

Secretary of State for Environment, Food and Rural Affairs
FAO Mr Richard Walton
Seacole Building
2 Marsham Street
London
SW1P 4DF

26 August 2025

Dear Richard,

Suffolk Water Recycling and Strategic Enhancement Project – Section 35 Planning Act 2008 Direction Request

Essex & Suffolk Water's (ESW) Water Resource Management Plan 24 (WRMP24) recognises that there is an urgent need to provide a secure and clean water supply, improve supply resilience, and meet future demand. The assessment set out within the WRMP24 has demonstrated that the Suffolk region faces a critical supply-demand deficit due to reductions in existing abstraction licences driven by environmental sustainability requirements, a significant increase in non-household customers, and the requirement for new drought scenario planning for 1 in 500-year events. In response to these challenges, ESW has proposed the Suffolk Water Recycling, Transfer and Storage Project (the Project).

It is crucial that the Project is delivered at the earliest opportunity in order to avoid a significant deficit of water supply for many of ESW's customers and to lift a moratorium that has been implemented on providing new mains water supplies to non-domestic users in the Hartismere Water Resource Zone (WRZ). The lifting of the moratorium¹ will support economic growth in the region and ensure a reliable supply of water to Sizewell C Nuclear Power Station² for its commissioning and operational phase.

The Development Consent Order (DCO) process is considered the most effective consenting route as it facilitates the earliest delivery of the Project by 2033. This approach aligns project completion with the lifting of the moratorium and the backstop date established between ESW and Sizewell C regarding water supply. The DCO provides an efficient framework for obtaining the comprehensive range of statutory powers, permissions, consents, and licences required to implement this significant and complex project across its wide geographical scope.

¹ ESW have indicated that this moratorium will remain in place until 2032 when new supply schemes within the WRMP24 are operational.

² consented in 2022

In contrast, pursuing consent through the Town and Country Planning Act, alongside multiple additional permissions, licences, powers, and consents, could result in considerable delays to this critical infrastructure project.

Water recycling is a relatively new and emerging technology in the UK and it is not one of the categories of water resources infrastructure that can automatically qualify as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008 (Planning Act), therefore a direction from the Secretary of State for Environment, Food and Rural Affairs (SoS) is required to bring this Project into the DCO process. Water transfer infrastructure (Section 28, Planning Act) can automatically qualify as a NSIP to be determined under the DCO process. However, notwithstanding its substantial size and critically important status, the Project does not meet the criteria and threshold set out in the Planning Act.

To provide certainty to ESW's programme for delivery of the Project in early 2030, it is essential that a section 35 Direction is given for the Project at the earliest date practicable.

ESW therefore requests that the SoS gives a Direction under section 35 of the PA 2008 for the 'principal' elements of the Project³ to be treated as development for which development consent is required.

ESW therefore encloses a 'qualifying request' under section 35 of the Planning Act for the Project, which is being made in writing and specifies the development to which it relates.

The information within the qualifying request explains why the conditions in section 35 (2) (a) and (b) of the Planning Act are met in relation to the Project, and why it is considered to be a project of national significance.

The qualifying request therefore meets the requirements within the meaning of section 35ZA (11) of the Planning Act to enable the SoS to give a direction for the Project under section 35 (1). The SoS is therefore respectfully invited to accept ESW's qualifying request and issue a section 35 direction for the Project at the earliest date practicable.

Yours sincerely,



Monisha Gower
Assets Director - Northumbrian Water

³ outlined in the Qualifying Request enclosed