

Appendix 22-PD-1: Consultation

Table of Contents

1.	Introduction	1
----	--------------------	---

Tables

Table 1: Scoping Opinion Responses	2
--	---

Appendix 22-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 the Environment Agency, Natural England, Historic England and local planning authorities in relation to water environment and flood risk.

1.2 Scoping Opinion and Additional Consultation

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 Scoping Report (**Appendix 5-PD-1** in PEI Report **Volume 4**) was issued on 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 agriculture and soils.
- 1.2.3 Following receipt of the 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 water environment and flood risk.
- 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 agriculture and soils.

Table 1: Scoping Opinion Responses

Consultee	Topic	Summary of comment	How and where addressed
PINS	Disturbance of existing contamination in groundwater during construction	This matter is proposed to be scoped out on the basis that disturbance on existing groundwater contamination has been scoped in for assessment in Chapter 14: Ground Conditions. The Inspectorate agrees with this approach and on this basis agrees this matter can be scoped out from the Water Environment and Flood Risk aspect chapter.	Noted, no further assessment undertaken within the PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk on this matter.
PINS	Deterioration of groundwater quality in aquifers, GWDTEs, abstraction points and WFD waterbodies by disturbance of existing contamination during construction	This matter is proposed to be scoped out on the basis that this aspect has been scoped in for assessment in Chapter 14: Ground Conditions. The Inspectorate agrees with this approach and on this basis agrees this matter can be scoped out from the Water Environment and Flood Risk aspect chapter. However, the ES should provide cross references to the water chapter where relevant.	Noted, no further assessment undertaken within the PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk on this matter. Cross-references have been provided where relevant.
PINS	Increase in residual risk of flooding from reservoirs during construction	This matter is proposed to be scoped out during construction on the basis that Parts 1a, 1b, 4a and 4b are not located in proximity to the risk of flooding from the Daventry and Drayton reservoirs. On this basis, the Inspectorate agrees that these parts of the proposed development are not likely to result in significant risk of flooding of canals during construction in these areas of the proposed development, therefore this matter can be scoped out of the ES.	Noted, no further assessment undertaken within the PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk on this matter.

Consultee	Topic	Summary of comment	How and where addressed
PINS	Increased risk of flooding from canals during construction	This matter is proposed to be scoped out on the basis that there will be no temporary works in parts 1a, 1b, 3 and 4b. On this basis, the Inspectorate agrees that these parts of the proposed development are not likely to result in significant risk of flooding of canals during construction in these areas of the proposed development, therefore this matter can be scoped out of the ES.	Noted, no further assessment undertaken within the PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk on this matter.
PINS	Reduction in water available for abstractors from the Rivers Tame and Trent during operation	This matter is proposed to be scoped out on the basis that there will not be a reduction in available water as abstractions in these areas will not be sourced from the rivers Tame and Trent. The applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of this scoping opinion) requesting for parts 1b, 2 and 3 to be scoped in for potential impacts from available water used for abstraction, on this basis the Inspectorate does not agree to scope out parts 1b, 2 and 3. The Inspectorate does agree to scope out parts 4a and 4b. The ES should provide an assessment of the likely significant effects on available water used for abstraction from the operation of the proposed development and provide evidence demonstrating agreement with relevant consultation bodies.	This comment is a misinterpretation of the Scoping Report. The intention was to point out that some specific impact sources and pathways are only relevant to certain parts of the scheme. We did not intend to scope out potential abstractor impacts for Parts 1b, 2, 3, 4a, or 4b generally (i.e. from general scheme operation and construction); the intention was to highlight that the specific impact source of reduced river flow in the Tame and Trent from the operation of Part 1a only has an impact pathway to abstractors in the Tame and Trent catchments, and no other part of the scheme. The PEI Report considers potential impacts on abstractors at all parts due to scheme construction or operation (see the PEI Report Volume 2 Chapter 22: Water Environment and Flood Risk section 22.4 Scope of Assessment).

Consultee	Topic	Summary of comment	How and where addressed
PINS	Sediment transport changes and hydroecological condition deterioration in the Rivers Tame and Trent during operation	This matter is proposed to be scoped out on the basis that the diversion of the Minworth Wastewater Recycling Centre discharge does not have the potential to change water levels and flow velocities in the Rivers Tame and Trent. Table 22-29 refers scoping out this aspect out for parts 1b, 4a and 4b only and does not refer to part 2. On the basis of the information provided in the scoping report, the Inspectorate agrees to scope this matter out, however clarity should be provided in the ES regarding which parts are to be scoped out.	Noted, further explanation / clarification on parts scoped out is provided in the PEI Report Volume 2 Chapter 22: Water Environment and Flood Risk (section 22.4 Scope of Assessment).
PINS	Deterioration of water quality in the Rivers Tame and Trent, the canal network and the Daventry and Drayton Reservoirs during operation	This matter is proposed to be scoped out on the basis that as these areas are 'controlled sites' and therefore there is no change to water levels and flow that could impact water quality. The applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of this scoping opinion) requesting for parts 1b, 4a and 4b to be scoped in for the potential due to potential discharges across all areas of the GUC transfer, on this basis the Inspectorate does not agree to scope out parts 1b and 2. The ES should provide an assessment of the likely significant effects on water quality from the proposed development and provide evidence demonstrating agreement on this matter with relevant consultation bodies.	This is a misinterpretation of the Scoping Report. The intention was to point out that some specific impact sources and pathways are only relevant to certain parts of the scheme. In this case, we intended to convey that the impact pathway of changes in the quality condition of controlled waters due to scheme operation is not relevant to the pipeline routes (1b and 4b). Refer to the PEI Report Volume 2 Chapter 22: Water Environment and Flood Risk (section 22.4 Scope of Assessment) for further details of matters scoped in / out of assessment. This chapter provides an assessment of the likely significant effects on water quality from the Proposed Development.

Consultee	Topic	Summary of comment	How and where addressed
PINS	Increase in flood risk from canals during operation	This matter is proposed to be scoped out on the basis that these areas of the proposed development are not located in proximity to the canal sections. On this basis, the Inspectorate agrees that these parts of the proposed development are not likely to result in significant risk of flooding from canals during operation, therefore this matter can be scoped out of the ES.	Noted, no further assessment undertaken within the PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk on this matter.
PINS	Changes to flow patterns and sediment mobility during operation	This matter is proposed to be scoped out on the basis that maintenance works that would alter sediment mobility would not be required in these parts of the proposed development. On this basis, the Inspectorate agrees that these parts of the proposed development are not likely to result in significant risk of changes to sediment mobility, therefore this matter can be scoped out of the ES	Noted, no further assessment undertaken within the PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk on this matter.
PINS	Study area	The scoping report states that the study area is defined as a 1km buffer around the EIA Scoping Boundary, however it is not clear where this study area has been derived. The ES should contain robust justification for the study areas, citing the likely extent of significant effects and any relevant guidance used.	The study area is further described in the PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk (section 22.5).
PINS	Existing baseline – flood risk and water capacity	The scoping report states in the existing baseline several other named reservoirs and waterbodies which are located within all parts of the proposed development which have a risk or residual risk of flooding. Given that the construction activities to raise banks and works to structures along the	The potential for impacts related to changed flows and changes in canal structure/assets to accommodate the Proposed Development is assessed in the PEI Report Volume 2, Chapter 22: Water Environment and

Consultee	Topic	Summary of comment	How and where addressed
		route of the GUC and the operation of the GUC with the transfer of water and abstractions, it is currently not clear whether receiving or hydrologically connected waterbodies and the fluvial floodplain would be impacted by the operation of the GUC. For example, the capacity for abstraction capabilities during prolonged periods of dry weather or an increase in water in the GUC system and the potential for breaching infrastructure. The ES should make clear how operation of the GUC may impact other connected waterbodies as a result of its operation. The applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of this scoping opinion) on this matter.	Flood Risk , with the assessment to be further refined at the ES stage.
PINS	Data and modelling	The scoping report has used modelling and data to assess the potential impacts on water resources, flooding and water quality from the proposed development. The applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of this scoping opinion) as it appears that some of the data and modelling does not reflect the current sources information available, therefore any conclusions used in the assessment of likely significant effects from this data and modelling maybe be inaccurate. The applicant should consult with relevant consultation bodies to ensure that the data used to inform the ES to assess the likely significant effects on water	Further modelling updates (water quality, hydrological and hydraulic) have taken place across several scheme parts using up-to-date information, to feed into the PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk and ES; this includes updating the River Tame river model for flood compensation assessment and design. The Environment Agency have been consulted on the modelling scopes, and consultation will continue through to the ES stage and DCO submission.

Consultee	Topic	Summary of comment	How and where addressed
		resources, flood risk and water quality are based on up-to-date information.	
PINS	Study area - WFD waterbodies	The scoping report states that the study area for the water environment has been determined by hydrological receptors connected to the proposed development, in addition to a 1km buffer around the scoping boundary and a wider buffer for the zone of influence where hydrological features are deemed relevant. A summary of the waterbodies which interact or cross the proposed development has been provided appendix 12-3. However, it appears that some WFD waterbodies or tributaries of these which interact or cross the proposed development have not been included within the figures provided. Therefore, it is not clear to what extent those WFD waterbodies have been taken into account in the assessment. The applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of this scoping opinion) on this matter. The ES should provide an assessment of all affected waterbodies including WFD bodies and provide maps to scale that identifies those waterbodies that are considered in the assessment of likely significant effects.	The Study Area is outlined in PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk (section 22.5). Updated figures showing all waterbodies are provided in Figure 22-P1-2; Figure 22-P2&3-2 and Figure 22-P4-2 in PEI Report Volume 3 .
Environment Agency	Flood Risk and Climate	Impact The impact of climate change on flood risk to and from the development could be underestimated if	Discussion on the impact of future climate change is included within the PEI Report Volume 2, Chapter 22: Water Environment

Consultee	Topic	Summary of comment	How and where addressed
		the lifetime of the development is beyond 100 years as UKCP18 data is limited to the year 2100. Solution It is important that a credible maximum climate change scenario is tested within any flood risk hydraulic modelling so that the impacts of flood risk to the development and the impacts of flood risk from the development can be understood if climate change projections were to increase. This is particularly important for receptors which are in areas of flood risk such as Minworth Advanced Water Treatment Plant (AWTP) and the abstraction and treatment facilities within Part 4a of the scheme.	and Flood Risk and PEI Report Volume 4, Appendix 22-5 Flood Risk Assessment.
Environment Agency	Risk of flooding from canals	Risk of flooding from the canal in both the construction and operation phases has been scoped in. If not properly assessed, flood risk may not be accurately represented. Assessments of the capacity of the canal and the impacts increasing the water in the canal may have on the risk of overtopping and breaching current infrastructure should be undertaken. Appropriate mitigations are also required for any increases in risk. When raising parts of canal walls and infrastructure within the project to reduce the risk of overtopping, bypass channels and/or flow routes which connect to flood plains will need to be raised in accordance and not disconnected.	Noted, this has been included in the PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk and PEI Report Volume 4, Appendix 22-5 Flood Risk Assessment.

Consultee	Topic	Summary of comment	How and where addressed
Environment Agency	EIA Scoping Report – Table 14-20 Magnitude of impact and descriptions	Discussion on the use of LA113 for impacts to groundwater. Impact Potential for lack of clarity over the magnitude of WFD impacts posed by the Project Solution Recommend that the applicant provides greater clarity over the proposed impact magnitude classifications regarding WFD waterbody status. We presume that the applicant's intended meaning is as follows: If the Project in isolation were likely to change a waterbody's WFD class from Good to Poor or prevent a waterbody from improving from Poor to Good this would be considered major adverse. If the Project in isolation were not sufficient to impose this magnitude of change but is likely to be a contributing factor to such a change, that this would qualify as a moderate adverse magnitude.	The LA113 method is well established and provides flexibility for assessing receptor sensitivity and impact magnitude. It is not intended to be prescriptive. The issue of deterioration in class relates to the ECJ Ruling on the Bund case and relates to the lowest class which is Bad, not Poor (for some elements); there is also no central government guidance on WFD assessment which makes this clear. In any case, impacts on WFD elements will be assessed on a case by case basis.
Environment Agency	Thames River Basin Management Plan	The list of information sources omits the Thames River Basin Management Plan, which is potentially a significant oversight. As Part 4b of the Proposed Development passes through groundwater and surface water bodies within this RBMP area, and all WFD groundwater bodies are also Drinking Water Protected Areas, the baseline assessment should include a review of all relevant River Basin Management Plans.	Applicable River Basin Management Plans are listed in Table 22-3, although the Thames RBMP is not included. AECOM will review the need to include the Thames RBMP.

Consultee	Topic	Summary of comment	How and where addressed
Environment Agency	Hydrogeological Risk Assessment and Drilling Fluid Breakout Plan	The proposed pipeline routes cross various watercourses, including a Main River (River Tame), WFD waterbody (Dog Lane Brook), and seven Ordinary Watercourses, with trenchless methods like horizontal directional drilling (HDD) and pipe jacking anticipated for these crossings. However, the report does not reference a Hydrogeological Risk Assessment or Drilling Fluid Breakout Plan, which are necessary to manage risks such as fluid loss, contamination mobilisation, and impacts on local water abstractions and groundwater quality, especially over longer distances or near sensitive receptors.	A Frac-out / break out plan to be included in the outline CEMP.
Environment Agency	Groundwater quality deterioration	Potential deterioration of groundwater quality resulting from accidental spillage during the operational phase, but no other potential source of deterioration of groundwater quality. Potential for contamination impact to groundwater quality resulting from leakage or overflow of the GUC or leakage from other transfer infrastructure has not been discussed.	The need to assess this impact pathway and will be reviewed and to be discussed with the EA as part of ongoing engagement.
Environment Agency	EIA Scoping Report – Appendix 7-2 Water Framework Assessment Screening Assessment	Table 5-4 'Groundwater scoping assessment summary table' presents a summary of each identified WFD Groundwater body within the Scoping Area, and whether this is proposed to be Screened In or Out for further assessment. The rationale for selecting which element of the Proposed Development (i.e. which Part) may	Discussion on what is scoped in for assessment is included in PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk.

Consultee	Topic	Summary of comment	How and where addressed
		impact specific WFD Groundwater bodies appears to include some errors or omissions. The Applicant should check and confirm which WFD Groundwater Bodies may potentially be affected by each Part of the Proposed Development.	
Environment Agency	EIA Scoping Report – Section 3.4.11 and 3.5.31	"The report states that the Part 1b EIA Scoping Boundary crosses several key features including an area safeguarded for High Speed 2 (HS2), at West of Hams Hall Substation. No specific crossing methodology is defined at this stage. We anticipate that there will be established lateral and vertical easements relative to current and future HS2 assets at the crossing location that may affect the crossing methodology and design at West of Hams Hall Substation. This may complicate achieving the desired transfer flows within Part 1b. It is anticipated that the HS2 team would hold groundwater monitoring data for the vicinity of the crossing, which would assist in understanding local ground conditions and hydrogeological characteristics. The Applicant is advised to contact the HS2 team (HS2enquiries@hs2.org.uk) to discuss the proposed crossing methodology for the Proposed Development, the timescale for HS2 scheme construction at this location relative to that of the Proposed Development, and to request copies of	The design team is engaging with HS2 on the crossing of HS2. Baseline information used within the assessment is included the PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk .

Consultee	Topic	Summary of comment	How and where addressed
		groundwater level monitoring data local to the crossing point which may be held by the HS2 project team."	
Environment Agency	EIA Scoping Report – Table 14-17	"The table presents potential construction phase effects proposed to be Scoped In or Out of further assessment. Effects on groundwater are Scoped In, with a list of activities and effects provided in the table. Dewatering activities are listed as a potential cause of mobilisation and migration of existing potential sources of contamination in the Potential Effects section but referred to as groundwater abstractions in the Rationale section. This could potentially cause confusion in the reader, and it is recommended that this activity is described consistently. An informative about construction dewatering is provided at the end of this response."	The PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk includes dewatering as a construction phase activity which may potentially result in an effect on groundwater.
Environment Agency	Sustainable Drainage Systems (SuDS)	The report states that surface water drainage strategies will be prepared to manage runoff from key aspects of the Proposed Development, but does not explicitly commit to following the principles of Sustainable Drainage Systems (SuDS). It is noted that the strategies will align with current policy and guidance, and involve liaison with relevant Lead Local Flood Authorities.	SuDS have been included in the PEI Report Volume 4, Appendix 22-5 Flood Risk Assessment, and will be incorporated into the design where possible.

Consultee	Topic	Summary of comment	How and where addressed
Environment Agency	Interaction between surface water and groundwater	The report acknowledges inherent uncertainty regarding the interaction between surface water and groundwater, which will be better understood through data collection. Careful consideration of these interactions is necessary when assessing impacts on water-dependent sites. This consideration applies not only to GWDTEs but also to aquatic habitats and surface water interactions.	Noted. The interaction between surface water and groundwater will be considered and understood through data collection.
Environment Agency	Storage at Daventry and Drayton Reservoirs	Careful assessment is required to ensure sufficient capacity at Daventry and Drayton Reservoirs for water storage. If not accurately assessed, the risk of overtopping may increase. The applicant should evaluate the increased water input, conduct overtopping and breach analyses, and mitigate any increased risks while maintaining the reservoirs' conditions.	Storage in both reservoirs will be controlled by employing flow monitoring and level controls at the intake to the pumping station and monitoring for the delivery into the new pipeline and for delivery from the pipeline into each reservoir at the new discharge structures. There will also be flow monitoring and level sensors at the discharge structures back into the canal. (section 22.11, Chapter 22: Water Environment and Flood Risk in PEI Report Volume 2). Check if JCB/WSP are doing any modelling on this
Environment Agency	Information about dewatering	If dewatering is required, it will require an abstraction licence if it doesn't meet the criteria for exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. It may also require a discharge permit if it falls outside of our	Noted. The Principal Contractor will determine, and apply for, permits and consents where required.

Consultee	Topic	Summary of comment	How and where addressed
		regulatory position statement for de-watering discharges.	
Environment Agency	Sustainable Drainage Systems (SuDS)	Infiltration SuDS should be used, but for clean water, as they may provide a pathway for pollutants. Maximum depths are noted, with deep bores are not appropriate where groundwater is a significant resource. SuDS should be constructed in line with good practice.	Noted. SuDS have been included in the PEI Report Volume 4, Appendix 22-5 Flood Risk Assessment , and will be incorporated into the design where possible
Environment Agency	Pipeline crossing the River Tame	The pipeline plans between Minworth and Atherstone cross the River Tame, requiring the crossing to be appropriately below the riverbed to avoid impacting the watercourse. If not sufficiently low, it could cause erosion of the riverbed and adverse effects on the watercourse. The crossing should be designed to mitigate any potential impacts on the watercourse.	Noted, the HDD crossing will be appropriately designed to avoid erosion of the riverbed.
Environment Agency	Disruptions to connections between fluvial watercourses and canals	The applicant plans to raise embankments along some canal sections due to increased water volume, which may disrupt the connection between fluvial watercourses and the canal during floods. This disruption could push floodwaters elsewhere, increasing flood risk. The applicant should assess and demonstrate that any disrupted connectivity between the fluvial floodplain and the canal does not increase offsite flood risks.	Noted, this will be reviewed and discussed with the EA during engagement and will be assessed as part of the Flood Risk Assessment development during both the PEI Report and ES stages.

Consultee	Topic	Summary of comment	How and where addressed
Environment Agency	Omission of EA Asset Management and Tamworth Borough Council	The EA (Asset Management) and Tamworth Borough Council are missing from the Scoping Opinion section 22.3.6. Reduced flow in the Tame could impact gauging stations at Lea Martson and Tamworth, and affect the abstraction licence at Cherry Holme paleochannel held by the council. These consultees should be included in the post-EIA scoping.	Noted, Tamworth Borough Council was not consulted by PINS as part of the Scoping Opinion. The requirement will be included with consultation with Tamworth Borough Council and the EA Asset Management team.
Environment Agency	Omission of ordinary watercourses and wider waterbody catchments	There is concern that ordinary watercourses and wider waterbody catchments may be omitted from further investigation or assessment. It is unclear if the Break Pressure Tank is connected to the unnamed ordinary watercourse specified in Scoping Opinion section 22.5.47. Merevale Lake is also not classified as a WFD waterbody, when it is online to Innage Brook WFD waterbody. The WFD assesses waterbody status and compliance for entire catchments, not just the main WFD river line. Some catchments may have in-waterbody problems from historic work which are not flagged at WFD outflow or sample points. WFD waterbody catchments and ordinary watercourses should be considered in all assessments and not just the statutory river layers.	Noted, we will consider if other ordinary watercourses need assessment as part of the WFD assessment. We will consult with the EA at PEI Report and ES stages, and they will be kept apprised of our progress with the WFD assessment.
Environment Agency	Chapter 22 - Water Environment & Flood Risk CONSTRUCTION	Issue Details of water supply and demand are not described in the project description of the construction phase. Activities described such as trenchless techniques (Horizontal directional drilling) and washing and dust suppression can	ECI and design teams to review the requirement for water as a result of environmental mitigation (such as dust suppression) and construction techniques and consider whether information can be provided as part of the ES submission.

Consultee	Topic	Summary of comment	How and where addressed
		require significant volumes of water in combination. Impact If a mains water connection is not practical, other sources of supply need to be considered. This can mean increased haulage on roads from water tankers, or consideration of a licence to abstract from surface water. Solution We recommend a basic water supply strategy /assessment for consumptive uses of water during construction as this can often be overlooked pre commencement. This should also consider permits required and appraise all sources of supply options.	
Environment Agency	"Main Report – Chapter 3 - Site description Ch3 - 3.2.11"	Issue Mitigation for the reduction of flows in the River Tame and Trent downstream includes the operation of controlled releases from Daventry and Drayton reservoirs. Lead times for the switch in supply from Minworth to the reservoirs is not yet made apparent. Impact The gradual process of ramping up and down of flows described in the project description does not feel conducive to a responsive or agile process	The assessment of Hands of Flow (HOF) constraint on the Trent will be included as part of the ES assessment at DCO.

Consultee	Topic	Summary of comment	How and where addressed
		should triggers be met to move from one supply to another. Solution Whilst these receptors are scoped in, the EA seeks to have confidence that appropriate triggers can be set in relation to the North Muskham hands off flow threshold to operate this mitigation and assurance that the lead times for operation are proportionate to the changeability of low flows when licence cessations are put in place and removed.	
Environment Agency	Impacts on navigation in the Rivers Tame and Trent	The potential impact on navigation caused by reduced flows in the Rivers Tame and Trent is not included. Statutory navigation levels in the River Trent could be compromised, especially during prolonged dry weather and drought, without proper mitigation. The impact on maintaining navigation levels should be included in the assessment until there is sufficient confidence in the proposed mitigation to negate this risk.	The modelling assessments completed at RAPID Gate 3 (which include climate change) have demonstrated the scheme will not have a material impact on water levels in the navigable sections of the non-tidal Trent. Further modelling will be undertaken for the EIA, for an extreme climate change scenario, to ensure a range of impact scenarios have been considered.
Environment Agency	Flood risk vulnerability	The Scoping Opinion does not describe the vulnerability classification of the proposed development, which is crucial for assessing climate change impacts. This classification needs to be determined and presented in the Environmental Statement and Flood Risk Assessment.	The flood risk vulnerability classification of each part of the scheme has been defined through the Flood Risk Assessment process.

Consultee	Topic	Summary of comment	How and where addressed
Environment Agency	Main Report – Chapter 3 - Site description 3.5.67	Issue There is insufficient detail regarding the abstraction required to top up the Daventry and Drayton reservoirs. Impact If increased quantities of water are to be released from the reservoirs to supply Affinity Water, this poses an increased demand from the GUC outside of normal operation of the transfer. The Abstraction point proposed for the GUC to top up Drayton & Daventry reservoirs (north of the Braunston tunnel) falls within waterbody GB109054044120 - Leam - source to conf Rains Bk. This catchment is closed to further abstraction. More information can be found here.	The reservoirs will be topped up using flow from the canal received via the Atherstone discharge for the Scheme - it will not require additional abstraction from any catchment.
Environment Agency	Table 22-29 Reduction in water available for abstractors from the Rivers Tame and Trent	Issue: The scoping report describes modifications to Daventry and Drayton reservoirs to maximize capacity for the scheme, but the annual capacity they can provide is unclear. Impact: If the reservoirs cannot sustain the scheme's requirements, it is uncertain whether the scheme will continue at the expense of the Tame and Trent or cease, affecting Affinity Water's supply.	Noted.

Consultee	Topic	Summary of comment	How and where addressed
Environment Agency	Abstraction licences	The Scoping Opinion highlights that abstraction licences on the Tame and Trent have been identified, but other licences within the same catchments are missing. Hands off flow licence conditions are determined by downstream and local availability, and can be set upstream or downstream of the abstraction point if no local gauging stations exist. The recommendation is to expand the scope of affected licences beyond the Tame and Trent to cover the entire catchment area.	Abstraction licence holders linked to flow conditions in the affected watercourses (Tame and Trent) were requested and used during Regulators' Alliance for Progressing Infrastructure Development (RAPID) Gate 2 and Gate 3 assessments.
Environment Agency	Abstraction licencing strategies	The report does not explore abstraction licensing strategies detailing water availability in catchments and sensitive areas, and incorrectly references Anglian CAMS. The proposal affects multiple CAMS catchments across the West Midlands, East Midlands, Lincs and Northants, and East Anglia. A comprehensive appraisal of all abstraction licensing strategies is recommended to better understand the risks of reduced water availability in the affected water bodies.	Noted, abstraction licensing to be reviewed and discussed during regular engagement with the EA.
Environment Agency	Chapter 22 – Water environment and flood risk	"Issue The (re-)abstraction points proposed at Bletchley and Leighton Buzzard are in the Upper and Beford Ouse CAMS catchment. Currently, CRT transfer water to the GUC from the river Tove at Stoke Bruerne or Great Ouse at Cosgrove for the purpose of maintaining navigation levels. These are subject to transfer licences held by CRT which	Modelling has been undertaken at RAPID Gates 2, 3 and for the EIA which demonstrate that losses are fully understood and have been taken account of in the diversion volumes required in order to achieve the required deployable output for the scheme. The Scheme will not result in additional abstraction to the canal from any

Consultee	Topic	Summary of comment	How and where addressed
		restricts abstraction to protect the Tove. It is understood that the re-abstraction described in Part 4 of the proposal is designed to be entirely supported by the discharge from Minworth (or alternatively Drayton/Daventry reservoirs). Additionally, we agree that an increased amount should be discharged than is abstracted to allow for losses. Impact If losses are not understood fully, there is the possibility that the water discharged does not fully compensate for the water abstracted resulting in a consumptive abstraction. An abstraction licence issued for a non-consumptive operation would be an unrestricted transfer licence however a consumptive abstraction which incurs losses from the Tove or Great Ouse, would be restricted to flows above Q32. Solution The EA would seek confidence from modelling outputs of the level of risk of losses occurring between Minworth and Leighton Buzzard resulting in reduced levels in the GUC which result in impacts to receiving waterbodies or increases to the abstraction required from the Tove or Great Ouse rivers. The impact to these rivers should therefore be scoped in as part of this assessment."	other catchment and this will be demonstrated as part of the ES.

Consultee	Topic	Summary of comment	How and where addressed
Environment Agency	"Main Report – Chapter 3 - Site description; 3.5.41 "	The proposal describes improvements or other works to structures along the route of the GUC to enable increased volumes of water during the transfer. These include raising the height of banks and weirs. The subsequent impact on receiving water bodies has not been scoped into assessment.	The assessment at ES stage will consider updated water resource and hydraulic modelling of the canal which quantifies potential changes to watercourse discharges from the scheme operation.
Environment Agency	GUC EIA Scoping Report V1 Main report/22.5.7	Water Quality Monitoring Locations and results Impact Insufficient information. Only 2 monitoring locations identified which relate the monitoring of the River Tame and the impact of the reduction of effluent into the River and the associated impact on the River Tame i.e. a depleted reach. During Gates 2 and 3, more locations downstream of Minworth WwRC were monitored and should be listed here. As well, reference of impact of the Minworth discharge only references sanitary determinands and it should include other polluting substances and chemicals, nutrients and temperature. Solution Addition of the other monitoring locations on the River Tame should be added to this paragraph. Addition of the other polluting substances, nutrients, temperature should be added to the paragraph."	Further details in the ES of all monitoring locations used to gather data on the impact of the scheme on the River Tame, including monitoring undertaken during previous Gate will be provided.

Consultee	Topic	Summary of comment	How and where addressed
Environment Agency	Table 22-28 Impacts on Surface Water Quality	All project parts are scoped in which is good. But only reference is made to dissolve oxygen as a pollutant caused by sediment disturbance. Impact Sediment disturbance can release other pollutants including heavy metals and chemicals into the water column such as oils and chemicals. Solution Addition of wording to include the potential of other pollutants such as oils/fuels, chemicals, heavy metals and other pollutants can be released from the sediment when it is disturbed.	The assessment for PEI Report and ES will include all potential pollutant risks, including temporary construction sources and contaminated sediment disturbance in the canal
Environment Agency	Consulting the Environment Agency on flood risk	The Environment Agency will be consulted on water quality, abstraction licence impacts, and WFD impacts, but should also be consulted on flood risk due to elements of the development being at risk from Main Rivers. Missing this consultation could overlook important flood risk aspects. It is recommended to consult the Environment Agency on flood risk, especially near Main Rivers or within Flood Zones 2 or 3, and for the scheme's overall flood risk management.	Flood Risk for the scheme will be discussed with the EA during engagement during PEI Report and ES stages.
Environment Agency	Future Baseline 22.5.200/ 22.5.201/ 22.5.202	Issue Future baseline scenario for WQ modelling of the Tame/Trent depleted reach does not consider future changes to discharge flow due to growth or river flow due to climate change. Impact	Summary of Water Quality Monitoring is included in the PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk . Water Quality Monitoring is discussed with the EA as part of ongoing engagement.

Consultee	Topic	Summary of comment	How and where addressed
		The ability to assess the impact of the transfer on the Tame/Trent depleted reach requires accurate future baseline scenarios that incorporates future changes in discharge quality, flow and river flows.	
Environment Agency	Water Monitoring Programmes	Issue Continuation of hydrological monitoring and water quality monitoring programmes, as well as further model simulations for the rivers Tame and Trent, the GUC and Daventry and Drayton Reservoirs (Parts 1a, 2 and 3) Impact Lack on detail on WQ modelling methodology.	Summary of Water Quality Monitoring is included in the PEI Report Volume 2, Chapter 22: Water Environment and Flood Risk . Water Quality Monitoring is discussed with the EA as part of ongoing engagement.
Environment Agency	Dissolved Oxygen Monitoring	2D dissolved oxygen modelling is also to be completed for the stretch of the River Tame between Minworth WwRC and Lea Marston lakes. Impact Agreed in Gate 3 comments that River Tame/Trent temperature will also be assessed using the 2D model.	Temperature as well as DO is a key output of the 2D modelling being undertaken on the Tame and has been used in the PEI Report, and will be used in the ES assessments
Environment Agency	Expansion of water quality impacts	The consideration of water quality impacts is limited to sanitary determinands, dissolved oxygen, and other polluting substances, omitting nutrients and temperature. The impact of the scheme on temperature within the Tame Trent depleted reach and receiving GUC will need to be addressed and considered. Also explicitly specify that nutrients will be considered in the assessment.	Water quality determinands have been agreed as part of ongoing engagement with the EA.

Consultee	Topic	Summary of comment	How and where addressed
Environment Agency	Flood risk hydraulic modelling	The River Tame is the main source of fluvial flooding for Minworth Advanced Water Treatment Plant (AWTP), and this risk has been assessed in the Flood Risk Assessments for Minworth AWTP and the pipeline to Atherstone. However, the flood risk hydraulic modelling held by the Environment Agency for the River Tame is outdated and may not reflect current and future flood risks. Using outdated information could lead to inaccurate Flood Risk Assessments. The Environment Agency would like to review the Flood Risk Assessment for Minworth AWTP and the pipeline transfer to Atherstone, noting that the existing modelling was completed in 2009 and 2013 and may need updates, especially regarding climate change allowances.	The hydraulic model of the River Tame is being reviewed and updated as part of the Flood Risk Assessment and EIA work to also include updated climate change scenarios.
Environment Agency	Water quality monitoring omission	The issue is that WQ modelling for Daventry and Drayton reservoirs has been omitted, which is necessary to assess the impact of the GUC discharge on water quality. The solution is to acknowledge the need for this modelling, using EA's PR24 WINEP supporting guidance for discharges into lakes and reservoirs.	Water quality assessment of the reservoirs is being undertaken to support the ES.
Environment Agency	Canals and Hydromorphology	Whilst the above statement is patently true, there are areas of canals that have developed hydromorphological features over the time that the canals have been in existence, especially where moving water is present (albeit temporarily in most cases). To discount hydromorphology within the canal, just because the watercourses were created artificially over 200 years ago, may lead	Canals are discussed as features with the WFD assessment, and within Chapter 22 of the PEI Report.

Consultee	Topic	Summary of comment	How and where addressed
		to an underappreciation of supporting habitat and potential ecological niches. Solution Treat the canal as a linear lake and consider morphological features that may have developed over time and that may support ecological features and habitats.	
Environment Agency	Pipeline crossings of WFD waterbody	The proposed pipeline route also crosses the WFD waterbody, Dog Lane Brook to the east of Kingsbury Water Park (see Figure 22-5, Sheet B). The proposed pipeline also crosses seven Ordinary Watercourses along its route based on ordnance survey mapping. One of the proposed access and working areas also crosses an unnamed Ordinary Watercourse near to Drybrooks Woods” – The maps don’t show the crossings of ordinary watercourses. Impact For WFD purposes, all watercourses are part of the WFD catchment, and it is important to know the impact on these tributaries as some tributaries are key in the classification of the waterbody status.	Assessment will ensure all watercourses are assessed in the EIA and WFD whether they are directly WFD classified or otherwise.
Environment Agency	Chapter 22: Water Environment and Flood Risk, Section 22.5.69	This is WFD waterbody ID GB104028042630, which is not designated as artificial or heavily modified, and hydromorphology supporting elements support good status” – The hydromorphology status is Not-High. Impact	Baseline data has been reviewed and updated for the PEI Report and will be rechecked at ES Stage; terminology will be changed as required.

Consultee	Topic	Summary of comment	How and where addressed
		Check hydromorphology status as the morphology classification has recently been changed.	
Environment Agency	Chapter 22: Water Environment and Flood Risk, Section 22.5.158	he River Ouzel (Ouzel US Caldecote Mill Water Body Water Body [WFD water body ID: GB105033037971]) crosses the Part 4a study area and Site B to the west of Little Brickhill. This water body is designated as heavily modified and hydromorphology supporting elements support good potential” – The hydromorphology status is Not-High. Impact Check hydromorphology status as the morphology classification has recently been changed	Baseline data has been reviewed and updated for the PEI Report and will be rechecked at ES Stage; terminology will be changed as required.
Environment Agency	Chapter 22: Water Environment and Flood Risk, Table 22-23: WFD Classifications (Part 4b study area)	The hydromorphology status is Not-High. Impact Check hydromorphology status as the morphology classification has recently been changed	Baseline data has been reviewed and updated for the PEI Report and will be rechecked at ES Stage; terminology will be changed as required.
Environment Agency	Chapter 22: Water Environment and Flood Risk, Table 22-20: WFD Classifications (Part 4a study area)	The hydromorphology status is Not-High. Impact Check hydromorphology status as the morphology classification has recently been changed. Solution Correct the hydromorphology status in all sections.	Baseline data has been reviewed and updated for the PEI Report and will be rechecked at ES Stage; terminology will be changed as required.

Consultee	Topic	Summary of comment	How and where addressed
Environment Agency	Chapter 22: Water Environment and Flood Risk, Table 22-28: Potential effects during the construction phase – Water Environment and Flood Risk	The potential impacts of open cut method on hydromorphology are not listed. It says the Construction works may affect surface water / watercourse flow patterns and sediment mobilisation". However, it can disturb the habitat conditions on the reach affected.	Each watercourse crossing will be assessed based on hydromorphological survey data collated for the EIA alongside the proposed construction methodology as part of the WFD and ES
Environment Agency	Figures Part 10 , Fig 22-16 WFD Surface Waterbodies	What do you mean by 'ordinary watercourses'? Impact For WFD purposes, all watercourses are part of the WFD catchment Solution It would be good if you can mark them as watercourses. All watercourses are WER/WFD watercourses. If a watercourse has a catchment area	Figures for the PEI Report will indicate all watercourses.
Environment Agency	Surface Water Figures	The Risk of Flooding from Surface Water (RoFSW) mapping can indicate flood risk for smaller Ordinary Watercourses but has limitations, such as not including structures or detailed river channels. The direct rainfall method used may not accurately represent fluvial flood risk for some watercourses, and the recent update only includes climate change representation for the 2050s epoch, potentially underestimating flood risk for developments beyond 2060. Therefore, Flood Risk Assessments for smaller Ordinary Watercourses could be inaccurate. While the RoFSW dataset is a useful	Noted, this has been considered within the preliminary FRA and PEI Report however further analysis and engagement with the EA and Lead Local Flood Authority (LLFA) will occur during the ES stage.

Consultee	Topic	Summary of comment	How and where addressed
		starting point, clear justification is needed if relying on it, and more detailed hydraulic modelling may be required to fully understand flood risks.	
Environment Agency	Changes in flow regime impacting fish	The proposal may reduce water flow to the River Tame and Trent, affecting abstractors in those systems. Changes in flow regime at downstream abstraction points could alter approach velocities around intakes, potentially impacting fish through impingement or entrainment. The EIA should assess the risk of increased impingement and entrainment of fish at downstream abstraction points due to the proposal.	HOLD: The impact on fish due to changes in flow and subsequent changes to flow regime around downstream abstraction points is covered in Chapter 12 Aquatic Ecology .
Environment Agency	Modelling – water quality deterioration	The statement that water quality deterioration in the Tame, Trent, canal network, and Daventry and Drayton Reservoir can be mitigated or is minimal based on modelling is assumptive without detailing the modelling results. Deterioration in water quality could lead to fish mortality and stress. Therefore, the results of the modelling and any proposed mitigation should be detailed to support this statement, and this information should be presented in the PEIR.	Details of modelling with regard to water quality deterioration is detailed within the PEI Report and will be updated in the ES as appropriate to the confidence in the evidence and design stage, at the time of publication. The impact of water quality deterioration is the subject of discussion with the EA as part of ongoing engagement.
Environment Agency	Flood Map for Planning dataset	Sections 22.5.27 and 22.5.94 reference the Flood Map for Planning, which has been superseded by new data published on March 25, 2025. The assessment of fluvial flood risk using the outdated Flood Map for Planning is inaccurate. The Flood Risk Assessment should reference the latest Flood Map for Planning dataset, available on the Defra Data Services Platform.	Noted, the updated version of Flood Risk for Planning has been used for PEI Report and will be used for ES.

Consultee	Topic	Summary of comment	How and where addressed
Environment Agency	Flooding from Surface Water dataset	Sections 22.5.29 and 22.5.94 reference the Risk of Flooding from Surface Water dataset, which has been superseded by new data published in January 2025. The assessment of surface water flood risk using the outdated RoFSW mapping is inaccurate. The Flood Risk Assessment should reference the latest RoFSW dataset, available on the Defra Data Services Platform.	Noted, the updated version of Risk of Flooding from Surface Water mapping has been used for the PEI Report and will be used for ES.
Environment Agency	Construction methodologies: access tracks over watercourses	It is assumed that access tracks over watercourses (such as culverts) will be required for vehicles during the construction phase, yet there is no reference within the EIA Scoping report to the proposed vehicle-crossing methodology. Impact Culverts have the potential to fragment habitats and reduces connectivity, making dispersal and commuting for some species difficult. Culverts also put an added pressure on otters during periods of high water-levels, as culverts offer little room for conveyance and put otters at risk of being killed when crossing roads.	Construction methodologies will be reviewed and developed by Early Contractor Involvement (ECI).
Environment Agency	Flood risk to Site B	The River Ouzel flows to the west of Site B, and a small Ordinary Watercourse bisects the site, which lacks Flood Zone mapping due to its small catchment size. This unmodelled watercourse could pose an underestimated flood risk to Site B. To accurately assess flood risk, detailed hydraulic modelling should be undertaken, and if relying on existing flood risk products like RoFSW mapping, clear justification should be provided, considering	Noted, the Ordinary Watercourse that crosses Site B will be reviewed and the modelling approach discussed with the LLFA and IDB during engagement at PEI Report and ES stages.

Consultee	Topic	Summary of comment	How and where addressed
		climate change effects for the development's lifetime.	
Environment Agency	Volume 1: Main Report, Chapter 22 – Water Environment and Flood Risk: Riparian Buffers	There is no reference within the EIA Scoping report to the establishment and maintenance of a riparian buffer during construction of the pipelines or infrastructure. The applicant should ensure there is a sufficient buffer between the development, any fences and any watercourse or ditch. This will allow for the natural river corridor to be maintained and the free movement of riparian mammals up and down the system.	Construction methodologies will be reviewed and developed by Early Contractor Involvement (ECI). Mitigation measures will be developed as the scheme design is progressed and will be discussed with the EA as part of ongoing engagement.
Environment Agency	Hydraulic modelling of the canal network	The section highlights the need for further hydraulic modelling of the canal network and additional modelling if there are extra discharges to surrounding watercourses. Without reviewing the underlying hydraulic modelling, the Flood Risk Assessment for the scheme could be inaccurate. It is recommended to submit any water level hydraulic modelling of the canal network to the Environment Agency for review to ensure the Flood Risk Assessment conclusions are reasonable.	Noted, results from the canal modelling will be used to assess impacts of water level rise within the full FRA at ES stage. EA will be able to see these results.
Environment Agency	Groundwater Source Protection Zones	The Applicant discusses the presence and extents of groundwater Source Protection Zones (SPZs) within the Study Area. The Environment Agency has recently updated Groundwater Source Protection Zones (SPZs) which have currently yet to be updated in MAGiC online	SPZ data have been reviewed and updated for the PEI Report.

Consultee	Topic	Summary of comment	How and where addressed
		maps, therefore the SPZ extents shown on that system may be inaccurate.	
Environment Agency	Groundwater Source Protection Zones	Various route options for Part 4b of the Proposed Development pass through designated groundwater SPZ1 and 2. Impact Some of the route options pose a greater risk of impact to groundwater SPZ1 and SPZ2 than alternatives.	Route options will be chosen through analysis of a number of constraints, including environmental, but also including engineering, planning and cost.
Environment Agency	Groundwater abstractions as receptors	The report lists sensitive controlled water receptors, which includes surface water features, groundwater aquifers and groundwater Source Protection Zones (SPZs) but does not include private or public potable water abstractions or Groundwater Dependent Terrestrial Ecosystems (GWDTEs). Although the list of ecological sensitive sites listed in Table 14-15 includes some GWDTEs this considers sites within 250m only, consistent with the adopted approach to land contamination assessment.	Data have been reviewed and updated for the PEI Report and ES.
Environment Agency	Table 22-28 Potential effects during the construction phase – Water Environment and Flood Risk	The report lists potential pathways considered present regarding land and groundwater contamination. The list does not include all potential groundwater contamination receptors, as these are considered elsewhere in Chapter 22 Water Environment and Flood Risk. However, in Chapter 22 the Applicant proposes to Scope Out construction phase impacts 'Disturbance of existing contamination in groundwater',	Paragraph 14.7.10 of Chapter 14 of the PEI Report Volume 2 states "Potential impacts on Groundwater Dependent Terrestrial Ecosystems (GWDTE), groundwater abstractions and any associated Source Protection Zones, and WFD groundwater bodies will also be considered, where relevant. The scope of assessment will be kept under

Consultee	Topic	Summary of comment	How and where addressed
		‘Deterioration of groundwater quality in aquifers, GWDTEs, abstraction points and WFD waterbodies by disturbance of existing contamination’ on the basis that these items are Scoped In within Chapter 14: Ground Conditions. This introduces contradictory statements, for example impacts to GWDTEs are not specified as pathways in Chapter 14 but are Scoped Out in Chapter 22 based on their inclusion in Chapter 14 of the EIA.	review as additional scheme information becomes available."
Environment Agency	Aquifer Sensitivity	High sensitivity aquifers covered by thin or variable thickness unproductive superficial deposits, e.g. Clay with Flints overlying Chalk bedrock locally along Part 4b of the Proposed Development are not taken into account. Impact Potential for credible impacts to high sensitivity aquifers to be overlooked in some areas where unproductive superficial deposits are recorded at surface.	Chalk aquifers are listed as principal aquifers, and are considered to be of High value.
Chilterns Conservation Board	Impacts on Chiltern Aquifer	Requesting confirmation of whether the Chiltern Aquifer is affected and a detailed assessment of surface water abstractions using a Rochdale Envelope approach, including mapping of catchments and chalk stream sources.	The Water Environment assessment has considered impacts on the Chalk aquifer in the Chiltern area, this includes the Mid-Chilterns Chalk and Chiltern Chalk Scarp WFD groundwater bodies. These WFD groundwater bodies are mapped in PEI Report Volume 3: Figure 22-P4-6 (Part 4 WFD Groundwater Bodies).

Consultee	Topic	Summary of comment	How and where addressed
Natural England	Water quality	Nationally Significant Infrastructure Projects (NSIPs) may affect water quality in areas where strategic solutions to pollution are still being developed and not yet reflected in local planning. The Environmental Statement should assess water pollution risks, including the need for nutrient neutrality, and consider any existing or emerging strategic solutions such as Diffuse Water Pollution Plans to protect sensitive water-dependent conservation sites.	Noted, the EIA will take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans.
Natural England	Water level management strategies	The EIA identifies high risks to water flows and levels in the Tame, Trent, and Humber rivers, with increased use of Hands off Flows (HoFs) potentially leading to ecological changes such as early species migration, algal blooms, and erosion. Future assessments should take a holistic approach, considering not only protected species but also the habitats they rely on, including impacts from prolonged low-flow conditions. Existing canal waste weirs present additional risks to water quality and the spread of invasive non-native species, and the Environmental Statement should clearly outline water level management strategies, including potential benefits from alternative practices like seasonal adjustments.	Noted, a holistic approach to assessment of impacts on the Tame and Trent to be taken. More detail has been provided in the PEI Report, and will also be included in the ES, with regard to how the canal will be operated and water levels will be controlled.
Natural England	Operation during drought conditions	The Environmental Statement should explain how the system will function during droughts to protect the Rivers Tame, Trent, and Humber, including consideration of additional water sources and the	Noted, as the design progresses, additional information on the operational arrangements of the scheme will be provided.

Consultee	Topic	Summary of comment	How and where addressed
		availability of reservoirs like Drayton Reservoir to maintain canal operations. It should also detail the methodology linking the project to drought plans from Severn Trent and Affinity Water. Additionally, the statement must clarify whether increased water flow will carry more silt and nutrients into the canal, and if so, address potential dredging, silt traps, and related mitigation for protected species and habitats.	Moreover, information on silt and nutrient dilution in the canals is provided within the PEI Report and will be included in the ES.
Anglian Water Services	Impacts on existing water and wastewater infrastructure	AWS welcomes the recognition of risks from the project to water and wastewater infrastructure and, reference should be made within the Scoping Report to the potential construction of the impacts on existing utility infrastructure and services. Given the potential location and extent of the proposed development area, there will be existing AWS assets both above and below ground, which serve the surrounding businesses and community. For instance, there are existing AWS assets including several water mains within the project area, such as within the highway or its verges which link to the various settlements. Water abstraction locations may also be within the project area. In addition, AWS has sewerage assets (drainage networks and above ground facilities including pumping stations and water recycling centres/ sewage treatment works). Connected to these are pipe connections to the corresponding settlements, including sewers and rising mains	The ES will consider impacts on existing water and wastewater infrastructure, and any water abstraction locations.

Consultee	Topic	Summary of comment	How and where addressed
		which can be in areas beyond the highway verges.	
Anglian Water Services		Utilities searches should be undertaken to establish the extent of AWS's current and planned assets within the scheme's application boundary. These should be mapped to establish interactions with assets and the scheme designed to avoid impacts upon those assets. AWS wants to ensure the location and nature of our assets serving local communities and strategic water supply infrastructure are identified and protected. To reduce the need for diversions and the associated carbon impacts of those works, ground investigations would enable the Applicant to design out these potential impacts and reduce the potential impact on services, if construction works cause a pipe burst or damage to supporting infrastructure.	Utilities searches will be undertaken to inform design development, with the aim to design out potential impacts on existing utilities, where possible. Where this is not possible, the Water chapter of the ES will consider impacts on existing water and wastewater infrastructure, and any water abstraction locations.
Anglian Water Services	Wastewater disposal and drainage strategy	The Scoping Report is not clear on how any wastewater will be disposed of and how this will be managed such as a connection to an available public sewer. AWS notes a drainage strategy will be prepared (listed under Section 23.3 'Proposed ES Structure'). The situation should be confirmed for all stages (construction and operation) within the EIA.	The Code of Construction Practices will describe the minimum standards the Contractor will need to implement during construction to the management of any wastewater from construction and operation. Furthermore, an Outline Drainage Strategy will be submitted with the DCO application. The minimum standards should also be covered in a water management and monitoring strategy developed by the

Consultee	Topic	Summary of comment	How and where addressed
			contractor. The minimum standards would include, but are not limited to, the following: • providing some degree of surface water attenuation prior to discharge for construction site runoff (for silt settlement), • wastewater to either be treated on site, tankered or discharge to sewer; • water supply to be sourced from local abstraction where resource is available etc.
Anglian Water Services	Flood Risk Assessment	AWS welcomes the statement that the Flood Risk Assessment will assess all applicable sources of flooding and identify any mitigation measures required to ensure flood resilience and to prevent any off-site impacts. We consider that this should help to avoid increased risk of groundwater infiltration/ surface water ingress to our wastewater networks that may lie in the vicinity of the proposed onshore scheme.	Noted.
Anglian Water Services	Climate change impacts in the Flood Risk Assessment	The Flood Risk Assessment, 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	Noted. Increased risk of surface water and groundwater flooding that could exacerbate sewer flooding has been considered as part of the PEI Report, Volume 4, Appendix 22-5 Flood Risk Assessment .

Consultee	Topic	Summary of comment	How and where addressed
		infrastructure becomes increasingly vulnerable to flood risk. The project 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		Any potential embedded design measures, such as Sustainable Drainage Systems (SuDS), to be utilized at permanent above-ground installations to manage rainfall run-off and achieve sufficient attenuation to avoid increases in flood risk, and compensation flood storage at temporary site compounds to manage flood risk at these locations. AWS is responsible for management of the risks of flooding from surface water which are directed to foul water or combined water sewer systems. Our preference would be for surface water run-off from above-ground permanent buildings and impermeable surfacing to be managed by SuDS with any outfall to a watercourse, in accordance with the drainage hierarchy. The risk of sewer flooding and any required mitigation within the public sewerage network should form part of an FRA and drainage strategy. AWS would wish to be engaged in the preparation of a drainage strategy and consider that this should be required to demonstrate the appropriate management of run-off from the proposed onshore scheme (see Section 7.3.8.10).	Impacts on sewer flooding have been assessed within the FRA and mitigation, where appropriate, will be set out within the Outline Drainage Strategy to be submitted with the DCO application. The Applicant will consult AWS for the development of the Outline Drainage Strategy. The need for connection to AWS wastewater services is to be confirmed.

Consultee	Topic	Summary of comment	How and where addressed
		Subject to confirmation that all surface water will be managed following the drainage hierarchy including (SuDS), AWS would want to clarify that the DCO as proposed will have no connection to the public sewer network for construction or for operations. This would then negate the need for the draft DCO to provide for any connection and so require consequent Protective Provisions and Requirements to ensure any connections did not compromise the wastewater services of existing customers. AWS will be a consultee set out in Requirements for the approval of drainage strategies and surface water management plans.	
Anglian Water Services	Water resources management	Section 4.2 'Water Resource Management Plan and Regional Plan Process' should also refer to AWS's WRMP Water resources management plan. As water may be used in the project construction and operation, this indicates that water resources should be assessed in the EIA. The EIA will need to consider water resources and water efficiency through the preparation of a Water Resources Assessment (WRA). AWS recommends that the WRA is an integral part of Chapter 22 Water Environment and Flood Risk. Impacts of climate change in terms of water availability for the construction, operation and decommissioning stages are also of relevance. In view of the guidance in the National Policy	Impacts on water resources will be assessed as part of the Water chapter of the ES. The ES will identify how the project will be supplied with water and how any wastewater will be managed and any impacts on existing infrastructure.

Consultee	Topic	Summary of comment	How and where addressed
		Statements we would have anticipated that the scoping would have included and then considered the approach to water supply and water resources in more detail. AWS requests that these points are assessed early in the ES to set out how the project will be supplied with water, the wastewater managed, how water assets serving residents and business will be protected, and how design has been altered to reduce the need for new water infrastructure or the diversion of existing assets. AWS also requires that the project seeks to minimise its demand for water and records this in the WRA. We advise that the WRA is used to inform the PEI Report at the Statutory Consultation stage of the DCO process and the ES at submission. This will include engagement with environmental regulators. In the case that an amount of water supply is to be requested from AWS for the project at construction or operation stage, the following additional points are made. AWS has a statutory duty to supply water for domestic purposes. This means we are legally obliged to supply water to all household properties as well as any domestic requirements	

Consultee	Topic	Summary of comment	How and where addressed
		(e.g., drinking water, hand-basins, toilets and showers) of non-household properties. In many cases, domestic demand will be the only requirement for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers). Non-domestic demand refers to water use for industrial processes, (e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type of water usage where it might put at risk our ability to supply water for domestic purposes. AWS has adopted a 'Non-Domestic Water Requests Policy' which states that requests over 20 m³/day will be declined. However, for Nationally Significant Infrastructure Projects that are requesting over 20 m³/day of non-domestic water (as defined above) for a scheme, a WRA must be completed. This is so we can better understand water demands, water efficiency measures, and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth. The WRA will also need to be submitted to the pre-planning team, so that the request for non-domestic water can be considered further. A copy of our WRA template is attached with this letter.	

Consultee	Topic	Summary of comment	How and where addressed
		AWS recommends that new water supply connections are not sought during construction and that potable water supply for welfare facilities, for example, are served by tanker to reduce the embedded (capital) carbon from providing new connections. The Applicant should further confirm there will be temporary concrete batching facilities with consequent water demands and would be off-site and so not require an on-site supply (Section 3.5.12 etc.). Water requirements for firefighting measures and construction traffic (dust suppression/ wheel washing areas) should also be explained.	
Atherstone Town Council	Impact of sewage discharge in Atherstone	The discharge of sewage into the canal in the centre of Atherstone will have a sewage discharge consent. Although treated, it is sewage and will have harmful parameters in it. Water companies are consistently breaking their discharge consents, and there is no indication that the Atherstone discharge will be any different. In appropriate conditions found in canals, bacteria from the discharge may have the ability to double in number every hour to levels causing a significant negative impact. Locks have slack water periods when not in use, where the water does not move, making it ideal for bacteria proliferation. Sewage discharges also release greenhouse gases, which would contribute to detrimental global effect of such emissions. The consultation documentation regarding the	Modelling confirms the Strategic Resource Option (SRO) operation is not expected to have significant acute impact on fish populations.

Consultee	Topic	Summary of comment	How and where addressed
		water quality at the end point makes no mention of the effect of possible changes to the current water chemistry supplying the areas industry, which could have possible detrimental effects on processes and products. Additionally, changes in pH levels, hardness and salinity may affect processes such as refrigeration, where more water will be used to protect against corrosion, scaling, bacteria and fouling. Also, alien species can colonise other water systems if they are forced to move from current locations, to the detriment of destination locations. Some residents expressed that it is incumbent upon water companies to remedy the high level of water leaks, before implementing a water transfer scheme, otherwise vast quantities of the water being transferred will simply be lost to leaks.	
Atherstone Town Council	Flooding and water quality	Flooding of canals does occur if too much water is discharged. If land adjacent to the canal becomes flooded, it will be contaminated with sewage pathogens which are harmful to plants, animals and humans.	Noted.
Atherstone Town Council	Climate change impact on water levels	Climate change was another issue that residents raised. They expressed that water transfer schemes could become redundant if rainfall patterns change, meaning that all the negative impacts of the scheme would be felt whilst the aims of it might be short lived. One resident stated that Bedfordshire, the proposed destination	Noted.

Consultee	Topic	Summary of comment	How and where addressed
		for the water, had recently had its highest rainfall since 1836 and had been flooded for two weeks.	
Atherstone Town Council	Water quality monitoring	Residents raised concerns about the safety of the water. Given that the canal is used for leisure activities, particularly by children, through Ruby's Yard, residents felt strongly that ongoing close monitoring of the water quality ought to be undertaken. These concerns were also shared by residents whose properties are near the canal and are worried about the flood potential and the detrimental impact that would have on their properties. Atherstone residents have questioned how the sewage outlet will be monitored, especially when occasional sewage overflows already occur at Mancetter. It was also raised that Ofwat and the Environment Agency already lack capacity to carry out adequate monitoring and that this project increases the probability of further overflows. Concern was raised that the prospect of further treatment works at Minworth brings an increased risk that the system will not cope.	Noted.
Atherstone Town Council	Flow rates, storm overflow, and pressures on locks	Concerns have been raised, regarding canal flow rates and the effect that varied flow rates from Minworth may have. Some residents were not content with the lack of detail in the consultation documentation regarding mitigations for storm overflow. They also considered that flow balance is important and lamented the potential effects	Ongoing modelling of the canal flow is being undertaken which will inform the final design of the Proposed Development, which may require additional structures (e.g. transfer locks) to avoid fast flows.

Consultee	Topic	Summary of comment	How and where addressed
		that could come about should the increased water volumes being transferred under this proposed scheme flow down the locks, in the direction opposite to which is intended. How will this be monitored? Atherstone residents contend that there are discrepancies between Ofwat volume figures and those of Affinity. The question of whether the lock structures will cope with the significant additional pressures placed upon them was raised as a concern. It was felt that more technical detail in this regard, would need to be shared, in order to allay the fears of some residents.	
Bugbrooke Parish Council	Flood risk	Bugbrooke Parish Council have reviewed the Scoping Report and believe that this scheme will have little impact on Bugbrooke. The major concern is flooding, and the Parish Council will reply on the relevant flood authorities to properly assess any risk and ensure it is mitigated. Bugbrooke has had flooding recently from the brook. The Section 19 report has not been issued yet to determine if the canal played a part in this flooding too, although this is unlikely.	Noted.
Weedon Bec Parish Council	Flood risk	The Grand Union Canal overflowed its bank twice this past winter and flooded areas around the church in Weedon Bec, so there is concern regarding flooding and raised water levels.	Noted, a Flood Risk Assessment (FRA) has been undertaken (see PEI Report Volume 4, Appendix 22-5 Flood Risk Assessment). The scheme will not be transferring large volumes of water during flood conditions, and this has been assessed in the FRA. The final design of the Proposed Development

Consultee	Topic	Summary of comment	How and where addressed
			will ensure that additional water in the canal network will be contained, with consideration of climate change scenarios.
Walton Community Council	ES modelling	The Environmental Statement should have careful modelling of different scenarios for water use, water shortages, housing developments or industrial use.	Water modelling is ongoing which investigates various scenarios of peak/low flows. Appropriate design is being considered to account for these scenarios. For the ES, a worst-case scenario(s) will be assessed.
Stoke Hammond Parish Council	Flood Risk Assessment	The flood plains surrounding the canal and the nearby River Ouse must be comprehensively investigated. Historical flooding data and future risks associated with water management should be fully considered.	Noted, a Flood Risk Assessment of the final Proposed Development design (and appropriate mitigation) has been undertaken (see PEI Report Volume 4, Appendix 22-5 Flood Risk Assessment). The final design of the Proposed Development will ensure that the additional water in the canal network will be contained, with consideration of climate change scenarios. The DCO would not be consented if there is residual risk of flooding as a result of the Proposed Development.
Old Stratford Parish Council	Canal bank breach	There is no mention in the EIA regarding the possibility of a canal bank breach in the event of flooding. This should be considered in the ES.	Appendix 17-1 (Scoping of Major Accidents and Disasters) provides justification for scoping out potential breaches of canal banks. This has been assessed and referred to within the FRA.
Old Stratford Parish Council	Increase to flow rates	The Scoping Opinion does not mention the direction of the increased flow rate but you should assume it is in one direction. This increase, as defined in the EIA states there will be some bank	Appropriate design will be identified for the final Proposed Development and additional mitigation (if required) will be identified in the ES.

Consultee	Topic	Summary of comment	How and where addressed
		erosion and vegetation detachment. No mention of mitigation procedures to deal with this but some mention is made in the use of Engineering Design Statements.	
Old Stratford Parish Council	Flood risk	The Grand Union Canal at Cosgrove does not mention the potential flood risk from water entering the Rivers Tove and Great Ouse due to surface water during construction stages. The flooding impact upon these catchments and adjacent settlements must be considered in the ES.	Water team to further review
Hunsbury Meadows Parish Council	Water level monitoring	It is our understanding that the Water Transfer using the Grand Union Canal will not affect the Northampton Arm of it (which passes through our Parish), since the arm is protected from the level and flow of the main canal passage above Lock 1 at Gayton. Indeed, the water level of the main canal passage is substantially higher than the arm below Lock 1 and there is no runoff link to the Arm at that point. That said, were that protection not to be in place, our concern would be the ongoing level of the canal water relative to the banks. The Northampton Arm whilst lower now, has been very high for some months and the banks have been gradually eroded into the tow path by moving water. The canal forms an important part of our flood defences for the wider flood plain on its route in to Northampton and link with the River Nene, and we would be concerned if this project in any way the likelihood of higher water levels in	Noted.

Consultee	Topic	Summary of comment	How and where addressed
		the Northampton Arm – either directly or because of the levels in the main corridor at Gayton - which may then give rise to flooding and “runoff” into our flood defence ditches. We trust that should this project go ahead, the Canals & River Trust will carefully monitor canal heights to prevent this happening.	
Hinckley & Bosworth Borough Council	Flood risk	The River Anker, which flows near Mancetter (approximately 500m from the canal), continues into Witherley, a settlement within our Borough. This area is particularly vulnerable to flooding, especially around Mythe Lane, Chapel Lane, and the top of Kennel Lane. These locations are among the most frequently flooded in the Borough, with residential properties affected during flood events.	Noted, a Flood Risk Assessment of the final Proposed Development design (and appropriate mitigation) has been undertaken (see PEI Report Volume 4, Appendix 22-5 Flood Risk Assessment). The final design of the Proposed Development will ensure that the additional water in the canal network will be contained, with consideration of climate change scenarios. The DCO would not be consented if there is residual risk of flooding as a result of the Proposed Development.
Milton Keynes City Council	Surface water drainage and policy compliance	The principles outlined in the EIA Scoping Report are acceptable. However, a full Flood Risk Assessment (FRA) and/or Surface Water Drainage Strategy must be submitted at the application stage, including: drainage hierarchy compliance; pre- and post-development runoff rates and calculations; discharge location(s); drainage design calculations; sub-catchment breakdown drawings; and maintenance and management plans for the development’s lifetime. The applicant must demonstrate alignment with local policies and Strategic Flood Risk Assessments (SFRA).	A Flood Risk Assessment (see PEI Report Volume 4, Appendix 22-5 Flood Risk Assessment) has been produced which outlines drainage proposals where the scheme has new permanent features which increase runoff which are not a key feature of the route through Milton Keynes. The scheme is being designed to ensure that operation does not remove required freeboard within the canal through management of water levels with required

Consultee	Topic	Summary of comment	How and where addressed
		Clarification is required on how the project may affect other developments discharging into the Grand Union Canal, such as the Bedford-Milton Keynes Waterway Park. This includes whether additional water quality treatment or revised discharge principles will be necessary. Additional requirements include: preference for Sustainable Drainage Systems (SuDS) over conventional systems; Land Drainage Consent for works affecting ordinary watercourses; acknowledgement of Riparian Ownership Responsibilities; potential need for Internal Drainage Board (IDB) Consent; and pollution controls during construction, including interceptors.	transfer locks, waste weir spill controls and bank raising where required.
Braunston Parish Council	Part 2 – Braunston Tunnel and Blisworth Tunnel	In Part 2 of the proposed development, regarding the effects of increased water flow velocities in the canals on navigation, the two major tunnels on the Grand Union Canal (Braunston Tunnel and Blisworth Tunnel) are pinch points along the transfer route where effects on water velocity will be concentrated and of particular concern. In the tunnels, the canal cross section is limited, there is little, if any, potential for increasing it and the increase in flow velocity will be experienced over a significant distance. Similarly loss of headroom due to increased water levels would also be an issue for boats passing one another in the tunnels, again with no opportunity for mitigation. The western entrance to Braunston Tunnel (1.87 km long) lies within Braunston Parish, so this is of	This will be reviewed during design development and assessed in the ES.

Consultee	Topic	Summary of comment	How and where addressed
		particular interest to BPC. While the issue of increased velocity and potentially reduced headroom are recognised in the Scoping Report in general, the specific issue of effects within tunnels is omitted completely. This does need to be considered in the EIA.	
Braunston Parish Council	Water supply during drought periods	While the use of the canal across Braunston summit for water transfer would be expected to ensure that periodic restrictions on use or closures of Braunston Locks due to drought would be eliminated, this would depend on some of the water pumped up the lock flight or to Drayton and Daventry Reservoirs being available for lock operations that would return water back down Braunston Locks. Discussion of the control rules to be adopted and the effects on navigation should be scoped into the EIA, as these may affect the (potentially positive) effects of the proposed development in securing water supply for canal operation during drought periods.	Noted.
Braunston Parish Council	Water quality	As the source of the water to be transferred is treated sewage, there is potential for the water transferred to contain elevated levels of plant nutrients (particularly phosphorus compounds). This could result in increased weed growth in the canals, which can cause disruption to boating (due to submerged macrophytes getting caught in propellers and due to floating plants, such as duckweed, blocking raw cooling water intakes). Changes in trophic status caused by input of nutrients could also cause a deterioration in the	Noted, the ES will provide further detail of water quality throughout the Proposed Development's Parts to give reassurance to on water quality and the inherent lack of risk of impacting the canal's water quality, and thus resulting effects on resident ecology including plants.

Consultee	Topic	Summary of comment	How and where addressed
		nature conservation value of the waterway and could result in the proposed development being non-compliant with WFD requirements. While BPC recognises that the project includes additional treatment for the water to be transferred, the Scoping Report gives no details of target nutrient levels in the water produced by the AWTP and only raises the topic of aquatic weed growth in relation to nature conservation. The effects of changes in weed growth on navigation should be considered fully in the EIA.	
Braunston Parish Council	Impact of stop locks	Part 2 of the Proposed Development mentions that additional stop locks are under consideration, but nowhere are the effects of additional stop locks scoped into assessment of effects on navigation.	Noted. The ES will appropriately assess the impacts of stop locks.
Braunston Parish Council	Water quality	The Scoping Report describes the proposed AWTP but gives no target effluent limit values. BPC is concerned about levels of plant nutrients and their potential effect on canal ecology and on navigation. The EIA should include full details of this topic.	ES to provide further detail of water quality throughout the Proposed Development's Parts to give reassurance on water quality and the inherent lack of risk of impacting the canal's water quality and resident ecology.
Central Bedfordshire Council	Key local evidence documents	Table 22-3 (List of other relevant regional or local strategic documents) does not reference key local evidence documents including: Central Bedfordshire Council's Strategic Flood Risk Assessment (SFRA); Water Cycle Studies; Local Flood Risk Management Strategy (LFRMS); and Central Bedfordshire Council's adopted land drainage byelaws. These documents were produced to support our Local Plan and are	These points are noted and the LLFA will be consulted as part of the PEI Report, ES and Flood Risk Assessment development.

Consultee	Topic	Summary of comment	How and where addressed
		critical in understanding the flood risk and water environment in our area. They are available via our website.	
Central Bedfordshire Council	Flood risk and water level monitoring	Flood risk and wider water environment considerations appear underexplored. It is noted that water will be abstracted from the Grand Union Canal at Leighton Buzzard and treated before distribution. However, Leighton Buzzard has a significant history of flooding from the River Ouzel and Clipstone Brook. Monitoring within the catchment is currently limited. There is a known relationship between river levels and overtopping risk of the canal infrastructure, which is not well understood. This interaction must be explored further, and measures taken to mitigate any existing and potential flood risks. Development must not lead to any detrimental impacts on local flood risk.	These points are noted and the LLFA will be consulted as part of the PEI Report, ES and Flood Risk Assessment development.
Central Bedfordshire Council	Flood mitigation	Central Bedfordshire Council, the Environment Agency, and the Internal Drainage Board are jointly considering the viability of strategic flood alleviation measures within the Ouzel and Clipstone Brook catchments. These include areas within a 1 km receptor buffer of the scheme (e.g. Leighton Buzzard and Hockliffe). We request that the delivery of the scheme be informed by these discussions and that a consolidated plan for flood mitigation be developed in partnership with Risk Management Authorities (RMAs).	These points are noted and the LLFA will be consulted as part of the PEI Report, ES and Flood Risk Assessment development.

Consultee	Topic	Summary of comment	How and where addressed
		The Internal Drainage Board must be formally consulted due to its jurisdiction and operational interest in the area.	
Central Bedfordshire Council	Impacts on peak levels, flow, and flood characteristics	The report recognises that the GUC crosses or is connected to watercourses in Central Bedfordshire, including the River Ouzel. Given the River Ouzel's influence on the River Great Ouse, which drains a wider catchment including Central Bedfordshire, we require full details to assess: anticipated impacts on catchment flow timing and peak levels; how the scheme may influence flood characteristics at the sub-catchment and catchment scale; and interconnectivity with the canal and Clipstone book, taking into account recent and historic flooding in the area.	These points are noted and the LLFA will be consulted as part of the PEI Report, ES and Flood Risk Assessment development.
Central Bedfordshire Council	Flood risk	We require detailed assessment of flood risk at the following locations: Three Locks – High risk of flooding associated with the River Ouzel, affecting the northern edge of a Possible Construction Area; and Leighton – Medium risk of flooding associated with the River Ouzel, affecting a Possible Construction Area and the potential Grand Union Canal transfer site.	These points are noted and the LLFA will be consulted as part of the PEI Report, ES and Flood Risk Assessment development.
Central Bedfordshire Council	Surface water flood risk	Surface water flood risk does not appear to be given sufficient consideration. This must be addressed, and relevant data shared for our review.	These points are noted and the LLFA will be consulted as part of the PEI Report, ES and Flood Risk Assessment development.

Consultee	Topic	Summary of comment	How and where addressed
Central Bedfordshire Council	Flood risk	Detailed Flood Risk Areas 22.5.151 – 22.5.157 identifies flood risks to Leighton Buzzard at: the south-east of West Bletchley (River Ouzel passing through Site B near the A4146 – Figure 22-27, Sheet A); and Slapton (an un-named tributary adjacent to Site H; Whistle Brook and the River Ouzel within the Part 4a study area – Figure 22-27, Sheet E). These areas are vulnerable and must be assessed in detail with appropriate mitigation measures proposed.	These points are noted and the LLFA will be consulted as part of the PEI Report, ES and Flood Risk Assessment development.
Central Bedfordshire Council	Flood risk (reservoirs, groundwater, fluvial, surface water, sewer flooding)	Construction Phase Impacts Table 22-28 (Potential effects during the construction phase – Water Environment and Flood Risk) outlines potential increased flood risk during construction from multiple sources, including: reservoirs, groundwater, fluvial (main and ordinary watercourses), and surface water. These risks are unacceptable in their current form and must be fully mitigated. Additionally: sewer flooding and exceedance of highway drainage are likely if river levels rise, as this restricts outfalls. This risk must also be addressed through mitigation.	These points are noted and the LLFA will be consulted as part of the PEI Report, ES and Flood Risk Assessment development.

