



BANNG UP-TO-DATE

28 NOVEMBER, 2009

IMPORTANT – GOVERNMENT COMING TO BLACKWATER

We are coming up to the most important point so far in the campaign against a major new nuclear complex at Bradwell. You will see below that the Department of Energy and Climate Change (DECC) is bringing an exhibition to West Mersea, Maldon and Bradwell. There will also be a public discussion at West Mersea and at Maldon.

If BANNG is to make an impression on DECC – particularly at the public discussions – as many supporters as possible need to turn out. I'm afraid this time you cannot just rely on a small, dedicated band of Core Group and Community Awareness Group members. A lot of people are needed to help provide cover at each of the exhibitions and to attend the public discussions. (You need to register to take part in the public discussions at www.nuclear-nps-events.info or call 0845 0048841.)

I know the times are inconvenient, it's winter and the days are shortening but Bradwell is on the Government's list and we need to make a big effort during the DECC exhibitions. I look forward to hearing from as many of you as possible with details of when you will be able to provide cover.

The BANNG campaign is making good progress but YOUR help will make a difference.

**(I can be contacted as follows:
e-mail: varrieblowers@yahoo.com
Telephone: 07932.644482)**

1. Department of Energy and Climate Change (DECC) Exhibition and Public Discussions

(YOUR CHANCE TO LET THE DEPARTMENT OF ENERGY AND CLIMATE CHANGE KNOW YOUR VIEWS ON THE PROPOSAL TO BUILD A NEW MEGA NUCLEAR POWER STATION AND HIGHLY RADIOACTIVE SPENT FUEL STORE AT BRADWELL.....AND ON THE NEW INFRASTRUCTURE PLANNING COMMISSION)

The Department of Energy and Climate Change (DECC) will be taking an exhibition to West Mersea, Maldon and Bradwell. There will also be two public discussions. (See details below.) The purpose of the exhibition is for the Government to give information about the draft National Policy Statement (NPS) on Nuclear Energy and the assessment of the Bradwell site as potentially suitable for new nuclear power.

The NPS was announced on 9 November and it explains the assessment of sites, why new nuclear power is needed and the Government's policy on managing radioactive waste safely. The NPS will set the framework for planning decisions on new nuclear power stations.

It is thanks to the activities of BANNG that the exhibition will come to West Mersea. The Chair of BANNG, Andy Blowers, had a 'constructive conversation' with DECC and there will now be a public meeting at West Mersea as well as at Maldon.

DECC are saying that 'Your views can make a difference' and that 'Your comments are valuable so make sure your voice is heard'. On their leaflet they suggest:

- you visit the exhibition;
- register to take part in the public discussion at www.nuclear-nps-events.info or call 0845 0048841;
- read the documents at www.energynpsconsultation.decc.gov.uk;
- respond to the consultation online, by post or at an event.

You should know that the documents are hundreds of pages long and that the leaflet omits to tell you that the deadline for responses to the consultation is 22 February.

DECC are calling the exhibition and public discussions 'Consultation on Bradwell'. As you will see from the dates and times below, this must be one of the shortest consultations in history and it is on a proposal that could have a massive effect – now and in the future - on the lives of thousands of people around and near the Blackwater estuary, as well as on the estuary itself. The populations of Colchester, Chelmsford, Southend, Clacton, Brightlingsea and others are within a 20 mile radius of Bradwell and yet no exhibition or public meeting is being held at any of those places.

The DECC exhibitions and public discussions will take place as follows:

Thursday, 10 December:

The Mersea Centre (MICA), West Mersea :	Exhibition	8.30 a.m. – 4.30 p.m
	Public discussion	12.30 p.m. – 2.00 p.m.

Friday, 11 December:

Maldon Town Hall:	Exhibition	8.30 a.m. – 6.30 p.m.
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Saturday, 12 December:

Bradwell-on-Sea Village Hall	Exhibition	9.00 a.m. – 4.00 p.m.
Maldon Town Football Club	Public discussion	10.00 a.m. – 12.00 p.m.

The BANNG Community Awareness Group is working on information to be handed out at the exhibitions. We are proposing to have a presence at each of them and at the public discussions. **REMEMBER, BANNG NEEDS AS MANY OF ITS SUPPORTERS TO BE THERE.** BANNG supporters will also be collecting signatures for the Petition.

A recent Press Release is attached (Appendix 1). This provides quite a bit of information that you might find useful when talking to DECC. Items 2 and 3 of this Newsletter and the letter to the Secretary of State from members of the first Committee on Radioactive Waste Management (Appendix 2) should also prove useful. There is also information on the BANNG website under 'Strategic Siting Assessment' that you may find helpful (www.banng.org.uk).

2. FAST-TRACKING OF MAJOR INFRASTRUCTURE PROJECTS (INCLUDING NEW NUCLEAR POWER STATIONS) THROUGH THE PLANNING SYSTEM

UNDEMOCRATIC NEW LEGISLATION WILL CURTAIL OPPORTUNITIES FOR PUBLIC TO HAVE A SAY

The Government has set up the Infrastructure Planning Commission (IPC) to fast-track planning applications for major infrastructure projects, including nuclear power stations, wind farms, new runways. This quango is unelected and will not be accountable to Parliament. Public Inquiries will no longer be held for such projects. The opportunities for the public to have their say will be severely curtailed.

Regardless of your views on any major project, I am sure you will agree that this really is a most undemocratic piece of legislation.

The IPC and storage of high-level radioactive waste

In a further undemocratic move, the Government states in the National Policy Statement that it is satisfied that interim storage of high-level radioactive waste [on each site for around 160 years] will provide an 'extendable, safe and secure means of containing waste for as long as it takes to site and construct a geological facility.....Having considered this issue, the Government is satisfied that effective arrangements will exist to manage and dispose of the waste that will be produced from new power stations. **As a result the IPC need not consider this question'** (Editor's emphasis).

3. THE STORAGE OF HIGH-LEVEL RADIOACTIVE WASTE AT EACH NEW SITE

THERE IS NO POLICY FOR THE STORAGE OF NEW BUILD WASTES EXCEPT STORE IT ON SITES FOR C. 160 YEARS

The first Committee on Radioactive Waste Management (CoRWM1) proposed to the Government how high-level legacy wastes (i.e. those from the first generation of nuclear power stations) should be dealt with. Andy Blowers, Chair of BANNG, helped to write this policy that was accepted by the Government. The policy is that communities should be invited to volunteer to host long-term storage and a possible national repository for the disposal of legacy wastes. Some form of compensation would be offered for becoming, in effect, a 'National Sacrifice Area'. The affected community would have a say in every stage of the process. This would be subject to geological suitability, of course.

The draft National Policy Statement on Nuclear Energy lists 10 sites around England and Wales, including Bradwell, as suitable for the long-term storage of the highly radioactive wastes from new nuclear power stations. The communities at the new sites are not being asked to volunteer to store these wastes. In effect, there will be 10 'National Sacrifice Areas' with toxic wastes foisted on them dotted around the English and Welsh coasts.

Four of the CoRWM1 members (including Andy Blowers) have written to the Secretary of State for Energy and Climate Change, copied to the Chair of the Infrastructure Planning Commission (IPC), stating their concerns. Andy Blowers says: 'The Government is claiming there is a solution when it is clear there is neither sufficient scientific evidence nor public acceptance let alone a community willing to host a repository for existing wastes. There is no policy for the storage of new build wastes except to keep these on each new site for around 160 years, yet the Government is saying the IPC need not take this into account when considering planning applications for new nuclear power stations'.

A copy of the letter from the former CoRWM1 members is attached (Appendix 3).

THERE'S A LOT TO TAKE UP WITH DECC:

- **THE PROPOSAL TO BUILD A NEW MEGA NUCLEAR POWER STATION WITH HIGHLY-RADIOACTIVE SPENT FUEL STORE ON THE TOTALLY UNSUITABLE BRADWELL SITE;**
- **THE UNDEMOCRATIC NATURE OF THE LEGISLATION TO FAST-TRACK MAJOR INFRASTRUCTURE PLANNING APPLICATIONS;**
- **THE GOVERNMENT'S ASSERTION – WITHOUT ANY EVIDENCE WHATSOEVER – THAT IT IS 'SATISFIED THAT EFFECTIVE ARRANGEMENTS WILL EXIST TO MANAGE AND DISPOSE OF THE WASTE THAT WILL BE PRODUCED FROM NEW POWER STATIONS'**

4. BANNNG Petition

Petitioning is going well and receiving a very positive reaction. A group of BANNNGers is currently engaged in collecting signatures around Mersea Island and has also recently visited Bradwell and Southminster. There are plans to continue petitioning around the Dengie Peninsula and dates for these visits will be announced.

There will be Victorian Markets at Maldon on the evenings of 3 and 10 December and petitioners will be there. The markets attract large numbers of people and should be a very good opportunity to collect signatures. Details of where and when to meet will be circulated. **Please do your best to come along.** You may even have the chance to do some Christmas shopping.

**THE MORE PETITIONERS WE HAVE, THE MORE SIGNATURES WE WILL COLLECT
AND THE MORE CREDIBLE THE PETITION WILL BE.**

5. Please Write to Give Your Views on Bradwell B To the Local MPs

Now that Bradwell is definitely on the Government's list, it would be a good moment to write to the local Members of Parliament to make them aware of your opposition to the proposals. The MPs are: Bernard Jenkin (North Essex); John Whittingdale (Maldon & East Chelmsford); Bob Russell (Colchester); and Douglas Carswell (Harwich). You may also wish to give your views on the Infrastructure Planning Commission.

Members of the Core Group will be meeting with Bob Russell, Liberal Democratic MP for Colchester on 7 December. We are awaiting a date for a meeting with Bernard Jenkin, Conservative MP for North Essex. We have also written several times to request meetings with John Whittingdale, Conservative MP for and Douglas Carswell, Conservative MP for but have so far not received replies. This is also true of our request, once again sent several times, to meet with Lord Hanningfield and other members of Essex County Council. All these parties have been sent BANNNG's formal consultation responses and also receive Press Releases.

Tom Parkes of The Gazette has kindly allowed me to paste in an article from that newspaper of 17 November in which Bernard Jenkin makes comments in favour of a new power station at Bradwell and the Chair of BANNNG, Prof. Andy Blowers, against (Appendix 3).

Andy and I met Mr. Jenkin at the Oyster Feast on 30 October and were surprised to learn that he did not know that it was proposed to store the high-level radioactive waste from a new station on site. The National Policy Statement has now confirmed what BANNNG has been saying all along: that high-level waste will be stored at Bradwell until the end of the 22nd century (i.e. for around 160 years from start of operations). Mr. Jenkin makes no reference to this in the article. It may be that, despite our best efforts to inform them, other MPs are likewise unaware.

The Government's proposed policy on the storage of waste from the new stations, means that there could be 10 high-level radioactive spent fuel stores dotted around the coast of England (one will be in Wales).

**Varrie Blowers,
Editor**

Appendices:

- Appendix 1 - Press Release, 10 November, 2009 ('BANNG Chair says Government Nuclear Statement on Bradwell is 'Superficial, Vague, Loosely-worded And Tentative')
- Appendix 2 - Letter from four former members of the first Committee on Radioactive Waste Management (CoRWM1) to the Secretary of State for Energy and Climate Change, dated 20 November, 2009
- Appendix 3 - Article from The Gazette of 17 November, 2009 which includes comments in favour of new nuclear and Bradwell from Bernard Jenkin, MP and from the Chair of BANNG, Prof. Andy Blowers against

Appendix 1/Press Release – 10 November, 2009

PRESS RELEASE

BANNG Chair Says Government Nuclear Statement on Bradwell Is ‘Superficial, Vague, Loosely-worded and Tentative’

On 9 November, the Government published its National Policy Statement on Nuclear Energy, setting out why it believes nuclear energy to be necessary and listing 10 sites, one of which is Bradwell.

BANNG Chairman, Andy Blowers, commented: ‘The Government’s Statement, especially with reference to Bradwell, is superficial, vague, loosely-worded and tentative. This is especially so in regard to its justifying the Bradwell site. There are many aspects of the Statement which are open to challenge and I feel confident that it will prove very difficult for Bradwell to achieve either a planning permission or regulatory approval’.

Among the issues wide open to challenge are:

- the lack of an emergency plan setting out how the authorities will cope in the event of a major emergency;
- the demographics assessment suggests the site meets its semi-urban criteria but fails to take account of the transient holiday populations, such as the large numbers in the caravan and camping sites on Mersea Island during the summer; there is also no consideration of the potential risks posed to substantial urban populations within 20 miles, including Southend, Chelmsford, Colchester and Clacton;
- the Government’s view that a nuclear power station would ‘pose very small risks to safety, security, health and proliferation’ is clearly open to challenge;
- the Environment Agency needs to explain what it means when it says that ‘it is potentially reasonable to conclude that a nuclear power station.....could potentially be protected against flood risks throughout its lifetime’;
- BANNG totally rejects the view that ‘a nuclear power station could be potentially be protected against flood risks through its lifetime, including the potential effects of climate change, storm surge and tsunami’; given that it is admitted that the high level wastes will remain on sites from upwards of 160 years, it is clearly impossible to predict with any confidence the effects of coastal change over such a long timescale;
- BANNG agrees that the impacts of the power station on the landscape and environment are likely to be substantial and is very concerned about the impact of outfalls of substantial amounts of cooling water in the estuary will have upon the marine environment, including the fishing and oyster industries; this is clearly a crucial issue in the context of Bradwell ;
- BANNG notes that it is not possible ‘to rule out adverse impacts on sights of European Nature Conservation Importance’; we do not believe that ‘there is an Imperative Reason of Overriding Public Interest that favours the inclusion of this site.....despite the inability to rule out adverse effects on European sites at this stage’; to the contrary, BANNG considers this issue alone to warrant the site being excluded from further consideration;

- the argument that impacts on landscape and environment can be successfully mitigated, is indefensible;
- BANNG believes the statement that radioactive wastes, including spent fuel and intermediate-level waste, can be safely and securely stored 'on the site.....until it can be sent for disposal in a geological disposal facility'; there is no such facility in prospect at present and wastes may well have to be stored on site indefinitely on a coastal site increasingly liable to inundation;
- BANNG is concerned that the problems of securing sufficient cooling water from the estuary may result in the need to construct cooling towers, especially if it is intended to construct more than one power station on the site;
- BANNG agrees that it will be necessary to assess the potential impacts on the fishing industry;
- we note that the Statement discusses the uncertainties with respect to the harmful effects of radioactivity on health; given this uncertainty, BANNG believes the Precautionary Principle should apply and that any risk should be avoided by not constructing a new nuclear power station;
- it is stated that 'a nuclear power station may also bring alternative economic benefits to a region which could have the potential to offset some disbenefits'; we regard as utterly bogus the argument that 'the likely enhancement in employment, community wealth, housing stock and other associated neighbourhood infrastructure should improve community well-being and health generally'; we consider the detriments to the tourist and fishing economy and the negative image created by a massive nuclear complex will far outweigh any increases in employment associated with a new plant;
- we note that there will be considerable impact once construction commences on minor roads leading to the station but we doubt that this can be mitigated by 'green travel planning' as suggested in the Statement;
- lastly, BANNG will be interested to see how the plant's designers will be able to 'demonstrate that the installed plant is able to withstand all site-specific natural hazards, including earthquake, flooding or meteorological conditions.

'Far from being a robust appraisal, the Strategic Siting Assessment of Bradwell is a strikingly fragile and flimsy document. The Government's determination to push through its proposals will be met with scepticism and informed opposition.'

Appendix 2/Letter to Ed Miliband, Secretary of State for Energy and Climate Change

20 November, 2009

Rt. Hon. Ed Miliband
Secretary of State for Energy and Climate Change
3, Whitehall Place,
London SW1A 2HD
Dear Secretary of State,

New Nuclear Build and the Management of Radioactive Wastes

We write to you as members of the first Committee on Radioactive Waste Management (CoRWM 1) which presented recommendations on the long term management of solid higher activity wastes to government in 2006. These recommendations were substantially endorsed by government and expressed as policy in its White Paper on *Managing Radioactive Waste Safely* in June 2008 (CM 7386). We wish to express our concern that our recommendations have been seriously misrepresented in your draft National Policy Statement on Nuclear Energy published on November 9th.

In concluding the section on radioactive waste management the NPS states: 'the Government is satisfied that effective arrangements will exist to manage and dispose of the waste that will be produced from new nuclear power stations. As a result the IPC need not consider this question' (paragraph 3.8.20).

We contend that it is unknowable whether or not effective arrangements will exist and that the question of management of these wastes on specific sites should be a matter that the IPC must consider.

The policy stated in the *White Paper on Nuclear Energy* is 'that before development consents for new nuclear power stations are granted, the government will need to be satisfied that effective arrangements exist or will exist to manage and dispose of the waste they will produce' (CM 7296, 2008, p.99).

In our view this is a matter of judgement not of ineluctable fact. The CoRWM1 proposals for long-term management of radioactive wastes identified a process towards a long-term solution, recognising that deep disposal should be implemented on the basis of 'an intensified programme of research and development into the long-term safety of geological disposal aimed at reducing uncertainties at generic and site-specific levels, as well as into improved means for storing wastes in the longer-term' (CoRWM, 2006, rec. 4). Moreover, implementation would also depend on finding a suitable site based on the principle of volunteerism, that is an expressed willingness of a community to participate in a site selection process. Neither the scientific nor the social requirements have yet been met and consequently, in our judgement, it is not possible to conclude that effective arrangements 'exist or will exist'.

In any case, the policy set out by CoRWM1 and subsequently pursued by government applies to *legacy* wastes alone. CoRWM was quite clear that its proposals should not apply to new build:

‘The main concern in the present context is that the proposals might be seized upon as providing a green light for new build. That is far from the case. New build wastes would extend the timescales for implementation, possibly for very long, but essentially unknowable, future periods. Further, the political and ethical issues raised by the creation of more wastes are quite different from those relating to committed – and, therefore, unavoidable – wastes. Should a new build programme be introduced, in CoRWM’s view it would require a quite separate process to test and validate proposals for the management of the wastes arising.’ (Page 13, *Managing our radioactive wastes safely, CoRWM’s recommendations to Government, CoRWM document 700, July 2006*).

However, it is clear that government has conflated the issue of new build with legacy wastes and thereby intends the CoRWM proposals to apply to both. No separate process, as suggested by CoRWM1, for new build wastes is contemplated. There will be no opportunity for communities selected for new nuclear power stations to consider whether they wish to volunteer to host a long term radioactive waste facility; it will simply be imposed upon them. As the government recognises these wastes may well be stored on site ‘for around 160 years from the start of the power station’s operations, to enable an adequate cooling period for fuel discharged following the end of the power station’s operation.’ (Draft National Policy Statement for Nuclear Power Generation EN-6, 3.8.17). In the absence of a process or acceptable policy for new build wastes, they may remain on site indefinitely. It is quite possible that, as a result of sea level changes, storm surge and coastal processes, conditions at some of the most vulnerable coastal sites will deteriorate thereby making it increasingly difficult to manage the wastes safely.

The problems presented by managing wastes in the very long-term will be both generic and site-specific. Consequently we find it hard to understand why the IPC, when considering applications for the development of individual sites, need not consider the question of waste management. Given the levels of public anxiety raised by the issue of nuclear waste and the burdens of risk and management that are imposed on future generations we believe consideration of safe management of wastes at each site should be a primary concern of the IPC. We invite you to confirm that this would be your expectation.

In conclusion we reiterate that we do not consider it credible to argue that effective arrangements exist or will exist either at a generic or a site-specific level for the long -term management of highly active radioactive wastes arising from new nuclear build. We believe the scrutiny of the arrangements proposed for each site must remain within the remit of the IPC.

We are copying this letter to the Chair of the Infrastructure Planning Commission and the Chair of the Committee on Radioactive Waste Management. In the interest of open debate we shall also make these views known to the media.

Yours sincerely,

pp. Professor Andrew Blowers OBE (member of CoRWM1)
Professor Gordon MacKerron (Chairman, CoRWM1)
Mary Allan (member of CoRWM1)
Pete Wilkinson (member of CoRWM1)

cc. Sir Michael Pitt, Chair, Infrastructure Planning Commission
Professor Robert Pickard, Chair, Committee on Radioactive Waste Management

Appendix 3/ Article from The Gazette of 17 November, 2009 which includes comments on new nuclear and Bradwell from Bernard Jenkin, MP by Tom Parkes

THE odds are rapidly shortening on nuclear energy being generated from a new plant at **Bradwell**. The Government says the scheme will be fast-tracked. **Bradwell** and nine other plants could be operational by 2018.

The Conservatives say the decision is ten years too late and look unlikely to derail the proposals if they win the general election.

Chief reporter **TOM PARKES** looks at the arguments for and against **Bradwell** returning to the nuclear stage.

FOR

BRITAIN is running out of power. With most of our collieries shut and North Sea gas reserves dwindling, the country is becoming ever-more dependent on gas from overseas. Prices are volatile, rising and falling according to global demand, and consumers bear the brunt when the cost increases.

The Government has warned it expects power cuts by 2017 as energy companies will not be able to buy in enough energy.

An ongoing programme to build 10,000 wind turbines, at sites including the London Array off Clacton, will help solve the problem. But critics warn these alone will not be enough. The wind cannot be relied on to blow, so back-up is inevitably needed.

Also, under the current system, domestic customers who want to buy renewable energy must pay a premium price to help fund construction of the turbines.

The Government has also signalled its willingness to grant consent for "clean coal" power stations, where polluting carbon-monoxide (CO₂) emitted by burning fuel is trapped and stored in undersea chambers. But the huge costs involved mean no firm has yet come forward to take ministers up on the offer.

The need to protect the planet is another good reason to say yes to nuclear.

Dirty and dangerous they may be, but atomic reactors do not rely like coal or gas-fired power stations on releasing CO₂ into the atmosphere.

If the vast majority of scientists are to be believed, releasing more CO₂ into the atmosphere is about the dumbest thing we could do. Emissions to date blamed for pushing the world to the brink of ecological disaster.

North Essex MP, Bernard Jenkin, who was shadow energy secretary at the start of the current Parliament, said: "New nuclear is a no-brainer. The UK is literally faced with blackouts from 2017 onwards unless we rapidly build new capacity.

"There is no way renewable energy sources such as wind could fill the gap on their own and if we rely on foreign gas we will be relying on Russia, who will cut it off when it suits them."

Aside from the national picture, another nuclear power station at Bradwell would be a huge boost for the local economy. Hundreds of people will be needed to build it and highly-skilled well-paid jobs will be created when it finally opens - all but guaranteed for decades to come.

AGAINST

BUILDING another N-plant at Bradwell could place the populations of the Dengie peninsula, Mersea and Colchester in grave danger. Generating nuclear power means splitting an atom and controlling a resulting chain reaction which if left unchecked would

create an explosion big enough to wipe out whole cities.

A serious mistake, such as was made at Chernobyl in the Ukraine in 1986, could result in leaks of radiation capable of wrecking the health of the population for miles around.

Nuclear lobbyists may say it won't happen. But what if Bradwell comes under threat from rising seas or even a Tsunami?

The prospect of an earthquake seems far-fetched but north Essex was rocked by one in 1884 and it could happen again.

Last week's official Government announcement on nuclear power said N-plant designers would have to "demonstrate that the installed plant is able to withstand all site-specific natural hazards, including earthquake, flooding or meteorological conditions".

Mersea resident and nuclear expert **Prof Andy Blowers** believes it will be impossible for any company to make such a guarantee. He fears the risks are being glossed over and will continue to be, as energy secretary Ed Milliband is proposing to change planning laws, to prevent local objections from slowing up the construction of new plants.

Prof Blowers said: "Far from being a robust appraisal, the Strategic Siting Assessment of Bradwell is a strikingly fragile and flimsy document. The Government's determination to push through its proposals will be met with scepticism and informed opposition."

The huge cost of building another Bradwell is another major concern. Mr Milliband has said there will be no Government subsidies for nuclear power stations but sceptics say there never has been nor will be an N-plant building programme which does not hit the public purse. Energy companies are already lobbying the minister to change his mind. And even if he holds out, the firms may look to raise the necessary funds by putting a Government-approved surcharge on household fuel bills.

When the new plant has come to the end of its natural life there will also be immense clean-up costs attached to getting rid of toxic nuclear material.

The Government's Nuclear Decommissioning Authority was set up only a few years ago to take charge of dismantling Bradwell Mark 1 and other defunct plants, as the huge cost was crippling their owner British Energy.

If billions of pounds can be found to build another Bradwell, why shouldn't we look instead at ambitious and radical new solutions such as building massive solar panels in the Sahara desert?

At local level there are massive drawbacks too - a second Bradwell could threaten the famous Mersea oyster industry, will damage island tourism and create another huge blot on the landscape.