

**Water Management Alliance:
Written Representation made to Planning Inspectorate on proposed Norwich
to Tilbury project**

Project PINS Ref: EN020027

Interested Parties:

1. Norfolk Rivers Internal Drainage Board
2. Waveney, Lower Yare & Lothingland Internal Drainage Board
3. East Suffolk Water Management Board

C/O Water Management Alliance

Interested Party reference: [REDACTED]

Date: 26th February 2026

The Boards are providing comment on the proposed Norwich to Tilbury project in this written representation. The primary reason for submitting the representation is in relation to the water environment. The Boards also wish to comment on the draft Development Consent Order. The Boards are prescribed consultees under the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.

Context for Interested Party

Parts of the proposed development area lies within the Internal Drainage Districts (IDD) of the Norfolk Rivers Internal Drainage Board (NRIDB), the Waveney, Lower Yare & Lothingland Internal Drainage Board (WLYLIDB) and the East Suffolk Water Management Board (ESWMB) (the Boards). The Boards are Internal Drainage Boards as defined by the Land Drainage Act 1991.

The Boards are all Member IDBs of the Water Management Alliance consortium of Internal Drainage Boards and therefore are submitting this written representation together via the Water Management Alliance.

The Boards are the regulator for several elements of the proposed works which require consent as per the Land Drainage Act 1991, including the Board's Byelaws. The applicant is seeking to disapply sections of the Land Drainage Act and instead include Protective Provisions within the Development Consent Order that require Board approval of plans for works affecting drainage infrastructure, including watercourses and pumping stations. **The Boards are therefore interested parties** due to the potential impact of the project on the Boards' ability to carry out their statutory functions relating to land drainage and reducing flood risk.

Agreement and Disagreement with the application

The Boards are collectively (via the Water Management Alliance) developing a Statement of Common Ground with the Applicant, which sets out the areas of agreement and areas of disagreement. The Statement of Common Ground has not yet been finalised, but the Water Management Alliance is engaging with the Applicant with a view to finalise the Statement before the close of the examination.

The current position of agreement and disagreement is as follows:

1. Land Drainage Consent requirements: Haul road crossings of watercourses will be minimised, with the Applicant seeking to reuse existing crossings wherever viable. **In discussion.**
2. Watercourse crossings and appropriate crossing methods: The proposed overhead lines, haul roads and Public Right of Way diversions will cross a number of watercourses within the IDD's of the three named Boards. Such works could, depending on the crossing methods, require approval from the Boards under the Protective Provisions within the draft Development Consent Order (Schedule 16, Part 3 of the draft DCO, APP-056), which replace the disapplied Byelaws of the Boards and/or Section 23 of the Land Drainage Act 1991. The applicant will be required to provide detailed designs for watercourse crossings when applying to the relevant Board for approval, as set out in the Protective Provisions for Drainage Authorities. The Environmental Statement Appendix 4.2 - Watercourse Crossing Details lists proposed overhead line, underground cable, and Public Right of Way diversion crossings and includes proposed crossing type: (temporary or permanent, closed culvert or clear span bridge for access crossings, and trenchless or open cut trenching for cable crossings). Document 2.6.2 Design and Layout Plans – Overhead Lines [APP-042] includes Illustrative Bridge Details and Illustrative Culvert Construction Details. However, more detailed, site-specific design drawings will be required by the relevant Board for each watercourse crossing requiring the Board's approval and the design of proposed watercourse crossings will follow IDB standard requirements. Confirmation will also be needed at the approval stage on whether any crossings, access routes and supporting drainage will be retained for the long-term maintenance and management. **In discussion.**
3. The Boards are seeking agreement with the Applicant that the Applicant will make good any damage caused by the Project to existing watercourse crossings. **In discussion.**

4. Pylon location near watercourses: The applicant proposes that pylons will be situated a minimum of 3.5m from the top of bank of any ordinary watercourses (Document 6.12, Environmental Statement Chapter 12 – Hydrology, Land Drainage and Flood Risk). The Boards are not in agreement with this minimum distance, since the Boards require access to arterial watercourses to enable maintenance and/or emergency works at all times. The Boards recommend the minimum distance between any pylon, including its foundations, and the bank of an arterial watercourse should be 9m within the internal drainage districts of Norfolk Rivers IDB and East Suffolk Water Management Board, and 7m in the Waveney, Lower Yare and Lothingland IDB. **In discussion.**

5. Minimum height of pylon cables: The Boards operate machines with a reach of up to 13m on the banks of arterial watercourses for maintenance and/or repairs to drainage infrastructure. The Boards therefore require a minimum clearance between ground level and overhead wires of 20m (13m + 7m safety distance) is required over arterial watercourses within the internal drainage districts. **In discussion.**

6. Surface Water Drainage: The Boards understand from earlier engagement that the Applicant is preparing a surface water drainage strategy, which will be shared with the Boards and will be submitted to the Planning Examination. The Boards await sight of this document. The Boards require to see detail of all proposed (temporary and permanent) discharges into watercourses within the affected Boards' districts. Such discharges will require approval from the relevant Board under the Protective Provisions that replace the disappplied Byelaws of the Board. Approval may be conditional, as per the Boards' Consent Policies. The Boards are supportive of the proposal that Sustainable Drainage Systems (SuDS) will be designed to contain up to the 1% Annual Exceedance Probability plus 25% climate change for the temporary works. The Boards defer to the relevant Lead Local Flood Authority (LLFA) guidance regarding on-site drainage design and agreed climate change allowances. Further, the Boards support the proposal that SuDS will be designed to discharge at a restricted rate as determined by the relevant LLFA's guidance. The Board understands that the Applicant is proposing to discharge at a maximum rate of 1.4l/s/ha or 1l/s (whichever is greater), however this will need to be confirmed by the LLFAs. The Boards wish to be involved in the development of drainage strategies where these are relevant to their IDD's. **In discussion.**

7. Draft Development Consent Order (DCO) wording: The Applicant has proposed Protective Provisions for drainage authorities within the DCO (Schedule 16, Part 3 of the draft DCO, APP-056), and disapplication of relevant sections of the Land Drainage Act 1991 (Schedule 17, part 7 of draft DCO, APP-056). The

Boards support this approach, subject to the Boards' continued involvement in the drafting process. The Boards realise that the Protective Provisions for drainage authorities impact other Risk Management Authorities in addition to the Boards. At present the Boards consider that the wording of the Protective Provisions is unsatisfactory, in several places. For example, the Boards consider the undertaker should be responsible for the maintenance of any drainage work within land held or occupied for or in connection with the specified work, from commencement of construction and for the lifetime of the specified work rather than for 12 months from the date of completion of the specified work as proposed by the Applicant (Protective Provisions for drainage authorities, paragraph 6 (1)). Further, the Boards consider the Protective Provisions should include a requirement that the undertaker should make good any damage caused by the project to existing watercourse crossings. Further discussion is also needed on the definitions of "relevant authority" and "drainage authority" in the Protective Provisions and in Article 20 (Discharge of Water) of the draft DCO. The Boards will continue to engage with the applicant and the other affected drainage authorities to agree appropriate wording for these and other unsatisfactory sections. **In discussion.**

8. Land Rights: It is currently understood that the IDBs affected by the Project do not own any land within the proposed development area. **Agreed.**

9. Cost Recovery: Water Management Alliance is seeking to agree a cost recovery process with National Grid for officer time spent on the project during the pre-application, examination and post-DCO periods. Conversations are ongoing. **In discussion.**

End.