



The Sizewell C Project

9.10.3 Statement of Common Ground - East Suffolk Internal Drainage Board

Revision: 2.0
Applicable Regulation: Regulation 5(2)(q)
PINS Reference Number: EN010012

August 2021

Planning Act 2008
Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009





CONTENTS

1	INTRODUCTION.....	1
1.1	Status of the SOCG	1
1.2	Purpose of this document.....	1
1.3	Structure of this Statement of Common Ground	1
2	POSITION OF THE PARTIES.....	1

TABLES

Table 2.1: Position of Parties	2
Table 2.2: SOCG meetings held between the parties	12

APPENDICES

APPENDIX A: ENGAGEMENT ON THE SOCG	20
--	----

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 D6], dated 29 July 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 D10.

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 and drainage design				
1.1	Impacts on flood risk within the Internal Drainage District and wider watershed catchment area.	The current drainage strategy assumes that infiltration is possible in most places. This has not been sufficiently evidenced.	<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>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</p>	SZC Co. To provide complete infiltration results	In Progress

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
			<p>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> <p>SZC Co. has informally provided a series of reports to ESIDB, including the groundwater conceptual model paper (subsequently submitted in Examination at Deadline D3), MDS hydrological review paper, MDS WMZ basic drainage design summary and MDS LEEIE basic drainage design summary. These papers are being submitted into Examination at Deadline D5.</p>		
1.2	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.	<p>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.</p> <p>For the MDS, the Outline Drainage Strategy has been developed that is based principally on infiltration, which will maintain the permeability of</p>	SZC Co. to provide additional detail as discussed including detailed calculations on attenuation/soakaway	In Progress

NOT PROTECTIVELY MARKED

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
			<p>the construction areas wherever possible, but 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 required, it will be at greenfield runoff rates.</p> <p>SZC Co. has informally provided a series of reports to ESIDB, including the groundwater conceptual model paper (subsequently submitted in Examination</p>	<p>capacity estimates</p>	

NOT PROTECTIVELY MARKED

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
			at Deadline D3), temporary marine outfall operation summary, MDS hydrological review paper, MDS WMZ basic drainage design summary and MDS LEEIE basic drainage design summary. These papers are being submitted into Examination at Deadline D5.		
1.3		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, specifically that the 1 in 100-year storm will be managed from the commencement of construction works. This is set out in the response to ExQ1 FR.1.69 which is located on the PINS website in REP2-104.</p> <p>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, including SZC Co. response to ExQ1 FR.1.69.	In Progress

NOT PROTECTIVELY MARKED

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
1.4		Details on WMZ 1 basin design which accommodates high groundwater levels	<p>SZC Co. has progressed 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.</p> <p>SZC Co. has informally provided a series of reports to ESIDB, including the MDS WMZ basic drainage design summary. These papers are being submitted into Examination at Deadline D5.</p>	SZC Co. to provide additional detail on basin design relative to water table.	In Progress
1.5		The Board agrees that the updated WMZ designs show all proposed discharges to watercourses are attenuated to some degree.	No additional comment from SZC Co.		Agreed
1.6		No drainage design has been provided for WMZ 8, 9 and 10, the Northern and Southern Park and Ride Sites and the Freight Facility	<p>Whilst the design has not been set for this area, it is expected that this would be discharge to the Sizewell Drain at multiple points, and regulated by means of a discharge consent(s) for approval by ESIDB.</p> <p>SZC Co. has informally provided a series of reports to ESIDB, including the groundwater conceptual model paper (subsequently submitted in Examination at Deadline D3), temporary marine outfall operation summary, MDS hydrological review paper, MDS WMZ basic drainage design summary and MDS LEEIE basic drainage design summary. These</p>	SZC Co. to provide the technical notes on MCA drainage design, the Northern and Southern Park and Ride Sites and the Freight Facility once completed.	In Progress

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
			papers are being submitted into Examination at Deadline D5.		
1.7		No discharge locations or invert levels have been proposed for the WMZs. 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. SZC Co. has initiated discussions with the ESIDB, alongside SCC and the EA, in respect of the proposed permits and consents, and associated timeframe.	SZC Co. to provide plan showing approximate locations of outfalls to enable ESIDB to advise on locations of concern.	In Progress
1.8		The Board notes that the depot has been included in WMZs 6 and 10 as indicated by SZC Co.	No additional comment from SZC Co.		Agreed
1.9	LEEIE/ACA –	The Board would like to have access to the calculations and models used to estimate attenuation basin volumes for all three catchments.	SZC Co. has informally provided a series of reports to ESIDB, including the MDS LEEIE basic drainage design summary. These papers are being submitted into Examination at Deadline D5.	SZC Co. to provide additional details.	In Progress
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 be considered by the Board,	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 do works controlled by the	SZC Co. to confirm access and maintenance aspects for	In progress

NOT PROTECTIVELY MARKED

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
	works (Sizewell Drain)	<p>rather than officers acting under delegated authority).</p> <p>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 seeks clarity on which side of the realigned drain SZC Co. Proposes maintenance to be undertaken from. If this is from the Eastern side then this should be included in current plans as the 9m maintenance strip needs to be factored in when organising the layout within the red line boundary. 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>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 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>	ESIDB, in respect of Byelaw 10.	

NOT PROTECTIVELY MARKED

NOT PROTECTIVELY MARKED

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
			<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 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</p>		

NOT PROTECTIVELY MARKED

NOT PROTECTIVELY MARKED

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
			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	Board is satisfied with the high level options paper provided.	No additional comment from SZC Co.		Agreed
2.1.3	Proposed Realignment - Infilling of multiple ditches and ponds and the shortening of the sizewell drain itself.	The ESIDB is satisfied that the proposal is unlikely to cause additional flood risk locally when considered in isolation from the remainder of the proposed development site.	No additional comment from SZC Co.		Agreed
2.4	Flood mitigation and habitat creation area -	The Board seeks further information on the location and design of this feature including proximity to the Board's Adopted Watercourse (Drain 7). If within 9m this should be clearly indicated at this stage so that the Board can evaluate whether it is likely to impact maintenance access. If it does then the	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 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.	SZC Co. to confirm whether proposed works within 9m of Drain 7 Adopted Watercourse.	In progress

NOT PROTECTIVELY MARKED

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
		<p>layout may have to be altered, thus affecting the red line boundary.</p> <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). 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>			
2.4.1	Flood mitigation and habitat creation area – Hydrological Links and Impacts	The Board seeks confirmation of the intended hydrological link between WMZ 5, the WRSA and the FMA to the riparian watercourse network (including rates / flow path etc).	<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</p>	SZC Co. to supply detailed information on hydrological link to riparian watercourse network and situation in which this might be used	In progress

NOT PROTECTIVELY MARKED



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

NOT PROTECTIVELY MARKED

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
			<p>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> <p>The WMZ5 basin / water resource storage area is to be developed at and below 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>		

NNB Generation Company (SZC) Limited. Registered in England and Wales. Registered No. 6937084. Registered office: 90 Whitfield Street, London W1T 4EZ

NOT PROTECTIVELY MARKED

NOT PROTECTIVELY MARKED

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
			SZC Co. has confirmed the hydrological linkage from the Water Resource Supply Area to a proposed discharge location into a minor watercourse on the eastern flank of the Flood Mitigation Area. The associated detail and consenting requirements are being discussed in joint meetings with the EA, SCC and ESIDB. SZC Co. has supplied infiltration data to ESIDB as part of MDS WMZ basic drainage design summary.		
3	Hydrological Impacts and Surface Water Discharge				
3.1	Changes to the hydraulic connectivity (including surface water to groundwater interaction) and changes in water level resulting from the cut-off wall and de-watering.	The Board acknowledges that the proposed water control structures would likely mitigate any changes in water level locally. The Board defers to the Environment Agency, the RSPB and Natural England regarding possible effects on groundwater and any ecological impacts which may result from the potential change to groundwater/surface water ratio.	No additional comment from SZC Co.		Agreed
3.4	Discharge of surface water to the sea.	The Board maintains that a periodically active discharge to the Sea needs to operate based on an agreed threshold of	The Sizewell Marshes (including the Sizewell Drain) are known to flood occasionally due to either extreme rainfall events or other external factors,	SZC Co. Must clearly identify the parameters	In Progress

NOT PROTECTIVELY MARKED

NOT PROTECTIVELY MARKED

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
		<p>action. This threshold must be agreed in partnership / consultation with all stakeholders and regulatory bodies.</p> <p>The Board remains 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 or change in water levels within the surrounding drainage infrastructure and/or Ground Water interaction (replenishment)</p>	<p>such as the Leiston Drain downstream being blocked or the Minsmere sluice inhibiting 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, 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</p>	<p>for use of this temporary outfall and support them with evidence</p> <p>ESIDB to review interactions between Water Monitoring Plan, Requirements 5 and 7.</p> <p>SZC Co. to submit Water Monitoring Plan at Deadline 6.</p>	

NOT PROTECTIVELY MARKED

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
			<p>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 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</p>		

NNB Generation Company (SZC) Limited. Registered in England and Wales. Registered No. 6937084. Registered office: 90 Whitfield Street, London W1T 4EZ

NOT PROTECTIVELY MARKED

NOT PROTECTIVELY MARKED

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
			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. SZC Co. has informally provided a series of reports to ESIDB, including the temporary marine outfall operation summary paper, MDS WMZ basic drainage design summary and MDS LEEIE basic drainage design summary. These papers are being submitted into Examination at Deadline D5.		
3.5	Infilling of the borrow pits causing changes in infiltration rates.		No additional comment from SZC Co.		Agreed
4	[Section Not Used]				
5	Minsmere Sluice				
5.1	Highlighting the importance of the Minsmere Sluice	While the Environment Agency are the most appropriate Risk Management Authority to comment in detail on the	SZC Co. recognises concerns of stakeholders regarding the long-term viability of Minsmere Sluice. It neither owns the structure nor includes it within	SZC Co. to provide the technical note on	In Progress

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
	<p>in relation to the surface water drainage from the catchment.</p>	<p>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).</p> <p>The Board defers to the Environment Agencies assessment on whether the Sluice will be negatively impacted by the development, either through changes in water-level in the catchment or through changes in sediment flow along the coast.</p>	<p>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 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>	<p>Minsmere sluice impact assessment when complete.</p>	

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
			<p>SZC Co. is preparing a note on the Minsmere Sluice operation and impacts, for submission into Examination at Deadline D5.</p> <p>SZC Co. has responded to Examining Authority ExQ1 FR.1.72 at Deadline D2, which is located on the PINS website in document REP2-100.</p>		
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		ESIDB to clarify the further information required to address this item.	
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 ensure that the Board is able to appropriately resource the applicants submission once it is received. It is also sought to avoid conflict between the	SZC Co. has received ESIDB's draft protective provision and has reviewed this. SZC Co.'s position is that the existing provisions in the DCO adequately secure and protect the Board's position and therefore protective provisions are not required.		Not Agreed



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

NOT PROTECTIVELY MARKED

Ref.	Matter	East Suffolk Internal Drainage Board position	SZC Co.'s Position	Further Action Required	Agreed / Not Agreed / In Progress
		<p>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 statutory functions are subject to due consideration.</p>			

NNB Generation Company (SZC) Limited. Registered in England and Wales. Registered No. 6937084. Registered office: 90 Whitfield Street, London W1T 4EZ

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.
23 June 2021	Discussion on content of the SOCG.
20 July 2021	Discussion on content of the SOCG.
29 July 2021	Discussion on content of the SOCG.