



Planning Inspectorate
National Infrastructure Planning
Sizewell C Team
Temple Quay House
2 The Quare
Bristol
BS1 6PN

Our ref AEO/DFM/NOR01691.8

Your ref Sizewell C DCO
SIZE-AFP059

24 August 2021

By email only to
sizewellc@planninginspectorate.gov.uk

Dear Sirs

Application by NNB Generation Company (SZC) Limited (the "Applicant") for an Order granting Development Consent for the Sizewell C Project ("the Application").

Walker Morris is instructed by Northumbrian Water Limited ("NWL") in the above matter. NWL is the statutory undertaker responsible for the provision of water services in Sizewell. NWL trades locally as Essex & Suffolk Water.

We write further to our letter dated 23 July 2021 lodging a holding objection to the above Application.

The Applicant and NWL have continued to work together to overcome the water supply difficulties associated with the Sizewell C Project.

NWL has also continued to engage with the Environment Agency ("EA") about the wider Water Industry Environment Programme ("WINEP") in relation to ensuring water can be supplied sustainably. As part of this engagement with the EA, NWL has been informed that a sustainability reduction may be applied to its abstraction licence for the Barsham River Works on the River Waveney. This was intended as the source of water for the Sizewell C transfer main. The result of such a cap could be to allow water to be abstracted to supply Sizewell C but with no additional spare capacity to supply to other future developments. NWL has not been provided with full details of the reduction of the abstraction licence and is continuing to work with the EA to establish its position with greater certainty. Simultaneously, an analysis of the implications is being rapidly undertaken.

The water supply position in the East of England is not favourable, with the EA categorising it as being a seriously water stressed area, and if the ability to abstract water from the River Waveney were to be capped, there are very few other sources of water available to NWL. The result of this would be that NWL would need significant capital projects such as a desalination plant or sewerage effluent reuse plant to meet anticipated non-Sizewell C future demand.

NWL is mindful of its statutory duties, pursuant to the Water Industry Act 1991, to develop and maintain an efficient and economical system of water supply within its area, and make arrangements for providing supplies of water to premises in its area and persons who demand them. NWL is aware its primary duty is to provide and install pipes and related infrastructure for domestic purposes. NWL is also mindful of its duty to co-operate with Local Planning Authorities to ensure that there is sufficient water to supply anticipated housing growth in its area.

Section 55(3) of the Water Industry Act allows a water undertaker to refuse to supply water for a non-domestic use if, in order to meet its existing obligations to supply water for domestic or other purposes, together with its probable future obligations to supply buildings with water for domestic purposes, the water undertaker would incur unreasonable expenditure in carrying out such works. Alternatively, the water undertaker may refuse if such supply would put at risk the ability of the undertaker to meet existing or probable future obligations. NWL is now likely to be in this position following the latest WINEP investigations and the EA being minded to reduce the annual licensed quantity on NWL's River Waveney abstraction licence.

Although NWL is continuing to engage with the EA at director and technical level and is working on reviewing the implications of the EA's stance, it is aware of the tight timescale within the DCO timetable and wanted to bring this matter to the ExA's attention as quickly as possible.

NWL remains committed to pro-active engagement with the Applicant, the EA and the ExA. NWL will continue to analyse the implications of the EA's stance and continually update the ExA, however, NWL believes the ideal outcome for water supply to Sizewell C may be for the Applicant to have a self-sufficient water supply.

Yours faithfully

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Walker Morris LLP