



Norfolk County Council

Response to Deadline 1 submissions

Norwich to Tilbury

(EN020027)

Deadline 2 – 12 March 2026

1. This submission provides Norfolk County Council's response to submissions at deadline 1.

[REP1-072] – 8.2 Drainage Strategy DCO (Final Issue A)

2. Norfolk County Council ("NCC") has met with the other lead local flood authorities ("LLFAs") affected by this project and have agreed to take the same position with regard to our response to the Drainage Strategy. The other LLFAs are Suffolk County Council, Essex County Council and Thurrock Council.
3. This document is 240 pages long and deals with inherently technical matters. Normally, the LLFAs would expect a drainage strategy to have been included as part of the application materials. In many cases, we make agreements with applicants to get early sight of key technical documents before acceptance, so that we have sufficient time for them to inform our relevant representations and local impact reports ("LIRs").
4. If this document had been published with the rest of the documentation on the acceptance date, our engineers would have had 11 weeks to review the drainage strategy before the relevant representations were due and nearly 22 weeks before the LIRs were due. Because the drainage strategy was only submitted at Deadline 1 the LLFAs have only had it for two weeks.
5. This is insufficient time to provide a comprehensive technical review of the drainage strategy. We recommend that the examining authority ("ExA") should take the opportunity of the ExA's first written questions to ask the LLFAs for their detailed technical view on the drainage strategy. In particular, the ExA may wish to ask the LLFAs how the drainage strategy should be secured in the draft development consent order, and what changes to the drainage strategy would be necessary to make it suitable for use as an outline drainage strategy.
6. What the LLFAs can say at this point is that the drainage strategy will require further work before it can be used as a basis for detailed design at a later stage. NCC's LIR contained a proposal for a new requirement for a construction surface water drainage strategy ([\[REP1-173\]](#), Table 4-A, pp. 43-44). NCC stands by this approach, subject to a suitable outline strategy being developed.