From: Paul Patterson

**Sent:** 05 September 2023 16:56

**To:** Stephen Roast

**Cc:** Grahame Stuteley; Naomi Goold

**Subject:** RE: SZC Req 12 consultation, Preliminary questions to SZC.

## Dear Stephen,

I met with Naomi today to discuss some questions arising from our meeting last week.

1 ESC will write to SZC Co requesting an extension to the Req 12 discharge period to align the end date with the Req 19 discharge period end date.

2 We don't regard the reference in Req 19 Part 3 `switching to adaptive design' to text in Req 12 as a cause for concern. The risk of a challenge should be mitigated by the joint approval date.

3 We will write to SZC Co to request the text changes discussed and agreed last week when these are agreed with managers / members.

4 We will aim to complete the Req 19 discharge process within the current 8 week period.

I have updated MMO on our position and have sought a catch up meeting with them.

Regards, Paul.

From: Paul Patterson

Sent: Tuesday, August 29, 2023 9:54 AM

To: Stephen Roast <Stephen.Roast@sizewellc.com>

**Cc:** Grahame Stuteley < Grahame. Stuteley @eastsuffolk.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 < <a href="mailto:Stephen.Roast@sizewellc.com">Stephen.Roast@sizewellc.com</a>>

**Cc:** Grahame Stuteley < <u>Grahame.Stuteley@eastsuffolk.gov.uk</u>> **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.

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?

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.

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.

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.

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.

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.



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