a should be reviewed for reopening before those in group 3b if possible:

*Tranche 3a – those furthest away from another library

Library	District	Rationale	Nearest alternative
Great Wakering	Rochford	Extremely small library, only a click and collect service would be possible. Low prioritisation within district due to size and level of business.	Rochford Library is 5.9 miles away. Libraries run by Southend are closer than Rochford.
Kelvedon	Braintree	Low prioritisation within district due to size and level of business;	Witham Library is 3.4 miles away,

		also concerns about social distancing arrangements.	Tiptree Library is 4.0 miles away.
Silver End	Braintree	Extremely small library, only a click and collect service would be possible. Lowest prioritisation within district due to size and level of business.	Witham Library is 4.2 miles away, Braintree Library is 4.6 miles away.
Southminster	Maldon	Extremely small library, only a click and collect service would be possible. Lowest prioritisation within district due to size and level of business.	Burnham Library is 3.0 miles away
Stock	Chelmsford	Extremely small library, only a click and collect service would be possible. Lowest prioritisation in district due to poor level of use. Shared entrance with primary school identified as a barrier to opening.	Billericay Library is 3.3 miles away, Galleywood Library is 3.2 miles away.
Thaxted	Uttlesford	Extremely small library, only a click and collect service would be possible. Lowest prioritisation within district due to size and level of business. Staffing shortages are particularly acute in this district	Dunmow Library is 6.4 miles away.

**Tranche 3b – those with alternative facilities within 3 miles

Library	District	Rationale	Nearest alternative
Debden	Epping Forest	Extremely small library, only a click and collect service would be possible. Lowest prioritisation in district due to low usage and proximity to Loughton. Likely to remain closed as college not planning to reopen.	Loughton Library is 1.0 miles away. Chigwell Library is 2.3 miles away.
Fryerns	Basildon	Low prioritisation within district due to proximity to other libraries. Staffing shortages are particularly acute in this district.	Basildon Library is 1.6 miles away, Pitsea Library is 2.2 miles away.
Holland	Tendring	Extremely small library, only a click and collect service would be possible. Low prioritisation within	Clacton Library is 2.0 miles away.

		district due to proximity to Clacton.	
Mark Hall	Harlow	Low prioritisation within district due to size and close proximity to three other libraries. Some concerns about social distancing arrangements. Staffing shortages are particularly acute in this district.	Harlow Library is 1.5 miles away, Tye Green Library is 1.4 miles away, Old Harlow Library is 1.5 miles away.
Stanway	Colchester	Lowest priority within district due to size and proximity to other services. Also concerns about social distancing arrangements.	Prettygate Library is 1.8 miles away, Colchester Library is 2.8 miles away.
Vange	Basildon	Low prioritisation within district due to proximity to alternative facilities. Staffing shortages are particularly acute in this district. Also identified as most difficult in team leader patch for social distancing arrangements to be implemented.	Basildon Library is 2.0 miles away, Pitsea Library is 1.4 miles away.
West Clacton	Tendring	Low prioritisation within district due to low level of business and proximity to Clacton.	Clacton Library is 2.4 miles away.
Wickham Bishops	Maldon	Extremely small library, only a click and collect service would be possible.	Witham Library is 2.9 miles away, Maldon Library is 4.1 miles away.

By the time the phased opening has reached tranche 3, it is likely that there will have been changes in staffing levels, changes to the risk assessment and changes announced by government or other agencies around social distancing requirements and so it is hoped most of these libraries can be opened as soon as possible thereafter.

Movement of stock and browsing

As in other retail environments, the library service needs to consider processes for the movement of goods within its buildings – at the lowest level being influenced most by customers borrowing, returning and browsing the book stock and other items in the library.

As described above, measures were already introduced before libraries went into lockdown to mitigate the risk to staff and other customers of cross contamination of stock. To reiterate these control measures, these include:

- As many items as possible being borrowed and returned through library self service machines and only being processed by a member of staff if absolutely not possible to do it by other means.
- Quarantining of returned stock for 72 hours from the day of return. Libraries will keep returned items in trugs or on trolleys and keep as separate as possible from the other stock – albeit it should be acknowledged that space to do this in the smaller libraries will be limited.
- Items handled by a customer when browsing (e.g. book, DVD) but not borrowed will be placed with the stock being returned that day for quarantining for 72 hours.

Before risk assessments have been carried out, the service has also identified other potential control measures that could be used to support this activity. This would be unlikely to completely remove the risk but would help to mitigate it:

- Insist that all customers entering the library must apply sanitiser before permitted entrance to the library using equipment provided.
- Removal of newspapers and magazines from libraries.
- Once deliveries of new stock start to be received by libraries, we will need to keep these in quarantine for 72 hours as well.
 - This will have an impact on space at some libraries, so we are carefully planning the recommencement of deliveries and whether some deliveries can be re-routed to a bigger, nearby library with space to store for 72 hours.
- Some libraries will be able to have return boxes outside libraries so customers can return items without having to enter the library itself (this is being looked at site by site).
- Items handled by a customer when browsing (e.g. book, DVD) but not borrowed will need to be placed with the stock being returned that day for quarantining for 72 hours wherever possible.
 - Signage will be placed to indicate this to customers. Alongside this we will have signage actively discouraging customers from handling an item unless they really intend to borrow it.
 - Acknowledge this is reliant on customers or staff identifying this and some customers may not tell us.
 - Risk that could reduce significantly the amount of browsable stock available to customers.
- We will review the layout of certain sections of the library where the existing shelving or layout encourage handling of multiple items of stock.
 - We will increase where possible face on display so customers only need to handle one item at a time.
 - Similarly we will change the way we use display furniture such as dumpbins and express zones.
 - At branch level, we will consider reducing the amount of stock that is on the open shelves and browsable to customers at any one time in high traffic areas to reduce the potential handling of stock. One specific example where

we will do this is with Picture Books for children such as board books which get repeated handling from small children. We will hold surplus stock in a staff area so that staff can top-up shelves through the day and/or bundle together a set bundles of books for customers to borrow in one go rather than browsing and selecting individual items.

- We will reduce the use of kinderboxes and similar furniture that necessitates customers handling more than one item.
- We will consider whether we remove reference stock from the shelves; or ask that customers wear gloves before handling reference stock.

Additional measures to reduce customer contact

In addition to the above measures specifically around the handling of stock, the service intends to introduce other measures that make the speed of transaction for returning or borrowing an item quicker, easier and less likely to encounter problems.

- As already mentioned, loan periods and amounts permitted to be borrowed are remaining at higher levels as was introduced prior to lockdown.
- Temporarily raising the level of debt customers can have on their account before being blocked from borrowing and renewing items through self service.
- Reducing the numbers of queries arising on customer's membership records that necessitate them having to seek support from a member of staff.
 - We are investigating either removing the customer block from self service where the customer's ticket has expired (preferred option); or automatically extending the expiry date for those who have expired to a future date (less preferred).
- In cases where an item will not scan through self service, e.g. there is a problem with the RFID tag in the book, staff will be asked to write down the barcode number of the customer's ticket as well as the barcode number of the item so that they can then process this on a staff machine afterwards.
 - Staff will be asked to do this in a staff area wherever possible rather than using a Hello Desk machine.
 - Extra laptops are being ordered so each library has a laptop that can be used in a staff area.
 - Staff will be advised not to physically handle the item themselves, just to make note of the borrower/item details. Issues with the item can be addressed when the item is returned following the quarantine period.
- Customers will be encouraged where possible to join the library online and a library card posted to them to reduce the numbers needing to join the library face to face and sit with a member of staff.

Freebournes Road teams: Library Support Unit and delivery drivers

Essex Libraries has a team based at the category 1 site at Freebournes Road in Witham. The library team based there comprises:

- An **office based team** who provide backroom/administrative support to the library service. This includes the processing and cataloguing of stock for libraries; the provision of the interlibrary loan service and Performing Arts service; and the processing of standing orders and invoices for the service, for example for newspapers and magazines. The team support library and registration officer colleagues as a distribution point for Bookstart baby packs. The team service both Essex Libraries and provide some of these services on behalf of Thurrock Libraries under an SLA.
- A **team of delivery drivers** who undertake the movement of stock and other reserved items between the Freebournes Road hub and all 74 libraries in Essex as well as the libraries in Thurrock. The team also provide a courier and delivery service on behalf of Essex Registration Service.
- One of the **mobile library vehicles** and drivers is based here too (see next section for more on mobile library service).

Although the Freebournes Road hub has remained open throughout the lockdown period, since it is shared with other priority colleagues such as ECL, the majority of the office based team have been able to work from home, as they all have laptops. Therefore, unless there has been a critical need for them to attend site, or they have needed to come to site to collect work, this team have remained working at home. The delivery drivers have been used to undertake a limited amount of work for both libraries and the registration service, otherwise staff have remained at home waiting for work. The mobile library service has not been operating and staff have been redeployed to other work.

We have been liaising with colleagues from MITIE regarding the recovery plan for the teams based at Freebournes Road, since MITIE are responsible for implementation of social distancing arrangements for most of this category 1 building, including the shared warehouse space.

Below is a summary of the intended recovery arrangements for these teams.

Office based team

As set out above, the office based team have generally been able to continue working from home throughout the lockdown period. Tasks that have been undertaken from home have included:

- Supporting the library Stock Manager with the placing of future stock orders.
- Reconciliation of invoices.
- Cataloguing activity. Ahead of a proposed change in the library management system in 2021, work has been continuing hard to review and update the library catalogue ready to move over to a new supplier. This includes the purging of thousands of inaccurate, missing or miscatalogued items from the library management system.
- The team have attended site to help prepare a one off delivery of stock to HMP Chelmsford, where the library has remained unmanned throughout lockdown.

A risk assessment was carried out of the space on 22nd May, which concluded that a percentage of the team (around 40%) would be able to return to work at Freebournes Road

to undertake work necessary to take place on site. Work identified as needing to take place on site and not from home includes:

Task	Detail	Time frame to get up to date
Receiving of new stock	To process the outstanding new stock left over from lockdown to clear the area for the newly placed deliveries	PRIORITY 1 - clear within 1 month of returning to Freebournes
Unwanted Stock shipped in from other libraries	Min of 40 trugs of unwanted stock that was already in the warehouse prior to lockdown and quarantined	Priority 2 - stock needs to be cleared to make space in the warehouse within 1 month of returning to Freebournes
FDI	As at 03.06.20 there are 364 invoices that need to be received/printed and collated to the FDI batches	End of July
Invoices	Unknown until return	End of July
Performing Arts Service (PAS)	PAS stock is held on site and needs staff to be on site to deliver this service. We currently intend to keep this service suspended when libraries reopen. Returning stock will need to be dealt with and any pending reservations will need to be reviewed / customers contacted.	Unknown until return
Processing new orders to fulfil existing reservations	Placing orders for new stock to meet reservations received prior to lockdown, including Amazon quick turnaround fulfilments	by end of July
Archiving invoices	Unknown until return	by end of August
Bolinda Statements	Unknown until return	by end of July
Newspapers/periodicals	Processing of invoices	by end of July
Interlibrary loans	Contact Unity UK regarding existing interlibrary loan requests or items out on loan (no new requests to be taken currently)	by end of July
Shelf checks – a limited selection of lendable stock is kept at LSU	Print list, find and process books	

Shelving	Filing existing books that were returned prior to lockdown	
Subs and SO's	Some filing to do and printing of invoices	by end of July
Summer Reading Challenge	Allocate and process books bought for SRC collection prior to lockdown	by middle of July

The current intention is that, since staff can do most of their work from home, there will be a phasing of the return for the team back to Freebournes Road, with staff only going on site to undertake a small amount of work during June. When libraries reopen from 6th July, this will be increased in line with the risk assessment, with around 40% of staff time returning to Freebournes, the remainder working at home. This plan will be reviewed and may need to be revised if the service offer available in libraries (both for Essex and for the services provided on behalf of Thurrock) changes in the intervening period or at a further stage in the phased reopening of libraries.

Delivery drivers

The delivery driver team have only been able to do a limited amount of work during lockdown. The team use Freebournes Road as a base location and for storage of stock in between shipment between libraries or registration offices, so they spend the majority of their working hours out on the road undertaking deliveries.

A risk assessment was carried out of the space on 22nd May and the majority of the team returned to working out of Freebournes Road from 26th May.

As noted elsewhere in this document, the delivery drivers are a crucial team to support the recovery for libraries and have been identified as being able to support in a number of ways outside the normal scope of their role. Here is a list of tasks agreed with the team leader of that team to be undertaken in the transition period prior to reopening. Some of these tasks may continue after 6th July as and where the team have the capacity to support those around business as usual:

- Clear all normal trugs / van deliveries held in libraries or at Freebournes Road prior to lockdown – this commenced 26th May.
- Home deliveries to customers of their reserved items (see section elsewhere in this document). The drivers and their team leader are working with one of the library team leaders to organise these deliveries, working with local library staff to facilitate access to the libraries, collation of deliveries and contacting library customers.
- Collection of MCCD (Medical Certificate of Cause of Death) certificates from doctor's surgeries on behalf of registration service. While we've been taking death appointments by phone, MCCD certificates have been scanned over from surgeries or hospitals to ERS, but we will still need the hard copies to come to Seax House. The drivers are collecting these from surgeries and bringing in to Chelmsford.
- There has been some limited work for registrations continuing, such as movement of stock and some register pages. Face to face appointments are scheduled to recommence from 15th June and after that the normal pouch

collections are expected to need to restart, similarly ceremony paperwork deliveries.

- 6 libraries don't have a self service (RFID) machine and we need to move one from one of the other libraries so that every library has one before we reopen.
- We will no longer be providing booksales from libraries. The drivers will collect this up from libraries and return to Freebournes Road for onward distribution to our supplier Better World Books.
- Collection of items, equipment and furniture left over from Essex Book Festival needs to take place as this was never completed in March.
- There has been some discussion about the drivers supporting the home library service over and above delivering reservations as set out above. This would include taking a small amount of additional stock alongside reserved items, but could grow into them undertaking some of the drop offs of stock when the service recommences in July if we don't have enough volunteers returning to the service (see also section on home library service).
- Supporting libraries needing to clear unwanted furniture or other waste for disposal.
- There may also be some support needed in shipping signage and equipment required to implement social distancing arrangements in libraries around the county from the central location in Chelmsford it is being delivered to.

Business as usual work for ERS will return from 15th June when face to face appointments restart. From 6th July onwards, the business as usual arrangements for library deliveries will gradually recommence on a phased basis in line with the opening of the libraries through July and August.

Mobile Library Service

Essex Libraries operates two mobile library vehicles (one based at Witham Library and one based at Freebournes Road, Witham). The service is normally operated by one full time and two part time drivers.

It will still be possible to provide a mobile library service, as both the vehicles are functional and some drivers are available, so the service will recommence on 6th July in line with the phased opening of libraries.

The service will however not be at the same level as business-as-usual and will be more prone to disruption.

- The vehicles have been assessed for social distancing arrangements. Only one customer will be allowed to come onboard the vehicle at any one time to access the service (we will also permit one adult to come onboard with a small group of children provided the adult accompanying the children supervises them at all times and they are in the same family group).
- A hand sanitiser dispenser will be installed on both vehicles fixed to the entrance-way wall, which customers will be asked to use before boarding the vehicle.
- The doors on the vehicle will be shut when the one customer is onboard to prevent further customers attempting to get onboard; notices will be on the doors advising of why we are doing this.
- Handrails will be wiped down with disinfectant before each customer enters (this was being done prior to the service shutting down).
- Since the mobile libraries do not have self-service machines, returned items will be placed in trugs onboard for quarantining and processed at a later date. The necessary space needed to implement this will slightly reduce the amount of browsable stock that can be kept onboard.
- Booksale items will be removed and donations will not be accepted.
- Reserved items being collected will be pre-issued and placed on the open shelves by the drivers before each stop so customers can help themselves to these without them needing to be issued on to their ticket. For bookgroups, items will be placed in a bag to reduce handling (*see however further below regarding home deliveries of reservations*).
- When customers want to borrow an item, there will be some options for how this can be done:
 - Customers stand behind a marked line 2 metres from the counter and call out their library card number and then the barcode number of items they want to borrow so the driver can input on the computer.
 - The fact that the doors on the vehicle will be shut whilst each customer is using the vehicle reduces the potential data protection issues about verbally calling out library card numbers.
 - Where this is not possible or practical, for example for visually impaired customers, the customer will bring their card and the items to the counter. A Perspex screen will be placed on the counter and the driver will look through the screen to take details of library card number and barcode number of items. Driver will also have a visor available to wear.
- The service does not currently have a full complement of drivers due to a vacancy. It has proven difficult to fill this vacancy, as the role has been advertised more than once to date without a successful candidate being appointed, which suggests this may not easily be resolved. In the absence of a full quota of drivers, the service has been using agency staff with the necessary HGV licence to drive the vehicle alongside a trained member of library staff to undertake the library duties. This

arrangement will not be possible because two people travelling together will not meet social distancing arrangements. This will also affect the service provision if the regular drivers are off sick or are on leave.

- At present we do not believe we can provide an alternative service, other than home deliveries of reservations, whilst complying with social distancing requirements, but we will review this regularly.
- Details of disruptions will be maintained on the Essex Libraries website.

Risks

- If someone was diagnosed with a case and had used the mobile library, this would have the potential to take the mobile off the road for several days whilst the vehicle was cleaned (having the mobile vehicle specially cleaned is a more bespoke service than would be the case at the static library buildings).
- Perspex screen and any other equipment required at stops will need to be able to be stored onboard for safe travel whilst vehicle moving.
- Ongoing disruption if not possible to fill the existing vacancy quickly.
- Reputational risk of not being able to maintain the full service until the vacancy is filled.

Home Library Service

The Home Library Service has not been running since lockdown commenced. There are a number of reasons for this:

- Concerns about social distancing arrangements.
- The closure of the libraries has prevented the volunteers accessing stock to make selections for customers.
- Many of the volunteers are not willing or able to volunteer because of their personal circumstances.
- Many customers are unable to receive the service due to shielding or being in the vulnerable group.

The service is planned to restart on 6th July in line with the phased opening of libraries, but we are making careful considerations to ensure the safety and wellbeing of both the volunteers delivering the service as well as the customers they are visiting. All of the above factors will still be at play on 6th July; and in addition we also expect an increase in demand for the service because customers previously accessing library services from a library will prefer to receive a service at home. All of these factors will influence the ability of the service to meet demand.

During lockdown, the service has regularly reviewed the offer to home library service customers and has implemented the following:

- Keeping in touch calls with the volunteers to check how they are and their current availability for when the service restarts.
- Befriending/keeping in touch calls to customers, either by library staff or their normal volunteer. Again this has been to check how customers are, signpost them to any other services they may benefit from (such as EWS) and to check their readiness to start receiving the service again.
- Starting 1st June we will be making home deliveries to customers of reserved items (*see further below regarding home deliveries of reservations*).
 - When customers are contacted to arrange this delivery, if the customer would also like some additional items to supplement the reserved items they have borrowed, we hope to facilitate a small selection of additional items on top of this.

From 6th July onwards, we intend to restart the service more fully, with volunteers returning to visiting customers' homes, but only to provide a drop-off service and not yet take in returned items. This is because it will be difficult to quarantine items being returned from customers at the same time as making visits to multiple customers with items to be borrowed.

The volunteers will be advised to contact each customer by phone prior to visiting to check:

- That they are happy to be visited
- What the agreed arrangements will be for dropping off the stock (e.g. whether to leave items on doorstep, an agreed time for the drop off etc.)
- If the customer would like more items than normal due to the length of time without a service.

If customers don't want to receive a visit, we may be able to arrange an alternative such as leaving items with a neighbour or carer; or keeping items at a library so that a friend or family member can come and collect them.

The library contact for each volunteer will discuss with the volunteers the practical arrangements that will need to be considered for them to carry out any visits. This will include:

- How items being selected to be taken to customers can be prepared. This will need to be thought about carefully to meet the wider service offer described above (e.g. where volunteers need access to the open shelves to select items for customers). It could be that in the short term, library staff already at the library will make up the selections for the volunteers so they only need to stop and pick up quickly; alternatively the volunteers might be able to access the library during closed times so they can choose items without restriction.
- Discussing how arrangements may need to be revised if the normal library the volunteer works out of is closed or the volunteer currently accesses the library after 5pm when the library will be closed.
- As new reservations cannot be placed, the volunteer may want to visit a different library than normal so they have a wider selection to choose from for their customers.
- Reminder of the longer loan period than normal for customers.
- Provide advice to volunteers about signposting opportunities and safeguarding policy for any concerns about customers.

We hope that the drop-off only service will only be a temporary arrangement and we will be able to reinstate the full service as soon as possible after 6th July, even if this involves the customer being visited twice so that stock being dropped-off and picked-up can be kept separate (but acknowledge this might be a lot to ask from volunteers).

Once the full service is available again, we will still need to have dialogue with the customers/volunteers about their circumstances and whether the volunteer can enter the customer's home as is normally the case – this might vary according to individual customers shielding or displaying symptoms.

As mentioned above, library staff are keeping in touch with volunteers to see how they are to gauge volunteer levels ready to deliver the service. We already know not all volunteers will be ready to volunteer by 6th July. Anticipating a shortage of available volunteers, ECC could look to address this issue by:

- Recruiting more volunteers through the current business-as-usual process, but this would take time and staff resource to put in place – especially so as Home Library Service volunteers are required to have an enhanced DBS check. Even then we could not be certain about the level of interest from prospective volunteers.
- Staff could undertake this work as a temporary measure in place of volunteers – there would be capacity issues with this as well as expense costs and staff would also need DBS check to be carried out.
- We could link up with other providers visiting vulnerable customers for other reasons, e.g. Essex Welfare Service.
 - We are currently working with the Strengthening Communities Team in Essex County Council to explore ways to pool resources and work together to enhance the pool of volunteers we might have available.

Issues for consideration

- Generic risk assessment will need to be developed.
- Until government advice changes, we probably should insist as a duty of care to our volunteers that they do not enter customers' homes, since we have no control over

social distancing arrangements in the home and cannot be sure of the level of risk the volunteers may be exposed to. For some customers this would be removing the most important part of the service (the social aspect with the volunteer).

- Many of the volunteers are only willing to volunteer as a pair (many also meet at their base library and then travel in one car to visit their customers before returning back to their base). Social distancing arrangements will prevent this from happening unless volunteers are in same family group, which we know will act as a disincentive to some volunteers doing their volunteer hours
 - They could instead travel in separate vehicles, but this would incur additional travel costs to the service in expense claims and even then social distancing arrangements would still apply.
- Activity will require access to sanitisers for volunteers (and potentially gloves if and when they start taking in returned items from customers that need to be handled and then quarantined). Access to this equipment may be hard to come by on a regular and consistent basis. Without these being available, volunteers/staff may be anxious and not want to undertake activity.
- Some volunteers will not want or be able to volunteer if their normal base library has not yet reopened and they have to go somewhere else.
- We would need to review the risk assessment at the point that returned items would be transported and agree the quarantining arrangements (e.g. bags or trugs for items to be placed in to reduce potential for spread of contamination).
- If the regular volunteer for a customer is not available (e.g. due to sickness or shielding), how customer records and stock choices/preferences are kept currently varies significantly across the county. It may be hard to retrieve this information if the library is closed or the regular staff/volunteers supporting this activity aren't around to obtain the information needed to share with another volunteer or staff member.
- Because some of the volunteers will have had a break in service of more than 3 months, we are going to need to consider additional steps under ECC's Safer Recruitment policy. This will include conducting status checks using the DBS Update Service where volunteer roles require a DBS check.
 - The service is being supported with this by the Customer Demand & Resource Planning team.
 - If volunteers have not kept their DBS Update subscription up to date and the status check fails, they will not be able to volunteer until a new DBS check takes place.

Transition period before reopening (getting ready stage)

During lockdown, library staff have been told not to attend work at the library at all, apart from in exceptional circumstances, or to support registration appointments. The majority of libraries won't have been visited by staff since the lockdown was announced. There will therefore need to be some work done to get both the building itself and specifically the library ready once go ahead is given to reopen.

As stated above, the current dates provided by government under their roadmap gives the service several weeks in June and early July to carry out necessary activity, which is a good amount of time to be fully prepared. The following activities are planned to start from 1st June onwards and are being scheduled by library managers. There is an associated checklist that library staff and supervisors will be issued to tick off as preparations proceed.

- 1) Staff at all levels to complete **self-declaration form**, identifying their personal circumstances and those of their household; and the **e-learning induction** programme either prior to returning to work or as soon as they are back at work.
- 2) **Visual inspection** of each site to check for any issues resulting in the long closure period. This includes an external and internal inspection for any potential damages or leaks.
- 3) **Risk assessment of each site**. This is required to meet government advice and to investigate changes to the layout of the library (both public space and staff area) to meet social distancing requirements. A team leader and/or area manager within the service will be carrying out this risk assessment to ensure a consistent approach across the service. The results will then be shared with staff.
- 4) Changes required to be implemented to meet findings of risk assessment. This includes changes to the layout to comply with **social distancing** requirements, removing and changing the layout of furniture, considering customer routing around the space etc as described in social distancing guidelines above.
- 5) Appropriate **signage** to be displayed to support the revised service offer, e.g. signs advertising the closure of the Hello Desk, signage asking people only to handle stock where they have the clear intention of borrowing it.
- 6) Site to be **cleaned** by MITIE ready for opening.
- 7) Checking all **equipment** is working, e.g. computers, self-service equipment.
- 8) Checking necessary **supplies** in place, including hand sanitisers as well as stationery.
- 9) **Reshelving** items returned during March 2020 and left in quarantine.
- 10) Processing any **money** left in quarantine during March 2020 and ensuring this is banked appropriately.
- 11) Carrying out a **stock take** of each library. This was a task that had commenced in March 2020 and needs to be completed. This is to ensure we have an accurate reflection of stock levels at every library and will allow items missing from the catalogue but currently showing as available to be purged.
- 12) A review of **posters and display material** in the library, removing items now out of date. Similarly ensuring current posters are on display, including current PLI certificate and 2020/21 fees and charges information.
- 13) Running a report on the **reserved items** in the library. Many customers were notified of reserved items ready for them to collect, but did not have the opportunity to come and collect them, prior to lockdown. We have decided to contact each customer to find out whether they still require the item awaiting collection; and if yes arrangements will be made to deliver this to the customer's home (see below).
- 14) Running a report on customers who have joined the library during lockdown but have only received a **temporary membership** number. Many customers have joined online during lockdown and been able to access online services during this period,

but not received a library card or full membership access. We will be updating library memberships for these customers and posting library cards to them so that they will gain full access rights without having to make a special trip to the library when they reopen. Cards will be posted out through Chelmsford Library where there is access to the County Hall mailroom.

- 15) Discussing opening arrangements with **partners and stakeholders** who share the space with the library service.
- 16) **Rotas** are produced and discussed with staff. This includes revising staff working patterns, which will need to be different to normal to reflect the different circumstances throughout the phased opening. This may also include booking additional as and when staff and/or asking staff for their willingness to work extra hours.
- 17) It is anticipated that **face to face registration appointments** will recommence from 15th June and therefore some staff will combine all of the tasks above with acting as a 'receptionist' for those customers to gain access to the 16 libraries with registration offices for their appointment (this will only involve opening the front doors to give them access and likewise at the end of the appointment whilst maintaining social distancing).
- 18) Staff will be asked to make as much space as possible for revised layouts and quarantined stock to be held and will therefore be asked to **declutter and tidy** the entire library space, especially staff areas.

Impact of social distancing and welfare arrangements for staff

The first actions from the risk assessment carried out by team leaders will be to consider and implement social distancing arrangements for staff areas. Staff will be accessing buildings as soon as possible afterwards, expected to be from 8th June, before customers re-enter the buildings, to prepare the libraries for reopening and to facilitate the recommencement of face to face registration appointments.

Key issues for consideration are:

- Discuss risk assessment with shared building users, e.g. Chelmsford Library will need to fit into wider plans made for County Hall complex; ceremony officers coming and going from library buildings when ceremonies restart.
- Social distancing arrangements for staff entry and exit points – separate entry and exit points if this is practicable.
- Staggered arrival times for staff, especially during the transition period where libraries opening hours do not need to be adhered to.
- Staggered lunch breaks for staff.
- Restrictions to numbers accessing staff kitchen, staffroom and toilet facilities.
- Trying to keep the same group of staff scheduled to work together at the same library on consecutive days wherever possible (this will be challenging as the service has so many part time workers).
- Provision of consistent hand washing facilities and hand sanitisers.
- Facilitate regular handwashing breaks for all staff.
- Access to wipes and sprays to enable high touch points to be wiped regularly.
- Review office checklist and change layouts of workroom areas, including following revised corporate advice about normal hotdesking arrangements.
- Where staff have an allocated laptop, they should use this at all times rather than using a desktop machine within the library. Where staff have to use a desktop computer because there is no alternative, staff should try to use the same machine each time. Should staff have to share a keyboard, mouse etc, sanitisers/hand gel should be used and hand washing breaks be included.
- Each library to have at least one laptop so that there is more flexibility on where staff can sit and work.
- If, during the transition period, libraries only have one member of staff on site doing admin and preparation work, lone working risk assessments will need to be reviewed, e.g. how and who staff contact someone to indicate they have left the building safely.
- Review fire evacuation procedures for staff.
- Remind staff not to share items for example, pens when signing in or out.
- Review of cleaning levels where staff are accessing the library at times when the building would not normally be cleaned as regularly.
- Trade Unions to be kept informed of proposals at high level view for the service.
- All staff will be contacted with revised guidelines before they return to work, as part of a revised health and safety induction encompassing significant changes in working practices. They will need to complete a self-declaration form, identifying their personal circumstances and those of their household; they will also complete an e-learning induction programme on or before their return to work that has been produced corporately by the Essex County Council Corporate Health and Safety team.
- All staff should be asked to review their emergency contact/next of kin details so that local managers can access these in the event of an emergency.

Additional impact for staff when customers return to libraries

The risk assessment for staff will need to take into account the period when staff are in the library alone, but then reconsider this again when customers return to using the libraries. This includes facilities shared by both customers, partners and staff.

Key issues for consideration:

- Any changes to elements mentioned above.
- Staff to be exemplars of social distancing arrangements so followed by customers.
- Review and reinforce disruptive behaviour arrangements. There must be a zero tolerance approach to verbal and physical abuse from customers.
 - Any additional security support we may require to assist with this, for example support from County Hall security at Chelmsford Library, when we immediately reopen.
- There will be currently be no lone working inside a library when libraries are open.

Equipment required to implement proposed measures

Until risk assessments are carried out, we won't know definitively any measures required at individual sites and/or additional requirements for extra equipment. The general advice from PHE is that:

"Where you are already using PPE in your work activity to protect against non-COVID-19 risks, you should continue to do so. When managing the risk of COVID-19, additional PPE beyond what you usually wear is not beneficial. This is because COVID-19 is a different type of risk to the risks you normally face in a workplace, and needs to be managed through social distancing, hygiene and fixed teams or partnering, not through the use of PPE".

Therefore the main message to staff will be to consistently reinforce the importance of:

- Keeping as many people as possible 2 metres apart from those they do not live with
- Regular handwashing

Things that we can be fairly sure will be identified on the risk assessments however are the requirement for:

- Guiding to inform customers about social distancing measures and/or create routing around the library spaces. This will be in the form of posters, barriers, signage, tape or floor guiding.
 - Some of this signage is available for the service through corporate means.
 - Some signage is available from PHE.
- Protective screening at any staff points where customers and staff are regularly expected to come into close contact (especially in registration offices).
- Queue management outside libraries. This will be in the form of barriers, tape or markings on the ground.
- Creating separate entrance and exit points.
- Extra storage solutions for storing returned items in quarantine.
- Furniture will need to be moved, removed or taped off.
- High traffic areas will need to be cleaned or wiped regularly.
- Staff not to handle items that customers are borrowing or returning to reduce contact.

The service already has the following equipment to support this:

- Self-service machines for borrowing and return of items.
- Some libraries have freestanding poster holders.
- Some libraries have hazard tape.
- Some libraries have tensa barriers or similar to cordon off certain areas.
- Some libraries have plenty of storage space where furniture could be stored, both for their own library and potentially other libraries.
- Spare libraries have surplus trolleys for storing books.
- The library distribution centre at Freebournes Road keeps some spare trugs; larger libraries may also have a surplus supply.
- Sack barrows are available at the majority of libraries to assist with moving furniture.
- The library service does have a 0.5 FTE member of staff who assists with low level maintenance work for the service.

In addition to the above, the library service and ERS have jointly ordered:

- Perspex screens to be used in registration offices.
- 200 packs of antibacterial wipes (60 wipes in a pack)
- Smaller Perspex screens for use on mobile libraries.
- 200 bottles of hand gel already arrived and distributed; another 400 bottles have been ordered (for use by staff and volunteers).
- Hand sanitiser pump bottles and 5 litre containers (for use for customers).
- Hand sanitiser dispensers for the mobile libraries – require installation.

Local supervisors and team leaders have also been given permission to buy additional supplies of wipes, hand gel and antibacterial sprays locally using their purchase cards where this is more practicable than orders through County Hall.

As risk assessments take place, further additional equipment may be identified as required; or may need to be shared between libraries (such as sack barrows), particularly to support staff during the 'getting ready' period for reopening.

Areas that will need attention and consideration where supplies are currently limited or not previously required are:

- Queue management outside libraries – this will need to be considered bespoke to each location as to best option such as barriers or markings on the ground. In some shared buildings and shopping centre locations this will be a joint discussion with other stakeholders.
- Hi vis jackets for staff to use where queue management is taking place on or near a road and this is identified as required by the risk assessment.
- Ongoing supply of sanitiser containers for use by customers – review once the 16 libraries open and we can anticipate how long supply purchased will last.
- Additional signage at larger sites advising of routing and social distancing arrangements – this has been ordered from colleagues in ECC property team.

Property related considerations

The fixtures and amenities within the library buildings are considered more fully in the generic risk assessment for use by library managers preparing libraries to open, but at a high level here are a few specific items we have considered not just as property related issues but as impacting on the service offer for customers.

- As stated above, no refreshments will be offered or café spaces to open.
- Ensure that toilets have signage on the outside that indicate that only one person enters the toilet area at a time; and that makes it clear when the toilet is occupied as per corporate guidelines.
 - We will not be offering customers access to our toilets or baby changing facilities as an interim arrangement.
- Lifts to be used only by one person at a time (staff or customers) unless the customers are members of the same household as per corporate guidelines.
- Not using escalators in libraries where there is an alternative staircase.
- Changing use of stairwells to be one way only where possible.
- Some of these facilities are not ECC's property so we will liaise with landlords etc about any local arrangements or risk assessments they may have introduced in shared areas.
- Although discussions will be had during the production of the risk assessment wherever possible, we will share copies of the risk assessment with all tenants or those leasing parts of our library buildings before they return to providing a service.
- Similarly although discussions will be had during the production of the risk assessment wherever possible, we will also request to see copies of risk assessments by partners or landlords where it affects the functioning of our service, e.g. for our libraries on school sites, Basildon Library where there is a shared entrance for multiple services operating from the hub.

What will need to happen if lockdown comes back into force or there is a second wave?

Once libraries reopen, if there was subsequently a second spike in cases of Covid-19, it seems reasonable to assume that how Essex Libraries reacts would be influenced by a steer from central government, either directly or indirectly. This could be in the form of news conferences, as has been the case to date, or could be provided to the local authority to cascade. The library service is aware that ECC is establishing a team to react and coordinate any information received through the new Track and Trace app and so it is possible this team could be used to cascade direction from government.

It seems reasonable to assume that a second wave, or spike, in cases would once again mean that:

- Non-essential travel and movement would be restricted.
- Restrictions on people congregating would be reintroduced.
- Non-essential shops and businesses would be asked to close.

Since libraries have been treated in government guidance in the same group as non-essential shops, it would follow that libraries would once again be asked to close, albeit it might be a more localised picture than the initial nationwide lockdown.

If government were to provide this direct advice, the experience gained from the first lockdown would allow us to reverse changes and follow a similar process as was the case in March 2020. This would include:

- Announcing libraries as closed – including possible requirement for a new CMA.
- Following the library closure checklist.
- Demobilising the building and addressing any measures required to maintain hygiene such as having rubbish and sanitary waste collected.
- Increasing loan periods and due dates, disabling overdue charges.
- Taking down public access to the library catalogue.
- Mobilising staff for redeployment.
- Working with registration colleagues to support how registration appointments would be delivered.
- Reverting back to the enhanced alternative offers through the e-library and through the Essex Libraries website and Youtube page.

If the government did not provide specific advice that all libraries should remain closed, but other restrictions were introduced that reduced the available workforce, or that influenced the number of buildings that could remain open safely and cleaned, the normal Essex Libraries Business Continuity Plan arrangements would be followed (i.e. starting to prioritise the libraries that remained open, gradually reducing down to the 16 libraries with registration offices in them, then the 4 hubs, then just Chelmsford Library).

If there was a second wave elsewhere in the country that did not directly impact on Essex and libraries were able to remain open, but supplies of sanitiser, hand gel or other cleaning materials were no longer available, the service would still need to be reviewed.

Protocol in the event of a suspected or confirmed case of Covid-19

If someone in one of the libraries reports they are symptomatic (i.e. they have a high temperature and a new, persistent cough) and suspect they may have Covid-19, they would be advised to:

- Return home immediately
- Avoid touching anything
- Cough or sneeze into a tissue and put it in a bin, or if they do not have tissues, cough and sneeze into the crook of their elbow.
- Follow the guidance on self-isolation.
- If they are a member of staff and are advised to self-isolate, they should not return to work until their period of self-isolation has been completed.

In the event that someone accessing one of the library service's buildings (whether staff, partner or customer) reports that they have been diagnosed with a confirmed case of Covid-19, it will be necessary to close that building to be cleaned with immediate effect to reduce the continued risk of contamination.

Current government advice is that the infection risk following contamination of the environment decreases over time and that the risk is likely to be reduced significantly after 72 hours. It is possible to request a deep clean of a library through MITIE, which if done reasonably quickly could allow the library to reopen 24 hours later; however the corporate advice received is that because a specialist contractor would need to be mobilised and the library service is geographically spread, the more realistic alternative is that the library remains closed for the full 72 hours and then receives a normal clean before reopening. In any case it is acknowledged that because of the nature of the content of libraries (thousands of books many without plastic covers that cannot be easily wiped or cleaned), remaining closed for the full 72 hours is a prudent measure to mitigate the risk of transmission through the book stock.

In the event of a confirmed case, all staff on duty since the person with the confirmed case accessed the space would be notified and as per PHE guidelines sent home and advised to self-isolate for 14 days. The other household members of that wider class or group do not need to self-isolate unless the child, young person or staff member they live with in that group subsequently develops symptoms. We would as much as possible also notify partners using the space and any customers that we were aware of using the space (this could be verbal where the customers are known to us, or through our social media channels as well as signage visible from outside the library building).

Consideration would need to be given to how short notice closures would affect other building occupiers, such as registration appointments that may be scheduled. The business-as-usual closure checklist would therefore also apply in addition to specific arrangements around the cleaning of the building.

If the library did need to be closed, we could investigate options to provide alternative opening hours at another library for the duration of the closure (subject to having enough staff to do so). This could be the case for example by providing additional opening hours at a library normally closed on certain days; or opening a library that it was hitherto not possible to open due to lack of staff.

Customer reservations

Customer reservations form part of our core library offer, whereby customers can order an item from anywhere in Essex and Thurrock libraries through the online catalogue for collection at their local library. Customers can also place Interlibrary Loan Requests to access items not held in Essex, which are then lent to Essex Libraries by other library authorities for loan to our customers.

During lockdown, the reservation service has been suspended and customers are not able to place new reservations, or collect reservations previously ordered that are awaiting collection at local libraries.

Once libraries reopen, we expect the demand for this service to increase, as customers will have limited browsing time when accessing a library, or will want to reduce the amount of contact time they will wish to have in a library when browsing.

A report run from the library management system in May 2020 indicates that there are approximately 7,000 items awaiting collection at Essex libraries when we reopen (plus 1,000 items in Thurrock libraries). This is a significant number of customers coming in to collect items shortly after libraries reopen, alongside customers wanting to return and borrow stock, at a time when we would be limiting customer numbers able to use the library and customers may have to queue outside waiting to gain access.

For this reason, we will not be reinstating the ability to place reservations as soon as libraries reopen; however reservations already placed but not received by the customers yet will be honoured.

To further mitigate the impact this may otherwise have had, we will be using staff time in the 'getting ready' phase prior to reopening to do the following:

- Staff to go into the library and go through their reservation collection shelf alongside a report from the library management system to check items supposed to be awaiting collection are on the shelf.
- Staff to contact each customer and check whether they still require the item(s).
- If the customer still wants the item, check whether the customer would prefer to have a home delivery of the item rather than collecting in person.
- If the customer would prefer a home delivery, agree how the item can be delivered – this will depend on the size of the item (whether it fits through a letter box); whether the customer would prefer it to be left on the doorstep or in back garden etc; confirmed that we won't physically hand the item to the customer if the customer is symptomatic.
- Arrange for the item to be collected by a member of library staff or one of the library service's van drivers from the local library and brought to the Freebournes Road library hub.
- Staff at Freebournes Road to confirm a home delivery with the customer; and a van driver to make the delivery.

This will be the first time that Essex Libraries has attempted a home delivery service to customers and will require significant capacity from our van delivery drivers, who normally be making deliveries to and from the libraries; however it is felt that should the trial of delivering existing reservations currently sitting in libraries be successful, this could be continued after libraries reopen.

The library management system indicates that there are approximately 25,000 items in Essex and Thurrock either in-between libraries satisfying existing reservations that would be

available for collection soon after we reopen, or are awaiting staff checking the shelves in libraries to process for an existing reservation. If these items could be home delivered, this would reduce the level of stock the drivers would need to move around on their regular deliveries to libraries and so it is hoped could counteract the change in staffing capacity.

It should be acknowledged that there will still be reservations that will need to get to libraries for collection, e.g. where a friend and family member is collecting the reservation on behalf of the customer, or where the customer will not be able to be at home at the time of a delivery. We hope to home deliver all these items before libraries reopen ; however if this proves not to be possible, extending the timescale for the home delivery service could lead to a reduced frequency of deliveries between libraries as per the current arrangements and so the benefits to certain customers of a home delivery might lead to other customers having to wait longer for their items.

It is however felt worth pursuing this option to reduce the potential impact when libraries reopen and to provide a better customer experience, especially for those customers who would either have to queue at libraries to collect their items, or are currently not able to get to the library for other reasons (no transport, reluctance to use public transport, are shielding or are in the vulnerable group).

Additional services normally available at libraries

The library service offers a range of services from its buildings, some of which are offered by the library service itself; others by library staff but on behalf of partners; or others where another organisation delivers a service using the library space. Some of these services are universally offered in all libraries, some only in a handful or even in individual libraries. With social distancing measures in place, it will be very difficult to provide all of these services as normal, either because of the amount of space required, or the level of customer contact involved. A summary of services and proposals are below:

Service	Comments
Battery recycling	As service is not part of the core service and encourages customers to make non-essential journeys, this service will not be available.
Booksales	As service is not part of the core service and encourages customers to make non-essential journeys, this service will not be available.
Café spaces	Service will not be available.
Crisp packet recycling	As service is not part of the core service and encourages customers to make non-essential journeys, this service will not be available.
Donations to stock	We will not be accepting donations to stock until further notice.
Document verification services	These are normally provided on behalf of another organisation. Individual discussions will be held with these organisations.
Electrical waste recycling	As service is not part of the core service and encourages customers to make non-essential journeys, this service will not be available.
EU settlement scheme	This service will be reviewed.
Faxing	Due to the handling requirements of both the documents to be faxed and the money to be taken from customers, this service will not be available.
Gallery spaces	Service may be available but will be subject to space and risk assessment at each library.
Hearing aid batteries	Service will be available.
Interlibrary loan requests	New requests for interlibrary loans (items requested from outside Essex and Thurrock libraries) will temporarily be suspended.
Newspapers and magazines (hard copies)	Due to the high touch nature of the service this service will not be available.
Performing Arts service	New requests through the PAS will be temporarily suspended, however existing items needing to be returned can be returned.
Periodical requests	New periodical requests will not be accepted on a temporary basis.
Photocopying	Due to the high touch nature of the service and many libraries not having coin boxes to take payment, this service is temporarily suspended.
Recycling resources on behalf of district councils, e.g. clear recycling sacks, kaddie sacks, cardboard waste bags.	Service offer looks different in each district. Will depend on individual discussions with district councils.

Scanning	As public computers will not be available, scanning will also not be available.
Sensory walls	We will not be able to provide access to this service until further notice.
Toilets and changing facilities	Service will not be available.

DRAFT

Libraries Connected 9 principles for reopening libraries

<https://www.librariesconnected.org.uk/news/safety-first-recovery-library-services>

- a. Staff, user and volunteer safety is paramount. All planning should be based on risk assessments, carried out with staff, unions and health and safety teams. It must take account of public health guidance and be frequently revisited as risks evolve.
- b. Re-opening will be a phased process based on risk management, availability of staff and resources, and local priorities of need.
- c. Vulnerable and disadvantaged users may not be able to physically access libraries while the pandemic remains, so thought should be given to meeting their needs through alternative arrangements.
- d. Planning should anticipate the need to withdraw or suspend services, should public health and government guidance require it, or if there is a shortage of staff and resources.
- e. The practicalities and priorities for reopening will differ for each library service, and careful planning is needed down to branch level.
- f. Planning should take into account preparation time for new procedures, spaces and workflows, and for staff training.
- g. Clear communication is essential to manage public expectations of the service and behaviour within the library buildings.
- h. The situation is changing fast and detailed advice will also change over time, so any plans should be flexible and take account of updated guidance and context. Once in delivery, revised arrangements should be reviewed regularly.
- i. Library buildings should reopen with the foundations to reshape into the form that best meets the future needs of society, and their communities, and learn from this period of enforced change without being limited by it

AGENDA ITEM 6

Report title: Proposals on ECC's future role in relation to services provided by ECC to Gypsy, Roma and Traveller communities in Essex.		PSEG/07/20
Report to: Place Services and Economic Growth Policy and Scrutiny Committee		
Date: 25/06/20	For: Discussion	
Report authors: Adrian Coggins, Head of Public Health and Wellbeing		
Enquiries to: Adrian.coggins@essex.gov.uk		
County Divisions affected: All Essex		

***Please note** that this report has a confidential appendix which is not for publication as it includes exempt information falling within paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972, as amended.*

1. Purpose of Report

- 1.1 This report is a briefing paper in advance of a Cabinet Report which is scheduled to be considered by Cabinet on 21 July 2020. This report sets out the future role of Essex County Council (ECC) in supporting the Gypsy, Roma and Traveller (GRT) communities within Essex.
- 1.2 There is evidence to suggest that the GRT community experience various inequalities, in terms of accessing key services with a propensity to experience ill health, lower life expectancy and educational attainment.
- 1.3 It is proposed that ECC's best role in supporting the GRT community is one of reducing the inequality of outcomes, particularly within health and education, and no longer directly providing travellers sites. This is commensurate with ECC strategic priorities of improving outcomes for the people of Essex and supporting those who are vulnerable and at risk of not achieving good outcomes.
- 1.4 With the intention of addressing the inequality of outcomes for the GRT community in Essex, whilst achieving the best strategic fit of service provision, this report will ask Cabinet on 21st July 2020 to agree to ECC divesting itself of the 11 ECC owned and one leased GRT sites.
- 1.5 Essex County Council no longer has a statutory duty to provide the sites.
- 1.6 The sites provide a substantive contribution to lower tier Local Authorities' traveller pitch provision, and lower tier Local Authorities are keen that this pitch provision continues.

2. Draft Recommendations to Cabinet

- 2.1 That ECC divest itself of the 11 owned and one leased site, through sale and through entering into negotiations regarding the leasehold site, to a third party or parties to own/lease and manage the Gypsy and Romany Traveller sites currently run by ECC.
- 2.2 That a two-stage competitive process be held to dispose of the sites where ECC owns the freehold with the selection/evaluation criteria being in Section 3 below with the Director, Capital Delivery being authorised to select the winning bid.
- 2.3 That Colchester Borough Council be involved in the selection process at Severalls based on the same criteria with a view to the lease being assigned or surrendered and re-granted by Colchester BC.
- 2.4 That the sites be sold on terms as set out in this report but specifically that they remain as GRT sites for a term of at least 25 years, or for the duration of the current or emerging Local Plan in the district, with the Director, Wellbeing and Public Health being authorised to determine the length.
- 2.5 That sites are sold with a covenant limiting the use as a travellers site and not for any other use requiring planning consent. An overage clause of 50% payable to ECC on future sale, change of use, extension or re-development for a period of 25 years from the date of transfer. This is indicative based on Officer discussion on previous transfer of ECC assets.
- 2.6 That with the divestment of the sites, ECC prioritises its role to one of reducing the inequality of outcomes, for Gypsy and Roma Travellers in Essex. This will be achieved through continuing with a specialist team - the Essex County Traveller Unit (ECTU), that is hosted by ECC, co-ordinating a broader overall outreach and advocacy programme with other agencies such as the NHS and Public Health England.
- 2.7 That the ECTU joint committee agreement continues in its current form to ensure a co-ordinated countywide enforcement and welfare response to Unauthorised Encampments (UEs) across Essex, subject to partners continuing to financially contribute towards service provision.

3. Summary of issue

- 3.1 The ECTU was established in 2012 and is a partnership operation, hosted and led by ECC working under a joint committee and funded by its members' contributions. The members currently comprise 10 Essex Local Authorities and one Unitary Authority. Essex Police and Essex Fire and Rescue also form part of the partnership alongside various ECC services.
- 3.2 The ECTU was established to address significant inconsistencies in policies and lack of co-ordination in the management of unauthorised encampments

across Essex, and to provide an outreach service that works with GRT families on ECC owned and private sites. It also undertakes centralised management of unauthorised encampments on local authority land or the highway on behalf of its members.

- 3.3 GRT communities experience significant inequalities in access to key services including health, education, social care and fire safety support though being a highly vulnerable, difficult to access group. GRT communities tend to have a propensity to experience ill health, lower life expectancy and educational attainment. The most recent GRT Health Needs Assessment (2018) reinforces the point that the GRT community often experience ill health and a lower life expectancy. This poorer health is due to many physical, environmental, cultural and psychological issues, and mental health needs may well be significant, like those from other vulnerable groups such as the homeless.
- 3.4 Evidence has also shown that members of the GRT community are often reluctant or unable to access services successfully – again, due to many cultural, social and logistical reasons, both within and beyond their communities. Travellers spoken to as part of the preparation of the Health Needs Assessment were largely happy to use the locally provided health services and did not want to use ones just for them. They did however often have considerable practical and cultural barriers that made deciding to access, and effectively navigating, those general services more difficult. Education outcomes is another area where outreach and advocacy are needed to support reducing the outcome gap compared with non GRT pupils.
- 3.5 The outreach and management of unauthorised encampments functions well as evidenced through twice yearly performance reporting to the ECTU Joint Committee. ECTU's outreach service continues to address those issues in facilitating the initial access to these key services with a view to continuation of access once established. A sample of achievements from 2016 to 2020 are given below:

Health - outreach to over 100 Gypsy/Travellers on primary immunisations and flu jabs – 400 families supported to register with a GP/confirmed GP registered, 53 people identified /supported with long term conditions

Education – 905 children supported into school – primary and secondary, 113 young people supported into further education /apprenticeships.

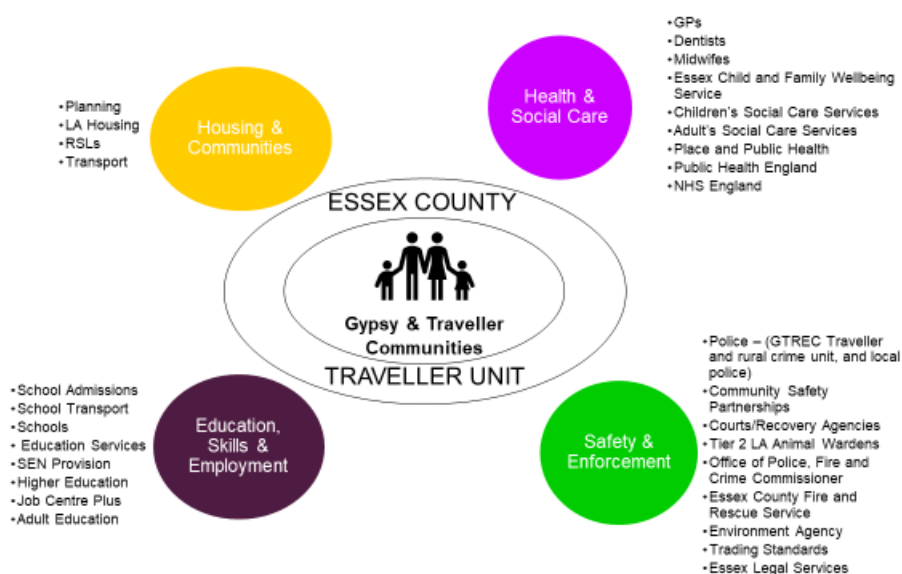
Fire Safety – 601 home fire safety visits completed, 556 smoke alarms issued, 339 site fire safety visits.

Unauthorised encampments – there have been a total of 1254 known encampments across Essex of which 745 were managed by ECTU on behalf of its members. From those that were managed by the ECTU 90.23% were visited within 1 working day of arrival, 295 left via

negotiation, 98.75% of the remaining were moved via the court systems within 10 working days, 93.75% within 7 working days.

- 3.6 ECTU successfully deals with encampments in a sustainable and appropriate way and continues to meet a need. Outreach and advocacy work are limited by capacity and management capacity is slightly biased towards those residing on sites, who may not be those in the greatest need. Capacity is additionally limited because the management of ECTU also manages travellers sites, as described later in the report. Although the sites have dedicated site management staff, outreach workers spend time assisting travellers who reside on site. This is likely to have to continue regardless of who owns the sites. This means that ECTU management resources which could be invested across the wider 2,000 population of Travellers in Essex are not because of a focus on site ownership and management which is based on the need for ECC to manage the travellers sites.
- 3.7 It is proposed that Essex GRT resources are instead focused on improving outcomes for Travellers which is based on a forward strategy. An outline of such agencies and stakeholders is given in the diagram below:

Essex Gypsy and Traveller Stakeholder Map



- 3.8 The ECTU is well placed to lead on the co-ordination of a broad integrated programme of work delivered across a range of commissioning responsibilities and by a number of different agencies. This could include both a strong engagement function first, and a subsequent programme of health and/or education outcome related interventions. This is in keeping with the 2018 GRT Heath Needs Assessment recommendation that there should be a) increased awareness and collaboration between professionals and organisations that work with Travellers to deliver outcomes in a systematic way b) introduction of more and specific health related goals and outcomes within ECTU's strategy,

building delivery and achievement into the unit's work plan though engagement with stakeholders, to provide capacity and monitor outcome delivery.

- 3.9 Continuation of hosting of the ECTU by ECC also provides a useful advisory role for areas of ECC and wider Essex public sector. The publication in April 2019 of the Parliamentary Women and Equalities Committee Report recommended that "senior leaders in all public service bodies be trained in the Public Sector Equality Duty and that each body have a Gypsy, Roma and Traveller "champion", similar to the role that exists in the National Police Chiefs Council." Retaining the considerable GRT expertise in house enables ECC to evidence not only that there are GRT champions, and also that policies developed by ECC can be subject to useful peer challenge from a team with the specialist expertise needed to inform the right approach.
- 3.9 Aside from ECC's lead role in the ECTU, ECC manages 11 owned and one leased GRT sites throughout Essex providing a capacity of 188 pitches. Of these 174 are currently habitable and occupied. These sites are managed as part of the ECTU operation, with some shared resources and joint roles but operate independently of the ECTU membership with a separate budget. ECC's ownership of these sites has arisen because until 1994 ECC was under a statutory duty to provide sites. The list of sites and locality is given below:

Site	District	Total Number of Pitches	ECC's Ownership
Hovefields	Basildon	25	Freehold
Ridgewell	Braintree	12	Freehold
Sandiacres	Braintree	14	Freehold
Cranham Hall	Chelmsford	10	Freehold
Ladygrove	Chelmsford	12	Freehold
Severalls	Colchester	12	Lease
Hop Gardens	Epping Forest	16	Freehold
Elizabeth Way	Harlow	21	Freehold
Fern Hill	Harlow	23	Freehold (subject to a covenant in favour of Homes England)
Brick House	Maldon	6	Freehold
Wood Corner	Maldon	20	Freehold
Felsted	Uttlesford	17	Freehold

- 3.10 Each pitch is held by a resident under a formal signed licence agreement. and is governed by the Mobile Homes Act 1983. Site residents generally have the right to remain in occupation for life or until such time as they voluntarily vacate the pitch or, are evicted through an order of the courts due to a breach of the licence agreement.
- 3.11 The sites are generally managed well but some experience, as with other Local Authorities managed sites, a range of specific, periodic issues that include anti-social behaviour, criminality, licence breaches, property damage, and fly tipping. Such issues can cause disharmony amongst residents of the sites and between the settled and GRT communities. We work to address such issues within given powers and in collaboration with the Police, and other Local Authorities as appropriate. However, where issues arise this can require

intensive management and in addition to site managers include the resources of the wider ECTU team and ECC management to resolve. In addition, ECC may incur expenditure to resolve such issues, which means that there is less money for general site maintenance. For example, during the financial year 2019/2020 £83,000 was spent on ad hoc waste clearance and prevention measures and £175,000 on static site security. The ECTU team and wider management resources could be better deployed on contributing to the improvement of outcomes for the wider GRT community across Essex, of approximately 2,000 people rather than addressing time consuming and often protracted localised site management issues.

- 3.12 The travellers site team does not have a capital budget and general basic operating repairs and maintenance are undertaken from revenue streams. Where capital investment has been undertaken, namely in the new build of Severalls site or re-instating of pitches at Fern Hill, funding has predominantly come from external grant bodies e.g. Homes England. There are currently no planned capital schemes for 2020/21 or future years. The controllable revenue budget for the sites for the current year and the projected budget for the service for future years can be seen below:

	Current Budget	Projected Budget (000's)		
	2020/21	2021/22	2022/23	2023/24
Expenditure	683	703	726	749
Income	(683)	(703)	(726)	(749)
Net site budget	-	-	-	-
Total ECC Net Controllable budget	267	274	278	259

- 3.13 In September 2018 Lambert Smith Hampton, ECC's property consultants, were commissioned to investigate a programme of planned and periodic maintenance for the sites. Lambert Smith Hampton have recommended that work costing an estimated £2.9 million be spent across the sites over ten years with a recommendation of work costing an estimated £506,527 being spent in year 1. This contrasts with the maintenance budget for £235,465, meaning that over time it is likely that a backlog of maintenance will arise. This takes no account of other factors which may increase the need for repair, for example, nine pitches on the Felsted site have recently become uninhabitable owing to antisocial behaviour. The maintenance budget for 2020/21 is £235,465 and the recommended expenditure exceeds this with no other funding identified within year or within future years budget. A summary of the recommended maintenance expenditure for all sites, over a 10-year period is given below.

Year 1	Year 2	Year 3	Year 4	Year 5	Years 6-10
£506,527	£663,904	£277,292	£243,707	£532,332	£673,298

- 3.14 The sites are run on a break-even basis. Around 66% of the sites' income comes directly from housing benefit and universal credit. We collect rent from those not eligible for benefits and water charges from all. The income collection operation collects around 95% of charges due. However, as similarly

experienced across the social housing / landlord sector, arrears occur. As of June 2020, outstanding arrears are £95,408 for site licence fees and £17,672 for water. The current COVID 19 situation has exacerbated arrears. Debts are attempted to be recovered and residents supported to pay with formal (via court orders) or informal management plans in place. Debt can particularly impact upon maintenance, as maintenance budget reduces with the availability of funds.

- 3.15 If the sites were sold then outreach could benefit by management time being freed to focus on outreach . At present 30% of the ECTU manager's post is charged to site management. Without the sites he could spend 100% of his time on supporting the wider GRT community rather than site management
- 3.16 Divesting is not incompatible with ECC's overall housing activities where there is a focus on improving outcomes for more vulnerable groups, rather than ownership and management of the homes in which they live. One example of this is where Essex Housing build apartments for people with Learning Disabilities and sell these buildings to Registered Providers, with ECC retaining the rights to nominate residents into the schemes.
- 3.17 District Councils are responsible for preparing a local plan to meet the housing needs of their districts, which includes sufficient provision for GRT community. Retention of the sites for GRT people is needed by districts to evidence that sufficient provision has been made. Discussion to date suggests that district councils have no objection in principle to ECC disposing of the sites, provided that due consideration is given to effective ongoing management. ECC is not able to guarantee that sites disposed of will remain in use as GRT sites indefinitely post sale, but will make all reasonable efforts, working in conjunction with districts, on any future site-specific sale agreements and appropriate title restrictions to ensure as far as possible that existing occupants' rights on the sites are protected.
- 3.18 Regardless of who owns the sites going forward, good site management is critical, and we will ask that joint management plans to collectively solve complex challenges should be considered by site owners and other local stakeholders such as tier 2 authorities and, if necessary on case specific basis, Police and the Essex Fire and Rescue Service. For example, in a minority of sites where there is criminal activity or antisocial behaviour a joined-up approach between the site owner, upper and lower tier local authorities and the police can ensure a good balance between engagement, welfare and enforcement functions. ECC has been proactive in instigating such joint management plans with other partners in the minority of sites where this is needed, and it is the expectation, but not a requirement of any sale that such joint working practices continue. ECC's role in such plans will be one of contribution, through the ECTU and working with wider partners, to improving outcomes as all site management responsibilities will cease once all sites have been disposed of.
- 3.19 No consultation with site residents has been undertaken. Consultation would be required if an option is chosen which has a significant impact on residents but the Council will require any purchaser to use the sites as a travellers site

and not risk their continued residence on sites. As a condition of disposal, it is proposed that buyers be required to use the sites as gypsy and traveller sites for a period of 25 years from the date of transfer, subject to discussion with other stakeholders on a site-specific basis.

3.20 It is proposed that in addition to the above restriction the following terms would apply to the freehold sales:

- A covenant requiring the owner not to cause or permit any nuisance on the site
- Overage provisions lasting for 25 years so if the site is re-sold or developed then 50% of the overage is paid to ECC
- Requirement to produce a site management plan

3.21 A risk register would be maintained for the site selection and disposal process. The risk log shall be dynamic and overseen by the Head of Service in consultation with the Cabinet Member. Such risks shall include but are not limited to:

- opposition to the proposal from residents and local community groups affecting the reputation of the County Council
- complaints from local residents and site residents if the future management of the sites is not of the expected standard and the County Council is perceived to have abdicated responsibility.
- complaints from local residents and site residents if the future management of the sites is poor, with the County Council having to resolve issues from its own resources.
- site residents receiving a worse service under the new ownership and that existing residents' rights of occupation are eroded.
- site residents vacating the sites and requesting housing placing pressure on districts and boroughs and potential increase in unauthorised encampments.

3.22 It is proposed that in taking forward the proposal to divest of the sites, the disposal process would include due diligence at all stages in determining the selection of 'fit and proper' future site owner(s). It is proposed that this is a two-stage process with the first stage being open to everyone to submit expressions of interest pre-qualification with those meeting the criteria being invited to proceed to submit a formal tender at the second stage.

Assessment Criteria	Criteria
Stage 1: Preselection (Pass in all areas is mandatory)	
Business and Professional standing <ul style="list-style-type: none"> • Convictions • Bankruptcy /insolvency/ compulsory winding up/ receivership • Failure of obligations to pay taxes/ social security. • Legal or administrative finding of an act of grave misconduct in the course of business 	Pass/Fail
Financial Standing	Pass/Fail

<ul style="list-style-type: none"> • Provision of statement of turnover, profit & loss, cash flow, audited accounts. 	
Competency & Track Record <ul style="list-style-type: none"> • Evidence of experience in managing traveller sites or social housing or equivalent business sectors. • Identification of References 	Pass/Fail
Business Practices <ul style="list-style-type: none"> • Management of Health & Safety • Environmental Management • Equalities 	Pass/Fail

3.23 Those passing at the first stage would be invited to submit a formal tender at the second stage when formal bids will be invited. The proposed award criteria are below. We have sought to maximise the weight given to quality but it should be noted that the Council's ability to enforce quality in tenders will be limited after the transfer has taken place. It is therefore crucial that as much of the quality as possible is assessed at stage 1.

Tender criteria	Max score
Lettings Policy, Procedure & Management <ul style="list-style-type: none"> • Allocations • Compliant handling • Repairs and maintenance • Treatment of licence fees/ utility charges • Compliance to Mobile Homes Act 1983 • Asset Management Plan / investment intentions 	10
Anti-Social Behaviour Strategy, Policy and Procedures <ul style="list-style-type: none"> • Complaint Handling • Intervention & Enforcement • Partnership working. 	10
Welfare Policies & Procedures <ul style="list-style-type: none"> • Debt management • Welfare support • Partnership working and accessibility to residents– Essex County Wide Traveller Unit outreach. 	10
Acceptance of Terms of Transfer (Pass / Fail) <ul style="list-style-type: none"> • Confirm acceptance of restrictions/ covenants • Appropriate plans for dealing with TUPE and Pensions issues 	
Appropriate supporting references (Pass /Fail)	
Price score	70

3.24 In event of no initial sale or a sale of only some of the sites, ECC will continue to manage the sites whilst disposal of the sites is progressed further. If it becomes apparent that disposal of the sites is unattainable in the short to medium term then ECC's provision of site management shall be reviewed and shall be subject, as determined by any outcome of any review, to further decision making.

4. Options

4.1 Option 1 – Do nothing and continue with current operations for both ECTU and ECC owned/leased sites.

This is not a recommended option as ECC's role is not as a social landlord and a better role is for ECC to focus on improving outcomes for the wider GRT communities across Essex, which would not improve unless additional effort is invested in the co-ordination of delivery of a broader outreach programme that encompasses the contribution and role of other agencies and stakeholders. Improving outcomes aligns well with ECC's strategic priorities. Maintaining ownership and management of the sites would not be congruent with ECC's overall housing activities where there is a focus on improving outcomes for more vulnerable groups, rather than ownership and management of the homes in which they live.

4.2 Option 2 - ECC divests itself of the sites based on current use (Recommended Option)

Recommended option being that ECC divests itself of 11 traveller sites by freehold transfer and the 1 leasehold site through negotiation with the lessor. Whereby the sites remain as GRT sites for an agreed term with appropriate protections applied such as restrictions in use and overage clauses specific to the individual circumstance of each site. In addition, existing residents to have the same future rights of occupation as they have now.

4.2.1 Upon divestment of the sites the ECTU/ ECC concentrates its efforts on:

- co-ordinating a better collective offer from internal ECC functions and external partners, including Public Health England and the National Health Service to improve outcomes for the wider population for the GRT communities across Essex.
- Continuation of ensuring a joined-up approach across Essex stakeholders with effective enforcement, management and welfare considerations associated with unauthorised encampments

4.2.2 Option 2 is commensurate with ECC's strategic priorities as well as adding value to the collective GRT work in Essex by:

- co-ordinating collective commissioning and provision of a multiagency outreach and advocacy offer in recognition of GRT communities specific and unique characteristics.
- co-ordinating a consistent approach countywide approach to the welfare and enforcement function for UEs.

4.2.3 This option would not seek to invest effort into GRT which is disproportionate to other vulnerable groups or other group with protected characteristics. It is in recognition of the unique characteristics of the GRT community and the need to

undertake specific targeted, co-ordinated activity for successful outreach, advocacy, welfare and enforcement.

4.3 Option 3 - ECC disposes of the sites for commercial gain

It is not recommended that ECC sells the sites purely for commercial gain e.g. change of use. Lower tier Local Authorities who have planning powers would be reluctant to allow change of land use from traveller sites to alternative use as current sites are a substantive contribution to localised GRT pitch provision. Site sale for commercial gain would also create uncertainty for current site residents on their future homes, which is not commensurate with ECC's proposed best role of improving outcomes for GRT. In addition there are various covenants in place across the sites that restrict the use of the sites to that of GRT sites. Although remedies could be sought to remove such covenants this could result in protracted legal processes with no certainty of outcome.

5. Issues for consideration

5.1 Financial implications

5.1.1 These will be completed with the necessary approval for the July 21st Cabinet report. Factual financial details relating to current operations are provided in Section 3 above.

5.2 Legal implications

5.2.1 Essex County Council does not have a statutory duty to provide GRT sites and it is therefore lawful to sell them but it clearly needs to consider the benefit of doing so.

5.2.2 The Council will need to be aware that the Essex Police have enhanced powers under section 62A of the Criminal Justice and Public Order Act 1994 to deal with unauthorised encampments if they can direct travellers to a local authority site in Essex. If all the sites are sold there will no longer be local authority sites in Essex, meaning that the police will no longer be able to use section 62A. In practice however the police make very limited use of this power. We have consulted the Police, making them aware of this fact and no objection the proposal has been raised.

5.2.3 There would be no direct impact on the ECTU Joint Committee, except that the money released would be available for more outreach work by ECTU staff.

5.2.4 Clearly all property would be sold subject to current restrictions on title in addition to the restrictions etc which we would impose on sale. There are two sites which require further detailed consideration:

Severalls, Colchester

5.2.5 Severalls is leased on a 10 year lease expiring in April 2022. The lease cannot be assigned. It is therefore the case that any disposal will need to be of a leasehold site, subject to the agreement of Colchester BC. It is likely that the current lease will be surrendered or re-granted, or Colchester may choose to sell the freehold as part of the disposal process. We will engage with Colchester BC before making a decision..

Fern Hill Harlow

5.2.6 In 2016 Essex County Council obtained a grant of £607,000 from the Homes and Communities Agency (HCA) now Homes England for the reinstatement of pitches at Fern Hill, Harlow. As part of the funding agreement a restriction was placed on the Register of Title. When we sell the site we must either repay part or all of the grant or arrange for the purchaser to sign a new agreement with Homes England. We would not proceed with the sale of Fern Hill without reaching a suitable accommodation with Homes England.

5.2.7 Homes England have been approached and they have provided initial commentary on this clause. This is that if ECC sells the site to a Registered Provider of social housing then the grant would transfer across to that Registered Provider. However, if the buyer is not a Registered Provider, then there is a possibility the grant will have to be repaid. It is advised that ECC provides Homes England with full details of the proposal and buyer when known so that they can evaluate ECC's proposal against the agreement.

5.2.8 Under s.123 of the Local Government Act 1972 we must obtain the best consideration reasonably available unless we have the consent of the Secretary of State. The fact that we propose to take account of quality in the disposal means that we are not necessarily going to achieve best value. However it is likely that all sales will be in compliance with general consents issued under section 123.

5.3 Staffing Implications

5.3.1 In relation to the preferred Option 2 – divestment of sites – key considerations in relation to staffing implications are:

Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE)

5.3.2 There are 5.5 FTE employees who are principally involved in management of the sites and who would potentially be in scope to transfer to a new employer. Potential buyers will be asked to submit an assessment of the TUPE position and unless it can be agreed the sale will not proceed. The situation could be that employees would transfer to the buyer or that they do not in which case ECC will need to meet redundancy costs unless staff can be redeployed elsewhere.

5.3.3 Site managers manage more than one site, it is likely that TUPE would apply to all site managers if all sites are bought by the same person or organisation, but if they are sold individually or in groups then the position is likely to be more complex.

5.3.4 An important aspect of the staff transfer process, will be to review the proportion of work currently being undertaken by individuals in the team. This shall be undertaken pre-transfer to determine employee liability for prospective buyers as any under representation of this could hold risks if the bidder finds they have more employee liability than was indicated on the initial tender spreadsheet.

Essex County Council Pension Position

5.3.5 Pension liability does not automatically transfer via TUPE, although some aspects of pensions transfer.

5.3.6 It is proposed that any buyer(s) would be required, if possible, to maintain Local Government Pension Scheme (LGPS) for transferring staff. Whilst in previous transfers of other services we have been able to require continued availability of the LGPS for transferring employees, the position with the travellers sites is more complex in that the asset will transfer and ECC will no longer commission or have any accountability for service provision or any contract with the provider. It may therefore be the case that we are unable to give a buyer 'admitted body status'. If this is the case we will have to either decide to leave it to the buyer to make pension arrangements, which could be a basic stakeholder pension, or we could require the buyer to provide access to a broadly comparable pension scheme. This may be easier for some employers than others and may deter some potential purchasers. This is still being explored.

6. Equality and Diversity implications

6.1 The Public Sector Equality Duty applies to the Council when it makes decisions. The duty requires us to have regard to the need to:

- (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act. In summary, the Act makes discrimination etc. on the grounds of a protected characteristic unlawful
- (b) Advance equality of opportunity between people who share a protected characteristic and those who do not.
- (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

6.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, gender, and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).

- 6.3 The equality impact assessment indicates that the proposals in this report will not have a disproportionately adverse impact on any people with a characteristic. The proposal seeks further to address the inequalities experienced by the GRT community through widening the work programme of the ECTU to attain better outcomes. The sites are to be divested, as a going concern, with protection sought to remain as traveller sites, with residents retaining the same rights to occupancy as they had under the ownership and management of Essex County Council

7. Session Aims

Members are asked to discuss the paper and proposals and provide feedback and recommendations.

8. List of appendices

- Appendix A - Equality Impact Assessment
- Appendix B – Confidential Appendix

9. List of Background papers

None

Equality Impact Assessment - Optional EqlA Review

Reference: EQIA149376354

Submitted: 16 December 2019 11:34 AM

Executive summary

Title of policy or decision: To recommend continued Essex County Council funding for the multiagency Essex Countywide Traveller Unit (ECTU)

Describe the main aims, objectives and purpose of the policy (or decision): To make the case for ECC's continued financial commitment to the multiagency ECTU partnership for the three year period from and including financial year 2019/20 through to financial year 2021/22.

What outcome(s) are you hoping to achieve?: Help people get the best start and age well, Transform the council to achieve more with less

Which strategic priorities does this support? - Help people get the best start and age well: Improve the health of people in Essex

Which strategic priorities does this support? - Transform the council to achieve more with less: Limit cost and drive growth in revenue

Is this a new policy (or decision) or a change to an existing policy, practice or project?: a change to an existing policy, practice or project

Please provide a link to the document / website / resource to which this EqlA relates: see uploaded doc

Please upload any documents which relate to this EqlA, for example decision documents: see uploaded doc

Assessing the equality impact

Use this section to record how you have assessed any potential impact on the communities likely to be affected by the policy (or decision): The Essex County Traveller Unit (ECTU) is a multi-agency partnership established to provide a consistent approach to managing and enforcing Unauthorised Encampments (UEs) across the whole of Essex.

ECTU ensures that UEs are dealt with by staff with specialist knowledge and expertise, and who are able to develop effective professional relationships with the Gypsies and Travellers in the UEs. This means that they are best place to exercise the enforcement and welfare functions required by legislation.

The proposed decision to continue to fund ECC's part of ECTU reflects how ECC has considered how to best minimise inequity across Essex in dealing with unauthorised encampments and are committed to doing so.

Does or will the policy or decision affect:

Service users: No

Employees: Yes

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The wider community or groups of people, particularly where there are areas of known inequalities: No

Which geographical areas of Essex does or will the policy or decision affect?: All Essex

Will the policy or decision influence how organisations operate?: Yes

Will the policy or decision involve substantial changes in resources?: Yes

Is this policy or decision associated with any of the Council's other policies?: Yes

Description of impact

Description of Impact. If there is an impact on a specific protected group tick box, otherwise leave blank. You will be given the opportunity to rate identified impacts as positive, negative or neutral on the next page: Race

I confirm that I have considered the potential impact on all of the protected characteristics: I confirm that I have considered the potential impact on all of the protected characteristics

Race

Nature of impact: Positive

Please provide more details about the nature of impact: ECTU ensures that UEs are dealt with in a fair and proportionate way across the county, and with by staff who are best placed to consider the welfare of the gypsies and travellers within them.

Extent of impact: Low

Please provide more details about the extent of impact: As this is a proposed continuation of funding, the impact is low.

Action plan to address and monitor adverse impacts

Does your EqlA indicate that the policy or decision would have a medium or high adverse impact on one or more equality groups?: No

Details of person completing the form

I confirm that this has been completed based on the best information available and in following ECC guidance: I confirm that this has been completed based on the best information available and in following ECC guidance

Date EqlA completed: 16/12/2019

Name of person completing the EqlA: Adrian Coggins

Email address of person completing the EqlA: Adrian.Coggins@essex.gov.uk

Your function: Economy, Localities & Public Health

Your service area: Place and Public Health

Your team: Public Health

Are you submitting this EqlA on behalf of another function, service area or team?: No

Email address of Head of Service: adrian.coggins2@essex.gov.uk