

## **Water Management Alliance:**

### **Comments made to Planning Inspectorate on Deadline 1 submissions**

#### **Norwich to Tilbury - 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:** 12<sup>th</sup> March 2026

This document provides Water Management Alliance (WMA)'s comments on the following documents submitted by the Applicant at Deadline 1:

- Document 8.2 **Drainage Strategy DCO** – Final Issue A, February 2026 [REP1-072]; and
- Document 5.9.16 **draft Statement of Common Ground – Combined Internal Drainage Boards – Water Management Alliance** – Final Issue B (February 2026) [REP1-041].

#### **Document 8.2 Drainage Strategy DCO – Final Issue A, February 2026 [REP1-072]**

WMA welcomes the publication of the Drainage Strategy. Drainage for permanent and temporary aspects of the proposed Norwich to Tilbury project will predominantly be a matter for the Lead Local Flood Authorities (LLFAs, e.g. Norfolk County Council and Suffolk County Council). However, where the project crosses Internal Drainage Board (IDB) districts – albeit small sections of the overall project area – those Boards are the relevant drainage authority. Section 5.4.6 of the Drainage Strategy lists LLFAs and Environment Agency as consenting authorities for the discharge of water into rivers or ordinary watercourses. The document should also record that IDBs are the consenting authorities for discharge of water into ordinary watercourses (i.e. not Main Rivers) within Internal Drainage Districts (IDDs).

The Applicant has notified WMA (in direct engagement) that temporary outfalls may be required into IDBs, that this will be confirmed during detailed design, and that where required, these outfalls will be agreed with the relevant IDB. WMA highlights that agreement of such temporary outfalls will follow the approvals process set out in the

Protective Provisions to be agreed for drainage authorities (please see below) within the DCO.

WMA welcomes commitment GG22, from 7.2 Outline Code of Construction Practice [APP-300], that '*Main Works Contractor(s) will prepare a Surface Water Management Plan to inform discharge of the DCO Requirement*', and that '*construction drainage measures will be developed liaising with the Lead Local Flood Authorities (LLFAs), with ongoing dialogue during implementation of the measures*'. WMA wish to be involved in liaison to develop measures and dialogue during implementation where drainage into IDD is proposed.

**Document 5.9.16 draft Statement of Common Ground – Combined Internal Drainage Boards – Water Management Alliance – Final Issue B (February 2026) [REP1-041]**

This document reflects feedback provided to the Applicant from WMA in February 2026.

WMA will continue to liaise with the Applicant to further develop this Statement of Common Ground as discussions continue during the Planning examination period. This will include a particular focus on the outstanding matters relating to the wording of the draft Development Consent Order (DCO) [APP-056], cost recovery and drainage strategy detail. Outstanding matters relating to the draft DCO include wording at Part 4 Supplemental Powers – Article 20 (Discharge of Water), and wording within Schedule 16, Part 3 – Protective Provisions for Drainage Authorities. WMA is continuing to liaise with the Applicant over these matters.

End.