Grand Union Canal Transfer

Appendix 18-PD-1: Consultation

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1. Introduction

1.1.1 This Preliminary Environmental Information Report (PEI Report) appendix consolidates key comments from the Environmental Impact Assessment (EIA) Scoping Opinion (**Appendix 5-PD-2** in PEI Report **Volume 4**) issued by the Planning Inspectorate (PINS) and other consultees, including the Environment Agency and local planning authorities, in relation to materials and waste.

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 materials and waste.

1.2.3 Following receipt of the EIA Scoping Opinion on 8 May 2025 (**Appendix 5-PD-2** in PEI Report **Volume 4**), the requirements summarised in **Table 1** below have been identified by consultees in relation to materials and waste.

1.2.4 **Table 1** sets out how and where these issues have been addressed within the PEI Report or will be addressed in the Environmental Statement (ES), to ensure they are appropriately considered as part of the ongoing assessment of effects on materials and waste.

Table 1: Scoping Opinion responses

Consultee	Topic	Summary of comment	How and where addressed
PINS	Waste arising from extraction, processing and manufacture of construction components and products during construction. (All parts)	3.14.1: The EIA Scoping Report states that the manufacturing of products and wastes associated with extraction and processing of products are outside of the scope of the ES assessment due to the manufacturers subject to their own waste management plans and are therefore not considered to form part of the proposed development. In addition, the EIA Scoping Report states that these would be subject to their own separate consenting and regulatory controls at the place of production. The Inspectorate notes the difficulty of undertaking any such assessment and agrees to scope this matter out on those grounds.	Scoped out agreed by PINS.
	Other environmental impacts associated with the management of waste from the proposed development e.g., on water resources, air quality, noise or traffic resulting from the generation, handling, onsite temporary storage or off-site transport of materials	3.14.2: The EIA Scoping Report states that these matters have been addressed in the other relevant chapters of the EIA Scoping Report, notably air quality and odour, ground conditions, noise and vibration, traffic and transport, water environment. The Inspectorate agrees to scope this matter out on the basis that these waste impacts are assessed in other chapters of the EIA Scoping Report.	Scoped out agreed by PINS. Emissions relating to other relevant aspects, such as water, air, and soil pollution, are assessed in separate chapters of the PEI Report.

Consultee	Topic	Summary of comment	How and where addressed
	and waste during construction. (All parts)		
	Changes to safeguarded mineral and waste sites during construction. (Parts 1a, 4a and 4b only)	3.14.3: This matter is proposed to be scoped out on the basis that safeguarded mineral and waste sites are absent from these parts of the proposed development. On this basis, the Inspectorate agrees that impacts to changes to safeguarded mineral and waste sites are not likely to occur for these parts. This matter can be scoped out from the ES.	Scoped out agreed by PINS.
	Changes in availability of materials during operation. (All parts)	3.14.4: This matter is proposed to be scoped out on the basis that changes in the availability of materials during operation will be negligible. The Inspectorate notes that 'Forecast Effects' (professional judgement) has been used to scope this matter out. Having regard to the nature and characteristics of the proposed development, the Inspectorate is content that significant effects are not likely during operation. These matters can be scoped out of further assessment.	Scoped out agreed by PINS.
	Other environmental impacts associated with the management of waste from the proposed development (e.g. on	3.14.5: The EIA Scoping Report states that these matters have been addressed in the other relevant chapters of the EIA Scoping Report, notably air quality and odour, ground	Scoped out agreed by PINS.

Consultee	Topic	Summary of comment	How and where addressed
	water resources, air quality, noise or traffic resulting from the generation, handling, onsite temporary storage or off-site transport of materials and waste) during operation. (All parts)	conditions, noise and vibration, traffic and transport, water environment. The Inspectorate agrees to scope this matter out on the basis that these waste impacts are assessed in other chapters of the EIA Scoping Report.	
	Changes in available landfill void capacity during operation. (Parts 1b, 2, 3, and 4b)	3.14.6: This matter is proposed to be scoped out on the basis that Parts 1b, 2, 3 and 4b of the proposed development would produce limited amounts of waste during operation associated with maintenance activities. Having regard to the nature and characteristics of the proposed development, the Inspectorate is content that significant effects are not likely. These matters can be scoped out of further assessment.	Scoped out agreed by PINS.
	Changes to safeguarded mineral and waste sites during operation. (All parts)	3.14.7: This matter is proposed to be scoped out on the basis that changes to safeguarding mineral and waste sites are not anticipated during operation of the proposed development. Having regard to the nature and characteristics of the proposed development, the Inspectorate is content that significant effects are not likely. These	Scoped out agreed by PINS.

Consultee	Topic	Summary of comment	How and where addressed
		matters can be scoped out of further assessment.	
	Existing baseline – anticipated quantities of materials	3.14.8: The EIA Scoping Report confirms that the types and quantities of key construction materials required for the proposed development is currently unknown. The ES should include estimates on the type, quantities and sourcing of materials used during the construction of the proposed development.	The PEI Report is based on information available at the time of writing. The ES will include indicative estimates of the types and quantities of materials as far as is possible at the time of writing. The exact sources of materials will be confirmed by the appointed contractor(s).
	Types and quantities of waste	3.14.9: The EIA Scoping Report does not provide an estimate on the quantities of waste arising from construction of the proposed development. The report proposes to incorporate the waste hierarchy and to produce an outline site waste management plan (OSWMP) and a materials management plan (MMP) to manage waste through construction. However, as the type and quantity of waste that will arise during construction is unknown, the ES should include estimates, by type and quantity, of expected residues and emissions and quantities and types of waste produced during the construction in line with Schedule 4	The PEI Report is based on information available at the time of writing. The ES will provide estimates of the types and quantities of waste, as far as is possible at the time of writing. Emissions relating to other relevant aspects, such as water, air, and soil pollution, are assessed in separate chapters of the PEI Report: • **Chapter 8: Air Quality and Odour** in PEI Report **Volume 2**; • **Chapter 14: Ground Conditions** in PEI Report **Volume 2**; and

Consultee	Topic	Summary of comment	How and where addressed
		of the EIA Regulations. The ES should include an assessment of likely significant effects and where appropriate should include emissions to other relevant aspect chapters such as water, air, soil pollution.	• **Chapter 22: Water Environment and Flood Risk** in PEI Report **Volume 2**.
Environment Agency	Excavated materials recovered through treatment can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice, which provides a framework for determining if materials are waste. Developers should ensure contaminated materials are chemically and physically characterised, and the permitting status of on-site operations is clear, contacting the Environment Agency early if uncertain to avoid delays. The Environment Agency recommends referring to the Code of Practice and their website for guidance.	Waste on site Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste. Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. The Environment Agency recommends that developers should refer to: • Position statement on the Definition of Waste: Development Industry Code of Practice	The Principal Contractor will determine whether the reuse of excavated material will be undertaken under a Waste Framework Directive exclusion, exemption, a Contaminated Land: Applications in Real Environments (CL:AIRE) Definition of Waste: Development Industry Code of Practice (DoW CoP) (Ref. 1) Materials Management Plan (MMP), or an Environmental Permit. If required, a CL:AIRE DoW CoP MMP would be developed by the appointed contractor(s).

Consultee	Topic	Summary of comment	How and where addressed
		• Our website at https://www.gov.uk/government/organisations/environment-agency	
Environment Agency	Contaminated soil that must be disposed of is classified as waste and its handling, transport, treatment, and disposal are regulated by waste management legislation including the Duty of Care Regulations 1991 and Hazardous Waste Regulations 2005. Developers should ensure all contaminated materials are chemically and physically characterised in line with BS EN 14899:2005 and clarify the permitting status of treatment or disposal activities, contacting the Environment Agency early if uncertain to avoid delays. If hazardous waste produced or taken off site exceeds 500kg in any 12-month period, the developer must register as a hazardous	Waste to be taken off site Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which include • Duty of Care Regulations 1991 • Hazardous Waste (England and Wales) Regulations 2005 • Environmental Permitting (England and Wales) Regulations 2010 • The Waste (England and Wales) Regulations 2011 Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency	All waste management will be carried out in accordance with the relevant regulations, and waste will be transported by licensed waste hauliers to waste management sites that hold the necessary regulatory authorisations and/or permits for the wastes consigned to them.

Consultee	Topic	Summary of comment	How and where addressed
	waste producer, with further information available on the Environment Agency's website.	should be contacted for advice at an early stage to avoid any delays. If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/government/organisations/environment-agency for more information.	
Central Bedfordshire Council	Kensworth quarry near Dunstable is an active chalk quarry, whose operations and potential future expansion might be negatively impacted by the development scheme	It is noted that proposed pipeline options SP10 and SP10A are in the vicinity of Kensworth quarry near Dunstable. This is an active chalk quarry, whose operations and potential future expansion might be negatively impacted by the development scheme. It is recommended that operators of existing quarries in the vicinity of the scheme be contacted to ensure that impacts on their commercial interests are taken into account.	Kensworth Quarry near Dunstable is not within the Proposed Development. It is not a safeguarded mineral site (strategic mineral site) as outlined in the Central Bedfordshire Council Policies Map (Ref. 2). The area forms part of a Chalk Group Mineral Safeguarding Area (MSA). MSAs are not considered to be safeguarded mineral sites and are not included in the Institute of Sustainability and Environmental Professionals' (ISEP)[1] 'Guide to: Materials and Waste in Environmental Impact Assessment, Guidance for a Proportionate Approach'

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

Consultee	Topic	Summary of comment	How and where addressed
			(Ref. 3); therefore, they are not assessed within a materials and waste assessment. Instead, this area, in which any future expansion would take place in has been considered within **Chapter 14: Ground Conditions** in PEI Report **Volume 2**.
Central Bedfordshire Council	Details of the proposed “Soil Reuse and Storage Depot scheme” requested.	CBC-19 Page 5. Environmental Improvement Plan – we need details of the proposed “Soil Reuse and Storage Depot scheme” as it will be significant particularly in the pipeline section. Pages 10.11 and 13. For some reason the minerals and waste elements WCC are responsible are duplicated by district and borough. WCC needs to be separate authority to avoid confusion and duplication.	The "*Soil Reuse and Storage Depot scheme*" is a government initiative and is not part of the Proposed Development. CL:AIRE supports the government scheme through its Earth Banks project (Ref. 4) by providing guidance and facilitating practical approaches for storing and reusing surplus soils. As outlined in point 8 of the Construction Policy proposal summary in Maximising Resources, Minimising Waste: policy summary table, (Ref. 5) Defra will publish a revised Code of Practice for the Sustainable Use of Soil on Construction Sites and begin development of a soil reuse and storage depot scheme in 2023. These will help prevent soil that would otherwise be classified as waste going to landfill and

Consultee	Topic	Summary of comment	How and where addressed
			encourage remediation and re-use of soil. Defra will pilot the soil reuse and storage depot scheme by 2026. The table sets out the policies relevant to each geographical local authority area, as the Proposed Development spans the jurisdictions of multiple authorities. For example, North Warwickshire, Nuneaton and Bedworth, and Rugby are within Warwickshire; therefore, the county-level policy also applies to these local authority areas.
Warwickshire County Council	Omission of mineral safeguarding.	WCC-1 Page 10. There is a significant omission of the implications for the scheme from the adopted minerals local plan. Firstly, there is no mention of the safeguarded mineral resources the project will pass through. Many MSAs will be affected including Brick clay, crushed rock at Atherstone, building stone, shallow coal, and sand and gravel. This needs to be properly assessed. Second there is no differentiation between existing mineral sites and allocations in the minerals local plan. At the moment the non -inclusion of Mineral Safeguarding is in the opinion of WCC inconsistent with the up-	MSAs are not considered safeguarded mineral sites and are not included in the ISEP Guidance (Ref. 3); therefore, they are not assessed in a materials and waste assessment. Instead, these areas have been considered within **Chapter 14: Ground Conditions** in PEI Report **Volume 2**. Safeguarded mineral sites are outlined in **Chapter 18: Materials and Waste** in PEI Report **Volume 2** and there is one existing mineral site in Warwickshire that is within the Proposed Development (Jees and Boon, site reference J&B_HR) and one allocated

Consultee	Topic	Summary of comment	How and where addressed
		to-date policies in the NPPF (216 c, d, and e and 218.) and the adopted mineral Plan (MCS 5 and DM10). In essence the NPPF and the local plan policies require the following elements to be considered for non-mineral development such as this: (a) it should avoid sterilising mineral resources of local and national importance. (b) it should avoid constraining or preventing the operation of existing mineral and mineral infrastructure and. (c) it should avoid constraining the operation of allocated sites. As far as I can see from the EIA Scoping Report none of these items has been adequately addressed. The development is not exempt development for the purposes of Appendix 3 of the adopted Minerals Local Plan, so a Minerals Assessment Report is required to be submitted and agreed. Paragraphs 9.177 – 9.180 in the adopted Minerals Local Plan set out the requirements to be met in preparing a report. In the opinion of the WCC the evidence in the EIA Scoping Report does not fully address these requirements and therefore unnecessary sterilisation of valuable mineral resources may take place WCC	mineral site (Hams Lane, Lea Marston, site reference HL9).

Consultee	Topic	Summary of comment	How and where addressed
		believe that potential peat resources sterilisation has not been addressed.	
Warwickshire County Council	Mineral safeguarding. Materials study areas. Cumulative assessment. Baseline data. The Warwickshire Waste Core Strategy Adopted Local Plan (2013-2028) deemed to be out of date.	WCC-2 Page 19. Section 21.4 and Table 21-3 reference needs to be made to safeguarded mineral resources and allocations in the adopted minerals local plan. Pages 19, 20 and 21 and Table 21-4. Due to the location of Part 1b which is close to both the Staffordshire and Leicestershire borders the study areas needs to be expanded to reflect this particularly as there are mineral resources, mineral sites and waste sites which could be affected. These elements would also be important for supplying materials to the project and taking waste to landfill. So, in Table 21- 4 Part 1b should include Staffordshire and Leicestershire and the East Midlands Region. There is also no mention of the requirement to consider other projects (cumulative assessment) which may have an impact on the availability of resources and capacities. This would include HS2, the A46 DCO and also the major development at Ansty north of Coventry.	As stated in **Chapter 18: Materials and Waste** in PEI Report **Volume 2**, MSAs are not considered safeguarded mineral sites and are not included in the ISEP Guidance (Ref. 3); therefore, they are not assessed in a materials and waste assessment. Instead, these areas have been considered within **Chapter 14: Ground Conditions** of the EIA Scoping Report (**Appendix 5-PD-1** in PEI Report **Volume 4**). Safeguarded mineral sites are outlined in **Chapter 18: Materials and Waste** in PEI Report **Volume 2**. The study area for materials is defined as the region in which that part of the Proposed Development is located. For Part 1b, this is the West Midlands. A worst-case assumption of a single region is applied, rather than combining material availability from two regions for Part 1b.

Consultee	Topic	Summary of comment	How and where addressed
		Page 22. Paragraphs 21.5.4 and 21.5.5- Baseline Conditions. Reference needs to be made to the 2023 Aggregates Minerals Survey for Great Britain which will be published this year and will have implications for determining future supplies of construction materials for the project locally, regionally, and nationally. There is also a need to make reference to the Local Aggregates Assessments for Warwickshire, West Midlands, Staffordshire, and Leicestershire. A key document regionally is the West Midlands Aggregates Working Party annual reports. All of these documents have the potential to change the data in Table 21-5 on page 23. Page 22 Paragraph 21.5.2 – A key component will be the extent to which the pipeline section will consume existing resources released along the route. The emphasis should be on avoiding importing primary aggregates to form the base and also for backfilling the pipeline trench. Pages 24 - 27 and 32 Tables 21 – 7, 21-8 and 21 -9. There is no reference to safeguarded mineral resources set out in MSAs.	Only safeguarded mineral and waste sites within the Proposed Development are considered in the assessment. A cumulative assessment for materials and waste is not proposed since: • As part of their planning function, Waste Planning Authorities (WPA) are required to ensure that sufficient land is available to accommodate facilities for the treatment of all waste arising within the area, either within the WPA's jurisdiction or through export to suitable facilities in other areas; • Minerals Planning Authorities (MPAs) are similarly required to ensure an adequate supply of minerals to meet the requirements of national and regional supply policies, as well as local development needs; • In preparing their waste management strategies, the WPAs already consider waste generation at the regional and sub-regional scale, since these are the figures which are then used for determining the need for waste facilities. The landfill void capacity

Consultee	Topic	Summary of comment	How and where addressed
		The data for waste derived from the adopted Waste Core Strategy is well out of date. Figure 3.1 reflects the position as of 2009 and therefore will need to be updated.	remaining (which is used to evaluate the effects of the Proposed Development) already considers the cumulative effects of waste generated by other developments, and hence a separate cumulative impact assessment is not required for waste. It is, therefore, not necessary or feasible for each development within the region to, in effect, duplicate the function of the WPA as part of the EIA process; and • It is assumed that each of the cumulative developments will also be considering and implementing the waste hierarchy as per requirements set out in The Waste (England and Wales) Regulations 2011 (Ref. 6). The materials assessment is conducted at a regional level rather than at a local authority level, and the materials data published by the Mineral Products Association for each region is considered the most up-to-date information available at that scale. If the Mineral Products Association updates its

Consultee	Topic	Summary of comment	How and where addressed
			Profile of the UK Mineral Products Industry data (Ref. 7) (currently the 2023 edition), this will be incorporated into the ES. Section 18.6 of **Chapter 18: Materials and Waste** in PEI Report **Volume 2**, outlines that mitigation measures will be considered and implemented where applicable including identifying, securing and using materials that already exist on site, or can be sourced from other projects, balancing the cut and fill and maximising the use of renewable materials and materials with recycled content. The Warwickshire Waste Core Strategy Adopted Local Plan (2013-2028) (Ref. 8) is deemed to be the current policy. If the position in Figure 3.1 in the Local Plan has been changed, updated information will need to be provided by WCC. A list of permitted waste sites within the Proposed Development from the latest Environment Agency data (Ref. 9) is provided in **Appendix 18-PD-2** in PEI Report **Volume 4**. There are no

Consultee	Topic	Summary of comment	How and where addressed
			permitted waste sites or waste site applications within the Proposed Development in Part 1b and one permitted waste site in part 2 (covering Warwickshire).
Warwickshire County Council	Landfill capacity	WWC-3 Page 39. Landfill capacity. Reference should be made to the West Midlands RTAB publication "Landfill in the West Midlands – 2019". During this year, a new document will be produced for the West Midlands by the RTAB – "Resilience of Non- Hazardous Residual Waste Management Capacity in the West Midlands." Another key document is DEFRA's "Residual Waste Infrastructure capacity note 2024". It is not clear from the document how different waste types are to be dealt with in particular canal dredgings and whether there will be sufficient facilities available to treat the waste. Page 41. Future baseline. There is publicly available information on construction materials, minerals, and waste so the arguments made are not supported. The following sources are relevant: Minerals – Adopted minerals local plans, AM 23, LAAs and WWAMP annual reports. Waste – adopted local plans, RTAB	Landfill capacity: the Environment Agency's Waste Summary Tables for England (Ref. 10) provide the most up-to-date landfill capacity data for the regions and sub-regions in which the Proposed Development is located. This is the only waste baseline data that will be used in the assessment. The ES will provide information on different waste types and proposed waste management routes. As outlined in **Chapter 18: Materials and Waste** in PEI Report **Volume 2** the waste assessment "…*does not consider waste processing and recovery facilities as sensitive receptors, rather: they are part of a system that has the potential to reduce the magnitude of adverse impacts associated with waste generation and disposal. Waste processing and recovery facilities are,*

Consultee	Topic	Summary of comment	How and where addressed
		reports and the DEFRA capacity note. Pages 42 and 43 Table 21 -15 and also page 51 and paragraph 21.7.12 a. WCC do not agree that waste from construction components should be scoped out. This assumes that all the materials will be imported to the project which will have significant environment and climate change effects. There is also a need to ensure that the contribution of recycled aggregates is maximised. At the moment the effects on safeguarded mineral resources must be scoped in. Page 43 Table 21-16 Because the impact of other projects mentioned above has not been assessed at all “Changes in availability of materials” should be scoped out. Page 44 Table 21-16. Because the exact quantities of waste to be created and then dealt with has not been provided and not related to the needs and demands of other projects “changes in available landfill void capacity “should not be scoped out. Page 44 Table 21 -16 B Because the waste sites data is well out of date there is no information on the capacities of the existing sites to accommodate the needs of the GUC project, no information on mineral resources and no details of the impacts on	*hence, different to landfills, in that the latter are finite resources.*” Future baseline: there is no collated, published future baseline for each region in which the Proposed Development is located that could be used in the assessment. The assessment is conducted at a regional level rather than at a local authority level; therefore, it is not proportionate to gather information from multiple local authority documents, each with varying timescales and methodologies for making predictions. Waste from construction components is outside the scope of the materials and waste assessment, as outlined in **Chapter 18: Materials and Waste** in PEI Report **Volume 2**. The environmental impacts associated with waste arising from the extraction, processing, and manufacture of construction components and products are addressed through the planning and permitting of the extraction, processing, and manufacturing sites. The climate change effects of materials, such as

Consultee	Topic	Summary of comment	How and where addressed
		existing permissions, permits, site closure and new sites coming forward “Changes to safeguarded mineral and waste sites “should not be scoped out.	embodied carbon, are covered in **Chapter 10: Climate** in PEI Report **Volume 2**. Section 18.6 of **Chapter 18: Materials and Waste** in PEI Report **Volume 2** states that mitigation measures will be considered and implemented where applicable, including identifying, securing, and using materials that already exist on site or can be sourced from other projects, balancing cut and fill, and maximising the use of renewable materials and materials with recycled content. Waste estimates are provided in the PEI Report and will also be included in the ES. Changes in available landfill void capacity have only been scoped out for parts of the operational Proposed Development where waste quantities are expected to be minimal. The baseline data used in the assessment will be the most up-to-date version of Environment Agency data e.g. landfill capacity permitted waste sites and applications and permitted landfills.

Consultee	Topic	Summary of comment	How and where addressed
			Capacity of other types of waste facility are not deemed to be sensitive receptors as outlined above. Changes to safeguarded mineral and waste sites are not scoped out, all local plans have been checked and all safeguarded mineral and waste sites within the Proposed Development are outlined in **Appendix 18-PD-2** in PEI Report **Volume 4.** Only parts of the Proposed Development in which no safeguarded mineral or waste sites sit are scoped out.
Warwickshire County Council	WCC-4 Page 45 paragraph 21.7.3 “Safeguarded mineral resources” should be included as a sensitive receptor. This will also require a change to Table 21- 17	Page 45 paragraph 21.7.3 “Safeguarded mineral resources” should be included as a sensitive receptor. This will also require a change to Table 21- 17 Development Management: From a Development Management perspective, we would like to see routing agreements for all accesses onto the public highway to ensure minimal disruption from HGV’s on the rural highway network. We would also request that the following informative notes are applied:- 1. Prior to commencement of development, the applicant is required enter into an agreement	Safeguarded mineral resources (MSA) are not deemed to be sensitive receptors in a materials and waste assessment. MSAs are not considered to be safeguarded mineral sites and are not included in the ISEP Guidance (Ref. 3); therefore, they are not assessed within a materials and waste assessment. Instead, these areas have been considered within **Chapter 14: Ground** in PEI Report **Volume 2**. Safeguarded mineral sites are outlined in **Chapter 18: Materials and Waste** in PEI Report

Consultee	Topic	Summary of comment	How and where addressed
		with the Highway Authority under Section 59 of the Highways Act 1980. Prior to works taking place on site and following completion of the development, a joint survey shall be undertaken with the County's Locality Officer to agree the condition of the public highway. Should the public highway be damaged or affected as a consequence of the works being undertaken during the development of the site, the developer will be required to undertake work to remediate this damage as agreed with the Locality Officer. 2. Before commencing any Highway works the applicant / developer must familiarise themselves with the notice requirements, failure to do so could lead to prosecution. Application should be made to the Street Works Manager, Budbrooke Depot, Old Budbrooke Road, Warwick, CV35 7DP. For works lasting ten days or less, ten days' notice will be required. For works lasting longer than ten days, three months' notice will be required.	**Volume 2** and there is one existing mineral site in Warwickshire that is within the Proposed Development (Jees and Boon, site reference J&B_HR) and one allocated mineral site (Hams Lane, Lea Marston, site reference HL9).

2. References

Ref. 1 Contaminated Land: Applications in Real Environments (CL:AIRE) (2011). Definition of Waste: Development Industry Code of Practice (DoW CoP), Version 2.

Ref. 2 Central Bedfordshire, 2014. Policies Maps. Available at: https://www.centralbedfordshire.gov.uk/info/48/minerals_and_waste/450/development_framework/2 [Accessed 10/11/2025].

Ref. 3 Institute of Sustainability & Environmental Professionals (ISEP) (2020). Guide to: Materials and Waste in Environment Impact Assessment, Guidance for a Proportionate Approach.

Ref. 4 CL:AIRE (2025). Proof-of-Concept Research and Demonstration of Soil Management, Storage and Treatment Facilities.

Ref. 5 Department for Environment, Food and Rural Affairs (2023). Policy paper, Maximising Resources, Minimising Waste: Policy Summary Table. Available: https://www.gov.uk/government/publications/waste-prevention-programme-for-england-maximising-resources-minimising-waste/maximising-resources-minimising-waste-policy-summary-table#construction [Accessed 10/11/2025].

Ref. 6 The Waste (England and Wales) Regulations 2011 (as amended). Available at: https://www.legislation.gov.uk/uksi/2011/988/contents Accessed 10/11/2025].

Ref. 7 Mineral Products Association (MPA) (2023). Profile of the UK Mineral Products Industry.

Ref. 8 Warwickshire County Council (2013). Warwickshire Waste Core Strategy. Adopted Local Plan 2013-2028. Available at: https://www.warwickshire.gov.uk/mineral-waste-plans/waste-development-framework/1 [Accessed 10/11/2025].

Ref. 9 Environment Agency (2025). Environmental Permitting Regulations – Waste Sites. Available at: https://www.data.gov.uk/dataset/e2cc8101-d8b7-434d-a26a-9115061bb57c/environmental-permitting-regulations-waste-sites [Accessed 10/11/2025].

Ref. 10 Environment Agency (2025). 2024 Waste Summary Tables for England – Version 1. Available at: https://www.data.gov.uk/dataset/81f9d676-e77c-4d68-ab0c-b67e0b0b353e/2024-waste-data-interrogator [Accessed 10/11/2025].