

Application by National Grid Electricity Transmission (NGET) for Norwich to Tilbury EN020027

The Examining Authority’s written questions and requests for information (ExQ2) Issued on 22 May 2026

Response from WATER MANAGEMENT ALLIANCE (REDACTED) on behalf of:

- **Norfolk Rivers Internal Drainage Board;**
- **Waveney, Lower Yare & Lothingland Internal Drainage Board; and**
- **East Suffolk Water Management Board.**

ExQ2	Question to:	Question:	Response from Water Management Alliance, dated 10th June 2026
WE 2.1	Water Management Alliance Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	Drainage Strategy Please provide comments on the updated drainage strategy submitted at deadline 4 [REP4-186].	WMA has reviewed the updated drainage strategy [REP4-186]. We provide the following comments: <ol style="list-style-type: none"> 1. Section 2.3.9: Maximum discharge rates for SuDS features: WMA welcomes the Applicant’s recognition of the IDBs’ required discharge rates within the Boards’ districts. We would highlight that even where proposed discharge rates are within these limits, discharge into ordinary watercourses within the IDB districts still requires Board consent (see point 4). 2. Section 3.2.2: Ordinary watercourse definition. It is incorrect to state that “ordinary watercourses regulated by an IDB are usually named”. We suggest the following text is substituted: <i>“Those regulated by an IDB, which include all named and unnamed ordinary watercourses within the Board’s district.”</i> 3. Section 3.2.4 states, “An assessment of the works has been undertaken to locate crossings of Main Rivers and Ordinary Watercourses, and to identify the relevant regulatory body for each Ordinary Watercourse.

ExQ2	Question to:	Question:	Response from Water Management Alliance, dated 10 th June 2026
			<p>These crossings are detailed in 6.4.A2 Environmental Statement Appendix 4.2 - Watercourse Crossing Details [APP-132].” However, Appendix 4.2 includes neither grid references nor the relevant regulatory body for each crossing. It would be helpful to have this information in one place to support our assessment of the number, location and risk of each crossing to the IDBs. WMA considers that both the Drainage Strategy and Appendix 4.2 should clearly state that IDB consent is needed for watercourse crossings within the Boards’ Internal Drainage Districts, and the locations of these.</p> <p>4. It is not explicit within the drainage strategy that Internal Drainage Board (IDB) consent is required for discharges into watercourses (other than Main Rivers) within the Internal Drainage Districts. At several points within the drainage strategy, for example sections 5.4 and 6.5, reference is made to consent being required from Environment Agency or Lead Local Flood Authority, but no reference is made to IDB consent requirement. We suggest section 5.4.6 should be reworded to read as follows:</p> <p><i>“5.4.6 Constructing an outfall to the river would require consent from the Environment Agency where an outfall is to a Main River, and the LLFA or IDB where an outfall is to an Ordinary Watercourse, depending on whether the outfall is within an IDB district.”</i></p> <p>5. Similarly, the drainage strategy does not explicitly acknowledge the requirement for IDB consent for works within 7m or 9m (depending upon the Board concerned) of an arterial watercourse within an Internal Drainage District. We suggest that section 6.5.5 should be amended to read as follows:</p>

ExQ2	Question to:	Question:	Response from Water Management Alliance, dated 10 th June 2026
			<p><i>“Works within 8 (EA) or 7 or 9 (IDB) metres from the top of a watercourse bank may also require consent. Consultation should be undertaken with the Environment Agency and Internal Drainage Board (where within an Internal Drainage District) to determine whether consent is needed.”</i></p> <p>6. Section 9.3.1 In addition to agreements with the landowner, LLFA and/or the Environment Agency, this section of the drainage strategy should include reference to the requirement for consultation and agreement with the relevant IDB in relation to the removal of temporary structures (including bridges and culverts) within the Internal Drainage Districts.</p> <p>7. Drainage Strategy Appendix A, Table A.1 Section A and B (Norwich Main Substation, RG Overhead Line Alignment, Bramford Substation), and Appendix B Indicative Drainage Figures (refers to 8.2.1 Drainage Strategy – Appendix B [Revision A] [REP4-188]): Appendix B of the Drainage Strategy [REP4-186] explains that <i>“the details shown in [REP4-188] are indicative only”</i>, that <i>“drainage collection systems will be designed at a later design stage”</i>, and that <i>“indicative outfall locations for the overhead line attenuation features have not currently been depicted”</i>. Further, Appendix B of [REP4-186] states that <i>“outfall locations where required, would discharge to locations within the Order limits.”</i> The current lack of grid references for each proposed attenuation / infiltration pond and their outfalls makes it difficult to say whether IDB consent will be required for discharge of water from these ponds. However, given that the overhead line route crosses parts of three IDB districts, it is likely that the Boards will be the Consenting body for some of the pond discharges. The Drainage Strategy should acknowledge the need for the Applicant to discuss discharge consenting requirements with the Boards when the drainage collection systems are designed.</p>

ExQ2	Question to:	Question:	Response from Water Management Alliance, dated 10 th June 2026
			<p>8. For ease of reference, we have referred to IDB consents in this submission, but note that the proposed disapplication of section 23 of the Land Drainage Act 1991 and use of Protective Provisions for Drainage Authorities (discussed further at WE 2.3) will mean that the usual IDB consenting process will be replaced by IDB authorisation of detailed plans, as set out in the Protective Provisions. This does not remove the need for the Applicant to engage fully with the affected IDBs during development of detailed drainage design (including outfall location, discharge rate, impermeable area drained, and headwall design) and watercourse crossing design (including existing watercourse dimensions, and proposed pipe, culvert or bridge dimensions) where these affect Internal Drainage Districts.</p>
WE 2.2	<p>WE 2.2 Water Management Alliance Essex County Council Thurrock Council Suffolk County Council Norfolk County Council</p>	<p>Progress with agreement of issues The Applicant states that it is confident that drainage issues can be resolved by close of the examination, please explain if you consider this an accurate reflection of progress and if there are specific matters you consider are at risk of not being agreed by the close of the examination.</p>	<ol style="list-style-type: none"> 1. WMA and the Applicant have been engaging to develop a Statement of Common Ground. The latest version of this, incorporating WMA comments, is document [REP4-087], submitted at deadline 4. This document reflects WMA's current view on matters agreed and yet to be agreed. 2. REP4-087 sets out matters that remain under discussion. These include matters relating to draft DCO wording (including Article 20: Discharge of Water and Schedule 16, Part 3, Protective Provisions for Drainage and Flood Authorities); Cost Recovery, Watercourse crossing methods, and the Drainage Strategy. A brief note on progress with each matter is given below: <ol style="list-style-type: none"> a. WMA continues to engage with the Applicant, via legal representation, regarding the DCO wording issues. Whilst some agreement has been reached with regards to some areas of wording within the Protective Provisions, neither the matters

ExQ2	Question to:	Question:	Response from Water Management Alliance, dated 10 th June 2026
			<p>regarding Article 20 nor the Protective Provisions have yet been resolved. WMA is expecting a further response from the Applicant on these matters. The Applicant has stated that <i>“further responses will be provided in the next revision of the Statement of Common Ground at Deadline 5”</i>; until this is received WMA cannot predict whether these matters will be agreed by the close of the examination.</p> <ul style="list-style-type: none"> b. The Applicant has agreed cost recovery for legal review of the Protective Provisions, but wider cost recovery for officer time spent on the Project has not yet been agreed. Again, the Applicant states that further responses will be provided at Deadline 5. c. Similarly, WMA awaits further responses from the Applicant in the next revision of the Statement of Common Ground at Deadline 5 regarding watercourse crossing methods. WMA does not consider that its position, set out in REP4-087, differs from the Applicant’s position on this matter and therefore it is envisaged that this matter will be agreed by close of the examination. To be clear, this does not mean that WMA approves the proposed watercourse crossing methods set out in 6.4.A2 Environmental Statement Appendix 4.2 - Watercourse Crossing Details [APP-132] (either assumed closed culvert or bridge) at all of the crossings proposed within the IDBs’ Internal Drainage Districts, but means that the process for Board approval of these watercourse crossings has been agreed, and will require the Boards’ consideration of detailed crossing designs, which are not available at this stage. d. Finally, matters relating to the Drainage Strategy have been covered in detail in WMA’s response to ExQ2 WE 2.1 (above) within this submission. WMA considers that the strategy fails to explicitly set out the requirement for IDB consents for discharge

ExQ2	Question to:	Question:	Response from Water Management Alliance, dated 10 th June 2026
			<p>into watercourses – to be delivered via the approvals process set out in the Protective Provisions – and the requirement for the Applicant to engage with the Boards as drainage authorities whilst developing detailed drainage plans, which will not be available before the end of the examination process. WMA awaits the Applicant’s updates at Deadline 5.</p> <p>3. WMA will continue to engage with the Applicant with a view to resolving these outstanding matters before the end of the examination if possible.</p>
WE 2.3	WE 2.3 Water Management Alliance Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	<p>Disapplication of section 23 of the Land Drainage Act 1991</p> <p>Further to Applicants reply to WE 1.9, please confirm acceptance, or otherwise, to the disapplication of section 23 of the Land Drainage Act 1991 and provide an update on your consideration of the Applicants proposed protective provisions in this regard</p>	<ol style="list-style-type: none"> 1. Water Management Alliance, on behalf of the three affected Internal Drainage Boards (Norfolk Rivers IDB; Waveney, Lower Yare & Lothingland IDB; and East Suffolk Water Management Board), accepts the disapplication of section 23 of the Land Drainage Act 1991, <u>subject to agreement of satisfactory protective provisions for the drainage authorities (which include the IDBs).</u> 2. Water Management Alliance is continuing to liaise with the Applicant in relation to the detail of the protective provisions for Drainage Authorities. Whilst the bulk of the protective provisions are acceptable to WMA, there remain several outstanding areas of disagreement; these are being negotiated via legal representation of both parties (WMA and the Applicant). WMA’s latest response was provided to the Applicant on 15th May 2026, and a further response from the Applicant is awaited.

End.