

Wendy McKay

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Our Ref: 20026727

Your Ref: EN010012

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By email only

Dear Ms McKay

Planning Act 2008 – Section 88 and the Infrastructure Planning (Examination Procedure) Rules 2010 – Deadline 8: Site Water Supply Strategy – Revision 2.0

Application by NNB Generation Company (SZC) Limited for an Order Granting Development Consent for the Sizewell C Project

For Deadline 8 (24th September) the Examining Authority (ExA) have requested comments on [REP7-037] Deadline 7 Submission - 8.4 Planning Statement - Appendix 8.4K - Site Water Supply Strategy - Revision 2.0

Separately, we have also provided detailed comments on the newly proposed desalination scheme, and a summary of our oral case presented at ISH11, Flooding, Water and Coastal Processes.

Phase 1 – Water Trucks

3.2.1 of the Water Supply Strategy states that water will be supplied by truck in the early works construction phase. The source of this water has not been confirmed with the water company. We are therefore unable to advise on the availability of sustainable water resources for these proposals.

Phase 3 – NWL Transfer Main

We consider that Water Supply Strategy does not currently identify a sustainable mains water source. 3.2.3 of the Water Supply Strategy states that Northumbrian Water Ltd (NWL) have forecast a supply deficit in the local Blyth Water Resource Zone and are unable to provide any mains water to the Sizewell C site from this area.

To supply mains water a scheme has been identified called the Sizewell C Transfer. Since the publication of the Water Supply Strategy, the Examining Authority (ExA) published an additional submission (dated 10th Sept) [AS-413] from Walker Morris LLP on behalf of NWL.

The Sizewell C Transfer proposes to use water capacity at NWL's River Waveney Waste Treatment Works. However, the viability of this scheme is dependent on maintaining sufficient annual licensed quantity on both NWL's River Waveney abstraction licence and also on the EA's Waveney Augmentation Groundwater Scheme (WAGS) licence which

supports NWL's river Waveney licence; and maintaining sustainable and resilient supplies to NWL's existing customers.

In order to inform their understanding of the viability of this scheme, NWL undertook a partial, interim WINEP investigation in July 2021. Having reviewed this investigation the Environment Agency (EA) wrote to NWL on 26 August 2021 to confirm that it is likely that significant sustainability reductions may need to be applied to the River Waveney abstraction licence.

Whilst the EA can advise on the availability of sustainable water resources supplies (headroom), it is a business decision for NWL to decide how it distributes this headroom amongst its customers.

NWL have since concluded they may not have sufficient 'headroom' to supply SZC via the SZC Transfer. To have further confidence in their decision, NWL have now proposed to undertake additional WINEP modelling which will now **not** be completed until 30 September 2021 (previously this was expected 24 September 2021).

The EA shall require at least two weeks to review the results of that additional modelling. Once complete we plan to update our letter of 26 August 2021 to NWL, to better advise the likely indicative annual licensed quantities for the River Waveney abstraction licence and the EA WAGS abstraction licence. It should be noted however that for NWL to reach a final decision on water availability, further work and analysis may well be required, including a cost benefit analysis / options appraisal, as other options - in addition to abstraction licence changes in order to meet WFD - have not been fully considered at this stage.

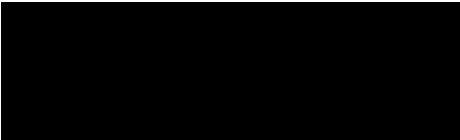
Once our updated position is known, NWL have stated that they will be able to better determine whether / when they may provide SZC with an operational water supply. However, this may remain a provisional position – pending the outcome of the additional steps set out above. The EA do not know how long it will take NWL to make this decision.

Non-Potable Water Usage

3.3.2.4 of the Water Supply Strategy identifies two licenced abstraction points that have a combined yearly abstraction allowance of approximately 80,000m³/year, equating to approximately 220m³/day, and proposes that they could be used to provide SZC with a source of non-potable water.

There is the process whereby licences can be used for a new purpose, or traded to a new owner. From the information provided however, we are unable to confirm how much water would be available under these licences for non-potable water and under what terms the water could be used. Discussions with EDF and the licence holder would be required to confirm whether moving of water rights for abstraction would be possible without the risk of Water Framework Directive deterioration.

Yours sincerely



Simon Barlow
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OFFICIAL