



**BANNG**  
Blackwater Against New Nuclear Group



## **CONSULTATION: WORKING WITH COMMUNITIES IMPLEMENTING GEOLOGICAL DISPOSAL**

### **RESPONSE OF THE BLACKWATER AGAINST NEW NUCLEAR GROUP**

#### **BANNG PAPER NO. 35**

##### *Preamble*

The Blackwater Against New Nuclear Group (BANNG) is a Citizens Based Organisation with a substantial supporter base, established ten years ago primarily to oppose new build at Bradwell in Essex. One of its main concerns has been the decommissioning and management of radioactive waste at the Bradwell A site and the prospective storage of radioactive wastes and spent fuel on site at the proposed Bradwell B power station now under active consideration. BANNG has also commented on national policies for radioactive waste management in a series of papers we have published over the last decade (see list at Annex A). These various responses reflect three main concerns of BANNG.

- First, the problems of managing wastes during the decommissioning and care and maintenance phases of shut down power stations, notably the graphite cores and ILW stores.
- Second, the problem of managing ILW and spent fuel during the operating, decommissioning and storage phases of new build power stations.
- And, thirdly, the off site impacts of waste management on the natural and human environment.

For BANNG this includes especially the marine environment and human wellbeing in terms of emergency planning procedures. In all of these matters, BANNG has been at pains to emphasise the very long time scales involved stretching well into the next century and possibly indefinitely. Consequently, we regard the issue of dealing safely and fairly with the problems of wastes that are stored at sites scattered around the country to be a far more significant priority than the search for a suitable and acceptable site for a potential GDF. Therefore,

**We urge the Government to focus its radioactive management strategy on the safe management of the existing legacy. This must take priority over the search for a suitable and acceptable site for a GDF. Creating further wastes as a result of a new**

**build programme will intensify the risks, perpetuating the problem of management into the far future and creating an intolerable burden for future generations. For this reason alone, the new build programme should be abandoned.**

It should be noted that BANNG's Chair, Professor Andrew Blowers has been involved in policy development for radioactive wastes over several decades as a member of the Radioactive Waste Management Advisory Committee (RWMAC, 1991- 2004), a non-executive director of Nirex and a member of the first Committee on Radioactive Waste Management (CoRWM, 2003-04). While with CoRWM he was chiefly responsible for drafting the policy recommendations that were adopted by Government. He led committee groups on political, social and ethical issues and chaired the Implementation Committee which set out the policies of voluntarism, participation and partnership which are the core elements of current policy as adumbrated in *Working With Communities*. His academic and political experience in radioactive waste management policy is expressed in his recent book, *The Legacy of Nuclear Power* (2017). Professor Blowers was a member of the Community Representation Working Group which provided advice during the development and preparation of *Working With Communities*. He is also Co-Chair of the BEIS/NGO Nuclear Forum which has considered radioactive waste management on many occasions. While Professor Blowers is supportive of the process of voluntarism and partnership as a way forward to identify potential sites, he considers a GDF, if it is ever to be built, must be confined to the long-term management of the nuclear legacy. His basic position is that stated most recently in *The Guardian* on 24 January 2018 and quoted in the NFLA's Briefing No. 71 on UK and Welsh Radioactive Waste Management Policy (NFLA, 2018).

**It is perverse to compound the problem by a new-build programme that will result in vastly increased radioactivity from spent fuel and other highly radioactive wastes which will have to be stored indefinitely at vulnerable sites scattered around our coasts. A new-build programme would create an unmanageable and intolerable burden on communities into the far future.**

While BANNG is happy to respond to this consultation we wish to emphasise that we consider the issue of a GDF is far less urgent than ensuring the long-term safety and security of legacy waste arisings. We consider the emphasis being put behind the programme is to legitimate new build by claiming that 'effective arrangements will exist to manage and dispose of the waste that will be produced from new nuclear power stations' (DECC, 2011, p.15).

#### *Working With Communities – General Comment*

BANNG recognises the effort to design a policy that is feasible, fair and democratic. We welcome the continuing emphasis on the voluntary principle, giving local communities a voice in participation but also in decision making. The commitment to a partnership approach is also welcomed. And we applaud the considerable effort that has gone into devising processes that seek to ensure involvement, compensation and community consent.

We have a number of observations on the processes of community identification. The processes are sometimes difficult to grasp and there is a sense of vagueness about how the principles will work in practice. There is a tension between dispersed and concentrated

democracy. Despite the emphasis on community participation, the models employed are elitist and the role of representative democracy elusive. Unlike the previous approach where local representative bodies had effective decision making power, in the model here, local authorities have a more peripheral role, albeit one that is potentially decisive. The developer plays a far more active role and the Government is the ultimate arbiter, giving the whole process a more centralist approach.

It is recognised that the time-scales of implementation are very long, transgovernmental and transgenerational. 'Finding a suitable location for a geological disposal facility is a complex, long-term process that will take many years'(3.26). It is suggested that identifying and selecting a site will take around 15 to 20 years and construction and operation a century or more. If this is about right then it will be the middle of the next century before closure is considered and much longer if new build wastes are added to the inventory.

These time-scales suggest more emphasis should be given to intergenerational equity issues rather than a focus on incentives and compensation for present generations. And, it needs to be recognised that while disposal is the destiny, storage above ground is a continuing necessity and there may be alternative options to disposal that should be considered during the exploratory process. We consider more thought needs to be given about future conditions, not only the physical conditions of a selected site but the social conditions of a host community in the future. **The problems and uncertainties of institutional continuity and social stability are especially significant at these time-scales, a further reason why we should only be dealing with the known inventory of legacy wastes and not with the unknowable inventory arising from a new build programme which would stretch the problem of permanent management far into the future.**

This consultation revolves around three central components of geological disposal. These are: the geological host rock capable of accommodating the repository; the disposal concept which must ensure safety over many thousands of years; and the community which must be willing to host the facility. These three, rock, facility and community must all coincide at a single location that will be acceptable for the long term. None of them can take precedence since they are interacting and interdependent. Achieving geological, engineering and community acceptability is a complex and, above all, time-consuming task. **BANNG urges the Government to recognise the scale of the task ahead and the time it may ultimately take to reach a satisfactory conclusion. There is no point in seeking to hasten or accelerate the process to ensure the future of new build. The focus must be on dealing with the legacy alone.**

### *Identifying Communities*

The approach to identifying communities is novel and innovative. Essentially, communities will be self-identifying and emerge and evolve over time. The idea is that this approach will be 'flexible, adaptable and able to be refined over time' (4.6). Initially there will be a *Search Area* with which the developer engages. This will be based on the area where a volunteer has come forward, defined and demarcated by a combination of spatial (geographic administrative) and developmental (impact) areas which must be bounded using ward boundaries to provide a defined area. The boundaries need not necessarily coincide with an administrative unit and could be uniquely bounded for the

sole purpose of defining the community. In addition there will be a *Potential Host Community* presumably within the search area or coincident with it though this is not clear. But, in essence, both (or perhaps one) are based on ‘using both administrative boundaries *and* identifying the areas in which the impacts caused by the siting and construction of the geological disposal facility will be experienced’ (4.10).

The process of determining the search area depends on a *formative engagement team*. Just how this might work is obscure. It appears to be based on the delivery body working with ‘parties interested in being involved’. This team transpires almost by osmosis, presumably on a self-appointed basis assisted by the delivery body. We see dangers in this, the prospect of a rather secretive, elitist and cosy process with no democratic checks which could become a self-perpetuating body with considerable influence and impact on the longer term and morph into a more permanent institution. We urge that much more thought and clarity is given to the initial formation of this body since it will become a critical actor in both the definition and development of the search area.

The *potential host community* is also an elusive concept. The paper states that the Search Area will become the Potential Host Community (PHC). The distinction, if there is one, is entirely unclear. The PHC would seem to be a relatively small area comprising the wards that surround the potential GDF with its constructional and operational impacts. The Search Area seems, intuitively, a rather larger area with the community or communities most affected by the project within which the PHC exists. The PHC will apparently be agreed by the Community Partnership, another rather mystical body.

Over all looms the principal local authority (or authorities) which play little direct role in the formation of the Search and PHC identification but which can prevent the whole process proceeding simply by their presence in a perfect illustration of ‘non decision making’ (Crenson, 1971).

*Consultation Question 1: Do you agree with this approach of identifying communities? Do you have any other suggestions that we should consider?*

While BANNG applauds the approach to voluntarism implied by the approach, we are concerned that it is too vague to be an effective or fair mechanism for the identification and definition of communities. The concept of self-defining communities of interest and the process of identification of the boundaries of Search Area and Potential Host Communities are difficult to fathom and may prove either undemocratic or unworkable in practice. The distinction, if there is one, between Search Area and PHC, needs much firmer clarification. The role of the Community Partnership in the identification process and the overall role of the Principal Local Authority also require clarification.

**In short, BANNG supports the intention of the self-identification process but considers it too vague, potentially undemocratic and unworkable in practice. Before proceeding further with the development of *Working With Communities* we urge the Government to clarify, refine and demonstrate the approach to understand if it can work.**

*Formative Engagement*

The initial stages of the search process are, in some respects, the most difficult and controversial. It is, perhaps, inevitable that some communications between interested parties and RWM will occur before the process is formally launched. If this is so, then we urge RWM to reveal any such discussion publicly so that there is no question of deliberate and premature effort to ensure that specific volunteers come forward.

In the spirit of open volunteerism, it is necessary for interested parties to make public an interest once the process has started. We reject the idea that ‘there is no pressure for the interested party to make public their interest’ (4.24). A closed and secretive initial searching must be out of the question to avoid the charge of *fait accompli* from the outset. In order to provide a democratic context at this initial stage, BANNG feels that individuals, landowners, businesses or community groups should present their interest to the delivery body through the local authority. The local authority would not be able to resist the interest but, rather, it would confer democratic legitimacy to the process. Similarly, the local authority itself would have to declare if it was an interested body. This would provide a clearer definition of the role of local authorities than the rather vague notion of involving local authorities ‘unless they choose not to be involved’ (4.29).

We support the need to engage with communities early but we feel the process of engagement requires further elaboration. We do not think it appropriate that the delivery body with an interest in finding a suitable site should identify the *formative engagement team*. This team would have a wide ranging role in setting up the organisational framework for the process and delivery of engagement funding. There is a danger, already alluded to earlier, of the process being closed, exclusive and elitist. We believe the involvement of principal local authorities should not be optional but that they should be represented on the formative engagement team. We feel that the government department overseeing the process should be responsible for setting up the formative engagement team in order to ensure a form of democratic accountability sufficiently removed from the pressure of local interests. It may be preferable for government, in consultation with local interests, to develop the protocols and procedures for the establishment of the formative engagement team and set out the principles and framework for its operation. Wherever possible, members of the team should be chosen by their organisations on a representative basis.

In response to Consultation Question 2:

*Do you agree with the approach of formative engagement? Do you support the use of a formative engagement team to carry out information gathering activities? Are there other approaches we should consider?*

BANNG makes the following observations:

**We support the principle of early engagement. In order to avoid the possibility of secretive and elitist processes we consider any approaches from or to RWM by interested parties should be declared from the outset. The government should establish the membership, framework and principles for the formative engagement team. The members should, as far as possible, be chosen by and accountable to their organisations. We consider the principal local authorities should be members of the formative engagement team.**

*Funding, Engagement and Partnership*

On the matter of funding, we support the use of Engagement funding to support the administration and operation of the formative engagement team and eventually the Community Partnership. It will also be necessary to provide information, dissemination and facilitation.

It appears that the early stage of engagement operated through the formative engagement team will eventually translate into a Community Partnership approach. This will comprise around 12 members drawn from the Search Area with the crucial remit of working with RWM on a siting process for a potential repository. The concept of a Community Partnership with an independent membership is supported but clearly more work needs to be done on how it is selected, operates and is managed. It is accepted that it 'is likely to evolve and develop over the duration of the siting process' (4.48).

We note that appointments to the Partnership 'will be discussed and agreed by a panel comprising the independent chair and initial interested parties involved in the formative engagement team' (4.46). We believe the panel should include members not involved in the formative engagement team. Some continuity and experience may be useful but renewal and refreshment of membership should be a principle to prevent the possibility of stagnation. The appointments panel will need a very clear remit and the criteria and methods for selection will need to be specified, perhaps by a joint local/central government agreement.

It is unclear whether the Community Partnership should draw some of its members from the formative engagement team but some continuity may be useful. The Partnership will be a decision making body and it is important that its membership is continually refreshed. Appointments should be for a fixed term and a maximum term should be considered.

We recognise that the detailed working methods of the Partnership still need to be worked out over time but it is important to get the basic principles right from the outset. There are two which we feel should be considered. The first is that RWM should not participate in the formal selection process of the Partnership. As the delivery body it is working with the Partnership and, therefore, should not be involved in its governance in any way. We do not agree that the delivery body should be a member of the Partnership and we agree that 'it will not have any role in representing the community or in decisions on the test of public support or whether to enact the community's right of withdrawal'(4.50). The second is that we do not agree that the Partnership should make its own decisions on appropriate membership and the appointment of members. This function should be reserved to an appointments process as a joint central/local government agreement to ensure that democratic accountability remains part of the process.

We fully support the idea of a Community Stakeholder Forum. Moreover, we do not think this is optional (as suggested in 4.53) but must be an integral element of community voluntarism and partnership ensuring the widest possible participation by the potentially affected public.

*Consultation Question 3: Do you agree with this approach to forming a Community Partnership? Are there any other approaches we should consider?*

**BANNG supports the proposals for Engagement funding and for a Partnership approach. We understand that the structure and organisation will evolve over time. However, we do not consider that the delivery body should be a member of the Community Partnership or have a role in its governance arrangement or appointments. In order that the Partnership should develop within a context of democratic accountability we consider that these arrangements should be developed through agreement between government and the principal local authority. While some continuity of membership is necessary and desirable we advocate that the Partnership is routinely refreshed through a limited term for individual membership.**

*Consultation Question 4: Do you agree with the approach to engaging people more widely in the community through a Community Stakeholder Forum? Are there any other approaches we should consider?*

**BANNG strongly supports the Community Stakeholder Forum as an essential component in ensuring the widest possible participation of the affected community in the process.**

#### *Community Agreement*

*Consultation Question 5: Do you agree with the proposal for a Community Agreement and what it could potentially include? Are there other approaches we should consider?*

**BANNG recognises that a formal structure including protocols on objectives, voting, code of practice, terms of reference etc. is necessary but questions whether a Community Agreement is necessary. In our earlier comments we have suggested that governance arrangements should be a matter for agreement between the Government and the principal local authority as the representative democratic bodies. We have also stated that the delivery body should not be involved in developing these arrangements or be a member of the Partnership body. The siting of a GDF is, ultimately, the responsibility of the Government, local government and the delivery body. Within that framework the Community Partnership should be able to act as an independent entity working with the local community.**

#### *Community investment funding*

Investment funding is necessary to encourage and reward communities who engage in the process for siting a GDF. As such it may be perceived in some quarters as a bribe rather than as an incentive to participate and compensation for willingness to take on an unwanted land use. It is highly likely that volunteer communities will be in areas where nuclear facilities already exist or in places of economic disadvantage or underdevelopment that will welcome the investment that comes with participation.

There are three general observations we wish to make on the issue of investment funding:

1. It needs to be viewed as a mechanism for community enhancement in the widest possible sense. Investment can be a means of improving the well-being of communities

through a conception or vision of those elements which provide identity and sense of community. The idea of an integrated sociological concept put forward in the German site selection report has resonance here (AkEnd, 2001). This identified the concept of 'potential analysis' for regional development built upon self-realisation through citizen participation. It is a combination of 'vision and volunteering' with citizens and councils indicating a willingness to participate in site selection.

2. Investment funding must be considered in the long-term. The impacts of GDF construction and operation will persist for well over a century before final closure can be contemplated. Future generations will experience these impacts more than the present. Therefore, investment needs to be directed at long-term enhancements rather than the emphasis on short-term, mainly economic benefits. This will require imaginative thinking and a willingness for the present day community to pass on the benefits of investment to future generations.

3. The principle of investment funding should be applied more widely and not confined simply to communities considering a GDF. As we indicated earlier, the GDF is unlikely to materialise for decades whereas highly active radioactive wastes must be stored on sites until the GDF is opened and will continue to be stored until its closure. In the case of new build, communities have been selected, not asked to volunteer for spent fuel stores. The ethical case for long term investment funding in these communities is pressing. It is patently unfair and irrational to compensate communities which will not have to bear the burden of waste for many years and not to do so for those which will bear the burden for decades to come.

Consultation Question 6: *Do you agree with the proposed approach to the way community investment funding would be provided? Are there alternatives that we should consider?*

**BANNG supports investment funding in principle provided that:**

- **It is clearly directed towards a broad vision of community well-being developed through widespread citizen participation.**
- **It is regarded as a long-term investment to meet the needs and perspectives of future generations who will bear the burden of repository development. This supports the principle of intergenerational equity.**
- **It is offered as a long-term commitment to all communities in areas located close to spent fuel and other nuclear waste stores. This supports the principle of intra-generational equity.**

*Right of withdrawal*

Consultation Question 7: *Do you agree with the proposed process for the right of withdrawal? Do you have views on how else this could be decided? Are there alternatives that we should consider?*

The right of withdrawal is a necessary and integral aspect of the voluntarist principle and is for the community to decide. BANNG supports this but makes the following observations:



- The right to withdraw should, in principle, be applied at any stage in the process.
- If the proposal to withdraw fails, it does not preclude the exercise of the right at a later stage in the process.
- The right to withdraw should be exercised by the community as defined through the process of community identification. This will presumably be the area that emerges from the Search Area and not the Potential Host Community where the two are different. The wider community that is potentially affected by the project provides the constituency for the exercise of the right to withdraw.
- The Community Partnership is the appropriate body to call for the right to withdraw.
- This is a fundamental right to be exercised by the community as a whole and, therefore, it should be a democratic decision based on a majority voting in a local referendum.

### *Test of public support*

Consultation question 8: *Do you agree with the approach to the test of public support? Do you agree that the Community Partnership should decide how and when the test should be carried out? Do you have views on how else this could be decided? Are there alternatives that we should consider?*

The voluntarist principle is based on consent, the willingness of communities to proceed. Therefore, it is necessary to test if approval exists within the community as a whole. It is suggested that the test of public support takes place once only, at the point before seeking regulatory and development consent. It may be argued that in such a long process community willingness to continue participation should be tested at different stages. The test of public support should complement the right to withdraw and may be used to anticipate the fundamental challenge that withdrawal implies. It may help to inform the Partnership and help to determine whether withdrawal should be contemplated.

A test of public support exercised at several stages provides a positive presumption to proceed in contrast to the negative right to withdraw. Regular testing would ensure that engagement and participation is continuous and prevent the Community Partnership becoming introspective and disconnected from the community.

We are concerned that the test of public support is taken prior to the process of licensing and consent. This is too early a stage at which to gain community endorsement for a project, the full implications of which may only become clear during the consenting process. Therefore, in addition, to a test before regulatory and planning consent, we consider a final test should be made before the point of final commitment to the project before the development proceeds to implementation.

The report states that the ‘test of public support will be carried out by the Potential Host Community’. Earlier in this response we pointed out that it was unclear whether the PCH coincided with the Search Area. We consider the PCH would be too small a unit for a test

of public support on a project that impacts a wide area. We feel it is most important that the definition of the area covered by the Community Partnership is clear. The confusion that exists between Search Area, PCH and Community Partnership is unhelpful in trying to comprehend the unit of administration that takes effective decisions on such matters as the right to withdraw and the test of public support.

It is noted that if the principal local authorities ‘no longer wish to support the process proceeding, then we recognise it is unlikely that the Community Partnership will be able to launch or demonstrate a test of public support at that time’ and, therefore, the process will effectively be terminated. This suggests that the local authorities are *primus inter pares* and are able to exercise power informally despite their subordinated role in the decision process. One of the reasons for relaunching the MRWS process was the consideration that the local authorities were responsible for the West Cumbrian process to stall. It appears that this situation is still possible in the revised process. If that is the intention then it would be better to be explicit and to state that the local authority has the effective powers to stop the process up to the point of the test of public support, after which the power to proceed lies with the Government. BANNG suggests the role and relationship of the local authority to the process needs to be reviewed and clarified. As it stands, we are confused.

On the test of public support BANNG has the following proposals and observations:

- **There should be tests of public support at various key points in the process to inform the Community Partnership and ensure continuing engagement with the community.**
- **There should also be definitive tests of public support at two final stages:**
  - before a decision is made to seek regulatory approval and development consent;**
  - to confirm community support at the conclusion of the licensing and consent process before the final decision is taken to proceed with the development.**
- **The definition of the community providing the test of public support needs to be clarified. We consider it should be the wider area affected by the project and covered by the search area and the Community Partnership. The potential host community would, in our view, in many cases be too small a unit. However, as indicated earlier, we consider the definitions of ‘community’ are confusing and must be used clearly and consistently in this document.**
- **We consider the role in decision making of the principal local authorities must also be clarified. It is important to understand the relationship between decision making by the ‘community’ and the recognition that the local authority must be supportive of the process.**

*Role of local authorities*

As indicated at several points in this response we do not agree that the proposals ‘set out clear roles for principal local authorities to perform within the siting process’. In the previous West Cumbria MRWS process the decision making role of the authorities was clear and one of the reasons for reviewing the process was to reduce this role. Hence, the approach of self-defining communities with the powers to withdraw or support the process.

Furthermore, it is assumed that the staged process of decision making was a further impediment to progress enabling ‘decisions being taken before a sufficient level of engagement has been undertaken’ (5.7). Instead, the revised process envisages only a final test of support to ensure ‘the test of public support is taken in the full knowledge of all the relevant facts’ (5.7).

BANNG disputes these arguments in the consultation document. While it is clear that the local authorities do not have the unilateral powers in the previous process, it is equally clear that they have a variety of opportunities of participation and intervention to determine whether the process proceeds or is terminated. BANNG believes local authorities as local representative bodies should have this determining role but feels it should be explicitly stated rather than implied. However, we also consider that the councils should exercise their role sparingly and should not have the power to overrule the wishes of the community as expressed in a test of public support. The role of the local authority should be to legitimate, not determine a decision to withdraw or proceed.

We also dispute that there should only be one test of public support at the end of the process however that is defined. We consider that continuing engagement should ensure sufficient information at relevant points in the process. In the absence of any tests of opinion there is the danger of ‘lock in’ whereby the process proceeds to its conclusion without any checks and balances possibly leading to a breakdown in trust and confidence that could jeopardise the outcome.

**Therefore, on the role of local authorities BANNG considers:**

**The representative role of local authorities should be explicitly stated in providing democratic legitimation to the process.**

**Local authorities should have the ability, as members of the Community Partnership, to decide whether to remain engaged or invoke the right of withdrawal as indicated in the consultation document.**

**Local authorities must endorse the outcome of a test of public support and cannot reject the outcome.**

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Committee on Radioactive Waste Management (CoRWM)*

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## **Annex A/**

## **ANNEX A**

### **LIST OF RESPONSES MADE BY THE BLACKWATER AGAINST NEW NUCLEAR GROUP (BANNG) TO GOVERNMENT AND OTHER CONSULTATIONS ON NUCLEAR ISSUES AND OTHER PAPERS**

BANNG (2008) Consultation on the Strategic Siting Assessment Process and Siting Criteria for New Nuclear Power Stations in the UK, Response on behalf of BANNG, November (BANNG Paper No.1)

BANNG (2009a) 'Have Your Say' Government Consultation on Nomination of Sites for New Nuclear Power Stations, Response to the Consultation by BANNG, May (BANNG Paper No.2)

BANNG (2009b) The Justification of Practices Involving Ionising Radiation Regulations 2004, Consultation on the Nuclear Industry Association's Application to Justify New Nuclear Power Stations, Response to the Consultation from Blackwater Against New Nuclear Group (BANNG), March (BANNG Paper No.3)

BANNG (2010a) Consultation on Draft National Policy Statements for Energy Infrastructure: Draft Overarching National Policy Statement for Energy (EN-1); Draft National Policy Statement for Nuclear Power Generation (EN-6) and Associated Documents, Response of the Blackwater Against New Nuclear Group (BANNG), February (BANNG Paper No.4)

BANNG (2010b) House of Commons Energy and Climate Change Committee, Inquiry into Energy National Policy Statements, Evidence on Behalf of the Blackwater Against New Nuclear Group (BANNG), January (BANNG Paper No.5)

BANNG (2010c) Environment Agency Generic Design Assessment AP1000 Nuclear Power Plant Design by Westinghouse Electric Company LLC: UK EPR Nuclear Power Plant Design by Areva NP SAS EDF; Consultation Document, Response by Blackwater Against New Nuclear Group (BANNG), October (BANNG Paper No.6)

BANNG (2010d) The Justification of Practices Involving Ionising Radiation Regulations 2004. Consultation on the Secretary of State's Proposed Decisions as Justifying Authority on the Regulatory Justification of the New Nuclear Power Station Designs Currently Known as the AP1000 and the EPR, response to the Consultation by the Blackwater Against New Nuclear Group, February (BANNG Paper No.7)

BANNG (2010e) The Energy Act 2008, 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, Response of the Blackwater Against New Nuclear Group (BANNG),  
June (BANNG Paper No.8)

BANNG (2011a) Planning for New Energy Infrastructure, Consultation on  
Revised Draft National Policy Statements for Energy Infrastructure, Response of  
the Blackwater Against New Nuclear Group (BANNG), January  
(BANNG Paper No.9)

BANNG (2011b) The Energy Act 2008, Consultation on Revised Funded  
Decommissioning Programme Guidance for New Nuclear Power Stations and  
Consultation on an Updated Waste Transfer Pricing Methodology for the Disposal  
of Higher Activity Waste from New Nuclear Power Stations, Response from the  
Blackwater Against New Nuclear Group (BANNG), March  
(BANNG Paper No.10)

BANNG (2011 c) Management of the UK's Plutonium Stocks, Consultation on the  
long-term management of the UK-owned Separated Civil Plutonium, Response  
from the Blackwater Against New Nuclear Group (BANNG), May  
(BANNG Paper No. 11)

BANNG (2011d) Japanese Earthquake and Tsunami: implications for the UK nuclear  
industry interim report by HM Inspector of Nuclear Installations May 2011, Comment  
on Behalf of the Blackwater Against New Nuclear Group (BANNG), August  
(BANNG Paper No. 12)

BANNG (2011e) Managing Radioactive Waste Safely: desk-based identification  
and assessment of potential candidate sites for geological disposal, Public  
Consultation, Response of the Blackwater Against New Nuclear Group (BANNG),  
September (BANNG Paper No. 13)

BANNG (2012a) Essex County Council's Waste Disposal Document: Preferred  
Approach, Public Consultation, Response of the Blackwater Against New Nuclear  
Group (BANNG), January (BANNG Paper No. 14)

BANNG (2012b) Geological Disposal of Radioactive Waste In West Cumbria?  
Public Consultation, Response of the Blackwater Against New Nuclear Group  
(BANNG), March (BANNG Paper No. 15)

BANNG (2012c) Application for Development Consent by NNB Genco (EDF  
Energy) for Hinkley Point C Nuclear Generating Station and Associated  
Development, Written Representation on behalf of the Blackwater Against New  
Nuclear Group (BANNG), May (BANNG Paper No. 16)

BANNG (2012d) Paper presented to the DECC/NGO Nuclear Forum, 'Radioactive  
Waste Management and New Build – Problems and Policies', October  
(BANNG Paper No. 17)

BANNG (2013) Sizewell C Proposed Nuclear Development Stage 1 Pre-  
Application Consultation, Initial Proposals and Options Consultation Documents,  
Response of the Blackwater Against New Nuclear Group (BANNG), February

(BANNG Paper No. 18)

BANNG (2013) Call for Evidence on Managing Radioactive Waste Safely – Review of the Siting Process for a Geological Disposal Facility, Response by the Blackwater Against New Nuclear Group (BANNG), June

(BANNG Paper No. 19)

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(BANNG Paper No. 20)

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