



Department for Environment and Community Services

UK-ABWR Regulatory Justification
Application
Department of Energy and Climate Change
Room 108
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London
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Email: abwrjustification@decc.gsi.gov.uk

Date: 12 May 2014
Your Ref:
Our Ref:
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Dear Sir or Madam

Consultation on the Nuclear Industry Association's application to justify the Advanced Boiling Water Reactor (UK-ABWR)

Thank you for the opportunity to respond to this consultation. This is submitted by South Gloucestershire Council as a delegated officer response following consultation with Lead and Local Councillors.

We note that the documentation incorrectly locates the nominated new nuclear build site (NNB) at Oldbury as being in Gloucestershire. We would be grateful if all documentation could be corrected to refer to Oldbury as being located in South Gloucestershire, not Gloucestershire. These are two different local authority areas.

Whilst a substantial part of the documentation relates to issues that are outside the remit of South Gloucestershire Council and /or will be addressed at the pre-application and application stage, we wish to comment as follows:

1. Ensuring public and worker safety is clearly a pre requisite for any new reactor design being considered for application in the UK. That said there are also significant concerns relating to the design of the structures that will house the reactors and facilitate cooling, and their potential environmental impact on the locality, including as follows:
2. Since Oldbury is located in a visually prominent location within a flat and open estuarine and historic Levels landscape adjacent to the internationally designated Severn Estuary, it is vital that any reactor is capable of being sensitively designed in terms of physical appearance, so that it can integrate with the surrounding landscape to an acceptable degree. This means minimisation of bulk of new build and in particular that conventional natural draught parabolic cooling towers would not be acceptable.

It is noted that paragraph 7.41 of Volume 1 of the consultation documentation states that hybrid cooling towers 'could' be used.

It is requested that DECC ensure that the applicant demonstrate that their proposed design is capable of:

- a) utilising the shorter hybrid cooling towers (approx. 60m height) rather than conventional cooling towers that can be up to 200m tall, and
 - b) being housed within buildings whose shape and form must be capable of achieving good design quality and integration with the surrounding low lying estuarine and Levels landscape.
3. It is suggested that any future public engagement events should held in locations close to the sites where the ABWRs are proposed to be implemented, so that members of the local communities can have the opportunity to raise questions or issues of concern to them.

We would be grateful if DECC would keep us informed regarding future consultations and developments.

Yours faithfully

Gillian Ellis-King
Strategic Projects Manager