

---

**From:** Paul Patterson  
**Sent:** 01 September 2023 11:05  
**To:** Grahame Stuteley; Naomi Goold  
**Cc:** Tamzen Pope; Charles Krolik-Root  
**Subject:** RE: SZC Req 12 & 19 consultation, PP update of responses to letters of objection.  
**Attachments:** SZC Req 12 response to objectors questions PP 230901.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Grahame and Naomi,  
Find attached my updated Draft detailed responses to questions raised by objectors that take account of my recent discussion with SZC Co.

In summary.

I do not believe that ESC currently has grounds to not approve the CPMMP. Furthermore if the Req 19 information (pre app due Tuesday) shows no change from DCO, as stated by S Roast, there will certainly be no grounds to not approve.

Many points raised by the objectors are valid concerns but are generally trumped by the fact that PINS has accepted the SZC Co view on impact and risk and so the objectors are in effect arguing that they do not agree with the PINS decision.

Under the CPMMP SZC Co has an obligation to maintain a sand / shingle embankment in front of the main site rock flood defence unless and until the site is decommissioned that can only happen when all nuclear materials, including waste, is removed from site.

To do so will probably require increasing effort and cost that may exceed SZC Co forecasts, however, that is a risk for SZC Co.

If in the future SZC Co wish to change their obligations under the CPMMP they can only do so with the approval of ESC and others. In my view this gives ESC strong protection.

Several objectors concerns are deferred to the Req 19 Discharge process.

I suggest that my notes be reviewed by you both and possibly Philip prior to discussion with members.

If members are keen to explore opportunities to not approve then it may be helpful to involve a legal team member in discussions with them. For you to decide.

Please let me know what more you need from me and by when.

Regards, Paul.

---

**From:** Paul Patterson  
**Sent:** Thursday, August 31, 2023 2:34 PM  
**To:** Grahame Stuteley <Grahame.Stuteley@eastsoffolk.gov.uk>; Naomi Goold <Naomi.Goold@eastsoffolk.gov.uk>  
**Cc:** Tamzen Pope <Tamzen.Pope@eastsoffolk.gov.uk>; Charles Krolik-Root <charles.krolik-root@great-yarmouth.gov.uk>  
**Subject:** RE: SZC Req 12 & 19 consultation, Note of Telcon 31/8 PP with S Roast and T Dolphin  
**Importance:** High

Hello Grahame and Naomi.

Find below my record of the discussion earlier today plus my attempt to identify further actions and timeline issues.

I think it may be helpful to hold a Teams meeting soon to agree a way forward.

### **Req 19 design approval.**

Pre app will arrive Tuesday 5/9 with a 4 week response deadline.

The 1 week delay will be absorbed by SZC with their review / amend period reduced from 4 weeks to 3 so the formal submission date will be unchanged.

The Req 19 information includes reference to output from the CPMMP when discussing conditions for construction of the Adaptive HCDF profile thereby creating a circular link.

SR posed a question - does the lack of prior approval of the CPMMP, including the part that is relied upon by Req 19, compromise the ability to approve Req 19 before approval of Req 12?

My view is that this adds weight to aligning the approval dates for both Reqs.

Tamzen and I will review this information. Grahame and Naomi – do you wish to see / comment on our feedback before we send it?

### **Req 12 CPMMP.**

I sent 6 questions to SZC listed below. SZC responded this morning.

Q 1 SZC are happy to defer the end date for Req 12 to align with that of Req 19. The current period for response to Req 12 expires ~ 4/10.

If ESC wishes to do this then ESC / SZC planners should confer to agree the process. Action GS / NG.

SR added that the HCDF position and profile has not changed since DCO.

Q2 SZC agree that additional text is required to clarify that the CPMMP may continue beyond 2140. SR / TD will prepare new text and submit to PP.

Q3 SZC agree that the text currently in Req 12 be added to the CPMMP.

Q4 SZC confirm that the risk of CPMMP delivery being more onerous than DCO reports suggest lies with SZC. PP accepts that this is adequately covered by changes in Q2 and Q3 above, subject to ESC approval of the amended text.

Q5 SZC confirm that any change in the method by which continuation of Long Shore Transport is achieved will require the prior approval of ESC and MMO. PP accepts that this is adequately covered by changes in Q2 and Q3 above, subject to ESC approval of the amended text.

Q6 SZC will provide information in the Req 19 submission.

### **Next steps.**

I will now update my Objection Review Report taking account of discussion in this morning's meeting. I will attempt to do this by CoP 5/9. I will then submit it to you both.

I presume next steps after that will be

1 Share the report with P Ridley and members to agree on a position. This may be approval subject to text changes and delay of Req 12 closure date to match Req 19 date or non approval for reasons to be defined. If we take this path then I suggest we take legal advice in what represents reasonable grounds.

2 Inform MMO of our comments. This raises a question do we await feedback by NE and EA before responding to MMO?

3 Notify SZC of the decision. I.e., changes to text we require in the CPMMP based upon my meeting notes above (we may already have their amended text by then) or non approval with reasons.

4 Ask MMO to inform us of any changes to CPMMP text they are considering, notably any that may affect our interests.

### **Timelines.**

I think that an extension of time to our 13 week Req 12 review period will be needed to complete these tasks without the additional need / benefit to align Req 12 and Req 19 end dates.

Note that the MMO review period is 26 weeks from 3/7 so there is less time pressure on them.

I understand that the review period for Req 19 after formal submission is 8 weeks? Grahame and Naomi, please comment.

If so then we need to consider if we intend to include in that another public planning consultation (3 weeks) and map out actions to be completed in the following 4/5 weeks.

**Next MTF.**

This is scheduled for 3/10 1000 to 1230. It will be the last MTF before my departure. Tamzen and Charles I suggest that you consider handover / familiarisation options.

Regards, Paul.

---

**From:** Stephen Roast <[Stephen.Roast@sizewellc.com](mailto:Stephen.Roast@sizewellc.com)>  
**Sent:** Tuesday, August 29, 2023 4:57 PM  
**To:** Paul Patterson <[Paul.Patterson@eastsoffolk.gov.uk](mailto:Paul.Patterson@eastsoffolk.gov.uk)>  
**Cc:** Grahame Stuteley <[Grahame.Stuteley@eastsoffolk.gov.uk](mailto:Grahame.Stuteley@eastsoffolk.gov.uk)>  
**Subject:** RE: SZC Req 12 consultation, Preliminary questions to SZC.

Hello Paul

Apologies for the late reply. Yes that will be fine – I have asked Tony Dolphin of Cefas to attend also.

Kind regards  
Stephen

**Dr Stephen Roast FLS**  
**Marine Environment Manager**  
MS Teams: 020 8078 1679  
Mobile: 07730 502432



---

**From:** Paul Patterson <[Paul.Patterson@eastsoffolk.gov.uk](mailto:Paul.Patterson@eastsoffolk.gov.uk)>  
**Sent:** Tuesday, August 29, 2023 9:54 AM  
**To:** Stephen Roast <[Stephen.Roast@sizewellc.com](mailto:Stephen.Roast@sizewellc.com)>  
**Cc:** Grahame Stuteley <[Grahame.Stuteley@eastsoffolk.gov.uk](mailto:Grahame.Stuteley@eastsoffolk.gov.uk)>  
**Subject:** RE: SZC Req 12 consultation, Preliminary questions to SZC.

Good morning Stephen.

Grahame has updated me on recent discussions regarding the submission of Req 19 information. It now appears unlikely that we will be in a position to discuss Req 19 in our planned telcon on Thursday. Can we use this time slot to discuss your responses to the questions below?  
Regards, Paul.

---

**From:** Paul Patterson  
**Sent:** Tuesday, August 15, 2023 3:00 PM  
**To:** Stephen Roast <[Stephen.Roast@sizewellc.com](mailto:Stephen.Roast@sizewellc.com)>  
**Cc:** Grahame Stuteley <[Grahame.Stuteley@eastsoffolk.gov.uk](mailto:Grahame.Stuteley@eastsoffolk.gov.uk)>  
**Subject:** SZC Req 12 consultation, Preliminary questions to SZC.

Hello Stephen.

Further to our telcon this morning find below questions / comments arising from ESC preliminary consideration of consultation feedback from communities. These issues are generated by community comments that align with residual officer concerns as noted in the final DCO SoCG and LIR.

These are my words with no input yet from others.  
To date we have had no feedback from any other MTF member.

Your replies will help inform if / how we take these matters forward in our final response that will include further consultation with MMO.

1 A change in the plan position or profile of the HCDF and SCDF from that shown in the CPMMP is possible under the final design process currently underway to inform the DCO Req. 19 discharge process. It is therefore possible that assumptions made in the CPMMP, regarding the location of the SCDF relative to the shoreline, will change which may affect the performance and management needs of the SCDF. It therefore seems appropriate for the plan position and profile of the HCDF to be finalised and approved before the CPMMP is approved and for assumptions in the CPMMP on HCDF and SCDF position and form to be confirmed as based upon the final design. Is it possible for the deadline for approval of Req. 12 to be delayed to coincide with the date for approval of Req. 19?

2 There are several references in the CPMMP to an 'end of design life' date of 2140 notably foot note 26 on page 35 of MSZ0001. This date is linked to discussion of decommissioning and cessation of monitoring and mitigation actions. There is potential for the actual end of site life date to be later than 2140 however this is not acknowledged in the CPMMP. A more precautionary approach would be to include text in the CPMMP that recognises the end of site life date is an estimate and the actual date may be later, requiring an extension of monitoring and mitigation actions beyond 2140 and to confirm that the CPMMP will remain viable at least to 2140 and beyond if necessary. Please also amend text to clarify that the end of site life date, which triggers preparation of the Monitoring and Mitigation Cessation Report, is based upon a forecast date by which all 'all nuclear materials and safety functions' are removed from the site and that all nuclear materials includes spent fuel waste.

3 MSZ0001, Page 35, states that once approved, the recommendations of the Coastal Processes Monitoring and Mitigation Cessation Report must be implemented. There is no similar text in MSZ0001 regarding implementation of the CPMMP. Noted that text to this effect does appear in Requirement 12 as copied below.  
*(2) The coastal processes monitoring and mitigation (terrestrial) plan referred to in paragraph (1), incorporating any variations approved by East Suffolk Council (and MMO), must be implemented as approved.*  
ESC's interests are best protected if this text is repeated within MSZ0001.

4 Please confirm that the CPMMP requires SZC to maintain a SCDF (unless / until that obligation is amended after approval by ESC and MMO) and that the risk of more frequent management interventions than forecast being required to achieve this outcome, potentially caused by an extended site life beyond 2140, or more aggressive shoreline change pressure / storm impacts, lies with SZC. Please identify existing or add new text within the CPMMP that makes this obligation explicitly clear.

5 Please also confirm that if, in the future, SZC wish to alter the method by which continuation of Long Shore Transport is achieved from a maintained SCDF to another approach, then this change requires the prior approval of ESC and MMO. Please identify existing / add new text within the CPMMP that makes the obligation for SZC to maintain LST across the SZC site unless / until changed by the Cessation report, explicitly clear.

6 The next item is also relevant to Req 19.

ESC has concerns at the proximity to the shoreline of the south eastern limit of the HCDF, that was moved by ~25m seaward during the DCO, to overlap but be separate from the SZB defence. Also that the SCDF volume at this point is the lowest on the frontage.

Following confirmation of the final HCDF design detail at this location under Req 19 please confirm and demonstrate that appropriate and representative (location specific) shoreline profiles have been used in the assessment of SCDF performance and durability at this location and also demonstrate that the SCDF at this location will be viable over the SZC life to 2140 and potentially beyond.

Councillor Ford, Grahame and I are meeting with Paul Collins, Bill Parker and other community / action group members on site on Thursday morning.

If any matters arise from that meeting that generate questions / comments similar to the above I will update this message on Thursday pm.

I am absent from CoP Thursday, returning Tuesday 29/8.

Regards, Paul.



**Paul Patterson | Senior Coastal Engineer**

East Suffolk Council

01502 523349 | 07880781265

[www.eastsuffolk.gov.uk](http://www.eastsuffolk.gov.uk)

[www.eastsuffolkmeansbusiness.co.uk](http://www.eastsuffolkmeansbusiness.co.uk)

Our ambition is to deliver the best possible quality of life for everyone who lives in, works in and visits East Suffolk.

**We are East Suffolk**

*Confidentiality: This email and its attachments are intended for the above named only and may be confidential. If they have come to you in error you must take no action based on them, nor must you copy or show them to anyone; please reply to this email and highlight the error.*

*Security Warning: Please note that this email has been created in the knowledge that Internet email is not a 100% secure communications medium. We advise that you understand and accept this lack of security when emailing us.*

*Viruses: Although we have taken steps to ensure that this email and attachments are free from any virus, we advise that in keeping with good computing practice the recipient should ensure they are actually virus free.*

This message has been scanned for malware by Websense. [www.websense.com](http://www.websense.com)

Click [here](#) to report this email as spam.