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Ms McKay
The Planning Inspectorate
National Infrastructure Planning
Temple Quay house
2 The Square
Bristol BS1 6PN

Copied to Ms Evans, Case manager (sizewellc@planninginspectorate.gov.uk)

03 September 2021

Dear Ms McKay

**Application EN010012 for The Sizewell C Project by NNB Generation Company (SZC) Limited (SZC Co.)
Request for Further Change to DCO Application**

I write on behalf of SZC Co. in relation to the application for development consent (the Application) for the Sizewell C Project, which was accepted for examination on 24 June 2020.

Background to change request

On 21 April 2021, the appointed Examining Authority (ExA) accepted for Examination 15 changes to the Application (Accepted Changes). A further three changes were accepted on 10 August 2021 (Further Accepted Changes).

On 23 July 2021, I wrote to you explaining SZC Co.'s intention to propose a further change to the Application [[REP5-001](#)]. I subsequently provided a Third Notification of Proposed Project Changes Report [[AS-397](#)] which identified the nature of the change proposed and advised of SZC Co.'s intention to request that the change be accepted as a change to the Application. In my letter I respectfully requested the advice of the ExA on the procedural implications of the proposed change and on the need, scale and nature of the consultation that SZC Co. may need to undertake. The ExA replied on 5 August 2021 [[PD-039](#)], drawing attention to the requirements of the Planning Inspectorate's Advice Note Sixteen: How to request a change which may be material (AN 16) and providing guidance on SZC Co.'s intended approach to the consultation on the proposed change and the submission of the change request.

SZC Co. has undertaken non-statutory consultation for a period of 24 days, which it considers to be appropriate and in broad accordance with the guidance. Further justification for our approach is set out in Section 4 of the Consultation Report (Doc Ref. 5.1Ad4 Ch). I am writing to you today to make a request for a change to be made to the Application.

Proposed change

As a result of ongoing engagement between the Environment Agency and Northumbrian Water Limited ("NWL", trading locally as Essex and Suffolk Water ("ESW")), SZC Co. has received information from ESW that an alternative temporary potable water source is necessary during the construction phase of the Sizewell C Project. This is because SZC Co.'s expectation that ESW would deliver a water supply transfer main early in the construction period, with water balanced locally in the interim period to provide potable water during the early years, has now been confirmed by ESW as being no longer feasible.

Consultation on the proposed change was carried out between 3 August and midnight 27 August 2021. Careful regard has been given to the consultation feedback in finalising this change request. Please refer to the Consultation Report Fourth Addendum (Doc Ref. 5.1Ad4 Ch) for details.

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The proposed change is summarised in **Table 1** and for these reasons SZC Co. considers that the change is not material.

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Table 1: Overview of Proposed Change

Proposed Change Number	Proposed Change Description	Environment Effects and Habitats and Protected Species	Order Limit Changes	New Compulsory Acquisition or Temporary Possession	Impact on Businesses or Residents
Proposed Change 19 (Temporary Desalination Plant)	A change to the Water Supply Strategy to propose new temporary infrastructure for the desalination and treatment of seawater to produce potable water suitable for construction-related activities until the Sizewell transfer main is delivered and operational.	<p>No new or materially different likely significant effects on the environment from that reported in the ES [APP-159 to APP-582], as updated by the subsequent ES Addenda [AS-179 to AS-292], [REP5-062 to REP5-069], [REP6-017].</p> <p>No change to assessment conclusions presented within Shadow HRA Report (Doc Ref. 5.10 [APP-145]) and first Shadow HRA Addendum [AS-178], or new European Protected Species licence required.</p> <p>No change to conclusions presented within Water Framework Directive Compliance Assessment (Doc Ref. 8.14) [APP-620, APP-621, APP-622 and APP-623] and the first WFD Compliance Assessment Addendum [AS-277 to AS-279].</p> <p>No change to findings presented within Eels Regs Compliance Assessment [APP-332].</p>	None	None	No new or materially different significant effects on businesses or residents.

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Environment effects and habitats and protected species

The proposed change has been subject to thorough environmental and other relevant assessment, the full details of which are contained within this submission. As shown in **Table 1** above, the proposed change is not considered likely to give rise to new or materially different significant environmental effects from those assessed and presented in the ES (or its subsequent Addenda). Further, the proposed changes do not change the findings of the conclusions set out in the Shadow Habitats Regulation Assessment, the Water Framework Directive Compliance Assessment or the Eels Regulations Compliance Assessment (or their subsequent Addenda).

Order Limit changes and compulsory acquisition/temporary possession

There are no changes to the Order Limits and no changes to the compulsory acquisition or temporary possession powers sought in the Application.

Impact on businesses or residents

No new or materially different significant effects on businesses or residents would result from the proposed change.

Change request

The proposed change is considered necessary to ensure the timely delivery of the Sizewell C Project and responds directly to information received from stakeholders. SZC Co. formally requests that the proposed change is accepted for Examination. The change is fully described, justified and assessed in the documentation submitted with this letter.

SZC Co. believes that both the Project and the Examination would be assisted by its acceptance.

Recent correspondence from NWL

SZC Co. is aware of NWL's most recent letter to the EXA dated 24 August, which suggests that NWL may have difficulty supplying water to SZC, even in the longer term, based on its current capital investment programme. Its letter raises issues which affect the availability of sustainable supply across the whole of the East of England and which, if confirmed, will require a strategic response by the water company in order that it can continue to fulfil its water supply duties under the Water Industry Act for Sizewell and elsewhere, including its duties under both sections 41 and 55.

SZC Co. is aware that the position is still the subject of the continuing studies and that no conclusions have yet been reached by NWL or by the Environment Agency. SZC Co. is engaging with both parties on the continuing work and its potential implications and will continue to keep the examination updated. Longer term plans will need to be put in place to serve the region and its committed growth.

SZC Co.'s proposed Water Supply Strategy pre-empts any risk for the duration of the construction period, allowing considerable time for longer term outcomes to be examined by all stakeholders.

SZC Co. is aware that there are a range of long term options open to NWL in discussion with the Environment Agency, in order to meet its supply obligations, including the current or alternative options for a transfer main, sustainable abstraction, waste water recovery, desalination and investment in more strategic water storage and transfer options.

SZC Co. welcomes the commitment from NWL to continue to engage proactively on these issues.

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Structure of this submission

This submission is divided into two parts:

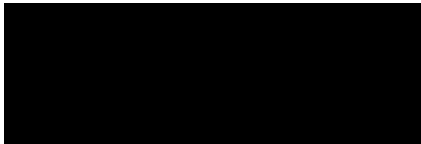
PART 1: Introduces, describes and justifies the proposed change; and

PART 2: Comprises the updates and addenda to the Application documents which would be appropriate if the proposed change was accepted.

The **Navigation Document** (Ref 1.3(N)Ch) provides a schedule of the information that is submitted today. The documents associated with the change request are coloured green to help differentiate between those that are being submitted as part of the wider Deadline 7 submission.

I would be grateful if you could confirm receipt of this submission and I look forward to hearing from you. Please do not hesitate to contact me if I can help in any way to further clarify any matters associated with this letter.

Yours sincerely



Carly Vince
Chief Planning Officer