

Appendix 23-PD-1: Consultation

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Appendix 23-PD-1: Consultation

1. Introduction

- 1.1.1 This Preliminary Environmental Information (PEI) Report appendix consolidates key comments raised in the Environmental Impact Assessment (EIA) Scoping Opinion (**Appendix 5-PD-2** in PEI Report **Volume 4**) from the Planning Inspectorate (PINS) and other consultees, such as Environment Agency, Natural England, Historic England, local planning authorities, in relation to cumulative effects and interactions.

1.2 Scoping Opinion

- 1.2.1 A scoping exercise was undertaken in early 2025 to establish the content of the assessment and the approach and methods to be followed.
- 1.2.2 The EIA Scoping Report (**Appendix 5-PD-1** in PEI Report **Volume 4**) was issued 28 March 2025 and records the findings of the scoping exercise and details the technical guidance, standards, best practice and criteria to be applied in the assessment to identify and evaluate the likely significant effects of the Proposed Development on cumulative effects and interactions.
- 1.2.3 Following receipt of the EIA Scoping Opinion on 08 May 2025 (**Appendix 5-PD-2** in PEI Report **Volume 4**), the requirements summarised in **Table 1** have been identified by consultees in relation to cumulative effects and interactions.
- 1.2.4 **Table 1** outlines how and where these issues have been addressed within the PEI Report or will be addressed within the Environmental Statement (ES) to ensure they are taken account of as part of the ongoing assessment of effects on cumulative effects and interactions.

Table 1: Scoping Opinion Responses

Consultee	Topic	Comment	How and where addressed
Planning Inspectorate (PINS)	Cumulative effects assessment	2.2.7: The [EIA] Scoping Report states that the list of sites to be included within the cumulative effects assessment (CEA) will be consulted on with host authorities. The ES should ensure that the sites included within the CEA are updated as close to the point of submission as is possible. Sites included should be agreed with host authorities.	As part of the ongoing consultation process, the Applicant will seek to agree the preliminary short list (as presented in Appendix 23-PD-2 in PEI Report Volume 4) with the relevant local and consenting authorities prior to the ES assessment commencing.
	Zone of Influence for cumulative effects	3.5.12: It is noted that for aquatic ecology, ZoI have been set as 2 kilometres (km) for protected and notable species and 10km for international and national conservation designations. The ES should also ensure that a ZoI for designated sites which may be hydrologically linked is included within the assessment.	Noted, study areas for cumulative effects related to aquatic ecology will consider hydraulic links in the ES.
Environment Agency	Impact of discharges on the canals.	Use appropriate modelling approach. This recommendation from the G3 WQ Modelling Method Statement tech note, page 5 should be added to the comments and outcomes/agreements summarised in page 16, Consultation section of chapter 22. Modelling the impact of discharges on canals and other still waters requires a highly site-specific modelling approach. Given the water management within canals careful consideration must be taken on	Noted, the Environment Agency will be updated on modelling approach during regular engagement. This will be further considered where relevant for the ES.

Consultee	Topic	Comment	How and where addressed
		the appropriate modelling approach to use. This should take account of accumulation and the extent to which the water body is impacted. This should include assessment of the mixing zone(s) in the water body and any potential breaches of EQS.	
	Main Report, 6.9 - In combination effects have not considered the cumulative impact of the GUC, the Severn to Thames Transfer (STT) scheme and the smaller transfer schemes (e.g. from the Blythe in the Trent Catchment to Finham brook in the Severn Catchment) on the River Trent Catchment.	By not considering the combination effects of all water transfer schemes, the report does not adequately consider the impact of the scheme on future water resource/availability in the Midlands for biodiversity. We'd recommend that the report acknowledges ALL water transfer schemes and their cumulative impact.	The listed documents will be reviewed and referred to in the ES where relevant.
Chilterns Conservation Board	Chiltern-specific zone of influence (ZOI) evaluation	To assist all parties, we seek a Chiltern-specific zone of influence (ZOI) evaluation in the section on cumulative effects. Following the PINS 17 Advice	Comment seeks specific baseline review of the Chilterns in relation to cumulative effects that may be above

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		Note on cumulative effects, we promote its central message that 'criteria should consider capacity of the receiving environment and receptors to accommodate changes likely to occur'. We have listed below some of those Chilterns AONB/NL-specific capacity issues and would welcome an appropriate commentary on them, with supporting maps and figures. When applying to the Chilterns AONB/NL, the new 'duty to further' in the CRow Act 2000 will apply.	and beyond what will be included within other, supporting assessments (such as LVIA, terrestrial and aquatic ecology, and the water environment). This will be further considered where relevant for the ES.
	Traffic and Transport (20.5.5)	20.5.5 - With regards to the factoring of base traffic flows using TEMPRO v 8.0, this would not be considered appropriate in isolation, and any Transport Chapter (and the Transport Assessment upon which much of the traffic data and assessment within the Transport Chapter would be based) should be scoped with the Council before any forecasting work is undertaken to determine any specific committed developments or changes in infrastructure which would need to be accounted for. It is possible that this could vary from the long list of cumulative schemes detailed in Appendix 6-1, as some major committed development may have a traffic impact beyond the distance thresholds applied.	Comments noted, however this does not follow the standard methodology for the entire route. As part of the ongoing consultation process, the Applicant will seek to agree the preliminary short list (as presented in Appendix 23-PD-2 in PEI Report Volume 4) with the relevant local and consenting authorities prior to the ES assessment commencing.

Consultee	Topic	Comment	How and where addressed
Natural England	Cumulative effect assessment	We welcome section 6.9 in the Grand Union Canal EIA Scoping Report - Volume 1 and appendix 6-1 in Volume 3, where a cumulative effect assessment is discussed. We advise this is updated for the Environmental Statement to include any new developments, including those which are reasonably foreseeable, which may cause in-combination or cumulative impacts. These should include: a. existing completed projects b. approved but uncompleted projects c. ongoing activities d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before this project is consented.	Noted, this request will be accommodated within the assessment methodology where possible. Generally, a clear timeline for delivery is required to assess plans or projects for which an application has not yet been made, best endeavours will be made to include all relevant plans and projects. This will be further considered where relevant for the ES.
	Landscape and visual impacts	The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA)	Noted, an LVIA will be undertaken and will consider impacts on LCAs and the special qualities of NLs. This will be further considered where relevant for the ES.

Consultee	Topic	Comment	How and where addressed
		in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.	
Anglian Water Services AWS-2	Opening remarks: Existing infrastructure managed by AWS	We would expect the EIA to include reference to any existing infrastructure managed by AWS and the provision of replacement infrastructure and the requirements for new infrastructure. It is noted that the GUC Transfer project will enable Affinity Water (AfW) to reduce the existing import from Grafham, benefiting the Water Resources East region through enabling a new reverse transfer between AfW and AWS, which will ultimately help to support Cambridge Water (Section 4.2.12).	The ES will consider impacts on existing utilities. The requirement for any diversions will be set out within the Proposed Development chapter of the ES. Furthermore, the draft DCO will set out protective provisions for statutory undertakers whose infrastructure is impacted by the Proposed Development.
Anglian Water Services AWS-14	Scheme assessment, design, mitigation and connections Drainage and Surface Water	The Flood Risk Assessment (FRA), as part of the EIA, should consider any increased risk of surface water and groundwater flood risks arising from the scheme that could exacerbate sewer flooding risks due to infiltration/ingress to AWS networks, particularly in terms of climate change impacts. The likelihood of more extreme weather events leading to higher-than-average rainfall and cumulative impacts of storm events, as recently experienced during Winter 2023/24, mean that infrastructure becomes increasingly vulnerable to flood risk. The project	Noted. Increased risk of surface water and groundwater flooding that could exacerbate sewer flooding will be considered as part of the FRA in the ES.

Consultee	Topic	Comment	How and where addressed
		should aim to minimize any flood risks as far as possible by designing in measures to limit increased flood risks to utilities infrastructure.	
Anglian Water Services AWS-17	Engagement and next steps	We consider AWS should be included on the list of consultees to be drawn up by the Applicant, as set out in Section 22.3 'Consultation' of the Scoping Report. AWS would welcome engagement with the Applicant throughout the next stages of the project to address and resolve issues prior to the submission of the DCO including Protective Provisions. The preparation of a Statement of Common Ground should document key issues and the status of whether issues have been resolved or remain under discussion, which helps to reduce the Examining Authority questions for statutory undertakers and removes the possible need for changes to the project during Examination. We would recommend discussion on the following issues: 1. Impact of development on AWS's water and water recycling assets. 2. The design of the project to minimise interaction with AWS's assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.	The Applicant will establish regular engagement with AWS during the pre-application stage.

Consultee	Topic	Comment	How and where addressed
		3. Requirement for potable and raw water supplies (if any) and the inclusion of the WRA in the draft ES. 4. Requirement for water recycling connections (if any). 5. Confirmation of the project's cumulative impacts with any relevant AWS projects. 6. The Draft Development Consent Order (DCO), including draft Protective Provisions and requirements specifically to ensure our services are maintained during construction.	
Warwickshire County Council WCC-2	Chapter 21 – Materials and Waste (page 19-24)	Page 19. Section 21.4 and Table 21-3 reference needs to be made to safeguarded mineral resources and allocations in the adopted minerals local plan. Pages 19, 20 and 21 and Table 21-4. Due to the location of Part 1b which is close to both the Staffordshire and Leicestershire borders the study areas needs to be expanded to reflect this particularly as there are mineral resources, mineral sites and waste sites which could be affected. These elements would also be important for supplying materials to the project and taking waste to landfill. So, in Table 21- 4 Part 1b should include Staffordshire and Leicestershire and the East	As stated in Chapter 18: Materials and Waste (PEI Report Volume 2), Mineral Safeguarding Areas (MSA) are not deemed to be safeguarded mineral sites and are not included in the Institute of Sustainability and Environmental Professionals'¹ (ISEP) 'Guide to: Materials and Waste in Environmental Impact Assessment, Guidance for a Proportionate Approach' (the 'ISEP Guidance') (Ref. 1) and therefore are not assessed in a materials and waste assessment.

¹ Formerly the Institute of Environmental Management and Assessment (IEMA).

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		Midlands Region. There is also no mention of the requirement to consider other projects (cumulative assessment) which may have an impact on the availability of resources and capacities. This would include HS2, the A46 DCO and also the major development at Ansty north of Coventry. Page 22. Paragraphs 21.5.4 and 21.5.5- Baseline Conditions. Reference needs to be made to the 2023 Aggregates Minerals Survey for Great Britain which will be published this year and will have implications for determining future supplies of construction materials for the project locally, regionally, and nationally. There is also a need to make reference to the Local Aggregates Assessments for Warwickshire, West Midlands, Staffordshire, and Leicestershire. A key document regionally is the West Midlands Aggregates Working Party annual reports. All of these documents have the potential to change the data in Table 21-5 on page 23. Page 22 Paragraph 21.5.2 – A key component will be the extent to which the pipeline section will consume existing resources released along the route. The emphasis should be on avoiding importing primary aggregates to form the base and also for backfilling the pipeline trench. Pages 24 -27 and 32 Tables 21 – 7, 21-8 and 21 -9. There is no reference to safeguarded mineral resources set out in MSAs. The data for waste	Instead, these have been considered within Chapter 14: Ground Conditions of the EIA Scoping Report. Safeguarded mineral sites are outlined in Table 21-7 Chapter 18: Materials and Waste (PEI Report Volume 2) and there is one existing mineral site in Warwickshire that is in the Proposed Development (Jees and Boon, site reference J&B_HR) and one allocated mineral site (Hams Lane, Lea Marston, site reference HL9). The study area for materials is the region in which that Part of the Proposed Development sits in. For Part 1b this is the West Midlands. A worst-case of one region is taken rather than adding the availability of materials from two regions together for Part 1b. Only safeguarded mineral and waste sites in the Proposed Development are considered in the assessment. A cumulative assessment for materials and waste is not proposed since:

Consultee	Topic	Comment	How and where addressed
		derived from the adopted Waste Core Strategy is well out of date. Figure 3.1 reflects the position as of 2009 and therefore will need to be updated	As part of their planning function, Waste Planning Authorities (WPA) are required to ensure that enough land is available to accommodate facilities for the treatment of all waste arising in the area, either within the WPA area, or through export to suitable facilities in other areas; Minerals Planning Authorities (MPA) are similarly required to ensure an adequate supply of minerals, sufficient to meet the needs of national and regional supply policies, and local development needs; In preparing their waste management strategies, the WPAs already take into account waste generation at the regional and sub-regional scale, since these are the figures which are then used for determining the need for waste facilities. The landfill void capacity remaining (which is used to evaluate the effects of the Proposed Development) already takes into account the cumulative effects of waste generated by other

Consultee	Topic	Comment	How and where addressed
			developments, and hence a separate cumulative impact assessment is not required for waste. It is, therefore, not necessary or feasible for each development within the region to, in effect, duplicate the function of the WPA as part of the EIA process; and It is assumed that each of the cumulative developments will also be considering and implementing the waste hierarchy as per requirements set out in The Waste (England and Wales) Regulations 2011 (Ref. 2). The materials assessment is conducted at a regional level not at a local authority level and the materials data published by the Minerals Products Association for each region is deemed to be the most up to date available at a regional level. No changes to Table 21-5 are proposed. If the Mineral Products Association update their Profile of the UK Mineral Products Industry data (currently the 2023 edition) this will be incorporated in the PEIR and ES.

Consultee	Topic	Comment	How and where addressed
			Mitigation measures will be considered and implemented where applicable including identifying, securing and using materials that already exist on site, or can be sourced from other projects, balancing the cut and fill and maximising the use of renewable materials and materials with recycled content. The Warwickshire Waste Core Strategy Adopted Local Plan (2013-2028) (Ref. 3) is deemed to be the current policy. Existing waste sites from the latest Environment Agency is provided in Chapter 18: Materials and Waste (PEI Report Volume 2). There are no permitted waste sites or waste site applications in the Proposed Development in Part 1b or Part 2 (cover Warwickshire).

2. References

- Ref. 1 Institute of Sustainability & Environmental Professionals (ISEP) (2020). Guide to: Materials and Waste in Environmental Impact Assessment, Guidance for a Proportionate Approach. Available at: <https://www.isepglobal.org/media/0t5fwyhj/iema-materials-and-waste-in-eia-march-2020.pdf> [Accessed 10/11/2025].
- Ref. 2 The Waste (England and Wales) Regulations 2011 (as amended). Available at: <https://www.legislation.gov.uk/ukxi/2011/988/contents> [Accessed 10/11/2025].
- Ref. 3 Warwickshire County Council (2013) Warwickshire Waste Core Strategy – Adopted Local Plan 2013-2028. July 2013.