Together Against Sizewell C

C/o [redacted]

28th October 2026

The Planning Inspectorate

Temple Quay House

2, The Square,

Bristol

BS1 6PN

Reference EN010012

Further consultation regarding the Notice of Application to make a Non-Material Change (NMC) to the Development Consent Order for the Sizewell C Nuclear Generating Station order 2022.

Together Against Sizewell C (TASC) would like to add this supplementary submission to the above consultation as further information has come to our attention regarding significant changes to the project approved in the DCO. These changes relate to the supply of water to the project during construction. We appreciate that this is not an issue included in the application submitted by Sizewell C (SZC) Ltd, but TASC believe the changes are of such significance that they should be considered by the Planning Inspectorate (PINS) along with the other changes.

We, again, refer to the following government guidance relating to changes to Development Consent Orders: 'Planning Act 2008: changes to Development Consent Orders' – GOV.UK.

Bullet point 16 on page 7 refers to the impact of changes on local businesses and residents – it states, *"The potential impact of the proposed changes on local people will also be a consideration in determining whether a change is material. In some cases, these impacts may already have been identified, directly or indirectly, in terms of likely significant effects on the environment. But there may be other situations where this is not the case and* ***where the impact of the change on local people and businesses will be sufficient to indicate that the change should be considered as material****. Additional impacts that may be relevant to whether a particular change is material will*

be dependent on the circumstances of a particular case, but examples might include those ***relating to visual amenity from changes to the size or height of buildings****; impacts on the natural or historic environment;* ***and impacts arising from additional traffic****."*

TASC believe that the guidance indicates that changes to the water supply during construction, should be considered as material changes because they deviate way beyond what was approved in the development consent order (DCO). In TASC's opinion, the proposed changes have been designed solely for the benefit of the project with little consideration for local residents, businesses and the environment. The changes came to light due to applications SZC Ltd have made to the Environment Agency (EA) under EA references NPS/WR/047455: New abstraction licence consultation and NPS/WR/047797: Formal variation abstraction licence consultation.

One application relates to the plan to discharge all the groundwater from dewatering the Main Construction Site (MCA), direct to the North Sea – during the DCO examination the Applicant advised in library document [REP7-015] para 3.1.32. *"Groundwater abstracted during dewatering would be treated if necessary before it is either discharged to sea via the CDO in compliance with an environmental permit or stored onsite for reuse in supporting construction activities…"* , therefore clearly suggesting that the water from dewatering the MCA could be used for construction activities if required. TASC have submitted a response to the EA's consultation, and this attached for your information.

The later application relates to a huge increase in the use of groundwater to be abstracted from the abstraction point on the Temporary Construction Site (TCA), this being due to the unexplained delay in getting the temporary desalination plant into operation. As you can see from TASC's attached consultation response to the EA, the Applicant's water strategy for construction was for the supply of water by tanker and limited abstracted water for the first 15 months of construction with the promise that the desalination plant will then supply the vast bulk of water required before the heavy usage of water, for activities such as concrete batching, tunnelling and bentonite slurry processing would start. As can be seen, SZC Ltd have now made a significant change in so far as intending to replace desalinated water with a prolonged use of water tankers (despite East Anglia being in drought and water stressed with residents suffering from Temporary Use Bans') and a huge increase in abstracted groundwater (despite the connectivity of that groundwater with the neighbouring Special Protection Area, Special Area of Conservation, Ramsar Site and SSSIs, and despite there being a substantial amount of groundwater nearby on the MCA that SZC are now intending to discharge to sea without use). Furthermore, SZC have so far refused to advise TASC as to when the desalination plant is expected to be fully operational and why it has been delayed.

Conclusion

TASC trust that you will consider that the change in the water strategy for construction, with delayed operation of the desalination plant, increased use of water tankers, increased abstraction from the TCA and non-use of water available from the dewatering from the MCA, is a material change to the SZC project. With the area water-stressed and in drought there is every likelihood that the changes in the water strategy for construction will have material impacts on residents, businesses and the environment.

Yours faithfully,

[redacted] on behalf of Together Against Sizewell C

Enclosures:-

TASC letter of 11th September 2026 to the EA regarding NPS/WR/047455: New abstraction licence consultation

TASC letter of 21st October 2026 to the EA regarding NPS/WR/047797: Formal variation abstraction licence consultation, and

Attachment submitted 21st October to the EA, 'Email thread with SZC Ltd to 18/10/26 regarding SZC water needs'

Subject:

Re: Sizewell C's potable/groundwater needs water supplies

From:

Together Against Sizewell C <correspondence@tasizewellc.org.uk>

Date:

16/10/2026, 10:06

To:

SZC-SM-Info <info@sizewellc.com>

CC:

[redacted]

TOGETHER AGAINST SIZEWELL C

Dear [redacted],

I have now had time to consider your email and advise that I am disappointed that your reply reads more as a PR exercise than a genuine attempt to answer the questions asked. In particular, in addition to the omission of the two documents previously requested, your response does not provide answers to the following questions asked in my email of 28th September:-

(i) When in 2027 is the temporary desalination plant expected to be operational?

(ii) Why, when construction of the desalination plant had started by October 2025, it is taking so long to build?

(iii) Has the quantity of water required for the project during construction increased from that disclosed in the DCO?

(iv) Please provide the expected maximum number of water tankers to be used in the future and where that water will be sourced i.e. will it still be supplied by Anglian Water?

Your email refers to the Sizewell C website, [redacted]. However, this website states,

"Our water strategy includes a temporary desalination plant on the main construction site, away from both Sizewell Marshes SSSI and Sizewell beach, ***to deliver all the water the project needs***.

Desalination is the process of removing salt and other minerals from sea water to create water to the quality required – e.g. potable drinking-quality or industrial grade water. The temporary desalination plant would provide a reliable, continuous source of water while a permanent water transfer main is completed.

Operating continuously, the temporary plant, powered by low carbon electricity, could produce up to 4,000m3 of potable grade water a day. Water production will be in response to construction demand and generally substantially less than this."

Your email contradicts the emboldened statement in the referenced website - in so far as your email claims that the desalination plant will only provide some of the water required, whereas the website states, as expected by TASC, that the desalination plant will deliver all the water needed for construction.

Furthermore, the final water strategy document from the approved DCO (8.4 Revision: 2.0 Planning Statement Appendix 8.4K: Site Water Supply Strategy, September 2021) states in para 3.2.1 that, *"The desalination plant will be constructed and commissioned, ready to supply the site with water by the start of October 2023."* and also advises that the use of water tankers will cease by January 2024, after starting their use 15 months earlier in October 2022. Sizewell C's use of water tankers started in early 2025 so, according to the timetable in the approved water strategy, their use should have ceased during summer 2026 at the latest. The indefinite reliance on the use of water tankers, the extended use of groundwater abstraction to March 2030, the increased volumes of abstracted water and deferred deployment of the desalination plant are contrary to the claim in your email that *"There has not been a change to the project's overarching approach of securing the water needed for construction while protecting supplies to existing homes and businesses."*

TASC challenge your statement that the company is '*protecting supplies to existing homes and businesses'*. By extending the use of water tankers that are being supplied by Anglian Water (a company that supplies many homes and businesses in Suffolk) during a period of prolonged drought, when residents are subject to a legally enforceable 'Temporary Use Ban', Sizewell C's use will be impacting the potable water available to Suffolk home-owners and businesses. Your email says that the desalination plant *'is expected to become operational when needed'* but surely it is needed now to reduce the reliance on water tankers and groundwater abstraction, especially if operations such as concrete batching, bentonite slurry processing and tunneling are occurring now. The TCA borehole was originally licenced for abstraction of 49 million litres per annum for agricultural purposes but SZC's current application is to increase abstraction to 219 million litres per annum for industrial processes - the earlier the desalination plant is commissioned the less impact there will be on groundwater levels and quality, and therefore the less adverse impact on designated wildlife habitats and species.

TASC would appreciate early answers to the questions (i) to (iv) above, plus the following:-

(v) When is it now anticipated that the use of water tankers will cease?

(vi) Will any of the water consuming activities such as concrete batching, bentonite slurry processing and tunneling be delayed due to the deferred date of commissioning the desalination plant?

(vii) Please provide your observations regarding the contradiction between your email and the Sizewell C website's claim that the temporary desalination plant will produce all the water needed for construction.

Kind regards,

[redacted]

On 13/10/2026 14:06, Together Against Sizewell C wrote:

TOGETHER AGAINST SIZEWELL C

Dear [redacted]

Thanks for the information - which I will respond to separately. However, I note that the two documents requested have not been supplied, As a reminder these are:-

The 'SZC Ltd document dated 24/03/26, prepared by Atkins Realis, entitled 'Early Years Water Demand & Supply TCA Borehole' - requested in my 2nd email of 28th September, and the other one requested in my 1st email on 28th September, "The HRA document supporting the above application to the EA, references other documents. One of these, referenced as [6] on page 5 of 29, entitled, 'Atkins, Hyder, Royal Haskoning DHV. 2015. Sizewell C SSSI Crossings: Environmental appraisal of options under consideration. November 2015', states that it is available on request."

Can you please arrange to supply these asap.

Best wishes, [redacted]

On 13/10/2026 10:09, SZC-SM-Info wrote:

Dear [redacted]

Thank you for your email 28 September.

The project's water demand varies during construction according to the activities taking place. Water forecasts and supply arrangements are therefore kept under review as the detailed construction programme develops.

There has not been a change to the project's overarching approach of securing the water needed for construction while protecting supplies to existing homes and businesses.

The temporary desalination plant forms an important part of this approach and is intended to provide a reliable source of construction water while the permanent regional supply is developed.

The temporary desalination plant also remains an important part of our construction water strategy and is expected to become operational when needed during 2027 with preparatory works already underway.

The reference to 31 March 2030 in the groundwater abstraction application should not be interpreted as the forecast operational date for the desalination plant.

The date defines the period covered by the abstraction application and provides appropriate flexibility and resilience during the construction programme.

The construction of the desalinisation plant requires a detailed delivery programme. This delivery programme is being carefully managed as the design, construction, infrastructure interfaces, regulatory requirements and commissioning arrangements are progressed.

Desalination is a specialist international industry and as outlined, the temporary desalination plant is one component of a broader and resilient water-supply strategy. It would not be appropriate for a project of this scale and duration to rely entirely on a single source of water, particularly where demand changes according to the construction activities taking place.

- The project's water strategy therefore includes a combination of:
    - temporary desalination;
    - appropriately licensed groundwater and surface-water abstraction;
    - potable supplies from regional water companies;
    - tankered supplies where required;
    - water storage;
    - demand-reduction measures; and
    - reuse of water wherever practicable.

This combined approach provides resilience against interruptions, temporary constraints and variations in construction demand.

Our information sheet on our long-term investment in water infrastructure in the region is available online here: [redacted]

Many thanks

[redacted]

From: Together Against Sizewell C <correspondence@tasizewellc.org.uk>
Sent: 09 October 2026 10:24
To: SZC-SM-Info <info@sizewellc.com>
Cc: [redacted]
<[redacted]
Whitelock' <sarah.whitelock@eastsuffolk.gov.uk>
Subject: Re: Sizewell C's potable/groundwater needs water supplies

TOGETHER AGAINST SIZEWELL C

c/o [redacted]

Dear [redacted]

I am conscious that TASC only have until 21st October to respond to the EA's consultation on the TCA borehole water extraction permit application so would be pleased if you can confirm that we can expect to receive the information and document requested in my emails of 28th September, by 14th October.

Many thanks and kind regards,

[redacted]

On 28/09/2026 17:28, Together Against Sizewell C wrote:

Many thanks for the acknowledgment, Hannah. I look forward to receiving the response.

In the meantime, I am aware that there is SZC Ltd document dated 24/03/26, prepared by Atkins Realis, entitled 'Early Years Water Demand & Supply TCA Borehole'. I cannot find a copy on the Environment Agency website so would be pleased if you would supply TASC with a copy.

Many thanks and kind regards,

[redacted]

On 28/09/2026 15:50, SZC-SM-Info wrote:

Dear [redacted]

I hope you are well.

Just to acknowledge receipt of the below; we will respond more fully to you as soon as possible.

Best Wishes

[redacted]

[redacted]

Community Relations Manager, Sizewell C

Regional External Affairs & Development

CEO's Office

From: Together Against Sizewell C <correspondence@tasizewellc.org.uk>
Sent: 28 September 2026 15:02

To: SZC-SM-Info <info@sizewellc.com>; [redacted]

Subject: Re: Sizewell C's potable/groundwater needs water supplies

(**) Correction: reference to one billion litres should read as one hundred million litres

TOGETHER AGAINST SIZEWELL C

c/o [redacted]

Dear [redacted],

TASC would appreciate further information relating to Sizewell C's needs for potable water and the implications this has for groundwater extraction. Part of our query relates to Sizewell C Ltd's application to the Environment Agency (EA) for a variation to the groundwater abstraction licence under reference NPS/WR/047797 (https://consult.environment-agency.gov.uk/psc/sizewell-c-limited-47797/), the consultation on which closes on 21st October - so we would appreciate a prompt reply in order for TASC to meet the EA's deadline.

With regard to the temporary desalination plant, your email of 16th October 2025 advised, *"In the second half of 2026 our potable/freshwater demand will be supplied by our on-site temporary desalination plant that is under construction."*. Your last email of 24th July 2026 advised, *"Prior to the permanent supply, we are on track to deliver our temporary desalination plant in 2027."*

Regarding the above-mentioned groundwater extraction application, it says in para 2.1.14.4, *"..., the operation of the TCA borehole is anticipated to be limited to a few years, from September 1st 2025 to 31st March 2030 after which a new desalination plant will be used to supply industrial process water."* The implication of this statement is that the desalination plant may not be operational until 2030 which means that this borehole could be used to extract over one billion(**) litres of groundwater each year from a seriously water-stressed region.

Can you please advise, when in 2027 is the desalination plant expected to be operational? If the operational date has been postponed again, please confirm whether it is possible that it may not be operational until 2030?

As you are saying that the desalination plant will be operational in 2027, why does the company need to extract this water from the borehole for industrial purposes up to 2030? Has the quantity of water required for the project increased from that disclosed in the DCO?

Can you please advise why, when construction of the desalination plant had started by October 2025, it is taking so long to build?

It is noted that construction of the initial concrete batching plants has now completed and that the cut-off wall construction will be taking place shortly. Bearing in mind the water needs for these and other construction activities, please advise the maximum anticipated daily requirement for water tankers prior to the desalination plant becoming operational. Please advise the proposed source of the tankered water.

The HRA document supporting the above application to the EA, references other documents. One of these, referenced as [6] on page 5 of 29, entitled, 'Atkins, Hyder, Royal Haskoning DHV. 2015. Sizewell C SSSI Crossings: Environmental appraisal of options under consideration. November 2015', states that it is available on request. Please arrange for a copy of this document to be emailed to me.

Kind regards,

[redacted]

[redacted] on behalf of TASC.

On 24/07/2026 11:18, [redacted]:

Dear [redacted]

Following on from our email exchange last week.

As a project, we're keenly aware that we operate in a water stressed area. We have a clear water strategy that is delivering the best outcome for the project and the East Suffolk region.

That involves working with Essex and Suffolk Water who are developing a new permanent supply scheme, which will offer a significant legacy benefit to East Suffolk. Prior to the permanent supply, we are on track to deliver our temporary desalination plant in 2027.

We have groundwater and surface water abstraction licences, and we work closely with our regulator to ensure that we're compliant. We have some of the most experienced people in the industry working at Sizewell C, supported by construction-leading practices to minimise environmental impacts. These include water management zones for buffer water storage, as well as dust suppression products to reduce airborne dust on site to help reduce the amount of water needed for dust suppression.

Orwell Logistics Park remains our primary operational hub for tankering activities, with an average of 13 tanker journeys per day. This is supplemented by around five tanker journeys per day from two additional locations in Felixstowe and Martlesham.

Many thanks,

[redacted]

From: Richard[redacted]
Sent: 15 July 2026 15:03
To: 'Together Against Sizewell C' <correspondence@tasizewellc.org.uk>;[redacted]
Subject: RE: Sizewell C's potable water supplies

Dear Chris,

Thank you for your email. Confirming receipt, we will get the specific answers to your questions over to you as soon as I can.

Our water strategy, as previously outlined remains as planned, and Orwell is up and running. We are fully aware of the current conditions and in regular contact with the EA and water companies.

Kind regards

R[redacted]

From: Together Against Sizewell C <correspondence@tasizewellc.org.uk>
Sent: 13 July 2026 14:36
To:[redacted]

[redacted]
Subject: Re: Sizewell C's potable water supplies

TOGETHER AGAINST SIZEWELL C

c/o Wood Farm, Westward Ho, Leiston, Suffolk IP16 4HT

Dear [redacted]

Further to your email below, TASC would appreciate an update on Sizewell C's potable water situation.

Based on your previous update, the assumption is that water is still being tankered in from the Orwell logistics park but I would be pleased if you could confirm this and the average number of tankers currently delivering water to the Sizewell C sites. If there is an alternative source, please advise.

Given how water-stressed East Suffolk is, please advise whether the abstraction licences on the main construction site are currently able to be utilised by the development or if abstraction is restricted in any way.

Noting that we are now in the second half of 2026, can you please advise the current estimate for commencement of the operation of the temporary desalination plant.

Best wishes,

[redacted]

On 16/10/2025 17:03, [redacted] wrote:

Dear [redacted],

Thank you for your recent correspondence. We apologise for the delay in getting back to you. As outlined by Zoe Botten, your letter was sent to an old email address that is no longer in use, we are rectifying the issue of the automated response. The best email address to contact Sizewell C is info@sizewellc.com.

Regarding our supply of potable/freshwater I confirm that potable water for welfare and construction is currently tankered to site from Anglian Water's water treatment works at Alton reservoir or a small number of standpipes approved for use by the water company.

Later this year water will instead be tankered from a new water storage facility being constructed at the Orwell logistics park on the A14. This facility will also be supplied by Anglian Water.

Our demand for water tankers fluctuates, and we have an average of twelve deliveries a day. Tankers must take the prescribed routes as outlined within the DCO, which is the A14/ A12 / B1122 / Lovers Lane, or directly to the Associated Development sites.

In the second half of 2026 our potable/freshwater demand will be supplied by our on-site temporary desalination plant that is under construction.

Non-potable water for use in activities such as dust suppression is already sourced on-site. We have two licensed surface water abstractions at Sizewell.

Further information on our water strategy can be found via the attached information sheet.

Kind regards

[redacted]

[redacted]

Sizewell C Senior Community Relations Manager

From: Together Against Sizewell C <correspondence@tasizewellc.org.uk>
Sent: 14 October 2025 09:32
To: [redacted]>
Cc: [redacted]
Subject: TASC query of 28th August regarding potable water supplies

TOGETHER AGAINST SIZEWELL C

c/o [redacted]

Hello [redacted],

As it is now nearly 4 weeks since my reminder about TASC's email and letter of 28th August regarding SZC' s potable water supplies, I would appreciate a response as soon as possible.

Best wishes,

[redacted]

On 17/09/2025 15:34, [redacted] wrote:

Thank you this is really helpful [redacted],

The original email was sent to Info@sizewellc.co.uk but I will take up with IT an appropriate automated response.

I can only apologise that your email didn't find its way to the team, but we are working on a response as a matter of urgency for you

Kind regards

[redacted]

From: Together Against Sizewell C <correspondence@tasizewellc.org.uk>
Sent: 17 September 2025 15:32
To: [redacted]
Subject: Fwd: Automated Response

TOGETHER AGAINST SIZEWELL C

c/o [redacted]

Dear [redacted],

Here is the automated response received after I sent the information request on 28th August.

Kind regards

[redacted]

-------- Forwarded Message --------

Subject: Automated Response

Date: Thu, 28 Aug 2025 14:57:51 +0100

From: sizewell@edfenergyconsultation.info

To: correspondence@tasizewellc.org.uk

Thank you for contacting the Sizewell C Information Office.

Your email is important to us and we will reply to your enquiry as swiftly as possible. Depending on your request, it can sometimes take up to five working days for us to respond.

In the meantime, you may like to read the frequently asked questions on our website at [redacted]

If your enquiry is urgent, you can also reach us on FREEPHONE 0800 197 6102 or visit us at the Sizewell C Information Office,
48-50 High Street, Leiston IP16 4EW (Mon-Fri 9:30am-5pm)

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Together Against Sizewell C

C/o [redacted]

11th September 2026

To: Environment Agency Water Quality Team psc-waterresources@environment-agency.gov.uk (by email only)

Dear Sirs,

Sizewell C Limited, NPS/WR/047455: New abstraction licence consultation

From reviewing the documents supporting this application, we cannot see that concerns raised by Suffolk Coastal Friends of the Earth (SCFOE) in the Sizewell C (SZC) DCO examination about groundwater levels and quality have been addressed by the applicant. As far as TASC is aware, the last independent study of ecohydrological impacts of the dewatering of the main development site was undertaken for the DCO and submitted by SCFOE. Its Authors were Dr Mould, Dr Rob Low and Jonathon Graham. As can be seen from pages 1 to 4 of their last submission to the DCO (available at, https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-008575-DL10%20-%20Suffolk%20Coastal%20Friends%20of%20the%20Earth.pdf), there were remaining concerns that had not been addressed, *"We have highlighted numerous serious concerns with the assessment of ecohydrological impacts on Sizewell Marshes SSSI from the proposed development in previous submissions, some of which are re-stated below. This section is a specific response to REP3-042 Appendix B2, which was produced by the Applicant to address some of these concerns."* There were earlier submissions containing greater detail relating to groundwater issues, including REP5-271. **TASC believe** that both EA and NE need to ensure the concerns raised in the SCFOE reports have been satisfactorily addressed. **TASC remain very concerned** that the impacts considered in this application focus on the quantity of water in the adjacent designated wildlife sites with insufficient attention paid to the quality of the water.

TASC note from the EA's advert for this application, it states that the abstracted water will be discharged to the North Sea 'without intervening use'. In July 2026 SZC Ltd advised TASC that they are using an average of 18 tankers per day from Suffolk sources to meet their water needs and the temporary desalination plant will not be operational until sometime in 2027. We assume, especially with SZC Ltd reporting that the concrete

batching plant will become operational this month, water usage will rise significantly. This gives rise to the question as to what monitoring there will be regarding the quality of the water being discharged – what assessment will there be and, if deemed 'clean', why is this water not being used for construction activities in such a water-stressed area?

Because TASC have not been able to find any information in this particular application that confirms that there will be thorough testing of the extracted groundwater for radionuclides and other contaminants, we have reviewed the supporting information for EA permit EPR/HB3542KC ('the Permit') and the Water Monitoring and Management Plan (WMMP). However, we have found it confusing to ascertain exactly what contaminants will be tested for during abstraction and discharge.

Para 4.2 of the Technical Support Document for the discharge Permit refers to excessively high levels of cadmium and mercury recorded in historical samples, yet there appears to be no specific plan to analyse the extracted groundwater for these substances. Para 3.1.2, under the heading, *'Discharge of groundwater from the MCA, including water produced by the installation and development of wells'* states, *"the dewatering wells shall connect via flexible hosing to a ring main which may transport the groundwater to a suitable groundwater treatment facility if treatment is required. If treatment is not required, the groundwater will be pumped to a groundwater storage tank prior to discharge via the CDO"* Para 6.2.2 of the report then goes on to say, *"…a sampling and analysis programme will be developed such that groundwater effluent samples are routinely analysed for the relevant determinands, including cadmium and mercury."* **TASC are of the opinion** that this abstraction licence should not be agreed unless (i) a groundwater treatment facility has been installed/approved, (ii) there is agreement that the extracted groundwater will be tested for radionuclides, cadmium and mercury, (iii) signs are placed on the Sizewell beach warning the public not to enter the water while the MCA groundwater is being discharged to the sea.

From the Water Monitoring and Management Plan, para 3.210 states, *"Water quality monitoring will be conducted monthly, subject to periodic review, with any changes agreed with the Water Management Working Group. Monitoring will comprise a combination of in-situ field sampling and laboratory analysis. The proposed list of water quality determinands and parameters are set out in Table 3.2. The selected determinands are those most important in influencing the composition of the target plant communities i.e M22)."* **TASC's concern:** As can be seen from Table 3.2 replicated below, there is no indication that there will be any testing for radionuclides, cadmium and mercury even though the discharge Permit refer to the presence of cadmium and mercury:-

Table 3.2: Proposed water quality determinands

Determinand	Units	Limit of detection*	Lab or Field Test
pH	n/a	n/a	Field
Electrical Conductivity	µS/cm	1	Field
Alkalinity (Total)	mg/l	10	Lab
Chloride	mg/l	1	Lab
Ammonium	mg/l	0.05	Lab
Ammoniacal Nitrogen as NH_3 and NH_4	mg/l	0.05	Lab
Nitrite	mg/l	0.02	Lab
Nitrate	mg/l	0.5	Lab
Total Phosphorus	mg/l	0.02	Lab
Phosphate	mg/l	0.2	Lab
Sulphate	mg/l	1.0	Lab
Total Oxidised Nitrogen	mg/l	0.2	Lab
Calcium	mg/l	5.0	Lab
Potassium	mg/l	0.5	Lab
Magnesium	mg/l	0.5	Lab
Sodium	mg/l	0.5	Lab

* Limits of Detection to be confirmed by the laboratory.

Para 1.5.1 of this licence application states, *"It is noted that the principal engineered control to limit the influence of the dewatering is the COW. Should a defect occur in the integrity of the COW as a hydraulic barrier this may result in a greater than anticipated drawdown of water levels in the Crag outside the COW. Should the defect be sufficiently large this could result in a change in the hydrogeological and hydrological regime."* **TASC's concern:** As mentioned in this application, Sizewell B's cut-off wall had a breach which needed repairing, highlighting the potential for failure of SZC's cut-off wall. **TASC believe** it was previously slated in the DCO that the cut-off wall would be 1.5 metres thick and built as a single wall. Without any explanation as to why, we now learn that the cut-off wall will be built in two sections and will be 1 metre thick. **TASC consider** that there should be an assessment of the safety and effectiveness implications of reducing the thickness of the cut-off wall and it being built in two sections.

Also in para 1.5.1, it states, *"Minor defects may be managed by local reinjection of water to reduce drawdown outside the COW"* **TASC's concern:** SZC Ltd need to identify the source of the reinjected water to demonstrate this will not negatively impact the quality of water in the neighbouring designated wildlife sites.

Under FOI request 202301047 released 16th February 2023, the Office for Nuclear Regulation (ONR), after being asked about the co-ordination between them and the EA,

advised, *"Ultimately, our focus will be on ensuring that the design of the cut-off wall, when developed, is adequately underpinned by performance data"* **TASC's concern:** can the EA confirm that the design of the cut-off wall they are considering is the same as the design before the ONR – we know from experience that SZC Ltd is capable of presenting different project proposals to different regulators, such as in the case of SZC's overland flood barriers!

Para 1.5.2 *"The Temporary Construction Area (TCA) borehole operation was not originally anticipated to continue once dewatering commences as water supply for the project will be met by the desalination plant. However, to allow flexibility in meeting the project's water needs the numerical modelling assessment does consider the potential effects of operating the TCA borehole at a higher abstraction rate during the MCA dewatering. This assessment shows that there is minimal superposition of drawdown related to each abstraction activity. Any in-combination environmental effects would be considered as part of a subsequent application to vary the TCA borehole abstraction licence. A conservative numerical modelling assessment has been carried out that considers abstraction from the TCA borehole taking place at the same time as dewatering within the MCA. The north and south surface water abstractions are anticipated to continue operating in line with their current licence conditions during dewatering within the COW"* **TASC's concern:** Why is the abstracted water being dumped into the North Sea when it could be used instead of the TCA borehole? If it is not 'clean' why is it OK to dump the abstracted water in the North Sea?

Para 2.3 "*A rapid decrease in groundwater levels in external monitoring points may signal a defect in the COW. Given the Crag deposits' high transmissivity, incoming water could pose risks to construction within the MCA and potentially affect nearby designated areas. A proposed threshold for acceptable change is set out in Section 3. Some of the monitoring points are expected to be tidally influenced due to their proximity to the sea which is considered in the trigger levels defined at those locations"*

Para 3.2 in section 3 then sets out the thresholds as follows:-

"▪ A decrease greater than 1m: dewatering operations must cease.

▪ A decrease of 0.5 – 1m: SZC is required to notify the Environment Agency (EA). Dewatering activities may continue.

▪ A decrease of 0.5m or less: no action is necessary; MCA dewatering activities may continue as normal.

TASC's concern: The proposed threshold levels for the piezometers in para 3.2 seem far too weak – we believe they should be halved.

The proposed period of 2 weeks to detect changes in water levels in the Crag is based on the period of time that was required to detect change in rate of drawdown caused by

a defect in the diaphragm wall during the construction of Sizewell B, after the start of dewatering.

The ranges chosen for the dewatering are more restrictive than the applied during the dewatering at Sizewell B, which considered a 2m change in drawdown over 2 weeks." **TASC concern:** just because 2 metres was, presumably arbitrarily, chosen for SZB, it doesn't mean a 1 metre threshold is sufficient for SZC – given the sensitivity of the local environment to groundwater levels and because SZC is being partially built on Sizewell Marshes SSSI, consideration should be given to reducing the trigger levels further.

"Prior to commencement of dewatering operations at least 1 week of data is proposed to be recorded at each monitoring point. This will allow baseline conditions to be established and identify any issues with monitoring installations or equipment." **TASC's concern:** is one week of data sufficient to provide an accurate baseline and will it take seasonal fluctuations into account?

TASC concern: what is the potential for changes in water levels below SZB ie is there a potential settlement issue for SZB due to this abstraction?

Para 4 *"Review of the monitoring data will allow the cause of the reduced levels to be determined. Possible indications of a natural cause include the following: • water levels in the Crag show a consistent long-term downward trend; • surface water flows show a consistent downward trend; • there has been an extended period of little or no rainfall; • lower trigger levels in the peat monitoring points in the WMMP [Ref. 6] are being passed; and • drought conditions have been formally declared."* **TASC concern:** if groundwater levels are too low these factors should not be used as an excuse for continuing the use of the TCA borehole – we believe the criteria should be if the level drops below a certain figure, irrespective of the cause, abstraction should cease.

Question 23 on page 26 says, *"A comment from EA/NE joint comments note (20/02/2026): It has been mentioned by SZC in WR meetings that the Minsmere-Walberswick sites are underlaid by a layer of clay. NE and the EA consider that that the consistency and integrity of this would need to be assured to a high degree of confidence before its presence can negate the need for any further consideration of Minsmere-Walberswick in regard to modelling and monitoring. NE add that in other areas on the east coast with broadly similar mixed geology between the crag and surface the thickness and continuity of clay layers varies to an extent where they are not confident that it provides such an impermeable layer to disregard all groundwater effects on habitats."* **TASC's concern:** SZC refer to para 2.2.3 as an answer but reading this does not provide 'a high degree of confidence' **TASC believe** that the EA should insist the developer fund an independent ecohydrological assessment of these proposals, reporting direct to the EA and/or NE.

Section 5 Conclusion *"If the analysis of the cause of groundwater level drop determines that low groundwater levels are a consequence of the MCA dewatering operations, there will be an increased frequency of data review. If review of the monitoring data indicates the hydrogeological regime is within a tolerable range for the designated sites, despite the additional drawdown induced by the dewatering, then operation can continue until levels are deemed unacceptable. This will ensure that there is no impact at designated sites."* **TASC's concern:** no, this is to ensure no delays to the project, not, as claimed, to protect the designated sites! The groundwater levels should not be allowed to get to a level "deemed unacceptable" - if there is a problem, the aim should be to keep within acceptable levels. SZC's proposals appear to be to dewater the MCA irrespective of the damage they may cause. This is of particular concern to TASC if the dewatering takes place during an exceptionally dry spell resulting from a severe drought, such as that being experienced this year. There needs to be a restriction in place so that the dewatering cannot take place if drought conditions exist. Without this, there is an even greater risk of harm to the sensitive, designated wildlife sites nearby. Additionally, this summer has illustrated the danger from wildfires in the area– has there been any assessment of the potential risk of wildfires should the grasslands neighbouring the site be allowed to get to a groundwater level 'deemed unacceptable'?

Yours faithfully,

[redacted]

Together Against Sizewell C

C/o [redacted]

21st October 2026

To: Environment Agency Water Quality Team psc-waterresources@environment-agency.gov.uk (by email only)

Dear Sirs,

Sizewell C Limited, NPS/WR/047797: Formal variation abstraction licence consultation

Together Against Sizewell C (TASC) welcome the opportunity to comment on the application from Sizewell C (SZC) Ltd to vary the existing groundwater abstraction licence. TASC do not consider that the Environment Agency (EA) can approve this application. This is on two grounds that are set out in more detail below:-

1. There is missing information in the application, so the public are unable to undertake a thorough review of the impacts i.e. the openness and transparency required is absent from this application, and,
2. This application represents part of a major change to the SZC project approved in the July 2022 DCO decision by the Secretary of State, in relation to the supply of water to the project for construction purposes.

TASC believe that there are at least two important documents that have not been made available to the public that will throw a light on the background to this application. One is referenced in the HRA document supporting this application – it is referenced as [6] on page 5 of 29 of the HRA and is entitled, 'Atkins, Hyder, Royal Haskoning DHV. 2015. Sizewell C SSSI Crossings: Environmental appraisal of options under consideration. November 2015'. While the HRA states that it is available on request, TASC have requested it in emails to SZC Ltd on two occasions.

The other document that we are aware of that has not been provided, is a SZC Ltd document dated 24/03/26, prepared by Atkins Realis, entitled 'Early Years Water Demand & Supply TCA Borehole'. Despite this document and the one referred to in the previous paragraph having been requested from SZC Ltd (as evidenced in the attached email thread), they have not been supplied, denying the public proper scrutiny of this application.

As the EA will be aware, the developer's water strategy for construction was set out in the DCO document, 'Planning Statement Appendix 8.4K: Site Water Supply Strategy Revision 2.0, this being the agreed proposal in the approved DCO. The Executive Summary advises, *"Because of the phasing challenges discussed above, the provision of water to the site is proposed across three separate phases:*

• *Phase 1 – October 2022 – January 2024 – Water provided through trucks*

• *Phase 2 – October 2023 – December 2026 – Water provided through local temporary desalination plant on site. The end date aligns with the proposed availability of NWL's transfer main, however this phase can be extended as required until such time the NWL transfer main is fully available.*

• *Phase 3 – December 2026 onwards – NWL transfer main. The strategy provides for continuous provision of potable water throughout the design life of SZC, from early construction to operation.*

There is overlap between Phase 1 and Phase 2 to allow for programme risk of the desalination plant, and an ability for Phase 2 to extend further until the NWL transfer main is fully available. Non-potable water supply is also considered for suitable construction activities such as irrigation, dust suppression, vehicle washing, etc. In order to reduce the amount of potable water used, a number of non-potable water supply options are considered and addressed. These include:

• *SZB treated foul water*

• *SZC treated foul water*

• *Existing licences currently used for irrigating crops within the order limits that will not be required during construction. Storage of non-potable water is also provided for within the order limits, so that supply during winter months can be stored and used in the higher demand summer months."*

Para 3.2.1 of this document states, *"The desalination plant will be constructed and commissioned, ready to supply the site with water by the start of October 2023."* and advises that the use of water tankers will cease by January 2024, after starting their use 15 months earlier in October 2022. Sizewell C's use of water tankers started in early 2025 so, according to the timetable in the approved water strategy, their use should have ceased during summer 2026 at the latest. It is clear from Figure 2-1 in the DCO document 8.4K that the approved project expected the desalination plant to be operational before demand exceeded 1.5 million litres per day – this no longer appears to be the case and would presumably be referenced in the 2026 missing document referred to above. As can be seen from the attached thread of emails between TASC and SZC Ltd, the developer has failed to advise TASC, when the use of water tankers is now

expected to cease, nor have they confirmed an operational date for the desalination plant.

Also, of relevance to this situation is Figure 3-8 which advises that the original licence taken on by SZC Ltd was for abstraction of 49.4 million litres per year for agricultural purposes, and para 3.3.3 refers to having facilities onsite for the storage of non-potable water.

Phase 3 of the water strategy set out above needs major revision as the NWL transfer main has not even received funding approval nor has a DCO application been made, let alone construction starting, if planning approval is granted. Therefore, a start date of December 2026 for the NWL main is doomed to be many years adrift from reality.

The water supply strategy is now vastly different from that set out in the approved DCO, in so far as:-

a) There appears to be no end date to the use of water tankers – despite supplies being sourced in one of the driest regions of the country from an area where residents are subject to legally enforceable Temporary Use bans and the area being susceptible to long-term drought conditions.
b) Due to what appears to be developer incompetence, the temporary desalination plant, a facility that was fundamental to obtaining DCO approval for the project, is years behind schedule and now possibly available some time in 2027. Yet we are told by SZC Ltd that activities such as concrete batching have started ([redacted] and other heavy water use activities such as tunnelling and bentonite slurry production are either underway or due to commence imminently i.e. before the desalination plant will be operational.
c) This application to increase abstraction of groundwater from this abstraction point to 219 million litres per annum and extend the licenced period to 2030, bearing in mind the original licence at DCO stage was for 49 million litres per annum, means that the total volume of groundwater that can be extracted from the network of interconnected designated wildlife sites will be more than 1,200% of the amount envisaged in the DCO. As well as the environmental impact, TASC has not seen any consideration of the potential impact that this may have on the vulnerability of the surrounding areas to wildfires.
d) There is no intended use of the millions of litres of MCA groundwater that will be abstracted under consultation NPS/WR/047455 being considered by the EA, the proposal being to dump that groundwater into the North Sea. This is despite the SZC Ltd's intention to establish onsite non-potable water storage facilities and these current proposals demonstrate an intention for heavy use of abstracted groundwater, as set out in c) above. The MCA site is only a few hundred metres

from the TCA borehole so why is SZC Ltd not using the MCA groundwater – this flies in the face of the developer's sustainability claims?

TASC believe that the matters included in paras a) to d) above are all part of the material change to the strategy for the supply of water for construction of SZC. As such, their impacts should all be considered cumulatively and should be presented to the Planning Inspectorate as a change to the project approved in the DCO. For the reasons set out above, the EA should not approve this application.

Yours faithfully,

[redacted]