



BANNG UP TO DATE

June, 2010

*An occasional newsletter for supporters of the
Blackwater Against new Nuclear Group (BANNG)*

Compiled by Andy Blowers, Chair of BANNG

In this issue, I look at what has been happening on the national and local scene over the last few months and the impact on the campaign against a new nuclear power station and spent fuel store at Bradwell.

1. Latest News

The Infrastructure Planning Commission – Making our Voice Heard Where and When it Counts

Along with leaders of local groups from Hinkley Point, Oldbury and Sizewell, I went to Bristol on June 9th to meet with Sir Michael Pitt, Chairman of the Infrastructure Planning Commission (IPC).

Sir Michael began by explaining the current situation with the IPC. It will be abolished as an independent decision making organisation but it will continue as a body that makes recommendations to the Secretary of State. The idea is that the IPC will be democratically accountable to government, not an autonomous organisation. Whether that benefits anti-nuclear interests is, I believe, open to doubt. Decisions may well become more politicised, less determined by balanced debate.

In terms of planning for nuclear energy, Sir Michael felt we were moving from a 'chaotic regime' to a more 'managed process'. The IPC intends to be open, neutral and careful in its approach, helpful and supportive to all those who wish to participate in decision making. Sir Michael recognised the disparity in resources and power

between nuclear interests and its opponents. The IPC aims to be more ‘community friendly’, facilitating involvement.

The IPC will be bound by the National Policy Statements (NPSs) which BANNG has criticised in its response to the Government’s consultations. It remains to be seen if the NPSs will be significantly changed in response to the consultation and if the Government will persist with unacceptable sites such as Bradwell. The NPSs, as they stand, provide a fair wind for nuclear and will severely constrain the IPC in responding to criticisms of local community groups.

Sir Michael outlined the planning process that would be followed by the IPC. He considered the pre-application stage to be fundamentally important in providing opportunities for interested parties (including NGOs and local community groups) to influence the process, to gather information and documentation and to begin to prepare their case. They would be invited to a local meeting. Once an application has been made there would be a preliminary meeting to set out the process, the form it will take and generally to set the scene for the Examination. During the Examination, which will be conducted by one or more Commissioners, the evidence will be sifted and challenged. Open floor hearings are almost inevitable especially for major developments such as nuclear power stations which may provide an opportunity to make the case directly to the Commissioners.

That said, the process seems centred on the applicant and the local authority for the sites in question. The applicant is responsible for conducting a pre-application consultation which is likely to be detailed and voluminous and focus on local impacts (roads, power lines, jetties, buildings and the like). The local authority (in our case it is not clear which this would include) has to issue a statement of community consultation. The IPC would need to be assured that consultation has been effective (and we know from recent experience just how ineffective it is likely to be). Groups like BANNG are urged to work with (and possibly through) the local authority which the IPC sees as the focal point of community representation and participation.

So, although there should be plenty of opportunity for local community groups to make representations and even to be heard, they will essentially be treated as interested parties. This may seem a less than adequate situation when put into our local Essex context. We know our local authorities are very different in their attitudes to Bradwell – Maldon is supportive, Colchester opposed and Essex seemingly indifferent. They have limited resources to deal with the issue and tend to treat it as a local planning matter rather than as a strategic concern. For, instance, they are not especially exercised about the waste issue. It is not clear that they have grasped the extreme difficulties of emergency planning in the face of a major release of radioactivity. BANNG and other national groups have taken a far broader perspective and focused on key issues which need to be given full attention if an application for development at Bradwell is made.

If it comes to the point of an application BANNG will, of course, make the most of its opportunities to present a detailed and convincing case against Bradwell. It is not clear that the IPC have yet recognised the important role of groups such as ours in raising issues and consciousness about the dangers for present and future generations should a mega reactor and spent fuel store ever be seriously considered on a site as

vulnerable as Bradwell. In the coming weeks BANNG will be pressing the IPC to ensure that local groups and NGOs are accorded the prominent role in the planning process that their knowledge and public support justifies.

2. What does a New Government mean for New Nuclear?

With a new Coalition Government in place will it make any difference to nuclear policy? Labour left office with plans for new nuclear power stations at ten possible sites (including Bradwell). Nuclear was to be part of the energy mix in the shift to a low carbon economy. The Conservatives backed the policy, the LibDems opposed it.

Nuclear energy is one of the clear fault lines in the Coalition. With a LibDem, Chris Huhne, as Secretary of State responsible for nuclear policy, how will the government reconcile their differences? This is what the Coalition agreement has to say about it:

Liberal Democrats have long opposed any new nuclear construction. Conservatives, by contrast, are committed to allowing the replacement of existing nuclear power stations provided that they are subject to the normal planning process for major projects (under a new National Planning Statement), and also provided that they receive no public subsidy.

This question of subsidy appears crucial. Most observers, and many of those within the nuclear industry, do not think a nuclear programme is possible without some form of subsidy met either from public funds or through consumers. And the industry is already being subsidised one way or another. The nuclear industry's security (police, etc.) is paid for out of the public purse. The proposal for a fixed unit price for waste management and disposal opens up the prospect for public subsidy to meet future escalating waste management costs. And, the introduction of a floor price for carbon favoured by the Government and the industry would effectively subsidise nuclear through higher prices passed on to electricity consumers.

So, a subsidy by any other name will smell as sweet and enable the Conservative part of the Government to press ahead without apparently compromising its policy. What, then, of the LibDems who, alone of the major parties, have campaigned vigorously against nuclear on the grounds that it is too costly, too late and too dangerous? Well, the Coalition Agreement provides them with a get out clause, 'allowing the Liberal Democrats to maintain their opposition to nuclear power' through a specific agreement that 'a Liberal Democrat spokesperson will speak against the Planning Statement, but that Liberal Democrat MPs will abstain; and clarity that this will not be regarded as an issue of confidence'. If anything this appears to strengthen the nuclear cause in Parliament since there will be virtually no opposition (apart from the SNP and Green party).

Politically, the situation has not fundamentally changed. But, as time passes, the likelihood of a substantial nuclear programme diminishes. The nuclear industry routinely runs over time and over budget, precisely what is happening to its flagship project in Finland. Although public approval ratings for nuclear have improved there still remains substantial and implacable opposition. Concerns about radioactive waste

management (a problem for present and future generations without any solution in sight) pose a major obstacle. And opposition from local communities facing the prospect of mega power stations and waste stores on crumbling coastlines is a factor that will become increasingly important.

Already there are delays in the timetable (the planning application for Hinkley Point has been put back six months already). The National Policy Statements have not yet been approved, there are calls for a Public Inquiry on Justification for nuclear energy and the design of the new reactors has not yet gained regulatory clearance. At the same time, more and more effort is being put into renewables which provide the safe clean and, potentially, economic way forward.

Despite the green light coming from Parliament, there are many reasons why new nuclear could falter in the coming months. Continuing opposition from groups like BANNG will help to assist in nuclear's downfall.

3. EDF Keeps Bradwell in the Frame

The early focus on new nuclear sites has been on Hinkley Point and Sizewell. These are expected to be the first in line and EDF Energy plans to build two reactors at each site amounting to around a total capacity of 6GW of electricity. That is about a quarter of the non-renewable (i.e. fossil fuels and nuclear) generation the government anticipates will be needed by 2025. EDF has already consulted on its proposals for Hinkley Point and an application for development is expected by the end of the year. EDF intends to consult on Sizewell in the coming winter.

Where does this leave Bradwell and the other sites such as Wylfa and Oldbury thought to be in the frame for early development? Although EDF own the Bradwell site, under competition rules the company is required to release it provided it obtains planning consent for two reactors at Sizewell. In a recent letter to stakeholders, EDF states its current position on Bradwell is as follows: 'While we are not currently progressing with new nuclear build plans at Bradwell we feel that there are good reasons to maintain the potential for development at the site'.

In the letter, EDF claims that there are no fundamental issues that would prevent the use of Bradwell as a site though it concedes further work will be needed to 'rigorously assess the impacts, and benefits'.

BANNG profoundly disagrees with EDF's optimistic assessment. As we have demonstrated in depth and in detail in our various responses to consultations on siting assessment, on nomination of sites, on the National Policy Statement and on Justification (for details see below) there are several fundamental reasons why Bradwell must be rejected as a potential site. Among these are the threat to the environment, ecology and economy of the Blackwater estuary, the problem of evacuating a large population in an emergency and the risks posed by storing highly radioactive wastes on a low-lying coast increasingly vulnerable to flooding, storm surges and erosion until the end of the next century.

EDF must concede that the case against Bradwell is strong. Perhaps EDF recognises the weakness of its position. It has already put the land up for sale. Is this in the hope

that it can salvage something from a poor investment?

BANNG is determined to press its opposition through critical research and argument as well as through raising public awareness and support.

4. Consultations Past, Present and Future

Past

One of the problems for a voluntary organisation like BANNG is the overload that comes from the necessity of responding to consultations. There is a danger of what is sometimes called ‘stakeholder fatigue’ setting in. This can only benefit the nuclear industry with its well-paid army of full-time managers, consultants and experts, its ample resources and its privileged access to government.

BANNG believes it is important to respond to consultations. We have criticised the consultation process as too fast, fragmented and burdensome and fundamentally unfair to local communities and the general public who find it difficult to participate. We have called for a new and more participative process in an effort to ensure public confidence in government decision making. Our voice is being heard. The House of Commons Energy and Climate Change Committee took evidence both verbal and written from BANNG and we are referred to several times in their Report. One of the Report’s conclusions is that the consultation has not gone far enough, that lessons should be learned and more innovative ways are needed in order to engage the public.

In our responses to various consultations we have provided evidence based on research and expertise as well as our knowledge of public concerns to present a compelling set of arguments against new nuclear at Bradwell. BANNG has achieved standing and has frequent meetings with government, with the regulators, with the Committee on Radioactive Waste Management as well as with national groups such as Greenpeace.

So far BANNG has made the following responses to consultations:

Present

We are currently preparing responses to two further consultations concerning the cost and financing of nuclear decommissioning and waste management. These are:

Consultation on the Financing of Nuclear Decommissioning and Waste Handling Regulations

Consultation on a Methodology to Determine a Fixed Unit Price for Waste Disposal and Updated Cost Estimates for Nuclear Decommissioning, Waste Management and Waste Disposal

Responses are due in by 18 June. If you want copies of these consultations you can obtain them by emailing decomguidance@decc.gsi.gov.uk You may even wish to provide a brief individual response.

Future

Along with many other groups and individuals, BANNG has repeatedly called for a Public Inquiry into Justification (see consultation above). In our most recent response we reiterated our call:

BANNG remains of the view that it is in the public interest that a Public Inquiry should be held after the Justification consultation process ends and before a final decision is made by the Secretary of State. This will provide an opportunity for an open, independent and searching review of the issues involved in the decision whether to justify new nuclear power stations.

It is now up to Chris Huhne to decide whether to call for a Public Inquiry. Simon Hughes who is the new Deputy Leader of the LibDems, and who was the Shadow LibDem spokesman on Energy, led the calls for an inquiry so we must hope he can persuade his colleague. But, don't hold your breath.

We shall soon have the Government's response to the consultation on the National Policy Statements (NPSs) on Energy and Nuclear Power (see list above). These are fundamental statements of policy and will strongly influence decisions on future energy projects and sites. The NPSs received a massive volume of criticism and much of this has been reflected in the House of Commons Inquiry (see above). The Government must decide if it is going to amend the statements before it adopts them. It will also have to decide whether it intends to list all the ten sites (including Bradwell) as potentially suitable for new nuclear power stations.

In view of the criticisms it seems inconceivable that the new government will accept the policy statements without amendment and it will be interesting to see if all ten sites are retained. Whatever happens there will be determined opposition both at national level and at individual sites.

5. BANNG – Action and Activities

Petition.

BANNG's petition continues to grow. Over coming weeks we shall be petitioning in local villages and towns around the estuary. If you have a little time to spare please get in touch and help in the effort to increase the already impressive number of signatures. If you have not yet signed, please do so and urge your friends and relations to join BANNG's campaign.

Fund-raising

Norma Creighton, Lynn Hartley, Paula Whitney and others have been raising funds at various events and have handed over £133 to BANNG's coffers. Thanks to all who helped for their efforts. In the coming weeks BANNG will be petitioning at various fetes and fairs in the area. Among these are:

June 19	Brightlingsea Carnival
August 7	Maldon Carnival

August 14	Clacton Carnival Procession
August 13 – 22	Southend Week – Procession on 22 nd
August 21/22	Walton Carnival – Procession on 21
August 26/27	Clacton Air Show
Sept. 4	Colchester Carnival & Oyster Festival
Sept. 25	Burnham Carnival

Do come along and help in the effort to keep BANNG moving forward.

Donations

We shall shortly be making a call for further subscriptions from our supporters. But, please do not hesitate to make a donation now. BANNG needs money for running expenses, printing and events. It is hoped that you will agree that you receive a very good service from BANNG. Several individuals have put in huge efforts to ensure that your voices are heard through responses to all government consultations, through lobbying MPs and local Councils, through writing articles, etc.. A coterie of supporters is carrying out petitioning. This is time-consuming but as a result we are able to claim that BANNG is the only organisation in the country that is consulting people face-to-face on their views on new nuclear build.

You can send your contribution by post to: Varrie Blowers at 8 Shears Court, West Mersea CO5 8DB.

Be Active

BANNG's Aims and Strategy are posted on our website (www.banng.org.uk) The Core Group and the Community Awareness Group hold regular meetings and we are always looking out for new people to join in our activities. If you would like to become more involved please let us know by contacting Varrie Blowers (contact details at end of Newsletter).

6. Forthcoming National Meetings

I will attend a stakeholder meeting with the Committee on Radioactive Waste Management (CoRWM) on 23rd. June. As a former member who helped to draft government policy on radioactive waste, I am anxious to make sure CoRWM argues for local communities to have a right to reject proposals for high level waste stores at new nuclear sites.

On 6 July I will join other stakeholders in Birmingham for a one day workshop run by the nuclear regulators on the Generic Design Assessment (GDA) of new nuclear reactors. The regulators must approve new reactor designs and, given the problems being encountered with some designs, this is by no means a straightforward process.

Meanwhile BANNG remains in touch with other local groups around the country. By keeping informed and working together a more credible and organised opposition can be mounted both at national and local level.

I hope that you have found this Newsletter informative. BANNG has achieved a good reputation at national and local level and has been getting its message across with some success. We must keep up the pressure and the good work over the months to come.

Best wishes,

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Chair of BANNG

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