

Appendix 11-PD-1: Consultation

Table of Contents

Appendix 11-PD-1: Consultation	1
1. Introduction	1
1.2 EIA Scoping Opinion.....	1

Tables

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

Appendix 11-PD-1: Consultation

1. Introduction

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

1.2 EIA Scoping Opinion

EIA Scoping Opinion

- 1.2.1 A scoping exercise was undertaken in early 2025 to establish the content of the assessment and the approach and methods to be followed.
- 1.2.2 The EIA Scoping Report (**Appendix 5-PD-1** in PEI Report **Volume 4**) was issued 28 March 2025 and records the findings of the scoping exercise and details the technical guidance, standards, best practice and criteria to be applied in the assessment to identify and evaluate the likely significant effects of the Proposed Development on cultural heritage.
- 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 cultural heritage.
- 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 cultural heritage.

Table 1: Scoping Opinion Responses

Consultee	Topic	Summary of comment	How and where addressed
Planning Inspectorate (PINS)	Findspots. (All parts)	3.4.1: The scoping report seeks to scope out 'findspots' on the basis that these are places where a chance find of archaeological evidence has been found but is no longer in situ. On this basis, the Inspectorate agrees to scope this matter out.	Noted. No further action required.
	Physical impacts on designated and non-designated heritage assets (including archaeology) caused by the operation of the proposed development. (All parts)	3.4.2: The scoping report seeks to scope out this matter on the basis that it is not anticipated that the operational phase would require intrusive works further to those which have been disturbed during the construction phase. On this basis, the Inspectorate agrees this matter may be scoped out from further assessment.	Noted. No further action required.
	Study areas	3.4.3: Paragraph 11.4.5 of the scoping report sets out the study areas which have been used for the cultural heritage assessment and this explains that the study area for Minworth Advanced Water Treatment Plant (AWTP) has been extended to 1 km [kilometre] as it is a taller structure and may impact on setting of cultural assets. Effort should be made to agree final study areas with relevant consultation bodies, such as Historic England and the host local authorities.	Noted. Further consultation will be undertaken with heritage stakeholders to inform the ES.
	Indirect effects on designated and non-designated heritage assets	3.4.4: Indirect effects on cultural heritage are not considered in the scoping report. The ES should identify and assess any likely significant indirect effects on historic environment assets for example, from change in drainage patterns. The applicant's attention is drawn to	The ES will consider and assess, where appropriate, any likely significant indirect effects arising from the Proposed Development.

Consultee	Topic	Summary of comment	How and where addressed
		comments from Historic England (appendix 2 of this opinion) in this regard.	
Historic England	Direct effects on designated and non-designated heritage assets	HE-1: HE appreciate the cautious approach to scoping, especially where evidence is limited or uncertain, supporting the inclusion of those impacts in the Environmental Impact Assessment (EIA). They also welcome the commitment to assess transport, noise, and vibration effects on the historic environment, and overall support the integrated method for evaluating impact and harm.	These comments from Historic England regarding direct effects to be assessed within the PEI Report and ES are noted.
	Embedded and additional mitigation	HE-2: HE note the plan to use micro-siting and route refinement to avoid impacts during design but strongly prefer complete avoidance of designated assets within the study area, such as Butler's Manor moated site. Historic England also support the use of archaeological evaluations like geophysical surveys and trial trenches to assess the condition of heritage assets within the scoping boundary.	Micro-siting will be reviewed as part of ongoing design to inform the ES. Historic England's comments regarding avoidance of assets during design and archaeological evaluations is noted. The assessments will take into account the current design and this may be refined further at the ES stage. Archaeological evaluations (i.e. geophysical survey and trial trenching) are currently being designed.
	Findspots	HE-3: The Scoping Report states that isolated findspots recorded by the HER within the EIA Scoping Boundary are proposed to be scoped out: HE do not have any concerns with this scoping decision.	Noted. No further action required.

Consultee	Topic	Summary of comment	How and where addressed
	Indirect effects on designated and non-designated heritage assets	HE-4: The Scoping Report recognises that indirect effects like hydrological changes could dry out wetland deposits and waterlogged archaeological remains, especially near the Minworth AWTP and the River Tame. HE request that this careful approach to managing groundwater and dewatering be extended to other heritage assets dependent on stable groundwater or water features, such as Drakenage Farm moated site and the Double moated site near Baxterley Church.	The ES will consider and assess, where appropriate, any likely significant indirect effects arising from the Proposed Development.
	General approach	HE-5: HE recognise that a thorough EIA report is essential for identifying and managing significant direct and indirect impacts on heritage assets at all levels. HE generally agree with the scoping approach and look forward to continued engagement with the applicant as the project progresses.	Noted. No further action required.
Atherstone Town Council	Direct effects on designated heritage assets	ATC-9: Residents were concerned about the potential of alterations being made to historically valuable and significant canal bridges to accommodate the proposed changes. Moreover, is concerned some that the route from Minworth covers 34 Grade II listed assets, one Grade II registered park and garden and two scheduled monuments, as well as passing through so much greenbelt land.	Appropriate consultation with Historic England and local planning authorities and assessment of cultural heritage impacts will be undertaken to avoid/minimise impacts through embedded design measures, where possible, for heritage assets.
Buckinghamshire Council	Study area and archaeological evaluation	BC-5: The Council welcomes that Cultural Heritage is proposed to be included in the Environmental Statement as Chapter 11 and proposes to include Cultural Heritage Desk-Based Assessment reports within the Technical Appendices. However, the Council has the following comments:	Changes to the preliminary order limits have been addressed through new Historic Environment Record (HER) data requests. Assessments have been made using the updated data from the HERs. The full baseline for the 500

Consultee	Topic	Summary of comment	How and where addressed
		11.8.2 Page 36 - the non-designated heritage asset baseline search does not cover the entire 500m study area due to late changes to the EIA Scoping Boundary. We would like to query this statement as this is still at an early stage and could be addressed in a relatively short period. 11.9.1 Page 36 - Archaeological evaluation works, including geophysical survey and trial trenching may be required and it is requested that this includes areas where ground works are proposed (including compounds and access routes). The canal itself and associated paths, locks and structures are significant heritage assets themselves and would expect appropriate recording prior to and during works and that reinstatement/new development is appropriate in design, scale and materials.	m study area is assessed in the preliminary assessment presented within the PEI Report and will be reviewed in the ES, which will be based upon the final Order Limits. The archaeological fieldwork programme will be scoped to include all intrusive ground works for construction and enabling works including compounds and access routes. Furthermore, historic built records, as part of additional mitigation, would be undertaken as required to the appropriate HE level.
	Study Areas	BC-6: It is acknowledged that 'Cultural' Heritage is proposed to be included in the Environmental Statement as Chapter 11, and that Heritage Desk-Based Assessment reports are planned to be included within the Technical Appendices. However, the Council have a number of comments: Study Area - Paragraph 11.4 specifies a study area with a 500-meter [m] radius. However, the significance of each asset is recognized and valued differently. Therefore, it is recommended to expand the study area to include important views to and from heritage assets. Assets located just beyond this radius should also be considered, particularly when conservation areas or villages are divided by the boundary. Topography must	A study area of 1 km has been applied to designated assets for Parts 1a and 4a of the Proposed Development due to the nature of the proposed infrastructure in these areas. Designated or non-designated heritage assets outside of the 1 km or 500 m study areas will be considered where their settings, including associated views, may be impacted by the Proposed Development and these will be included in the cultural heritage assessment accordingly.

Consultee	Topic	Summary of comment	How and where addressed
		be taken into account, as extensive views play a crucial role in understanding and appreciating heritage assets. For instance, the villages of Mentmore and Ascot. Setting refers to the surroundings in which your historic asset is understood, experienced and appreciated, including present and past relationships to the surrounding landscape. The importance of setting lies in what it contributes to the significance of your historic asset. Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.	
	Direct impacts on designated and non-designated heritage assets	Impact on Work Areas - The work areas should ensure that heritage assets are protected. Photographic records may be required to document the current state of these assets. Additionally, the environmental and heritage constraints and the indicative location of the pumping station, construction area, works compound, and access points should assess the impact on nearby heritage assets and materials, whether temporary or permanent. The setting of heritage assets is crucial, and listed building consent will be expected for any works to structures or areas, in line with policy.	Historic Built Records and/or archaeological fieldwork, as part of additional mitigation, would be undertaken as required to the appropriate HE level and would accommodate photographic records. A full assessment of impacts on designated and non-designated heritage assets will be undertaken for the ES.
	Direct impacts on designated and non-designated heritage assets	Non-Designated Heritage Assets - It is important to note that non-designated heritage assets should include not only archaeological sites but also built environments and parks and gardens. Buckinghamshire has a large number of locally important heritage assets, which	Assets within the Preliminary Order Limits were noted during a walkover survey, which was undertaken between September and October 2024.

Consultee	Topic	Summary of comment	How and where addressed
		contribute positively to the local character and identity of Buckinghamshire and are valued by local people. These heritage assets, which may include buildings, archaeological remains, parks, gardens, or public works of art, sometimes have little or no protection, and over time, our special places can be lost. Once on the list, these assets become known as Non-Designated Heritage Assets. This list is not exhaustive, and, in some cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications. The Ministry of Housing, Communities and Local Government has made funds available to twenty-two Local Authorities, including Buckinghamshire, as part of a national initiative to improve the provision and standard of locally held Lists of Non-Designated Heritage Assets. The link below is to the project's website. All Non-Designated Heritage Assets identified in the relevant areas listed on the Local Heritage List should be considered. A list can be provided if necessary.	Review of up-to-date design information has been undertaken within the PEI Report and will be reviewed within the ES to assess potential impacts, such as the height, massing and scale of built elements of the Proposed Development.
Wolfhampcote Parish Council	Direct impacts on designated and non-designated heritage assets	WPC-5: The parish contains several heritage assets and is historically linked to the Grand Union Canal. The potential for impacts on listed buildings, conservation areas, and archaeological remains must be addressed.	The PEI Report and ES will assess the impacts and the likely significant effects in relation to built heritage (e.g. Listed Buildings, Conservation Areas) and archaeology.

Consultee	Topic	Summary of comment	How and where addressed
Stoke Hammond Parish Council	Direct impacts on designated heritage assets	SHPC-4: Any potential impact on Grade II listed buildings in the vicinity of Lock 23 should be carefully examined.	Assets within the vicinity of Lock 23 will be considered where they are within the study areas for the Proposed Development.
Old Stratford Parish Council	Direct impacts on designated heritage assets	OSPC-3: There is no mention of the listed bridge or the Iron Trunk at Cosgrove and no mention that the Grand Union Canal is a Conservation Area. These important heritage features must be considered within the ES.	The listed bridge is unspecified. There is a grade II* listed bridge recorded at Cosgrove (NHLE: 1190608), this bridge is recorded in paragraph 11.5.28, entry 'v' of the EIA Scoping Opinion and is considered within Chapter 11: Cultural Heritage (PEI Report Volume 2). The Iron Trunk was mentioned in paragraph 11.5.26, entry D of the EIA Scoping Opinion. The National Transport Trust discuss the Iron Trunk as also being called the Cosgrove Aqueduct. It is scheduled as the Wolverton Iron Trunk Aqueduct (NHLE: 1006934) and is considered within Chapter 11: Cultural Heritage (PEI Report Volume 2). The Grand Union Canal Conservation Area is referenced in paragraph 11.5.30 as Grand Union Canal (DNN19699), entry F within the Scoping Opinion. It is considered within Chapter 11:

Consultee	Topic	Summary of comment	How and where addressed
			Cultural Heritage (PEI Report Volume 2).
Hinkley & Bosworth Borough Council	Heritage impacts	HBBC has reviewed potential heritage impacts and can confirm that there are no heritage assets within their Borough that are expected to be directly affected by the proposed development.	Noted. No further action required.
Milton Keynes City Council	Direct impacts on designated heritage assets	MKCC-3: There is a proposed area of significant development alongside the canal at Fenny Stratford. This is in close proximity to five Grade II Listed structures: The Red Lion Pub, Pump House, the lock itself, and canal side cottages. These are architecturally and evidentially significant as canal-side lock workings from the Industrial Revolution period. The setting remains a pocket of the former rural eastern edge of Fenny Stratford and is significant in evidencing the former life and use of this area. At this stage, comments are advisory. Special regard should be given to the desirability of preserving these Listed Buildings and their settings when detailing any developments. It is anticipated that while there are unlikely to be heritage benefits arising from these works, buildings and their settings will need careful consideration to avoid negative impacts. Relevant policies: • Planning (Listed Buildings and Conservation Areas) Act 1990, Sections 16, 66, 72 • National Planning Policy Framework (NPPF, December 2024), particularly Section 16 • Plan: MK - Policy HE1.	The comments from Milton Keynes City Council are noted and this will be considered during the assessment as part of the PEI Report and ES.

Consultee	Topic	Summary of comment	How and where addressed
		Archaeological Heritage – Assessment Summary Parts 2, 4a, and 4b of the proposed scheme may have indirect impacts on heritage assets of archaeological interest within the Milton Keynes City area. Additionally, Parts 2 and 4b may result in direct impacts. The scope of assessment is considered appropriate, with particular support for the following measures in Part 4b: • Aerial photographic and LiDAR assessment • Geophysical surveys • Geoarchaeological deposit modelling and monitoring • Trial trench evaluation • Continued engagement with archaeological officers is encouraged as the project progresses.	
Warwickshire County Council	Unidentified archaeological features and embedded and additional mitigation	WCC-1: There is a potential for as yet unidentified archaeological features to survive across the proposed application site, which may be disturbed or destroyed by the proposed development. A desk-based assessment and walkover survey alone are unlikely to provide sufficient baseline information to assess potential archaeological impacts or to develop an appropriate mitigation strategy. The Council are pleased to note that paragraph 11.7.8 references the Environmental Statement (ES) being informed by the results of additional evaluative techniques, such as geophysical survey and trial trench evaluation. However, the Council would highlight that there is limited reference to such surveys elsewhere in this chapter of the scoping report, which primarily focuses on desk-based assessment.	Archaeological evaluations are currently in the planning stage. The results of surveys will feed into design and the assessment in the ES.

Consultee	Topic	Summary of comment	How and where addressed
		For example: Table 11-1: National Policies, Plans and Strategies – Cultural Heritage only references desk-based assessment under the ‘Relevance to the assessment’ column. The only other reference to further surveys is found under Section 11.9: Approach to Mitigation. The Council therefore request that the potential need for evaluative fieldwork—in addition to the desk-based assessment—be clearly highlighted to the applicant at this stage and detailed in the ES. Additional Observations: While Table 11-1 references paragraph 207 of the NPPF, which requires applicants to describe the significance of any heritage assets affected by a proposal, it omits the following critical clause: “Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.” The Council also note that paragraph 11.3.1 references potential impacts on “known archaeological remains and areas” raised during Phase 1 Public Consultation. However, there remains a potential for the scheme to impact unidentified archaeological features. Recommendation: The Council advise that the Warwickshire County Council Archaeological Information and Advice team be consulted in their role as archaeological advisors (under Service Level	

Consultee	Topic	Summary of comment	How and where addressed
		Agreements) to the Warwickshire district councils referenced in paragraph 11.3.4.	
Braunston Parish Council	Direct impacts on designated heritage assets	BPC-1: The area around Braunston Bottom Lock lies within Braunston Conservation Area and provides the setting for no less than three listed buildings/structures (as detailed in Volume 2, Part 3, Figure 11-3, Sheet L). BPC wishes to see this taken into account fully in the EIA process when considering alternatives for precise location and design of the pumping station and associated infrastructure.	Braunston Conservation Area and the designated assets contained within it are considered within within Chapter 11: Cultural Heritage (PEI Report Volume 2) and will be reviewed further for the ES.
Central Bedfordshire Council	Embedded and additional mitigation	CBC-4: Palaeolithic remains could be found anywhere in the locality. Therefore, where the scheme passes through this area, it will be necessary for the results of geoarchaeological fieldwork to form part of the baseline Cultural Heritage data. Chapter 11 – Cultural Heritage Table 11-1: National policies, plans and strategies – Cultural Heritage The table suggests that the assessment will be desk-based only. However, sections 11.7.7 and 11.7.8 indicate that the Cultural Heritage Chapter will also be informed by the results of walkover surveys, geophysical surveys, geoarchaeological deposit modelling and monitoring, and trial trench evaluation (if required). Section 11.9.1 also states geophysical survey and trial trench evaluation may be required (although they are considered in the mitigation section which is presumably an error). It should be made clear that the baseline data will not just be drawn from desk-based research. This is because desk-based research alone will not be able to identify the nature, extent, character, state of preservation and significance	Archaeological evaluation works are currently in early design and will be finalised following final design information. CBC will be consulted on this work prior to it being undertaken. The heritage prefix will be addressed in further assessments and throughout Chapter 11: Cultural Heritage (PEI Report Volume 2). In regard to findspots, their context were utilised to review the archaeological potential within the Preliminary Order Limits or Indicative Work Areas.

Consultee	Topic	Summary of comment	How and where addressed
		of heritage assets with archaeological interest likely to be affected by the scheme. For Central Bedfordshire, the Council expect the baseline data to include the results of non-intrusive surveys and for those survey results to have been tested in the field by intrusive evaluation. In opinion, if this data is not acquired, the Scheme will not comply with the national policies for the protection and enhancement of the historic environment. Table 11-2: List of relevant local policy – Cultural Heritage the Archaeology Team highlight that Chapter 18 of our Local Plan (2015-2035) has specific requirements. For example, for the impact of development proposals on archaeological earthwork sites. Given the Scoping Boundary intersects with numerous archaeological earthworks sites, some of which form part of the same contemporary landscape as designated remains (for example at Church End, Hockliffe) the Council consider the assessment needs to address each Local Authorities individual policies and requirements. The Council also consider it necessary for the baseline data to address whether in relation to Battlesden Park for example, the Scheme would comply with Policy HE2 of the Local Plan (Historic Parks and Gardens). 11.5 Baseline Conditions 11.5.3 – This paragraph states that the information from Central Bedfordshire and Luton HER is presented using the unique HER prefix of MBD. These numbers are not the HER numbers for the authority area, this matter needs addressing and correcting. 11.5.5 – This paragraph indicates that “findspots” have been scoped out of the assessment. The rationale given is that they represent	

Consultee	Topic	Summary of comment	How and where addressed
		the chance find of archaeological evidence which is no longer within the context it was found in. Whilst findspots may not represent heritage assets with archaeological interest, they can and do often provide indicators of where potential heritage assets with archaeological interest may lie. To scope out all findspots therefore, is to ignore the information the multiple items from the same place (particularly those of the same chronological period) may be telling us about what lies beneath the surface. We suggest this matter is reconsidered, if not for single items at least for the recovery of multiple artefacts. 11.5.35 – 11.5.56 – These paragraphs discuss the known baseline data for Part 4b (the Pipeline to Underground Reservoir near Luton). To the knowledge of the Archaeology Team there are no Palaeolithic round barrows, the Council suggest the relevant experts address this error. Summary With reference to archaeology (whether designated or non-designated), the Environmental Impact Assessment needs to ensure that the baseline data acquired is sufficient to fully describe the significance of all heritage assets with archaeological interest that may be affected by the proposals and the impact each stage of the proposal will have on them. This includes identifying areas that have the potential to include heritage assets with archaeological interest. It must also be prepared by recognised archaeological specialists, with appropriate expertise. The Council acknowledge AECOM are involved with the project and have a demonstrated track record of working with them on infrastructure projects.	

Consultee	Topic	Summary of comment	How and where addressed
	Study area	CBC-5: The Applicant should include a 1km study area from the EIA Scoping Boundary instead of 500m for designated heritage assets (but not non-designated heritage assets) to ensure all potential impacts on the historic environment are captured. 11.5.35 - 11.5.36 and 11.5.55 - 11.5.56 - Additional non-designated heritage assets may still be identified – such as following site visits – so the current lists should not be considered definitive. 11.9 Approach to Mitigation Further consideration should be given to mitigation regarding the setting of heritage assets, such as screening. The indicative pipeline routes suggest there would be some overlap with both designated and non-designated heritage assets. Any direct physical impact should be avoided, especially concerning designated assets.	A 1 km study area has been applied for Parts 1a and 4a due to the nature of the proposed infrastructure in these areas. A 500 m study area is considered proportionate to Parts 1b, 2, 3 and 4b for designated heritage assets due to the localised nature of the works. Embedded design measures and additional mitigation have been taken into account within Chapter 11: Cultural Heritage (PEI Report Volume 2) and will be within the ES to reduce impacts upon heritage assets.