

Appendix 8-PD-1: Consultation

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Appendix 8-PD-1: Consultation

1. Introduction

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

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 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 air quality and odour.
- 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 air quality and odour.
- 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 air quality and odour.

Table 1: Scoping Opinion Responses

Consultee	Topic	Summary of comment	How and where addressed
PINS	Dust impacts, including the use of Non-Road Mobile Machinery (NRMM) during construction. (Parts 1a and 4a)	3.2.1: PINS agrees that dust impacts, including those from NRMM, may be scoped out on the basis that a Dust Management Plan will be secured as part of the Code of Construction Practice. The Plan should include details on the type, number, location, and operational hours of NRMM, as well as associated emissions. Any mitigation measures relied upon should be secured through the draft DCO.	An Outline Construction Environmental Management Plan (CEMP) will be produced for the DCO application and will set out the control measures required to address, reduce and control emissions from the construction of the Proposed Development. A Preliminary Outline CEMP has been produced for the PEI Report (see Appendix 24-PD-2 in Volume 4).
	Odour impacts, including the use of NRMM during construction. (All Parts)	3.2.2: The Scoping Report states that no significant odour impacts are expected to arise as part of the construction works, however it is noted on Figure 21-1 that the proposed development will run through two areas shown as historic landfill. The Inspectorate therefore does not agree to scope this matter out at this stage. Accordingly, the ES should include an assessment on odour impacts related to construction works in or adjacent to landfill sites or the information referred to demonstrating agreement with the relevant consultation bodies and that significant effects are unlikely to occur.	The assessments approach to odour has been set out in Section 8.4 of Chapter 8: Air Quality and Odour (PEI Report Volume 2). Potential odour emissions will be controlled through measures set out in the Odour Management Plan as part of the Preliminary Outline CEMP (see Appendix 24-PD-2 in Volume 4). At the current level of design information available, it is not anticipated that there will be any

Consultee	Topic	Summary of comment	How and where addressed
			significant odour impacts, however this will be reviewed for the ES.
	Traffic emissions outside an Air Quality Management Area (AQMA) during construction (Parts 1b, 2 (partially) and 3)	3.2.3: PINS does not agree to scope out traffic emissions outside AQMAs at this stage. The ES should include estimated construction traffic volumes or demonstrate that flows would not exceed Institute of Air Quality Management (IAQM) thresholds, along with information on Particulate Matter (PM ₁₀ , PM _{2.5}), and nitrogen oxide (NO _x) emissions. The ES should also clarify which part of Part 2 is proposed to be scoped out and include cross-references to the human health chapter where relevant.	Traffic data will be reviewed as part of the ES, and screened against the IAQM criteria defined in Section 8.4 of Chapter 8: Air Quality and Odour (PEI Report Volume 2). Where potential impacts from road traffic emissions cannot be screened out, a detailed assessment will be undertaken and included in the ES.
	Traffic emissions (within or adjacent to an AQMA) during construction (Parts 1a, 2 (partially) 4a and 4b)	3.2.4: The Inspectorate does not agree to scope out this matter at this stage. The ES should include estimated construction traffic volumes or demonstrate that flows would not exceed IAQM thresholds, and provide information on PM ₁₀ , PM _{2.5} , and NO _x emissions. The ES should also clarify which part of Part 2 is proposed to be scoped out and ensure consistency between tables, including clarification of whether Part 2 is fully or partially scoped out. Appropriate cross-	Traffic data will be reviewed as part of the ES, and screened against the relevant IAQM criteria defined in Section 8.4 of Chapter 8: Air Quality and Odour (PEI Report Volume 2). Where potential impacts from road traffic emissions cannot be screened out, a detailed assessment will be undertaken and included in the ES.

Consultee	Topic	Summary of comment	How and where addressed
		references to the human health chapter should be included where relevant.	
	Emissions, including use of NRMM during operation. (All Parts)	3.2.5: The Scoping Report seeks to scope this matter out on the basis that there would be no direct emissions from the operation of the proposed development. On this basis, PINS agrees to scope this matter out.	Scoped out from the operation of the proposed development as discussed in Chapter 8: Air Quality and Odour (PEI Report Volume 2).
	Odour during operation. (All Parts)	3.2.6: The Scoping Report seeks to scope this matter out on the basis that the proposed development does not have potential to change the baseline odour climate at any relevant receptor location and it will not give rise to any new odorous emissions. On this basis, PINS agrees to scope this matter out from further assessment.	Scoped out from the operation of the proposed development as discussed in Chapter 8: Air Quality and Odour (PEI Report Volume 2).
	Road traffic emissions during operation. (All Parts)	3.2.7: PINS agrees that operational traffic volumes are expected to be low, limited mainly to vehicle movements associated with the Minworth Advanced Water Treatment Plant (AWTP) (Part 1a), abstraction and treatment activities (Part 4), and maintenance of Parts 1b, 4b, and the canal network (Parts 2 and 3). On this basis, operational traffic impacts may be scoped out from further assessment.	Scoped out from the operation of the proposed development as discussed in Chapter 8: Air Quality and Odour (PEI Report Volume 2).

Consultee	Topic	Summary of comment	How and where addressed
	Baseline	3.2.8: The ES should ensure that baseline information used to inform assessment work is accurate. It is noted that paragraph 9.5.21 states there are no AQMAs in Buckinghamshire Council administrative area, however in its response to the Scoping Report, Buckinghamshire Council (see appendix 2 of this opinion) point out that there are five AQMA in its area, yet none are located in Part 4 of the proposed development. Comments made in point 3.2.4 of the Scoping Opinion are also relevant to this point.	Section 8.4 in Chapter 8: Air Quality and Odour (PEI Report Volume 2) discusses the AQMA in Buckinghamshire County Council's administrative area. It concludes that the nearest AQMA in Buckinghamshire is located in Aylesbury, approximately 8 km to the west of the Proposed Development, and will not be affected by the Proposed Development (provided in Figure 8-P2-1 in PEI Report Volume 3). Therefore, it is considered that no further assessment of air quality impacts on the AQMA is required.
	Guidance	3.2.9: The Applicant's attention is drawn to the Defra advice 'PM _{2.5} Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM _{2.5} or its precursors.	Measures to reduce and control emissions of Particulate Matter (including PM _{2.5}) will be set out in the Outline Construction CEMP.
	Effects on European sites	3.2.10: The Scoping Report states that Chiltern Beechwoods Special Area of Conservation (SAC) is scoped out with regards to ecology.	No likely significant effects have been identified in the PEI Report. This will be reviewed as part of

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		Paragraph 13.5.8 of the Scoping Report states that Chilterns Beechwood SAC/ Site of Special Scientific Interest (SSSI) is located approximately 3km south of Part 4b. PINS considers that the ES should include an assessment of air quality impacts resulting from the proposed development should be included where significant effects are likely to occur.	the ES and more details are available.
		3.6.8: The Inspectorate advises that potential air quality impacts on Chilterns Beechwood SAC/SSSI should be assessed, as the scoping report only considers hydrological impacts.	No likely significant effects have been identified in the PEI Report. This will be reviewed as part of the ES and more details are available.
Buckinghamshire Council	Air Quality	The Council agrees with the size of the study area as outlined within section 9.4 and Table 9-4 in the Scoping Report. The use of Defra's background concentration maps is acceptable to describe the baseline conditions across the study areas for nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}) due to a lack of air quality monitoring locations being located near to the proposed study areas. Section 9.5.15 of the Scoping Report states that Part 4a of the Proposed Development is located within Central Bedfordshire Council's	Section 8.4 in Chapter 8: Air Quality and Odour (PEI Report Volume 2) discusses relevant AQMAs within each local authority's administrative area. No likely significant effects have been identified, and this will be reviewed as part of the ES.

Consultee	Topic	Summary of comment	How and where addressed
		administrative area. This is not correct as both Site B and Site H are located within the Buckinghamshire Council boundary and not within Central Bedfordshire Council's administrative area. Therefore, this section must be updated to reflect the status of air quality within the Buckinghamshire Council area. Section 9.5.21 states that there are no AQMAs declared within the Buckinghamshire Council administrative area. This is not correct as there are 5 AQMAs declared within the Buckinghamshire Council Area (more information on these can be found on the air quality pages of our website). However, none of the AQMAs are within the Part 4 EIA Scoping Boundary. Table 9-5 outlines the potential effects during the construction phase – air quality and odour. This states that construction dust impacts, including the use of NRMM for Phase 4a, will be scoped out. This is because potential impacts from dust emissions arising from activities during the construction phase have been considered using an approach based on the IAQM Guidance on the Assessment of Dust from Demolition and Construction Dust Guidance. Construction dust emissions will be controlled using good practice	

Consultee	Topic	Summary of comment	How and where addressed
		techniques and mitigation measures will be identified and secured through a Dust Management Plan as part of the Code of Construction Practice. Therefore, it is concluded that no significant air quality or amenity impacts from dust generation are likely if a management plan is adopted. The Council agrees that if mitigation measures and a dust management plan are adopted and implemented during the construction of Phase 4a, then there will be no significant air quality impact from dust generation. The table also indicates that construction dust impacts, including the use of NRMM for Phase 2 and 4b, will be scoped in, which we agree with. Construction traffic emissions (outside an AQMA) will be scoped out. This is on the basis that it is considered unlikely that traffic flows during the construction phase would exceed threshold volumes outlined within the Environmental Protection UK (EPUK) and IAQM 'Guidance on Land-Use Planning & Development Control: Planning For Air Quality' (Ref. 1), which indicate when an air quality assessment would be required, which we agree with. It is noted that the rational text for this row states that Parts 1a, 4a,	

Consultee	Topic	Summary of comment	How and where addressed
		and 4b are located within an AQMA(s) and are therefore not included in this particular assessment. However, Part 4a is not located within an AQMA.	

2. References

- Ref. 1 Environmental Protection UK (EPUK) & Institute of Air Quality Management (IAQM) (2017) Guidance on Land-Use Planning & Development Control: Planning For Air Quality, January 2017.