

Appendix 21-PD-1: Consultation

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Appendix 21-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** of PEI Report **Volume 4**) from the Planning Inspectorate (PINS) and other consultees, such as Environment Agency, Natural England, Historic England, local planning authorities, in relation to traffic and transport.

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 EIA 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 traffic and transport.
- 1.2.3 Following receipt of the EIA Scoping Opinion on 08 May 2025 (**Appendix 5-PD-2** in PEI Report **Volume 4**), the requirements summarised in **Table 1** have been identified by consultees in relation to traffic and transport.
- 1.2.4 **Table 1** outlines how and where these issues have been addressed within the PEI Report and/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 traffic and transport.

Table 1: Scoping Opinion Responses

Consultee	Topic	Summary of comment	How and where addressed
PINS	Impact on hazardous/large loads during construction. (All Parts)	3.13.1: This matter is proposed to be scoped out on the basis that the proposed development will not generate significant hazardous/large loads during construction. However, PINS notes that in Table 21-15 in the Scoping Report changes in available landfill capacity have been scoped in as the types and quantities of waste during construction is unknown. Therefore, PINS considers that insufficient information has been provided and is not in a position to scope this matter out. This should be confirmed in the ES and an assessment provided, where significant effects are likely to occur.	A preliminary assessment of the impact on hazardous/large loads during the construction phase has been included in Chapter 21: Traffic and Transport (PEI Report Volume 2). The ES will provide further detail of likely construction volumes and types to determine if significant amounts of hazardous/large loads will arise for the Proposed Development. If so, further assessment will be undertaken. Further information will be established on construction waste volumes and types for the final design of the Proposed. The ES will review this information, and if required will undertake the necessary assessment.
	Impact on severance of communities during operation. (All Parts)	3.12.2: This matter is proposed to be scoped out on the basis that the Proposed Development will not significantly impact existing canal navigation and Public Rights of Way (PRoW) during operation as it is anticipated in both cases that navigation by water and by PRoW will be reinstated post-construction. However, it is also noted that in paragraph 3.5.62 and Table 20-4 in	Further information and justification has been provided in Section 21.4 of Chapter 21: Traffic and Transport (PEI Report Volume 2) to scope out the impact on severance of communities (e.g. by changes to existing canal navigation, PRoW, canal towpaths and navigation by water) during operation.

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		the Scoping Report that there is the possibility that mooring sites and PRowS could be permanently diverted. In addition, there is uncertainty over how the water levels during prolonged dry weather will be maintained during operation to adhere to statutory levels required for navigation, the Applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of the Scoping Opinion) on this matter, on this basis PINS does not agree to scope out the impact of severance on communities. The ES should provide an assessment of the likely significant effects of severance by changes to PRowS and navigation by water during operation of the Proposed Development and provide evidence demonstrating agreement with relevant consultation bodies	This position will be reconfirmed at the ES stage, upon review of the final design of the Proposed Development, whether further assessment is required.
	Impact on pedestrian delay during operation. (All Parts)	3.12.3: This matter is proposed to be scoped out on the basis that the Proposed Development is not expected to generate significant additional traffic flows, and the primary operational traffic will mostly comprise of maintenance visits during operation of the proposed development.	Noted. Effect remains scoped out.

Consultee	Topic	Summary of comment	How and where addressed
		On the basis of the information provided in the Scoping Report, PINS can agree to scope this matter out.	
	Impact on non-motorised user (NMU) amenity during operation. (All Parts)	3.12.4: This matter is proposed to be scoped out on the basis that the Proposed Development will not significantly impact existing PRoWs during operation of the proposed development as it is anticipated that diverted PRoWs will be reinstated post-construction. However, it is also noted that in Table 20-4 in the Scoping Report that there is the possibility that PRoWs could be permanently diverted. On the basis that PRoWs are reinstated, PINS can agree this matter can be scoped out of the ES.	Further information and justification has been provided in Section 21.4 of Chapter 21: Traffic and Transport (PEI Report Volume 2) to scope out the impact on severance of communities (e.g. by changes to existing canal navigation, PRoW, canal towpaths and navigation by water) during operation. This position will be reconfirmed at the ES stage, upon review of the final design of the Proposed Development, whether further assessment is required.
	Impact on fear and intimidation on and by road users during operation. (All Parts)	3.12.5: This matter is proposed to be scoped out on the basis that the Proposed Development is not expected to generate significant additional traffic flows, and the primary operational traffic will mostly comprise of maintenance visits during operation of the Proposed Development. On the basis of the information provided in the Scoping Report, PINS can agree to scope this matter out.	Noted. Effect remains scoped out.

Consultee	Topic	Summary of comment	How and where addressed
	Impact on road vehicle driver and passenger delay during operation. (All Parts)	3.12.6: This matter is proposed to be scoped out on the basis that the Proposed Development is not expected to generate significant additional traffic flows, and the primary operational traffic will mostly comprise of maintenance visits during operation of the Proposed Development. On the basis of the information provided in the Scoping Report, PINS can agree to scope this matter out.	Noted. Effect remains scoped out.
	Impact on hazardous/large loads during operation. (All Parts)	3.12.7: This matter is proposed to be scoped out on the basis that the Proposed Development is not expected to generate significant hazardous/large loads during operation as the primary operational traffic will mostly comprise of maintenance visits during operation of the Proposed Development. On the basis of the information provided in the Scoping Report, the Inspectorate can agree to scope this matter out	It is anticipated that no significant numbers of abnormal indivisible load (AIL) vehicles or Heavy Goods Vehicle (HGV) are required for the operation of the Proposed Development. However, due to ongoing design development, specific details regarding hazardous loads during operation are still to be established. Therefore, the operational impact on hazardous loads will be further reviewed and (if required) assessed at the ES stage.
	PRoW intersected or affected by the Proposed	3.12.8: The Scoping Report states that the Proposed Development will intersect and will affect PRoWs, these are listed in paragraph 20.5.3 and appendix 20-2 of the Scoping Report. It is noted in the scoping report that	Appendix 21-PD-3 in PEI Report Volume 4 provides an indicative list of PRoW (including bridleways, footpaths and canal towpaths) potentially affected by the Proposed Development. Figure 3-P23-1

Consultee	Topic	Summary of comment	How and where addressed
	Development. (All Parts)	PRoWs are anticipated to be impacted by the Proposed Development. However, it is unclear which PRoWs will be closed or diverted. The ES should describe and assess the potential impact of affected PRoWs, and this information should be clearly presented on supporting plans within the ES.	in PEI Report Volume 3 shows the Indicative Working Areas for both Parts 2 and 3, indicating where canal towpaths could be impacted by the Proposed Development. As described in Chapter 21: Traffic and Transport (PEI Report Volume 2), a preliminary assessment for the impact on PRoWs during construction has been provided; and also provides justification for why impacts during operation can remain scoped out. This position will be reconfirmed at the ES stage, upon review of the final design of the Proposed Development, whether further assessment is required.
	Roads intersected or affected by the Proposed Development. (All Parts)	3.12.9: The Scoping Report states that the Proposed Development will intersect and will affect local and main roads, as well providing temporary and permanent access to the site, these are listed in paragraph 20.5.2 and appendix 20-1. It is noted in the Scoping Report that traffic and transport impacts are anticipated. However, it is unclear which roads will be closed, diverted or have traffic management.	Appendix 21-PD-2 in PEI Report Volume 4 provides an indicative list of roads intersected by the Proposed Development. At this stage, it is unknown which roads will likely be closed or diverted; however this will be confirmed (and assessed appropriately) at the ES stage.

Consultee	Topic	Summary of comment	How and where addressed
		The ES should describe and assess the potential impact of affected roads networks, haul roads and access points, and this information should be clearly presented on supporting plans within the ES.	
	Affected road network (ARN). (All Parts)	3.12.10: The Scoping Report (appendix 7-1) states that the volume of construction traffic is not known and the ARN has yet to be modelled. The ES should provide baseline and modelling data for the affected road network and characterise the construction traffic change in terms of number, types and routing of movements in line with relevant guidance, including that for construction workers, and assess significant effects where they are likely to occur.	As described in Chapter 21: Traffic and Transport (PEI Report Volume 2), the indicative number of construction vehicle traffic has been concluded to be minimal and thus does not result in likely significant impacts. However, the ES will provide details of estimated traffic flows for both the construction and operational phases, and the anticipated affected road network. If significant levels of traffic flows are identified, then these will be assessed appropriately.
Anglian Water Services	Management Plans (Section 23.4) DMP, CEMP, and CTMP	The management plans listed in Section 23.4 'Application Documents' of the Scoping Report, such as the DMP, CEMP and CTMP, should include steps to remove the risk of damage to AWS's assets from plant and machinery (compaction and vibration during the construction phase) including haul and access roads. With regards to vibration from	Appropriate mitigation measures for the protection of existing utilities for the construction stage will be presented in the Outline Construction Environmental Management Plan (CEMP). A Preliminary Outline CEMP has been prepared for the PEI Report (see Appendix 24-PD-2 in PEI Report Volume 4).

Consultee	Topic	Summary of comment	How and where addressed
		construction this should take account of potential effects on our assets. Further advice on minimising and then relocating (where feasible).	Furthermore, the draft DCO will set out protective provisions for Statutory Undertakers whose infrastructure may be impacted by the Proposed Development. The protective provisions will set out the process to be followed for any further approvals from statutory undertakers for the agreement of detailed design and construction methods, where works may impact on existing utilities.
Wolfhampcote Parish Council	Construction Impacts on Local Roads and Verges	The report should assess potential increases in traffic, construction vehicle movements, and associated disruption to local roads — including access roads, rural lanes, and junctions within the parish.	Sections 21.9 and 21.10 of Chapter 21: Traffic and Transport (PEI Report Volume 2) sets out the construction and operational implications in the vicinity of Wolfhampcote Parish. It describes that Heavy Goods Vehicles (HGV) and staff traffic numbers will be very low, and not likely to give rise to significant effects. This will be kept under review and re-examined at ES Stage with the final Proposed Development design.
	Impacts on PRow and canal towpaths during construction and operation	The ES should assess impacts on public access, including the disruption of footpaths, bridleways, and canal towpaths used by residents and visitors. Our parish towpaths are used regularly and therefore if any footpath or	The ES will provide further details of which PRow and canal towpaths will be impacted (whether temporarily or permanent) based on the final Proposed Development design. Where appropriate, the ES will describe

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		towpaths are closed, that these closures are overnight or small walkable diversions are made.	and assess the potential impact of affected PRow and canal towpaths.
Braunston Parish Council	Impact of construction transport on Braunston village and potential mitigation through canal use.	Access to the Braunston Bottom Lock pumping station site is currently via a narrow village road and a farmer's field, which is unsuitable for HGVs. Braunston Parish Council (BPC) is concerned that the EIA Scoping Report does not consider the potential for transporting construction materials via the canal network, which could mitigate adverse impacts from HGV traffic. The Grand Union and Oxford Canals in the area can accommodate vessels capable of carrying materials, and there are wharves with good road access for loading. BPC requests that the EIA explore the use of waterways as an alternative transport method to reduce disruption to the village.	Contractors will consider use of waterways for transporting materials and equipment to reduce number of HGVs in sensitive areas.
Central Bedfordshire Council	Traffic and Transport (Baseline and Policy)	Policy EE12 requires that any development affecting a PRow must include a Rights of Way Scheme demonstrating how the PRow network will be protected, enhanced, and reconnected. This includes formalising temporary alternative routes as permanent or permissive paths post-development and ensuring surfaces are	As much as practicable, PRow affected by the proposed construction will either be kept open during construction through the use of (e.g.) temporary railed walkways, or a short diversion will be provided. An Outline PRow Management Plan will be produced as part of the DCO submission, which will set out the PRow

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		properly reinstated without harming the character or other parts of the path. Chapter 20 – Traffic and Transport outlines the baseline conditions for assessing traffic impacts. While publicly available data may be suitable for broad assessments, detailed surveys are expected where significant impacts or highway works are proposed. The scope of traffic surveys should be agreed with Central Bedfordshire Council, which holds relevant data. The geographical extent of the assessment should cover infrastructure boundaries and construction/diversion routes, with impacts during construction expected to be most significant. The IEMA guidance thresholds (10% for sensitive areas, 30% for general traffic/HGV increases) will be used, and the Council expects to be consulted on identifying sensitive locations and receptors.	affected and measures to reduce impacts on users. Detailed comments on impact assessment methodology and requirements for consultation are noted and will be taken forwards as appropriate as the scheme develops.
	Management of Public Rights of Way During Construction	Users of PRow are identified as socio-economic receptors in the proposed development, with 47 PRow expected to be affected. A detailed schedule of works must be submitted well in advance, as each path closure requires a Temporary Traffic Regulation Order (TTRO), involving legal procedures and public	As much as practicable, PRow affected by the proposed construction will either be kept open during construction through the use of (e.g.) temporary railed walkways or a short diversion will be provided. An Outline PRow Management Plan will be produced as part of the DCO

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		consultation. Suitable alternative routes of equal classification should be provided during construction, and these must be included in TTRO applications. Parishes such as Caddington and Kensworth are particularly impacted due to the high number of affected and well-used paths, including promoted and long-distance routes. The development could disrupt community access for recreation, health, and daily activities, so minimizing closure durations is essential. A Rights of Way Scheme must be submitted in line with Policy EE12, detailing how PRoWs will be protected, enhanced, and reconnected, including surface reinstatement and formalization of temporary routes post-development, while preserving the character of the paths.	submission, which will set out the PRoW affected and measures to reduce impacts on users. However, this will all be reconfirmed at the ES stage with the final Proposed Development design.
	Approach to Traffic Forecasting and Cumulative Impact Assessment	CBC Highways DM advises that using TEMPRO v8.0 alone to factor base traffic flows is not appropriate. Any forecasting work for the Transport Chapter and associated Transport Assessment should be scoped with the Council beforehand to ensure that committed developments and infrastructure changes are properly accounted for. These may differ from the cumulative schemes listed in Appendix 6-1,	Sections 21.11 and 21.12 set out the construction and operational implications in the vicinity of Central Bedfordshire. As can be seen, HGV and staff traffic numbers will be very low, and not likely to give rise to significant effects. This will be kept under review and re-examined at ES stage with the final proposed development design.

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		as some major developments could have traffic impacts beyond the applied distance thresholds.	
	Assessment of Construction Transport Impacts and Inclusion of Large Loads	CBC Highways Development Management agrees that the main transport-related impacts will occur during the construction phase rather than operation. However, the operational phase should still be assessed and mitigated if necessary through the Transport Assessment. While all listed construction impacts should be scoped into the assessment, CBC queries the exclusion of large loads, noting that it is unclear whether abnormal loads will be required for the proposed works. Therefore, excluding this element at this stage is considered premature.	It is currently anticipated that there will be no AIL vehicles and minimal HGV requirements for the construction phase of the Proposed Development. However, this will all be reconfirmed at the ES stage with the final Proposed Development design.
	Assessment Criteria and Traffic Impact Methodology Concerns	CBC Highways DM raises concerns about the proposed classification of effects in Table 20-10, noting that categorising impacts such as 30 HGVs per hour as 'minor' may overlook significant effects, especially near sensitive receptors. The current approach also appears to exclude impacts triggering Rule 2 (10–30% increases in sensitive areas) from assessment. CBC expects the assessment to include both direct impacts from construction traffic and secondary impacts from diversions or closures. While the general assessment criteria are	The scope of assessment will be in line with the appropriate IEMA guidance. The initial estimates for construction traffic within the area are expected to be very low and will have negligible impact. This, therefore, currently does not warrant any further assessments. However, this will all be reconfirmed at the ES stage with the final Proposed Development design.

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		broadly supported, CBC disagrees with the approach to Driver Delay, emphasizing that delays are more accurately assessed at junctions using modelling software, as recommended by the Institute of Environmental Management and Assessment (IEMA) [now the Institute of Sustainability & Environmental Professionals [ISEP]] guidance (Ref. 1). A more detailed junction-level assessment should be scoped through the Transport Assessment process.	
National Highways	Assessment of Traffic Magnitude During Peak Construction	The EIA Scoping Report proposes assessing the magnitude of traffic change during peak development hours, which is accepted. However, it is also expected that the assessment includes a 24-hour analysis for the peak construction year. In line with Rule 1 of the IEMA guidance (Ref. 1), the number and proportion of HGVs should be clearly identified to ensure a comprehensive understanding of potential impacts.	The initial estimates for construction traffic within the different parts of the Proposed Development are expected to be very low in comparison to existing SRN traffic due to the trips being dispersed over a wide area and is therefore considered to have negligible impact. This, therefore, currently does not warrant any further assessments. However, this will all be reconfirmed at the ES stage when full details of HGV movements are known once the final Proposed Development design is defined.
	Construction Traffic Assessment and	National Highways notes that all IEMA assessment criteria (Ref. 1) for the construction phase have been scoped in, except for	It is currently anticipated that there will be no AIL vehicles and minimal HGV

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	Inclusion of Abnormal Loads	abnormal/hazardous loads. They request that this be revisited once more information is available, and the scope adjusted accordingly. Section 20.8 of the EIA Scoping Report identifies that transport impacts will mainly arise from material deliveries and contractor movements. A detailed daily breakdown of vehicle trips by type during construction should be provided. National Highways also expects to review the proposed methodology for traffic distribution and assignment as part of ongoing discussions.	requirements for the construction phase of the Proposed Development. However, specific details regarding hazardous loads are still to be confirmed. Therefore, the construction impact of hazardous loads will be assessed and determined at ES stage.
	Peak Construction Assessment and Traffic Forecasting Methodology	The proposed assessment during the peak construction period is accepted as a suitable worst-case scenario. However, while the operational phase is proposed to be scoped out, the Applicant is advised to use the most recent version of TEMPro to factor baseline traffic flows for future years. Details of the TEMPro version, road type, and geographical area used should be clearly presented in the Transport Assessment for verification. Additionally, National Highways requests involvement in discussions regarding committed schemes near the SRN and will review the full list once confirmed.	The initial estimates for construction traffic within the different parts of the Proposed Development are expected to be very low in comparison to existing SRN traffic due to the trips being dispersed over a wide area and is therefore considered to have negligible impact. This, therefore, currently does not warrant any further assessments. However, this will all be reconfirmed at the ES stage with the final Proposed Development design.

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	National Highways Consultation and SRN Traffic Concerns	National Highways welcomes the proposed consultation during the PEI Report and ES stages. However, they express specific concern about traffic-related impacts on all sections of the SRN that intersect with the Proposed Development study area, emphasizing the need for thorough assessment of these effects.	The initial estimates for construction traffic within the different parts of the Proposed Development are expected to be very low in comparison to existing SRN traffic due to the trips being dispersed over a wide area and is therefore considered to have negligible impact. This, therefore, currently does not warrant any further assessments. Furthermore, where the Proposed Development crosses major roads, such as the SRN, the design proposes to utilise trenchless techniques to install the new pipeline, which may include pipe jacking, combined with micro-tunnelling, and thrust and reception pits which will help in limiting the disruption to the network. However, this will all be reconfirmed at the ES stage with the final Proposed Development design.

2. References

- Ref. 1 Institute of Sustainability & Environmental Professionals (ISEP) (2023)
Environmental Assessment of Traffic and Movement (July 2023).