



The Sizewell C Project

9.10.3 Initial Statement of Common Ground - East Suffolk Internal Drainage Board

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1 INTRODUCTION

1.1 Status of the SOCG

- 1.1.1 This Statement of Common Ground ('SoCG') has been prepared in respect of the application for development consent under the Planning Act 2008 ('the Application') for the proposed Sizewell C Project. This version [Deadline D2], dated 27 May 2021, has been prepared through a programme of engagement between NNB Generation Company (SZC) Limited ('SZC Co.') as the Applicant and East Suffolk Internal Drainage Board ('ESIDB' or 'the Board'), referred to as 'the parties'. A final version will be submitted at Deadline D9.

1.2 Purpose of this document

- 1.2.1 The purpose of this SoCG is to set out the position of the parties arising from the application for development consent for the construction and operation of the Sizewell C nuclear power station and together with the proposed associated development (hereafter referred to as 'the Sizewell C Project'). This SoCG has been prepared in accordance with the 'Guidance for the examination of applications for development consent' published in March 2015 by the Department of Communities and Local Government (hereafter referred to as 'DCLG guidance').
- 1.2.2 The aim of this SoCG is, therefore, to inform the Examining Authority and provide a clear position on the state and extent of discussions and agreement between the parties on matters relating to the proposed Sizewell C Project.
- 1.2.3 This SoCG does not seek to replicate information which is available elsewhere within the DCO application documents. All documents are available on the Planning Inspectorate's website.

1.3 Structure of this Statement of Common Ground

- 1.3.1 **Chapter 2** provides a schedule which detail the position on relevant matters between the parties, including any matters where discussions are ongoing. This is underpinned by Appendix A, which provides a summary of engagement undertaken to establish this SoCG.

2 POSITION OF THE PARTIES

- 2.1.1 **Table 2.1** provides an overview of the position of the parties and any further actions planned.

Table 2.1: Position of Parties

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
1	Flood risk				
1.1	Impacts on flood risk within the Internal Drainage District and wider watershed catchment area.	<p>The current FRA and drainage strategy assume that infiltration is possible in most places. This has not been evidenced and the IDB is unsure that it is possible in some cases due to the underlying soil and geology.</p> <p>To the best of our knowledge the flood risk modelling and baseline data has not been shared and resultantly we are unable to comment on the suitability of the model or the validity of any assumptions which it underpins.</p>	<p>In order to understand the flood risk implications of the project, a detailed flood risk assessment has been completed that is underpinned by detailed modelling and full hydrological assessment, including whole catchment rainfall-runoff assessment. The hydrological assessment within the Flood Risk Assessment is not sensitive to local variations in soil conditions, being a catchment-wide study based on gauged and donor data.</p> <p>Appendix 3 [APP-099] [link to page] provides the Fluvial Hydrology Report to the Main Development Site Flood Risk Assessment (MDS FRA). On receipt of review comments from the EA, additional consideration of hydrology was incorporated in the MDS FRA Addendum [AS-157] [link to page]. Data used in the development of the hydrological model is included in the respective reports.</p>	<p>ESIDB to continue to review the relevant DCO documents.</p> <p>SZC Co. to provide the following technical notes:</p> <ol style="list-style-type: none"> 1. Hydrogeology and hydrology assessment note 2. MDS hydrology 3. Water management zone summary 4. MDS WMZ design once completed. 	In Progress

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			<p>The site-specific soil/geology, and local variation, is being considered in the design of the surface water infrastructure. Infiltration testing has been carried out at the MDS, principally in 2014 and 2017, and a further ground investigation is currently underway. This is considered in outline in the Outline Drainage Strategy [APP-181] and a further technical note is being prepared on the MDS water management zones design, which will include summary infiltration testing results.</p> <p>The hydraulic modelling has been directly shared with the EA for review for both the MDS FRA and MDS FRA Addendum. The appropriateness and acceptance of this work is being managed through the EA Statement of Common Ground.</p>		
2	Works to, and in close proximity to, ESIDB's 'Adopted Watercourses'				
2.1	The proposed realignment of an Adopted Watercourse and associated	All works within 9m of the adopted watercourse will require the Board's formal consent as per the Land Drainage Act 1991, including the Board's Byelaws (which must	SZC Co. recognises that these watercourses are designated by ESIDB as 'Adopted Watercourses' and that ESIDB is the regulator as per Section 23 of the Land Drainage Act 1991. Furthermore, that consent is required to	Discussions on protective provision and securing mechanisms to continue.	In progress

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	works (Sizewell Drain)	<p>be considered by the Board, rather than officers acting under delegated authority). The ESIDB seek clarity on exactly how and when the applicant will apply for Land Drainage Consent. The ESIDB believes a protective provision may be the best option to ensure an effective approach.</p> <p>The Board would like to highlight that if access and maintenance cannot be carried out from the Eastern bank of the realigned drain (due to the proposed development and accompanying works), these will have to be carried out from the Western bank. The Board would like to see this potential impact included within the impact assessment of the realignment as well as any correspondence with Natural England.</p>	<p>do works controlled by the Board's Byelaws (made as per Section 66 of the Land Drainage Act 1991).</p> <p>The concept design for the realigned Sizewell Drain recognises its importance as a component of Sizewell Marshes SSSI and the influence it has on the hydrology of the adjacent wetland habitats. SZC Co. outlined its proposals in pre-application consultation and the concept design is included in Appendix 19C of Volume 2, Chapter 19 (Groundwater and Surface Water) of the Environmental Statement (ES) [APP-309]. We recognise the important role that the IDB has in the post-DCO consenting of the realignment prior to its construction.</p> <p>This design will be updated in support of the Land Drainage Consent application. SZC Co. notes the design requirements set out by ESIDB and will engage with the Board in the development of these designs.</p> <p>The potential ecological impacts on the Sizewell Marshes SSSI from the proposed realignment of the Sizewell Drain adopted</p>		

SIZEWELL C PROJECT – STATEMENT OF COMMON GROUND
EAST SUFFOLK INTERNAL DRAINAGE BOARD

NOT PROTECTIVELY MARKED

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			<p>watercourses is fully assessed in Volume 2, Chapter 14 [APP-224 and AS-033] of the ES, and the appropriateness and acceptance of this work is being managed through the NE Statement of Common Ground.</p> <p>SZC Co. notes ESIDB's comments on the existing Water Level Management Plan (WLMP), which is a working document and plan that sits outside of the DCO application and remit. As stated in Volume 2, Chapter 19, Appendix 19F Water Monitoring and Response Strategy of the updated ES [AS-236], the proposed Water Monitoring Plan (as secured by Requirement 7) could potentially be used to update the existing WLMP, outside of the DCO.</p> <p>However, SZC Co. is drafting a Heads of Terms (HoT) for a proposed side agreement between SZC, NGL and RSPB as the riparian landowners along Leiston Drain. This will potentially include other relevant bodies including the EA, IDB and NE for all parties to set out the shared objectives for managing water levels within Sizewell Marshes and to ensure</p>		

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NOT PROTECTIVELY MARKED

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			that all parties continue to manage water levels within their land ownership in a manner that is consistent with maximising the ecological value of the SSSI. The agreement would seek to ensure that no party places additional burden on adjoining landowners without their prior approval. All parties agree to use reasonable endeavours to work together in managing water levels in the area and will work together constructively and proactively. The agreement is intended to recognise SZC Co.'s new role and re-formalise the existing agreements in place or implicit in the management of the SSSI.		
2.1.2	Proposed Realignment - Water control structures	Not enough detail provided to date.	The design of the proposed water control structures on the realigned Sizewell Drain will be provided in support of the Land Drainage Consent application. SZC Co. notes the design considerations set out by ESIDB and will engage with the Board in the development of these designs. SZC Co. is preparing a high level options assessment of control structures for the confluence of the Sizewell Drain and Leiston Drain and will share this with	SZC Co. To provide high level options assessment of control structures for the confluence of the Sizewell Drain and Leiston Drain	In Progress

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			ESIDB. SZC Co. proposes to incorporate provision in the design for eel passage.		
2.1.3	Proposed Realignment - Infilling of multiple ditches and ponds and the shortening of the sizewell drain itself	The ESIDB would like to know how much total water capacity will be lost through these works and how/where that will be mitigated.	<p>The design of the proposed realignment of the Sizewell Drain will be updated in support of the Land Drainage Consent application. SZC Co. notes the design considerations set out by ESIDB and will engage with the Board in the development of these designs.</p> <p>The assessment of the impact on habitats and mitigation proposals is assessed in Volume 2, Chapter 14 [APP-224 and AS-033] of the ES, and the appropriateness and acceptance of this work is being managed through the NE Statement of Common Ground. Mitigation is being addressed in the associated Terrestrial Environment Monitoring and Mitigation Plan (TEMMP) which SZC Co. has developed in consultation with NE and will be submitting to PINS at Deadline D2.</p>		In Progress
2.4	Flood mitigation and habitat creation area	The Board seeks further information on the exact function, location and design of this feature including proximity to the Board's Adopted Watercourse (Drain 7).	SZC Co. recognises that drainage works within 9m of an Adopted Watercourse will require Land Drainage Consent from the Internal Drainage Board, and will require to be supported by designs and	In Progress	In Progress

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		<p>All works within 9m of the adopted watercourse will require the Board's formal consent as per the Land Drainage Act 1991, including the Board's Byelaws (which must be considered by the Board, rather than officers acting under delegated authority).</p> <p>The ESIDB seek clarity on exactly how and when the applicant will apply. The ESIDB believes a protective provision may be the best option to ensure an effective approach.</p>	<p>information to an appropriate level of detail. The need to formally consent the works proposed for the development of the flood mitigation and habitat creation area will be confirmed in discussion with ESIDB.</p>		
2.2.1	Flood mitigation and habitat creation area – Hydrological Links and Impacts	<p>We seek confirmation of the intended hydrological link to the riparian watercourse network (including rates / flow path etc).</p> <p>We seek confirmation regarding whether SZC have modelled a potential breach scenario.</p>	<p>SZC Co. notes ESIDB's comments on the existing Water Level Management Plan (WLMP), which is a working document and plan that sits outside of the DCO application and remit. As stated in Volume 2, Chapter 19, Appendix 19F Water Monitoring and Response Strategy of the updated ES [AS-236], the proposed Water Monitoring Plan (as secured by Requirement 7) could potentially be used to update the existing WLMP, outside of the DCO.</p> <p>However, SZC Co. is drafting a Heads of Terms (HoT) for a proposed side agreement between SZC, NGL and RSPB as the riparian landowners along Leiston</p>	<p>SZC Co. to supply information on hydrological link to riparian watercourse network.</p> <p>SZC Co. to supply infiltration data to support position.</p>	In progress

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			<p>Drain. This will potentially include other relevant bodies including the EA, IDB and NE for all parties to set out the shared objectives for managing water levels within Sizewell Marshes and to ensure that all parties continue to manage water levels within their land ownership in a manner that is consistent with maximising the ecological value of the SSSI. The agreement would seek to ensure that no party places additional burden on adjoining landowners without their prior approval. All parties agree to use reasonable endeavours to work together in managing water levels in the area and will work together constructively and proactively. The agreement is intended to recognise SZC Co.'s new role and re-formalise the existing agreements in place or implicit in the management of the SSSI.</p> <p>No outfalls are proposed from the WMZ5 infiltration basin at this stage. There are no local watercourses and infiltration rates are strong in this location.</p> <p>The WMZ5 basin / water resource storage area is to be developed at and below</p>		

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			<p>ground level and would not require a breach assessment.</p> <p>The design of the proposed flood mitigation and habitat creation area will be updated in support of the appropriate consent application. SZC Co. notes the assessment and design considerations set out by ESIDB and will engage with the Board in the development of these designs.</p>		
3 Hydrological Impacts and Surface Water Discharge					
3.1	Changes to the hydraulic connectivity (including surface water to groundwater interaction) resulting from the cut-off wall	We maintain concerns regarding possible changes in spring issues adding to base flow once they enter the surface water system	<p>SZC Co. has fully assessed the potential impacts to groundwater and surface water from the proposed development, including the effects of the cut-off wall and impacts on water chemistry. This assessment is provided as Volume 2 Chapter 19 of the ES [APP-297] and is supported by appendices setting out the baseline data and describing the conceptual site model (Appendices 19B, 19B1 and 19E) [APP-304 APP-305 APP-306 APP-307 APP-308 APP-309] and groundwater / surface water numerical model (Appendix 19A)</p>	<p>ESIDB to continue to review the relevant DCO documents.</p> <p>SZC Co. to share the technical note summarising the groundwater / surface water interface with ESIDB once finalised.</p>	In Progress

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			<p>[APP-298 APP-299 APP-300 APP-301 APP-302 APP-303].</p> <p>SZC Co. is due to issue a technical note summarising the groundwater / surface water interface, in particular describing the limited flow between Crag and Peat and the strong relationship between Peat groundwater and surface water.</p> <p>SZC Co. notes ESIDB's comments on the existing Water Level Management Plan (WLMP), which is a working document and plan that sits outside of the DCO application and remit. As stated in Volume 2, Chapter 19, Appendix 19F Water Monitoring and Response Strategy of the updated ES [AS-236], the proposed Water Monitoring Plan (as secured by Requirement 7) could potentially be used to update the existing WLMP, outside of the DCO.</p> <p>However, SZC Co. is drafting a Heads of Terms (HoT) for a proposed side agreement between SZC, NGL and RSPB as the riparian landowners along Leiston Drain. This will potentially include other relevant bodies including the EA, IDB and</p>		

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			NE for all parties to set out the shared objectives for managing water levels within Sizewell Marshes and to ensure that all parties continue to manage water levels within their land ownership in a manner that is consistent with maximising the ecological value of the SSSI. The agreement would seek to ensure that no party places additional burden on adjoining landowners without their prior approval. All parties agree to use reasonable endeavours to work together in managing water levels in the area and will work together constructively and proactively. The agreement is intended to recognise SZC Co.'s new role and re-formalise the existing agreements in place or implicit in the management of the SSSI.		
3.2	The submitted Flood Risk Assessment (FRA) and Environmental Statement (ES) only assess the impacts of an infiltration led drainage strategy	The applicant has provided no evidence to support the viability of an infiltration led drainage strategy. The ESIDB believes that the FRA and ES cannot be based on an unsupported scenario.	SZC Co. is proposing to use SuDS to mimic nature and typically manage rainfall close to where it falls. The upper areas of the TCA catchment are characterised by few or no watercourses, due to effective infiltration into typically sandy soils. Lower down the TCA catchment there are more evident watercourses and typically lower	SZC Co. to provide the technical note on MDS and WMZ design once completed. SZC.Co to provide infiltration data. SZC.Co to provide details of attenuation	In Progress

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			<p>infiltration rates. Ground investigation, including infiltration assessment, has been carried out to characterise the underlying soils / geology, principally in 2014 and 2017. GI is currently underway to validate those earlier findings. SZC Co. has used a conservative approach throughout, by using the lowest infiltration rates to inform the design of surface water infrastructure for the concept design used in the DCO submission.</p> <p>SZC Co. is proposing a sequence of management practices, control structures and strategies designed to efficiently and sustainably drain surface water, while minimising pollution and managing the impact on water quality of local water bodies. These will transport (convey) surface water, slow runoff down (attenuate) before it enters watercourses, provide areas to store water in natural contours and be used to allow water to soak (infiltrate) into the ground or evaporate from surface water and transpire from vegetation (known as evapotranspiration).</p>	basin sizing and evidence that sizing is appropriate to support position.	

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			<p>Where suitable, the surfaces of the catchments are proposed to be permeable, so surface water will infiltrate to ground in the first instance. Any runoff that does not infiltrate directly will be captured through swales that border each catchment. The swales provide local source control to ensure the management of water returning to the ground to mimic the existing condition. The swales contain an infiltration trench beneath them which will encourage further infiltration, as well as provide additional storage. Any water that does not infiltrate through the infiltration trench into the surrounding ground will be captured by a perforated pipe within the trench, which will convey the flow to a Water Management Zone (WMZ) infiltration basin.</p> <p>More frequent storm events will not need to overflow into the WMZ infiltration basins and surface water will be primarily discharged through infiltration at source. In less frequent storm events, the WMZ infiltration basins will be used to attenuate and infiltrate surface water and as such have been sized so they have capacity for</p>		

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			<p>a 1:100-year storm event including climate change.</p> <p>Infiltration basins in catchments 1, 2, 3, and 6 have an outlet to nearby watercourses, restricted to greenfield runoff rates. As an additional backup measure, the WMZ infiltration basins for catchments 1-4 have an allowance for an overflow into a conventional drainage system (spine network) discharging to the combined drainage outfall (CDO) which discharges to the sea. Hydraulic modelling currently shows this network is not required; this spine network has only been included at this stage as a precaution.</p> <p>SZC Co. is preparing a further technical note on the MDS water management zones design, which will include summary infiltration testing results.</p>		
3.4	Discharge of surface water to the sea	We maintain that a periodically active discharge to the Sea needs to operate based on an agreed threshold of action. This threshold must be agreed in partnership / consultation with all stakeholders and regulatory bodies.	The Sizewell Marshes (including the Sizewell Drain) are known to flood occasionally due to either extreme rainfall events or other external factors, such as the Leiston Drain downstream being blocked or the Minsmere sluice inhibiting	SZC Co. Must clearly identify the parameters for use of this temporary outfall and support them with evidence.	In Progress

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		<p>We remain concerned that a permanent discharge of surface water to the sea before it has the chance to flow through the surrounding drainage system could lead to a currently unassessed / unconfirmed reduction in water levels within the surrounding drainage infrastructure.</p> <p>In addition to the above, we are also concerned that Ground Water replenishment will be impacted by the currently proposed practices (including potentially discharging temporary development areas to the Sea). Whilst we acknowledge this could protect construction from a SW flood event there may be limited GW aquifer recharge as a consequence. The total water resource balance needs to be managed.</p>	<p>surface water flow to sea. In these scenarios, the Sizewell drain overtops and the low-lying areas in the SSSI become inundated with surface water. If a rainfall event occurs on the MDS while the SSSI is inundated with water, surface water runoff will be captured and attenuated in temporary infiltration ponds. However, discharging to the backed-up Sizewell Drain in these conditions is not considered suitable, even if restricted to greenfield runoff rates. In this scenario, another option for discharging surface water should be considered, and therefore a temporary marine outfall has been proposed which would discharge to sea, acting as a 'release valve'.</p> <p>The temporary marine outfall is proposed to be installed early in the construction programme, as a redundancy measure or a precautionary principle for discharging surface water to sea, prior to the CDO being installed. The outfall would principally be used where factors external to the MDS that are out of the control of SZC result in the Sizewell Drain being unsuitable to discharge to, for example,</p>	<p>SZC Co. to provide the technical note on Temporary marine outfall assessment once completed.</p>	

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			<p>flooding on site caused by offsite flood conditions.</p> <p>This permit will be applied for in the future through the EA. The conditions from the EA may stipulate a suitable water level within the SSSI that must be reached before the temporary marine outfall can be switched on. Similarly, there may be a level defined by the permit conditions where the marine outfall must be switched off and discharge is returned to the SSSI for recharge of surface and groundwater. The pump may also need to be used in other exceptional events such as if water levels in and around the site present a risk to health and safety.</p> <p>SZC Co. notes ESIDB's comments on the existing Water Level Management Plan (WLMP), which is a working document and plan that sits outside of the DCO application and remit. As stated in Volume 2, Chapter 19, Appendix 19F Water Monitoring and Response Strategy of the updated ES [AS-236], the proposed Water Monitoring Plan (as secured by Requirement 7) could potentially be used</p>		

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			<p>to update the existing WLMP, outside of the DCO.</p> <p>However, SZC Co. is drafting a Heads of Terms (HoT) for a proposed side agreement between SZC, NGL and RSPB as the riparian landowners along Leiston Drain. This will potentially include other relevant bodies including the EA, IDB and NE for all parties to set out the shared objectives for managing water levels within Sizewell Marshes and to ensure that all parties continue to manage water levels within their land ownership in a manner that is consistent with maximising the ecological value of the SSSI. The agreement would seek to ensure that no party places additional burden on adjoining landowners without their prior approval. All parties agree to use reasonable endeavours to work together in managing water levels in the area and will work together constructively and proactively. The agreement is intended to recognise SZC Co.'s new role and re-formalise the existing agreements in place or implicit in the management of the SSSI.</p>		

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3.5	Infilling of the borrow pits causing changes in infiltration rates	The potential infilling of the Borrow pits with new materials is likely to lead to a change in infiltration rates and a possible result of this could be a change in the surrounding water levels or risk of flooding.	SZC Co. has fully assessed the potential impacts to groundwater and surface water from the borrow pits, including the effects on infiltration rate. This assessment is provided as Volume 2 Chapter 19 of the ES [APP-297] and draws on the numerical modelling of groundwater / surface water (Appendix 19A) [APP-298 APP-299 APP-300 APP-301 APP-302 APP-303] , the outputs of which show that the effect is limited and would not contribute to flooding.	ESIDB to continue to review the relevant DCO documents.	In Progress
4 Water Management Zone and Detailed Drainage Design					
4.1	Lack of detail and evidence in available drainage strategy	Water Management Zone (WMZ) and Detailed Drainage Design: There is a consistent and continuous lack of detail and evidence in the available drainage strategy which makes it very difficult to assess the viability of the proposals.	SZC Co. is required to mitigate all significant adverse effects related to the Sizewell C Project. In order to understand the extent of the effects, an Environmental Impact Assessment has been undertaken and physical mitigation and implementation measures identified. For the MDS, the Outline Drainage Strategy has been developed that is based principally on infiltration, which will maintain the permeability of the construction areas wherever possible, but	SZC Co. to provide the technical note on MDS WMZ design once completed.	In Progress

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			<p>ultimately emulating existing baseline conditions and thus balancing both infiltration and greenfield discharge. It is based upon the principle of phased and flexible implementation, which will protect the area outside of the development site up to a 1 in 100 year flood event. Design work continues, informed by the findings of site investigations and with further investigations planned. Any discharge from the site will be at the greenfield runoff rates.</p> <p>The individual aspects of the drainage strategy for MDS are described above in section 3.2, which describes how a conservative approach has been taken based on ground investigation data, to develop the concept design. SZC Co. is preparing a further technical note on the MDS water management zones design, which will include summary infiltration testing results.</p> <p>For the AD sites, infiltration is the preferred strategy and the same principle of protecting areas outside of the development up to a 1 in 100 year flood event will be applied. Where discharge is</p>		

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			required, it will be at greenfield runoff rates.		
4.2		The timeline for Water Management Zone (WMZ) implementation is currently unclear. This could result in substantial flood risk if development takes place before the drainage infrastructure within a Water Management Zone is not ready to operate.	<p>SZC Co. recognises the requirement to manage surface water flooding throughout all stages of construction and to develop drainage infrastructure alongside the initial construction activities and as activities within the WMZs change. This will need to be responsive and flexible to the changing character of each WMZ, whilst being rooted in the SuDS philosophy throughout.</p> <p>SZC Co. fully recognises that it has a responsibility to manage surface water from the outset of construction activity. Specific measures will be secured through the COCP [AS-273] and the environmental permits and licences, which provide the framework for adjustment over time.</p>	ESIDB to continue to review the relevant DCO documents.	In Progress
4.3		We understand that the currently planned attenuation basin in WMZ 1 may be subject to changes at detailed design due to encroachment on a wildlife habitat. If these changes result in the abandonment of this basin, it is possible that all discharges from	SZC Co. is progressing this design to accommodate the Natterjack toad habitat and retain the basin. Design work has shown that a detention basin of appropriate size can be maintained in this location. SZC Co. is preparing a further	SZC Co. to provide the technical note on MDS WMZ design once completed.	In Progress

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		WMZ 1 (as well as those from WMZ 7,8 and 9 before the Combined Drainage Outfall is ready) would either be discharged to a watercourse or to WMZ 2. The impacts of these potential scenarios have not been investigated and subsequently could increase flood risk.	technical note on the MDS water management zones design, which will include summary infiltration testing results.		
4.4		On occasion (e.g. WMZ 6) it appears that where an infiltration system cannot be designed to accept flows from the entirety of a WMZ catchment, discharge is to be directed to a watercourse with no attenuation. Any unattenuated discharge is strongly discouraged by the Board, the NPPF and National Best Practice without appropriate justification.	In respect to the design standards (retaining storm events within the site up to 1 in 100 with an allowance for climate change), all discharges to watercourses will be subject to attenuation. SZC Co. is preparing a further technical note on the MDS water management zones design, which will include summary infiltration testing results.	SZC Co. to provide the technical note on MDS WMZ design once completed.	In Progress
4.5		The available information states that some of WMZ 8 will drain 'naturally' to the adjacent environmentally sensitive Marsh, but has not advised whether this is through the means of infiltration, discharge to a watercourse or overland flows. The Board is concerned that no drainage strategy has been provided for the increased impermeable area and therefore increased	Whilst the design has not been set for this area, it is expected that this would be by discharge to the Sizewell Drain at multiple points, and regulated by means of a discharge consent(s) for approval by ESIDB.	SZC Co. to provide the technical note on MDS WMZ design once completed.	In Progress

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		volumes (rather than 'natural') of surface water flows.			
4.6		The drainage strategies for WMZ groups 1 and 2, as well as WMZ 10, the Northern and Southern Park and Ride Sites, the Two Village Bypass, the Yoxford Roundabout, the Link Road and the Freight Management Facility have not been evidenced as being feasible due to the lack of infiltration testing.	SZC Co. is preparing a further technical note on the MDS water management zones design, which will include summary infiltration testing results. SZC Co. is preparing a further technical notes on the Associated Development sites' drainage design, which will include summary infiltration testing results.	SZC Co. to provide the technical notes on MDS WMZ and AD sites drainage design once completed.	In progress
4.7		Where infiltration has been deemed impossible from geological surveys, nearby watercourses/rivers have been identified but no direct discharge location has been proposed. At this stage, the Board is not able to comment on these discharge locations due to the lack of information provided. The ESIDB seek clarity on exactly how and when the applicant will provide this information.	It is proposed to begin to define these as part of detailed design, in consultation with ESIDB and the EA, as part of the consenting regime.		In Progress
4.8		The Board has been unable to locate a drainage strategy for the Depot South of the WMZ 10.	This has been addressed by extending the areas of WMZs 6 and 10. SZC Co. is preparing a further technical note on the MDS water management zones design.	SZC Co. to provide the technical note on MDS WMZ design once completed.	In Progress

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
4.9		WMZ 5 draining into WRSA and thence into local network?	As presented in the Changes submission [AS-005] the water resource storage area has been relocated to a position adjacent to the WMZ5 detention basin. SZC Co. does not propose to drain from either the WMZ5 detention basin or water resource storage area to the flood mitigation and habitat creation area.	ESIDB to continue to review the relevant DCO documents.	In Progress
4.10	LEEIE – comments based on report titled 'SZC Enabling Works Detailed Design' (Doc No: SZC-EW0302-XX-000-NOT-400003, Rev 02, 31/08/2020)	<p>Catchment 1 and 3</p> <p>The Board seeks clarification on the exact discharge rate and how a change in rate would affect the design of the WMZ.</p> <p>Choice of discharge location is in the Boards view unfounded.</p> <p>The Board would like to see models which confirm that the use of the Leiston Drain as the more frequent discharge route creates less flood risk than the alternative.</p> <p>Catchment 2</p> <p>The drainage strategy for catchment 2 is yet to be confirmed, if this is proposed to discharge along with catchments 1 and 3, the Board seeks further detail regarding the impact this additional volume of water will have on the sizing of the WMZ as well as</p>	SZC Co. is preparing a further technical note on the LEEIE basic drainage design.	SZC Co. to provide the technical note on LEEIE basic drainage design once completed.	In Progress

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		<p>proposed discharge rates.</p> <p>The Board would like to have access to the calculations and models used to estimate attenuation basin volumes, proposed flow rates and flood risk for all three catchments.</p>			
5 Minsmere Sluice					
5.1	Highlighting the importance of the Minsmere Sluice in relation to the surface water drainage from the catchment.	<p>While the Environment Agency are the most appropriate Risk Management Authority to comment in detail on the assessment of the impact on the Minsmere Sluice, we wish to highlight the importance of the Sluice in relation to surface water drainage from the catchment (and therefore from the proposed development area). It is our understanding that the Sluice may be nearing the end of its useful life (a milestone which will have a significant impact on surface water drainage, and may result in the requirement for a pumping station) and therefore any impact on the Sluice may act to accelerate this process.</p> <p>ESIDB remain unclear how the applicants have been able to conclude that there will be no increase in discharge volumes from the development relative to the greenfield</p>	<p>SZC Co. recognises concerns of stakeholders regarding the long-term viability of Minsmere Sluice. It neither owns the structure nor includes it within the Application boundary for the proposed power station.</p> <p>Minsmere Sluice is an Environment Agency owned and maintained structure that controls drainage from the Minsmere New River, Leiston Drain and Scott's Hall Drain. It provides controls and limits the ingress of salt water and is tide locked when water levels in the North Sea are high. At low tide drainage of the upstream fluvial system via Minsmere Sluice is via gravity. SZC Co. notes that the Shoreline Management Plan (SMP) policy for the wider coast (MIN12.3 and MIN12.4) in the vicinity of Minsmere Sluice is managed</p>	<p>SZC Co. to provide the technical note on Minsmere sluice impact assessment when complete and response to ExA question FR.1.72 at Deadline 2.</p> <p>ESIDB awaiting confirmation from the Environment Agency regarding the nature of the works undertaken to the Sluice in 2013.</p>	In Progress

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		scenario prior to undertaking / submitting infiltration results and evidencing the viability of a drainage strategy reliant on infiltration.	<p>realignment, whereas the position for Minsmere Sluice is for it to be maintained. Consistent with the policy stated in the SMP, the Environment Agency refurbished Minsmere Sluice in 2013 and this work was completed with a 50 year design life.</p> <p>A thorough assessment has been undertaken and reported on in Volume 2, Chapter 19 (Groundwater and surface water) of the Environmental Statement [APP-297], which concludes that there would be no significant change in water levels and discharge volumes, and therefore there would be no mechanism that could accelerate degradation of the Minsmere Sluice.</p>		
5.2		With the changes in water-level and discharge volumes that are likely to result from the development the Board is concerned that the existing pressure on the sluice will increase thus furthering any adverse impacts discussed in section 2 of this representation. The applicant has indicated that they might consider placing a temporary pump upstream of the sluice to	SZC Co. is not predicting significant changes in water level and discharges and is committed to developing an approach that is sustainable for the duration of construction and operation. Correspondingly the proposed development follows key principles of SuDS and the drainage hierarchy. The proposed drainage infrastructure and the		In Progress

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
		redirect water for re-use within the catchment when needed. While this might prove useful in the short term, the drainage impacts of the development will persist beyond its operational timeframe and a temporary solution is therefore not sustainable.	proposed water control structure on the realigned Sizewell Drain will enable flexibility in the control of discharges to the watercourses and water levels.		
5.3		As the applicant has identified, changes to long term sediment flow off the Coast because of the hard-coastal defence as well as the changes to the Beach Landing Facility will likely lead to accretion to the North of the development. The Board are concerned that this could hamper future discharge to the sea from the gravitational drainage system at Minsmere and that this has not been sufficiently considered.	<p>There is no potential for the SZC development to cause or affect the discharge from Minsmere. Please refer to CG.1.18 for further detail.</p> <p>The potential accretion (or a reduction in erosion rates) on the southern Minsmere frontage (within a few hundred metres of SZC) arising from deposition SCDF sediments would not extend to the sluice (which is approximately 1.6 km north of SZC) and therefore would not affect the sluice's ability to discharge, for the following reasons:</p> <p>(a) SCDF beach shingle (proposed mitigation) would, in net terms, drift slowly to the south, not to the north. Some shingle may accumulate immediately to the north of Sizewell C, but not as far as the sluice (longshore transport</p>	Board awaiting answer to ExA question FR.1.73 at Deadline 2.	In Progress

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			<p>calculations and tracer studies indicate that detectable volumes of SCDF shingle are not likely to be encountered more than a few hundred metres north of Sizewell C). Therefore there would be no impact at the Minsmere Sluice outfall.</p> <p>(b) Any SCDF sediments that are transported north of Sizewell C would most likely be deposited and retained in areas where the shoreline has already receded to a more westerly position than the SCDF (tens to a few hundred metres north of Sizewell C). This would tend to trap shingle and prevent further northward transport for as long as the more westerly shoreline position persisted.</p> <p>(c) The sluice's outfall pipe will continue to disrupt natural shingle transport for as long as it is present, which can be seen as an alternating accumulation of sediment on either side of the sluice determined by storm direction. SZC's activities will have no bearing on that process.</p>		
5.4		The Board feels that a suitable long term solution to the above problems may be the	In accordance with SZC Co.'s response to 5.3, no mitigation is proposed.		In Progress

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		installation of a new pumping station to replace the gravity sluice. Any such structure would likely be managed by an appropriate Risk Management Authority on completion, in line with a Water Level Management Plan agreed by all regulators and stakeholders.			
5.5	Placement a pump upstream of the Sluice and re-use water	Further information required.	SZC Co. is updating the Water Supply Strategy and is not progressing an option for abstraction of surface water upstream of the Minsmere Sluice.	SZC Co. to issue the revised Water Supply Strategy.	In Progress
6 Development Consent Order					
6.1	Draft Development Consent Order	To Be Confirmed			In Progress
6.2	Protective Provision for drainage and flood risk	ESIDB have provided SZC Co. with proposed wording sought in respect of protective provisions for drainage and flood risk. This provision is sought to avoid conflict between the planning process and the Board's regulatory regime and consenting process (as per the Land Drainage Act 1991 and the Board's Byelaws), while assuring the Board that their interests and ability to undertake their	SZC Co. has received ESIDB's draft protective provision and is currently reviewing this.	SZC Co. to provide amended version of the PP for discussion.	In Progress

SIZEWELL C PROJECT – STATEMENT OF COMMON GROUND
EAST SUFFOLK INTERNAL DRAINAGE BOARD

NOT PROTECTIVELY MARKED

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		statutory functions are subject to due consideration.			

NOT PROTECTIVELY MARKED

APPENDIX A: ENGAGEMENT ON THE SOCG

A.1.1. The preparation of this SoCG has been informed by a programme of discussions between the parties, as are summarised in **Table 2.2**.

Table 2.2: SOCG meetings held between the parties

Date	Details of the Meeting
3 March 2021	Discussion on matters raised by ESIDB in their Relevant Representation (30 September 2020).
17 March 2021	Continued discussion on matters raised by ESIDB in their Relevant Representation (30 September 2020), with focus on: hydrology; drainage design infrastructure and effect on discharge; role of the Minsmere Sluice; impact of cut-off wall and piling; groundwater / surface water interface; and operation of the CDO.
21 April 2021	Discussion on content of the SOCG.
6 May 2021	Discussion on the Protective Provision and consenting regime, in order to progress this item on the SOCG.
20 May 2021	Discussion on the Protective Provision and consenting regime, in order to progress this item on the SOCG.