

From: [Fletcher, Ian \(Winnersh\)](#)
To: [BramfordtoTwinstead](#)
Cc: [Bramford to Twinstead](#); [Bevan, John](#); [Rotherham, Sally](#)
Subject: Bramford to Twinstead - clarifications in respect of S51 advice.
Date: 03 July 2023 17:23:45

Dear Jake

Thank you for the S51 Advice of 23 May 2023.

Would it be possible to seek clarification in respect of some of the advice provided in the letter in respect of points that were suggested could to be errors or omissions?

I set out the issues on which clarification would be appreciated below.

1. The letter notes, reflecting the response in box 30 of the S55 checklist, that the Flood Risk Assessment (APP-059) does not specify whether the land that is within Flood Zone 3 is located in Flood Zone 3a or Flood Zone 3b. The figures in the FRA show the Flood Zone 3 dataset, which was obtained from the Environment Agency. This shows that the floodplains within the order limits are very small, with the River Brett at 140m wide, River Box at 130m and River Stour at 600m. Flood Zone 3a and 3b datasets are produced by individual District Councils as part of their Strategic Flood Risk Assessments (SFRA) to support Local Plans. In the current economic climate the SFRA modelling typically only covers areas where housing is proposed. National Grid requested the Flood Zone 3a/3b data from the respective councils. Babergh and Mid Suffolk District Council confirmed that it only has this data for areas with a housing allocation in the emerging Joint Local Plan, none of which are within the Bramford to Twinstead Order Limits. Braintree District Council has provided Flood Zone 3b data. This is the same as the extent of Flood Zone 3 shown on the FRA Figures. Therefore, based on the data available, there would be no differentiation between Flood Zone 3a or 3b on any of the FRA figures and hence no benefit in providing amended drawings.
2. In respect of Water Bodies in River Basin Management Plans (APP-016) it is stated that the plans do not identify areas of water drainage or surface water management. It is not clear to us what is meant by this. Could you please expand on what is required here in the context of an electricity network reinforcement? This figure is supplied to meet the requirements of APFP Regulation 5(2)(l)(iii) which asks for "a plan with accompanying information identifying...water bodies in a river basin management plan". As far as we are aware we have met the legal requirement. Can you please advise where the policy or legal requirement for this information came from and if required, what dataset is being requested?
3. In respect of the Access Rights of Way and Public Rights of Way Navigation Plans (APP-012) it is stated that these plans do not contain any information relating to car parking. In what way would these plans cover car parking? We did not think this was necessary. Can you please advise where the policy or legal requirement for this information came from and if required, what dataset is being requested?
4. Finally, in respect of the same plans (APP-012) it is also indicated that when compared with schedule 7 of the draft DCO (APP-034) there is a numbering convention discrepancy and two examples are provided. We do not believe that there is any discrepancy. Where a street or public right of way is to be temporarily stopped up and for which there is no diversion to be provided this is listed in Part 2 of schedule 7 of the DCO. The two examples given are listed correctly in part 2 and the referencing is the same on the relevant plans. To enable a

distinction to be made between closures to public rights of way without diversions and closures with street management (which in some cases are across multiple streets and may have multiple end points, hence different numbers were used at each end) we adopted a different numbering system. In the case of the former we elected to have the same reference number at the start and end, and in the case of the latter different numbers were used.

If we can make changes to the application to satisfy your requirements in these four areas, please let us know what changes are required.

I look forward to hearing from you.

Regards

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