



Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Grand Union Canal Transfer

Case Reference: WA0210001

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) to
Regulation 10 of The Infrastructure Planning (Environmental Impact
Assessment) Regulations 2017

08 May 2025

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1. INTRODUCTION

- 1.0.1 On 28 March 2025, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Affinity Water and Severn Trent (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Grand Union Canal Transfer (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.
- 1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:
- <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/WA0210001>
- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice pages, including '[Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

['Nationally Significant Infrastructure Projects: Advice pages'](#)

- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

ID	Ref	Description	Inspectorate's comments
21.1	Paragraphs 1.2.1 and 3.5.5	Alternatives	There are a number of elements of the proposed development which have are currently being considered, such as locations of the outfall, abstraction points (referred to in the scoping report as Site B and Site H) and whether a wetland area will be used to settle out solids. The applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the proposed development have yet to be finalised.
212	Paragraph 3.5.1	Design flexibility	The Inspectorate notes the Applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the proposed development. The Inspectorate expects that at the point an application is made, the description of the proposed development will be sufficiently detailed to include the design, size, capacity and locations of the different elements of the proposed development or where details are not yet known, will set out the assumptions applied to the assessment in relation to these aspects. Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES.
213	Table 3-1	Construction compounds	The scoping report states that the proposed development would require construction compounds as set out in table 3-1, however, the exact locations are yet to be determined. To ensure a robust assessment of likely significant effects, the ES should provide details regarding the number, location and dimensions of construction compounds, and whether they will be temporary or permanent compounds. Details should be presented regarding any necessary reinstatement works and the ES should provide cross references to other relevant assessments such as air quality and landscape.

ID	Ref	Description	Inspectorate's comments
214	Paragraph 3.5.6 and figure 3.4	Building parameters	The indicative location of the Minworth Advanced Water Treatment Plant (AWTP) is shown on figure 3.4 and paragraph 3.5.6 and states that the AWTP will be no higher than 15 metres. To ensure a robust assessment of likely significant effects, the ES should include a full and detailed description of any built structures for which development consent is sought, including the location, maximum length, width, height. The ES should include cross reference to relevant aspects such as landscape.
215	Figure 3.6 sheets W, X and Z. Figure 1-1 sheet E	Red line boundary	Figure 3.6 sheets W and X show large areas of land identified as being in the red line boundary, but it is not entirely clear what is proposed for this land. Figure 1-1, sheet E, shows these may be the locations being considered for the abstraction, storage and treatment plant. To aid understanding of plans, the ES should ensure that all parts of the proposed development are clearly presented on accompanying figures and cross references provided within the main text to where features are shown.
216	Paragraphs 4.4.3 and 5.6.2	Alternatives	Paragraph 4.4.3 of the scoping report states that Gate 4 reports for the Regulators' Alliance for Progressing Infrastructure Development (RAPID) Gate reporting stages will be submitted to RAPID after the application for Development Consent for the proposed development has been submitted to the Planning Inspectorate and accepted for examination which is anticipated to be in May 2027. Paragraph 5.6.2 states that Gate 4 will be developed in parallel with the preparation of the DCO application. The ES should ensure that any information which is relied upon is robust and up to date and is consistent with information provided in the Gate 4 stage.
217	Paragraph 10.4.1	Demolition	Demolition is only briefly referred to in paragraph 10.4.1 of the scoping report with regards to demolition as a result of site clearance. The ES should provide details regarding any demotion activities which will be required as part of the proposed development, and cross referral to relevant assessment chapters such as air quality and materials and waste should be included.

2.2 EIA Methodology and Scope of Assessment

ID	Ref	Description	Inspectorate's comments
221	Paragraphs 3.8.1 and 6.5.18	Decommissioning	<p>The scoping report seeks to scope out decommissioning in entirety on the basis that there is currently no intention to decommission the proposed development as it will be in operation indefinitely.</p> <p>The Inspectorate agrees that decommissioning can be scoped out of the ES on that basis that a high-level summary of potential effects for each environmental aspect is provided within the ES. The Inspectorate expects this to include a description of likely methods for decommissioning.</p>
222	n/a	Environment Agency data	<p>The Environment Agency has published new flood and coastal erosion risk data in 2025 following the release of its "National assessment of flood and coastal erosion risk in England 2024". Further updates are also expected to follow. The applicant should ensure that assessments take account of updated data sets as these become available through Defra's Data Services Platform. Where relevant, the applicant is encouraged to liaise with the EA to determine the implications for project design and the scope of assessments.</p>
223	n/a	Legibility	<p>The figures provided as part of the scoping report do not have an index page, and due to the volume of figures and parts these figures are split into, it is difficult to easily locate figures. For ease of navigation, the ES should provide an index of figures which will be submitted with the ES.</p>
224	Chapter 7	Other assessments	<p>Chapter 7 of the scoping report 'Other assessments' provides information regarding other assessments which are outside the scope of EIA. These are:</p> <ul style="list-style-type: none"> • Habitats Regulations Assessment • Water framework Directive Compliance Assessment

ID	Ref	Description	Inspectorate's comments
			<ul style="list-style-type: none"> • Flood Risk Assessment (FRA) • Biodiversity Net Gain and Environmental Net Gain • Equality impact assessment <p>Where there may be linkages between these assessments and EIA aspects, such as biodiversity, communities and water resources, references should be clearly set out in the ES.</p>
225	n/a	Reliance upon RAPID submission documents	<p>The scoping report relies on modelling which has been undertaken as part of the RAPID process. Appendix 12-1 refers to a number of documents which have been provided as part of the RAPID submission. However these are not provided as part of the scoping report. The ES should ensure that information relied upon forms part of the ES.</p>
226	n/a	Transboundary	<p>The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts.</p> <p>The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision.</p> <p>Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process.</p>

ID	Ref	Description	Inspectorate's comments
			The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.0.7 above.
227	Section 6.9 and appendix 6-1	Cumulative effects assessment	The scoping report states that the list of sites to be included within the cumulative effects assessment (CEA) will be consulted on with host authorities. The ES should ensure that the sites included within the CEA are updated as close to the point of submission as is possible. Sites included should be agreed with host authorities.
228	Main tables and summary tables	Scoped in and scoped out effects - consistency	The Inspectorate notes there are some inconsistencies between the effects scoped in/ out within aspect tables and those set out in the summary tables in scoping report chapter 24. The applicant should ensure that where summary tables are used, that the content is consistent with the relevant aspect chapters.
229	Paragraph 9.4.9 and table 14-3	Receptors	The ES should ensure that all receptors which may be affected by the proposed development are identified in the assessment and they should be included within the correct assessment. The applicant's attention is drawn to comments from Natural England and Milton Keynes City Council (Appendix 2 of this opinion) regarding sites such as Griff Hill Quarry Site of Special Scientific Interest (SSSI), Bugbrooke Meadows SSSI and Blue Lagoon Local Nature Reserve.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Agriculture and soils

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
31.1	Tables 8-21 and 24-1	Loss and disturbance of soil resources related to agricultural land during operation. (Parts 1b, 4a and 4b)	The scoping report explains that there will be no disturbance of soils and agricultural land once the proposed development is complete and operational. Any maintenance or repair works would be ad hoc and limited and managed in accordance with standard industry practice. As such, this potential effect is scoped out of the EIA. Geo-environmental considerations relating to non-agricultural soils are provided within Chapter 14: Ground Conditions. Based on the justification provided in the scoping report, the Inspectorate agrees to scope this matter out from further assessment.
31.2	Tables 8-21, 24-1 and paragraph 8.4.2	Loss and disturbance of soil resources related to agricultural land during construction and operation. (Parts 1a, 2 and 3)	The scoping report states that no agricultural land is required for these parts of the proposed development. On this basis, the Inspectorate agrees this matter may be scoped out from further assessment.
31.3	Tables 8-21 and 24-1	Impacts on agricultural land through restriction to agricultural function within the farm holding during construction and operation	The scoping report states that restrictions to agricultural function from permanent and temporary use of farmland is a potential socio-economic impact and is captured in Chapter 19: Socio-Economics. Geo-environmental considerations relating to non-agricultural soils are provided within Chapter 14: Ground Conditions. On the basis that this matter is considered in other chapters of the scoping report, the Inspectorate agrees

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		(Parts 1b, 4a and 4b)	this matter may be scoped out for Chapter 8 Agriculture and soils, though clear cross referencing where necessary should be included in the ES.
314	Tables 8-21 and 24-1	Impacts on agricultural land through restriction to agricultural function within the farm holding during construction and operation. (Parts 1a, 2 and 3)	The scoping report states that no agricultural land is required for these parts of the proposed development. On this basis, the Inspectorate agrees this matter may be scoped out from further assessment.

ID	Ref	Description	Inspectorate's comments
315	n/a	Agricultural land	The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives.

3.2 Air quality and odour

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Tables 9-5 and 24-2	Dust impacts, including the use of Non-Road Mobile Machinery (NRMM) during construction. (Parts 1a and 4a)	The scoping report seeks to scope out impacts from emissions of dust during the construction phase on the basis that a Dust Management Plan would be provided as part of the Code of Construction Practice. Limited information is provided in the scoping report regarding the use of NRMM, such as type, number, location or operational hours of such machinery and likely emissions. The Inspectorate agrees that dust impacts including from NRMM can be scoped out provided information on the type, duration and location of NRMM is provided in the Dust Management Plan. Where mitigation measures are being relied upon, these should be secured in the draft DCO.
322	Tables 9-5 and 24-2	Odour impacts, including the use of NRMM during construction. (All parts)	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.
323	Tables 9-5 and 24-2	Traffic emissions outside an Air Quality Management Area (AQMA) during construction	The scoping report seeks to scope out traffic emissions outside AQMAs on the basis that traffic flows are unlikely to exceed threshold volumes set out in Institute of Air Quality Management (IAQM) Guidance. The scoping report does not include an estimate of anticipated traffic volumes and paragraph 9.7.7 of the scoping report states that a review of traffic flow estimates will be undertaken at PIER and ES stages. The scoping report does not present any information concerning PM10, PM2.5 and NOx and how baseline

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		(Parts 1b, 2 (partially) and 3)	<p>emissions may be affected by construction traffic. It is also not clear which part of Part 2 is intended to be scoped out at the description provided states "Part 2, partially".</p> <p>At this stage the Inspectorate does not agree to scope this matter out. The ES should include details of traffic volumes associated with the construction phase or demonstrate that traffic flows would not exceed relevant IAQM criteria. Information relating to emissions of PM10 and PM2.5 and NOx should be included in the ES. Furthermore, the ES should explain which part of Part 2 would be scoped out.</p> <p>Appropriate cross references to the human health chapter should be made where relevant.</p>
324	Tables 9-5 and 24-2	<p>Traffic emissions (within or adjacent to an AQMA) during construction</p> <p>(Parts 1a, 2 (partially) 4a and 4b)</p>	<p>The scoping report seeks to scope this matter out on the basis that it is considered unlikely that traffic flows would exceed threshold volumes in order to meet IAQM criteria. The scoping report does not include an estimate of anticipated traffic volumes and paragraph 9.7.7 of the scoping report states that a review of traffic flow estimates will be undertaken at PIER and ES stages. The scoping report does not present any information concerning PM10 and PM2.5 NOx and how baseline emissions may change during the construction phase. It is also not clear which part of Part 2 is intended to be scoped out at the description provided states "Part 2, partially".</p> <p>At this stage the Inspectorate does not agree to scope this matter out. The ES should include details of traffic volumes associated with the construction phase or demonstrate that traffic flows would not exceed relevant IAQM criteria. Information relating to emissions of PM10 and PM2.5 NOx should be included in the ES</p> <p>The ES should explain which part of Part 2 would be scoped out. It is noted that table 24.2 states that Part 2 will be scoped out, but does not state 'partially', the ES should ensure that tables used in are consistent with one another.</p> <p>Appropriate cross references to the human health chapter should be made where relevant.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
325	Tables 9-6 and 24-2	Emissions, including use of NRMM during operation. (All parts)	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, the Inspectorate agrees to scope this matter out.
326	Tables 9-6 and 24-2	Odour during operation. (All parts)	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, the Inspectorate agrees to scope this matter out from further assessment.
327	Tables 9-6 and 24-2	Road traffic emissions during operation. (All parts)	The scoping report states that during operation, only a limited number of vehicles would be required and these would primarily serve the Minworth Advanced Water Treatment Plant in Part 1a. Other operational movements would be required for the abstraction, storage and treatment side in Part 4 and maintenance visits to Part 1b and 4b and canal network (Parts 2 and 3). On this basis, the Inspectorate agrees that traffic volumes during operation are unlikely to result in significant effects and agrees this matter may be scoped out from further assessment.

ID	Ref	Description	Inspectorate's comments
328	Paragraph 9.5.21	Baseline	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 non are located in Part 4 of the proposed development. Comments made in point 3.2.4 of this opinion are also relevant to this point.
329	n/a	Guidance	The Applicant's attention is drawn to the Defra advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed

ID	Ref	Description	Inspectorate's comments
			development have been identified and how action has been taken to minimise emissions of PM2.5 or its precursors.
3210	Paragraph 13.6.9	Effects on European sites	<p>The scoping report states that Chiltern Beechwoods Special Area of Conservation (SAC) is scoped out with regards to ecology. 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.</p> <p>The Inspectorate considers that the ES should include an assessment of air quality impacts resulting from the proposed development should be included significant effects are likely to occur.</p>

3.3 Climate

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Table 10-6	On-site decommissioning activities, transportation and disposal of waste materials and transportation of workers during decommissioning. (All parts)	The scoping report seeks to scope these matters out on the basis that decommissioning is to be scoped out in its entirety and therefore there will be no use of energy or emissions associated with decommissioning. The Inspectorate agrees that this matter may be scoped out, however in accordance with point 2.2.1 of this scoping opinion, a high-level summary of potential effects for each environmental topic should be provided within the ES.
332	Table 10-7	Sea level rise. (All parts)	The scoping report states that as the proposed development is located inland, sea level rise has been scoped out. The Inspectorate agrees that sea level rise may be scoped out.

ID	Ref	Description	Inspectorate's comments
333	Paragraphs 3.8.1, 10.7.25 and 10.8.3	UKCP18 climate projections	The scoping report explains that UKCP18 climate projections will cover the construction and operational phases of the proposed development. It is noted that UKCP18 is limited to the projection period of 2100, however paragraph 3.8.1 explains that the proposed development will be operated indefinitely. The ES should establish how impacts from climate beyond 2100 will be presented if the proposed development is planned to continue past this point. The applicant's attention is drawn to comments from the Environment Agency (in appendix 2 of this opinion) in this regard.

3.4 Cultural heritage

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
341	Paragraphs 11.5.6 and 11.6.6 and Tables 11-7 and 24-4	Findspots. (All parts)	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.
342	Tables 11-8 and 24-4	Physical impacts on designated and non-designated heritage assets (including archaeology) caused by the operation of the proposed development. (All parts)	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.

ID	Ref	Description	Inspectorate's comments
343	Table 11-3 and paragraph 11.4.5	Study areas	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 1km as it is a taller structure and may impact on setting of cultural assets. Effort should be made to agree final

ID	Ref	Description	Inspectorate's comments
			study areas with relevant consultation bodies, such as Historic England and the host local authorities.
344	n/a	Indirect effects	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 comments from Historic England (appendix 2 of this opinion) in this regard.

3.5 Ecology - aquatic

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	Tables 12-5 and 12-6 and 24-5 paragraph 13.5.6	European Habitats Sites potentially within Zone of Influence (Ensor's Pool SAC/SSSI) during construction and operation. (Part 2)	<p>The scoping report states that despite Ensor's Pool Special Area of Conservation (SAC)/ Site of Special Scientific Interest (SSSI) being located within the Zone of Influence of the proposed development, there are no hydrological pathways and therefore there is no potential for effect. On the basis of there being no hydrological connection, the Inspectorate agrees this may be scoped out.</p> <p>Though if changes are made to the design of the proposed development which result in any potential for hydrological connectivity, the potential for significant effects should be assessed.</p>
352	Tables 12-5 and 24-5	<p>Impacts on water quality and hydrology on:</p> <ul style="list-style-type: none"> • Humber Estuary SAC/Ramsar/SSSI • River Mease SAC/ SSSI <p>during construction. (Part 1a, including Tame and Trent Part 1b)</p>	<p>The scoping report states that there are no impacts pathways to these designated sites during the construction phase due to distance from Parts 1a and 1b of the proposed development. The River Humber sites are approximately 120km and the River Mease sites are approximately 23km from the proposed development.</p> <p>At this stage the Inspectorate does not agree to scope out impacts on these designated sites. Potential for hydrological connectivity to these sites is not clear and it is noted from comments from the Environment Agency (see appendix 2 of this opinion) that river lamprey and sea lamprey which are features of the Humber Estuary SAC, are expected to migrate into the River Trent. As such, an assessment of impacts on these sites should be included in the ES.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
353	Tables 12-5 and 24-5	Other national statutory designated sites (SSSI, LNR) designated at least in part for aquatic ecology interest during construction (Part 1a including Tame and Trent)	<p>The scoping report states that there are no impact pathways during the construction phase to any other statutory designated sites of interest for aquatic ecology due to a lack of direct hydrological connectivity. The scoping report states that the nearest SSSI designated for aquatic ecology is the River Blythe, located 2.8km to the southeast. The nearest Local Nature Reserve is Plantsbrook Reservoir 2.4km away.</p> <p>On the basis of a lack of hydrological connectivity, the Inspectorate agrees this may be scoped out. Though if changes are made to the design of the proposed development which result in any potential for hydrological connectivity, the potential for significant effects should be assessed.</p>
354	Tables 12-5 and 12-6	Detrimental effects to fish passage and spawning habitats during construction and operation (Part 1a including Tame and Trent)	<p>Effects on smelt in Part 1a Rivers Trent and Tame are scoped out given that Environment Agency records of this species are for the Humber Estuary and not the Rivers Tame and Trent, and no significant hydrological effects are modelled downstream of the tidal limit (Cromwell Weir).</p> <p>The scoping report does not provide sufficient justification to scoping this matter out and the Inspectorate does not agree that effects on smelt at Part 1a may be scoped out at this stage. Accordingly, the ES should include an assessment of these matters, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.</p>
355	Tables 12-5 and 12-6	White clawed crayfish during construction and operation (All parts)	<p>The scoping report seeks to scope out effects on white clawed crayfish, stating that desk study and eDNA surveys has established that white-clawed crayfish are absent from all parts of the proposed development.</p> <p>In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.6	Table 12-6	Impacts to qualifying features of designated sites during operation. (Part 1a: Tame and Trent only)	<p>The scoping report seeks to scope out effects from changes in connectivity of SSSI to the rivers Tame or Trent as a result of reduced flows on the following designated sites:</p> <ul style="list-style-type: none"> • Attenborough Gravel Pits SSSI • Holme Pit SSSI • Mother Drain Misterton SSSI • Farndon Ponds LNR • Plantsbrook Reservoirs LNR <p>The scoping report states that these sites do not depend on water supply at times of low flow in the River Trent and therefore will not be affected by the minimal modelled reductions in flow at these locations. On the basis of the information in the scoping report, the Inspectorate agrees to scope this matter out. However, the modelling relied upon to should be presented in the ES.</p>
35.7	Table 12-6	Changes in connectivity of the SSSIs to the rivers Tame or Trent resulting from reduced flows and from potential effects of surface and groundwater connectivity during operation. (Part 1a: Tame and Trent only)	<p>The scoping report seeks to scope out effects from changes in connectivity of the SSSIs to the rivers Tame or Trent as a result of reduced flows on the following designated sites:</p> <ul style="list-style-type: none"> • Donington Park SSSI • Whitacre Heath SSSI • Attenborough Gravel Pits SSSI • Holme Pit SSSI • Lockington Marshes SSSI • Lea Marsh SSSI • Humber Estuary SSSI (features other than lamprey spp.) <p>The scoping report also seeks to scope out potential effects of surface and groundwater connectivity on the above SSSIs. This is explained as being due to the distance of the SSSIs from the rivers Tame and Trent. The Inspectorate does not agree at this stage to scope out effects on these sites. It is not clarified whether the sites listed above are water dependant and the scoping report does not explain how far from the order limits these sites</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			are. As such, the ES should provide an assessment of the sites or provide justification that significant effects are unlikely. The applicant's attention is drawn to comments from the Environment Agency (Appendix 2 of this opinion) in this regard.
35.8	Tables 12-6 and 24-5	Effects of hydrological changes resulting in altered connectivity to the River Tame on non-statutory Local Wildlife Site (LWS) or equivalent during operation (Part 1a: Tame and Trent only)	The scoping report seeks to scope out effects of hydrological changes resulting in altered connectivity to the River Tame on 22 LWS or equivalent on the basis that modelled hydrological changes will be insignificant and will not have an effect on aquatic habitats. On this basis, the Inspectorate agrees this matter may be scoped out. However, the modelling relied upon should be presented in the ES.
35.9	Tables 12-6 and 24-5	Non-statutory sites unconnected to the canal network LWS and County Wildlife Site (CWS) during operation. (Part 2)	The scoping report states that modelling and design assumptions indicate that there will be no impacts to aquatic receptors in sites unconnected to the canals, and no changes in flows over waste weirs to receiving water bodies. On this basis, the Inspectorate agrees this matter may be scoped out. However, the modelling referred to should be presented in the ES.
35.10	Tables 12-6 and 24-5	Potential barriers to fish passage on the River Tame and	The scoping report seeks to scope impacts from potential barriers to fish passage as a result of the proposed development, at Site 11 (Meadow Weir). The scoping report states that the proposed development not expected to have an impact on the overall passability and the site is already considered a 'complete barrier' for all flows and species for the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		Trent during operation. (Site 11 only)	baseline situation, limited by depths. The scoping report confirms that passage through the fish pass is unimpacted. On the basis of this information, the Inspectorate agrees this matter may be scoped out from further assessment.
35.11	Tables 12-6 and 24-5 and Appendix 12-1	Impacts on fish from reduced flow in the River Tame during operation (Part 1a. Tame and Trent only)	The scoping report seeks to scope out impacts on fish from reduced flow in the River Tame during operation. Two sites were identified where flow issues could arise, Orton Weir and Water Orton Lane toad bridge. With regards to Orton Weir, it is stated that the Environment Agency advised that achieving improved fish passability at this site at low flows is not critical. In addition, it is located just upstream of the main Minworth discharge. With regards to Water Orton Lane road bridge, the scoping report states that a site visit determined that this was not a barrier to fish passage, given it is a bridge with flowing river beneath it. On the basis of the information provided in the scoping report, the Inspectorate agrees this matter may be scoped out from further assessment.

ID	Ref	Description	Inspectorate's comments
35.12	Table 6-6	Zone of Influence for cumulative effects	It is noted that for aquatic ecology, Zol have been set as 2km for protected and notable species and 10km for international and national conservation designations. The ES should also ensure that a Zol for designated sites which may be hydrologically linked is included within the assessment.
35.13	Table 12-3	Study areas	The ES should clearly define and justify the final extent of the study area with reference to the potential Zone of Influence (Zol), taking into account any receptors where there is potential for hydraulic connectivity with the proposed site. Any use of professional judgement should be fully justified in the ES. Effort should also be made to agree the final study areas with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
35.14	Paragraph 12.6.1	Construction impacts	It is noted that impacts from construction on European eel via entrapment will be assessed. However, the ES should also consider entrapment on coarse fish fry and eggs. The applicant's attention is drawn to comments from the Environment Agency (appendix 2 of this opinion) in this regard.
35.15	Paragraph 12.7.13	Compensation	The scoping report refers to development of mitigation and compensation. If compensation measures are required as a result of the proposed development, the ES should clearly set out what the compensation requirements are, seek agreement of compensation measures with relevant stakeholders and explain how compensation would be secured in the Development Consent Order.
35.16	Table 24-5	Sensitive receptors	The scoping report identifies the River Ouzel chalk stream as a habitat of principle importance. The Inspectorate considers that the Chilterns chalk stream should be included within the assessment where significant effects may occur. The applicant's attention is drawn to comments from Chilterns National Landscape (appendix 2 of this opinion) in this regard.

3.6 Ecology - terrestrial

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
361	Tables 13-16, 13-17 and 24-6	Indirect impacts to statutory designated sites of international importance beyond 2km of the proposed development during construction. (Parts 2, 4a and 4b) and during construction and Part 2 and 4b during operation)	<p>The scoping report seeks to scope out effects on Ensor's Pool SAC/SSSI and Chilterns Beechwood SAC/SSSI during construction, on the basis that these sites are not hydrologically connected. On this basis the Inspectorate agrees to scope out effects on Ensor's Pool SAC/SSSI and Chilterns Beechwood SAC/SSSI, during construction and operation.</p> <p>The Inspectorate notes that the scoping report seeks to scope out Parts 2, 4a and 4b during construction but only Parts 2 and 4b in operation, therefore the ES should confirm that Part 4a is also to be scoped out for operation.</p>
362	Tables 13-17 and 24-6	Indirect effects on designated sites due to disturbance of qualifying species during operation and maintenance (All parts)	<p>The scoping report seeks to scope out this matter on the basis that disturbance to qualifying features of statutory sites would be limited and unlikely to be significant. The scoping report also states that there are no statutory designated sites in close vicinity to Part 1a, 1b, 2 (pumping stations) and Part 4a.</p> <p>Whilst the Inspectorate notes that indirect during operation of the proposed development are not likely to have significant effects on designated sites, the scoping report does not provide details of location, duration and type of maintenance activities. The Inspectorate therefore considers there is potential for disturbance during maintenance activities, and these should be assessed in the ES where likely significant effects may occur.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
363	Tables 13-17 and 24-6	Indirect effects on non-statutory designated sites due to disturbance of qualifying species during operation (Parts 1b (pipeline) Part 3 and Part 4b)	<p>The scoping report seeks to scope this matter out on the basis that maintenance works would be ad hoc and limited. The scoping report states that there is no permanent operational noise or lighting associated with Parts 1b pipeline, 3 and 4b of the proposed development. Any maintenance works would be ad hoc and limited. As such, this impact pathway (and thus potential effect) has been scoped out for these parts of the proposed development.</p> <p>Whilst the Inspectorate notes that indirect during operation of the proposed development are not likely to have significant effects on designated sites, the scoping report does not provide details of location, duration and type of maintenance activities. The Inspectorate therefore considers there is potential for disturbance during maintenance activities, and these should be assessed in the ES where likely significant effects may occur.</p>
364	Tables 13-17 and 24-6	Permanent impacts to ancient woodlands during operation. (All parts)	<p>The scoping report seeks to scope out impacts on ancient woodland due to the nature of the operational and maintenance works of the proposed development.</p> <p>At this stage, with no information regarding the location, type or duration of operational or maintenance activities, the Inspectorate does not agree to scope this matter out. The scoping report identifies a number of areas of ancient woodlands close to or directly adjacent to the Order limits which may be affected by operational and maintenance activities.</p> <p>Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.</p>
365	Tables 13-17 and 24-6 and	Disturbance/displacement of protected and notable species through increased	<p>The scoping report seeks to scope this matter out on the basis that there is no permanent operational noise or lighting associated with Parts 1b pipeline, 3 or 4b, and any maintenance activities will be ad hoc at limited. Paragraph 3.7.2 of the scoping report states that operational and maintenance activities will be set out in the ES.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	paragraph 3.7.2	disturbance during operation (Parts 1b, 3 and 4b)	At this stage, with no information regarding the location, type or duration of operational or maintenance activities, the Inspectorate does not agree to scope this matter out. Accordingly, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Description	Inspectorate's comments
366	Paragraph 12.5.2	Priority Species	The scoping report states that desk studies have included a review of the conservation status of habitats and species identified using local lists of priority species and habitats, however the scoping report does not identify the priority habitats and species relevant to the proposed development. The ES should ensure this detail is provided.
367	Table 13-3	Study area	The scoping report states that a study area of 2km for internationally and nationally designated conservation sites has been used for the terrestrial ecology assessment. This is extended to 30km for European sites designated for bats, 20km for birds and 10km downstream where a site has hydrological connectivity. The ES should clearly define and justify the final extent of the study area with reference to the potential Zol, taking into account any receptors where there is potential for hydraulic connectivity with the proposed site. Any use of professional judgement should be fully justified in the ES. Effort should also be made to agree the final study areas with relevant consultation bodies.
368	Paragraph 13.5.105	Chilterns Beechwood SAC/SSSI	The scoping report considers impacts on Chilterns Beechwood SAC/SSSI through hydrological connectivity, however, emissions from air are not considered. The Inspectorate considers that potential impacts on Chiltern Beechwoods SAC/SSSI should be considered in relation to air quality as set out in ID ref 3.2.9 of this opinion.
369	n/a	Veteran trees	The Inspectorate considers that in addition to identifying the location of ancient woodland, the ES should also identify the locations of veteran trees through appropriate desk and,

ID	Ref	Description	Inspectorate's comments
			where necessary, field based survey. The ES should assess the effects of the Proposed Development on veteran trees where significant effects are likely to occur.
36.10	n/a	Confidential annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.
36.11	Table 13-6	Ancient woodland	<p>It is noted that the scoping report relies on the Ancient Woodland Inventory to identify ancient and veteran trees within the study area. Ancient woodlands smaller than 2 hectares are unlikely to appear on these inventories.</p> <p>The scoping report identifies loss of ancient trees or habitat degradation as impacts of the proposed development. The ES should assess likely significant effects on all relevant ancient woodland receptors; seek to avoid direct impacts on ancient woodland and veteran trees; and ensure that there is no increase in fragmentation of these habitats.</p>
36.12	Paragraph 3.5.28	Reinstatement works	The scoping report states that once the pipe is installed, the backfilled area will be reinstated to previous use with vegetation reinstatement taking place over the next planting season. The ES should explain what monitoring will be undertaken to ensure reinstatement of vegetation is successful.

3.7 Ground conditions

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.1	Tables 14-17 and 24-7	Effects on human health from dewatering during construction. (All parts)	The scoping report seeks to scope this matter out on the basis that any effects would be temporary and the proposed development would be undertaken in accordance with Construction Design and Management 2015 Regulations. Human receptors are also protected by health and safety legislation and mitigation. On this basis, the Inspectorate agrees this matter may be scoped out from further assessment.
37.2	Tables 14-18 and 24-7	Indirect and direct impacts to identified receptors ie human health and controlled waters resulting from disturbance of ground during operation. (All parts)	The scoping report seeks to scope this matter out on the basis that operation and maintenance activities are unlikely to result in impacts to human health and controlled waters. The scoping report states that an unacceptable risk from contaminated land would be addressed during the construction phase. On this basis, the Inspectorate agrees this matter may be scoped out from further assessment.

ID	Ref	Description	Inspectorate's comments
37.3	Table 6-6 and paragraph 14.4.5	Study area	The scoping report states that the study area for hydrogeology receptors is 250m but will be extended to 1km in areas where these are higher permeability aquifers such as Principal aquifers and SPZs. The scoping report does not justify the study areas proposed.

ID	Ref	Description	Inspectorate's comments
			The final study area should be based on an understanding of the likely contamination/impact pathways that exist, informed by the baseline data collection. The ES should also confirm the guidance that has been used to support the choice of study area and should consistently present study areas on relevant figures.

3.8 Human health

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
381	Tables 15-13 and 24-8	Changes in air pollutants from construction activities during construction. (Parts 1a, 1b, 4a and 4b)	<p>The scoping report proposes to scope this matter out on the basis that significant construction air quality effects are not expected at Parts 1a and 4a with the implementation of management measures and, at Part 1b and 4b, air quality effects on human health would be managed by a Dust Management Plan and Odour Management Plan under the Code of Construction Practice.</p> <p>The Inspectorate agrees that dust impacts on human health, including from NRMM can be scoped out provided information on the type, duration and location of NRMM is provided in the Dust Management Plan. Where mitigation measures are being relied upon, these should be secured in the draft DCO.</p> <p>It is noted on figure 21-1 that the proposed development will go through two areas identified as historic landfill. The Inspectorate therefore does not agree to scope out an assessment of odour 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.</p> <p>The Inspectorate considers that insufficient information has been provided concerning emissions of PM10, PM2.5 and NOx and how baseline emissions may be affected by construction traffic. As such, the Inspectorate is not in a position to scope this matter out. The ES should consider air quality effects from PM10, PM2.5 and NOx in the context of human health.</p>
382	Tables	Changes in air pollutants from road traffic during	The scoping report seeks to scope impacts from changes in air pollutants from road traffic during construction and operation. The Inspectorate considers that changes in air pollutants are unlikely to be significant during operation and therefore this may be scoped

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	15-13, 15-14 and 24-8	construction and operation. (All parts)	<p>out. However, the scoping report does not include an estimate of anticipated traffic volumes and paragraph 9.7.7 of the scoping report states that a review of traffic flow estimates will be undertaken at PIER and ES stages. The scoping report does not present any information concerning PM10 and PM2.5 NOx and how the emissions may change during the construction phase.</p> <p>At this stage the Inspectorate does not agree to scope out changes to air pollutants on human health during construction. The ES should include details of anticipated traffic volumes associated with the construction phase or demonstrate that traffic flows would not exceed relevant IAQM criteria. Information relating to emissions of PM10 and PM2.5 NOx should be included in the ES.</p> <p>Appropriate cross references to the air quality chapter should be made where relevant.</p>
383	Tables 15-13 and 24-8	Water availability: changes in water availability during construction. (All parts)	The scoping report seeks to scope this matter out on the basis that changes in water availability are not likely to occur during construction. On this basis, the Inspectorate agrees this matter may be scoped out of the ES.
384	Tables 15-13, 15-14 and 24-8	Health-related behaviours: physical activity; risk taking behaviour; diet and nutrition. Changes to levels of physical activity, risk taking behaviour and consideration for diet and nutrition during	<p>The scoping report seeks to scope this matter out on the basis that construction and operation of the proposed development is not likely to impact upon risk taking behaviours and diet and nutrition. The Inspectorate agrees this matter can be scoped out from the ES.</p> <p>The scoping report states that changes to levels of physical activity will be assessed under the open space, play and leisure health determinant, as derived from the Institute of Environmental Management and Assessment (IEMA) Guide to: Effective Scoping of Human Health in Environmental Impact Assessment. As such, the Inspectorate is also content to scope this matter out from the human health chapter.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		construction and operation. (All parts)	
385	Tables 15-13 and 24-8	Social participation, interaction and support. Changes to opportunities for community participation and interaction, and for social and family support during construction. (Parts 1a and 4a)	The scoping report seeks to scope this matter out on the basis that community assets are absent from these parts of the proposed development. On this basis, the Inspectorate agrees that impacts to social interaction and support are not likely to occur for these parts. This matter can be scoped out from the ES.
386	Tables 15-13 and 24-8	Social participation, interaction and support. Changes to opportunities for community participation and interaction, and for social and family support during operation (All parts)	The Inspectorate agrees that given the nature of the proposed development, impacts to social participation during operation are not likely to occur. This matter can be scoped out from the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
387	Tables 15-13 and 24-8	Social environment: relocation; community safety; community identity; and culture, resilience and influence. Changes to perception and actual level of risk and crime. Changes to community identity such as sense of belonging during construction and operation. (All parts)	The Inspectorate agrees that given the nature of the proposed development, impacts to the social environment during construction and operation are not likely to occur. This matter can be scoped out from the ES.
388	Tables 15-13, 15-14 and 24-8.	Bio-physical environment: radiation. Changes to exposure to radiation risks during construction and operation. (All parts)	The Inspectorate agrees that the construction and operation of the proposed development is not likely to lead changes to exposure to radiation risks. This matter can be scoped out of the ES.
389	Tables 15-13, 15-14 and 24-8.	Institutional and built environment: wider societal infrastructure	The Inspectorate agrees that the construction and operation of the proposed development will not result in significant changes to the institutional and built environment. This matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		and resources. Changes to features of the built environment and wider public health environment that contribute to physical and mental health outcomes during construction and operation. (All parts)	
38.10	Tables 15-13 and 24-8	Healthcare and other social infrastructure. Permanent changes in access to and demand for healthcare services and other community facilities during operation. (All parts)	On the basis that operational activities associated with the proposed development are expected to be minimal, the Inspectorate agrees that any impacts to healthcare and other societal infrastructure are not likely to be significant. This matter can be scoped out of the ES.
38.11	Tables 15-13 and 24-8	Open space, play and leisure. Permanent changes in availability and quality of, and access to, public	On the basis that operational activities associated with the proposed development are expected to be minimal, the Inspectorate agrees that any impacts to open space, play and leisure are unlikely to be significant. This matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<p>areas of open space and recreational walking and cycling routes during operation.</p> <p>(All Parts)</p>	
38.12	Tables 15-13 and 24-8	<p>Transport modes, access and connections. Permanent changes in community severance, vehicles on the local road network and public transport during operation.</p> <p>(All Parts)</p>	<p>On the basis that operational activities associated with the proposed development are expected to be minimal, the Inspectorate agrees that any impacts to transport modes, access and connections are unlikely to be significant. This matter can be scoped out of the ES.</p>
38.13	Tables 15-13 and 24-8	<p>Economic environment (employment and income, education and training opportunities). Operational direct and indirect job creation and economic activity, as</p>	<p>The Inspectorate agrees that due to the limited nature of operational activities, operational employment and wider economic benefits are likely to be limited. This matter can be scoped out of the ES.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		well as educational opportunities and support during operation. (All parts)	
38.14	Tables 15-13 and 24-8	Noise and vibration. Permanent changes to noise and vibration and road traffic noise during operation. (Parts 1b (excluding Break Pressure Tank), 3 and 4b)	This matter is proposed to be scoped out on the basis that, with the exception of the Break Pressure Tank which is scoped in, these areas will not contain any noise producing plant. On this basis, the Inspectorate agrees that significant effects are not likely to occur. This matter can be scoped out of the ES.
38.15	Tables 15-13 and 24-8	Noise and vibration. Permanent changes to road traffic noise during operation. (All parts)	This matter is proposed to be scoped out on the basis that the proposed development is not expected to generate significant additional traffic flows once operational. Insufficient information has been provided on the location, type and duration of maintenance activities to rule out significant effects as a result of increased road traffic. As such, the Inspectorate is currently not in a position to scope this matter out. The ES should either assess noise and vibration impacts on sensitive receptors due to an increase in road traffic or provide justification as to why this matter is not expected to result in significant impacts. This justification should be supported by information on maintenance activities such as the location, type and duration of such activities.
38.16	Tables 15-13 and 24-8	Housing: permanent changes to housing	The scoping report proposes to scope this matter out on the basis that no additional changes to housing need and provision beyond those identified as permanent in the construction phase. On this basis, the Inspectorate agrees that significant impacts as a

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		need and provision during operation. (All parts)	result of changes to housing need and provision during the operation of the proposed development are not likely to occur. This matter can be scoped out from the ES.

ID	Ref	Description	Inspectorate's comments
38.17	n/a	n/a	n/a

3.9 Landscape and visual

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
39.1	Paragraph 16.6.5 and Tables 16-11 and 24-9	Physical and perceptual aspects of the landscape designations and Landscape Character Areas (LCAs) within the study areas during operation. (Parts 1b, and sections of 4b outside the National Landscape)	The scoping report proposes to scope this matter out on the basis that the majority of pipelines outside of the National Landscape (NL) will be underground and reinstated as part of the construction phase. This justification does not include mention of the Break Pressure Tank (BPT) structure. As such, the Inspectorate considers that insufficient information has been provided to rule out operational impacts on landscape designations and LCAs. The ES should either provide a statement with further justification as to why significant effects would not be likely to occur, including reference to the parameters and location of the BPT in relation to any designations/LCAs, or provide an assessment of these matters.
39.2	Tables 16-11 and 24-9	Visual effects on visual receptors, based on identified representative views during operation. (Parts 1b except for the Break Pressure Tank, and sections of Part 4b outside the National Landscape)	The scoping report proposes to scope this matter out on the basis that the majority of pipelines outside of the NL will be underground and reinstated as part of the construction phase. Providing any above ground pipelines are assessed where significant effects are considered likely, the Inspectorate agrees that this matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
393	Tables 16-11 and 24-9	A standalone nighttime assessment during operation. (All parts)	The scoping report proposes to scope this matter out on the basis that there will be limited lighting required during the operation of the proposed development. The Inspectorate considers that insufficient information has been provided on the lighting scheme for the proposed development. As such, the Inspectorate is not in a position to scope this matter out entirely. Whilst it is considered that a standalone nighttime assessment is not required, the impacts from lighting should still be considered within the landscape and visual chapter of the ES.

ID	Ref	Description	Inspectorate's comments
394	N/A	Photography / visualisations	The Inspectorate advises that, with regards to landscape photography and visualisations, the applicant should seek to agree the number and location of wireframes / photomontages with the relevant consultation bodies.
395	Section 16.4	Study areas	For the avoidance of doubt, the study area should be informed by Zones of Theoretical Visibility (ZTV) and be based on the furthest extent of likely significant effects.

3.10 Major accidents and disasters

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 24-1 and Appendix 17-1 Table 1	Flooding from rivers, surface water, groundwater, reservoirs, canals and sewers. – Construction and Operation (All parts)	This matter is proposed to be scoped out on the basis that during construction, good practice measures (set out in the Code of Construction Practice (CoCP) and secured in the DCO) will be implemented, works will be overseen by a qualified civil engineer and a permanent site drainage system will incorporate a range of measures to ensure the proposed development is not at risk of flooding during operation. Considering that the flood risk of the proposed development is to be assessed within a FRA and ES Chapter 22: Water Environment and Flood Risk, the Inspectorate is content to scope this matter out from the Major Accidents and Disaster (MA&D) assessment.
3.10.2	Table 24-1 and Appendix 17-1 Table 1	<p>Extreme weather events:</p> <ul style="list-style-type: none"> Storms, heatwaves, low temperatures and heavy snow during construction (All parts) Droughts during construction and operation (All parts) 	<p>This matter is proposed to be scoped out on the basis that first notification of a severe weather event will come from the met office as an early warning, the CoCP will set out measures for the monitoring of adverse weather conditions and include requirements for emergency preparedness and response plans and a safe system of work would be implemented by the contractor(s) to state how health and safety matters are managed and risks are identified.</p> <p>Drought during operation is also proposed to be scoped out on the basis that the proposed development has been designed to provide potable water during periods of drought.</p> <p>Given these measures and the nature of the proposed development, the Inspectorate agrees that MA&D from extreme weather events are unlikely to occur. This matter can be scoped out from the ES.</p>
3.10.3	Appendix 17-1 Table 1	Wildfires during construction. (All Parts)	The scoping report states that fire safety risks at the construction site will be managed in compliance with Construction Design and Management regulations 2015 and relevant good industry practice. This includes the completion and implementation of a Fire Risk Assessment prior to construction, including emergency plans and procedures. On this

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			basis, the Inspectorate agrees that the potential for MA&D from wildfires during construction can be scoped out of the ES.
3.104	Appendix 17-1 Table 1	Ground or structural collapse during construction. (All parts)	The scoping report states that risks of ground/structural collapse would be minimised through geotechnical design in accordance with relevant standards and that further assessment of ground conditions underlying the site would be undertaken for specific areas, if deemed necessary. On this basis, the Inspectorate agrees that the risk of a MA&D occurring through ground or structural collapse is not likely to be significant. This matter can be scoped out of the ES.
3.105	Appendix 17-1 Table 1	Fire/explosion (including from unexploded ordnance (UXO) or utility strike) during construction. (All parts)	This matter is proposed to be scoped out on the basis that any response required on site would be covered by the emergency arrangements and the implementation of a safe system of work and the CoCP will outline the procedure required if a UXO is found during construction. Providing the Preliminary Risk Assessment does not identify any areas with a high risk of UXO, the Inspectorate is content to scope this matter out. Should any high risk UXO areas be identified through the PRA, then these should be fully assessed within the ES.
3.106	Appendix 17-1 Table 1	Pipeline burst during construction and operation. (Parts 1b and 4b)	This matter is proposed to be scoped out on the basis that a pipeline burst during construction would be managed by the existing procedures enforced by Affinity Water/ Severn Trent and a FRA is to be submitted with the DCO to confirm that the proposed development would not alter residual flood risk from a pipeline burst during operation. On this basis, the Inspectorate agrees that a MA&D from a pipeline burst is not likely to occur. This matter can be scoped out from the ES.
3.107	Appendix 17-1 Table 1	Pollution incident during construction and operation. (Parts 1a and 4a)	This matter is proposed to be scoped out on the basis that measures for pollution prevention and control will be set out within the CoCP, which includes the requirement for an emergency response plan. On this basis, the Inspectorate agrees that MA&D as a result of a pollution incident are not likely to occur. This matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.108	Appendix 17-1 Table 1	General mains network outage causing the proposed development to lose power during operation. (Parts 1a and 4a)	This matter is proposed to be scoped out on the basis that the proposed development would be designed to shut down safely in the event of loss of power. On this basis, the Inspectorate agrees that a loss of power to the proposed development would be unlikely to result in MA&D. This matter can be scoped out of the ES.
3.109	Appendix 17-1 Table 1	Major accidents caused by malicious acts/vandalism against the proposed development during operation. (All parts)	This matter is proposed to be scoped out on the basis that the proposed development would implement security arrangements in line with existing Severn Trent, Canal & River Trust and Affinity Water operating procedures and that malicious acts that may result in water pollution would not impact on the ability of the proposed development to provide water as the abstracted water would be subsequently treated. On this basis, the Inspectorate agrees that MA&D caused by malicious acts/vandalism are not likely to occur. This matter can be scoped out of the ES.
3.10.10	Appendix 17-1 Table 1	Impairment, interruption or severance of existing utilities (electricity, gas, water and telecommunications) during construction. (All parts)	The scoping report states that the CoCP will include the requirement for measures for the protection of existing utilities to be established, such as inspection pits and clearly demarcated clearances. On this basis, the Inspectorate agrees that MA&D as a result of impairment, interruption or severance of existing utilities are not likely to occur. This matter can be scoped out from the ES.
3.10.11	Appendix 17-1 Table 1	Full or partial obstruction of emergency services during construction.	This matter is proposed to be scoped out on the basis that journey delays will be assessed within the traffic and transport section of the ES and procedures to address any highway incidents or vehicle breakdown of construction traffic especially at peak times will be requirement of the Construction Traffic Management Plan (CTMP).

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		(All parts)	
3.10.12	Appendix 17-1 Table 1	Outbreak of disease including animal health, notifiable disease, emerging infectious disease and pandemic influenza during construction. (All parts)	The Inspectorate agrees that likely significant effects resulting from the outbreak of disease during construction of the proposed development are not likely to occur. This matter can be scoped out from the ES.
3.10.13	Appendix 17-1 Table 1	Severe meteorology during construction and operation. (All parts)	The Inspectorate agrees that severe meteorology is unlikely to result in MA&D during construction or operation of the proposed development. This matter can be scoped out of the ES.
3.10.14	Appendix 17-1 Table 1	Earthquakes during construction. (All parts)	The Inspectorate agrees that, due to the geographic location of the proposed development, earthquakes are not likely to occur at a magnitude that would constitute significant effects. This matter can be scoped out of the ES.
3.10.15	Appendix 17-1 Table 1	Volcanic eruptions during construction. (All parts)	The Inspectorate agrees that, due to the geographical location of the proposed development, volcanic eruptions are not likely to occur. This matter can be scoped out of the ES.
3.10.16	Appendix 17-1 Table 1	Road traffic accidents on the wider road network during construction.	This matter is proposed to be scoped out on the basis that although construction would introduce additional vehicle movements into the wider road network, the risk would be managed through a CTMP. On this basis, the Inspectorate agrees that MA&D as a result of road traffic incidents on the wider network are not likely to occur. This matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		(All parts)	
3.10.17	Appendix 17-1 Table 1	Railway incidents during construction and operation (Part 1b)	This matter is proposed to be scoped out on the basis that sections of the part 1b pipeline that cross railway lines and Highspeed 2 safeguarding areas will be tunnelled, the depth and design of which would be agreed with Network Rail. On this basis, the Inspectorate agrees that railway incidents as a result of the proposed development are not likely to occur. This matter can be scoped out from the ES.

ID	Ref	Description	Inspectorate's comments
3.10.18	n/a	n/a	n/a

3.11 Noise and vibration

(Scoping Report Section 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Table 18-5	Direct permanent noise impacts on sensitive receptors during operation. (Parts 1b (excluding BPT), Part 3 and Part 4b)	This matter is proposed to be scoped out on the basis that these parts of the proposed development do not contain any noise producing plant. On this basis, the Inspectorate agrees that these parts of the proposed development are not likely to result in significant noise impacts on sensitive receptors. This matter can be scoped out of the ES.
3.11.2	Table 18-5	Direct permanent vibration impacts on sensitive receptors during operation. (All Parts)	<p>The scoping report proposes to scope this matter out on the basis that none of the proposed development installations are expected to generate levels of vibration that would constitute significant effects on nearby receptors and the applicant has committed to ensuring all relevant mechanical elements are fitted to manufacturer recommended anti-vibration mounts and that the structure of each permanent installation provides an adequate level of vibration isolation such that no significant levels of vibration are emitted into the environment.</p> <p>The Inspectorate considers that insufficient information has been provided on the nature and location of plant, noise sensitive receptors and operational activities to scope this matter out. The ES should assess direct permanent vibration impacts on sensitive receptors in proximity to the proposed development.</p>
3.11.3	Table 18-5	Direct permanent noise impacts on sensitive receptors due to increased road traffic during operation.	The scoping report proposes to scope this matter out on the basis that the proposed development is not expected to generate significant additional traffic flows once operational. Insufficient information has been provided on the location, type and duration of maintenance activities to rule out significant effects as a result of increased road traffic. As such, the Inspectorate is currently not in a position to scope this matter out. The ES should

		(All Parts)	either assess noise impacts on sensitive receptors due to an increase in road traffic or provide justification as to why this matter is not expected to result in significant impacts. This justification should be supported by information on maintenance activities such as the location, type and duration.
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ID	Ref	Description	Inspectorate's comments
3.11.4	n/a	Ecological receptors	The Inspectorate notes that there is little reference to other receptor types that may be sensitive to noise and vibration, such as ecological receptors. The Inspectorate welcomes consideration of noise impacts on nature conservation areas and other ecological receptors (e.g. protected species). The noise assessment should cross-refer to the findings of other relevant aspect chapters. The ES should clearly explain any assumptions made regarding the assessment of likely significant effects arising from noise and vibration on sensitive ecological receptors
3.11.5	n/a	Sensitive receptors	For the avoidance of doubt, the ES should provide a list of sensitive receptors in proximity to the proposed development. This should include consideration of ecological, heritage and human receptors. Figures showing the location of these receptors in relation to the proposed development should also be provided.
3.11.6	Paragraph 18.4.1	Study area	The scoping report states that the construction phase study area is defined as 300m from the Order limits for noise, and 100m for vibration. It is not clear where this study area has been derived. The ES should contain robust justification for the study areas, citing the likely extent of significant effects and any relevant guidance used.
3.11.7	Paragraph 18.3.3	Monitoring locations	The Inspectorates considers that the location of monitoring locations for noise and vibration should be detailed on a figure in relation to the proposed development and sensitive receptors.
3.11.8	Section 18.7	Methodology	The Inspectorate considers that predicted vehicle movements and details on the type, duration and location of plant on site should be used to inform a worst-case scenario for the assessment.

3.12 Socio-economics

(Scoping Report Section 19)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.121	Tables 19-10 and 24-12	Impacts on the use of the canal network as a recreational and leisure resource via direct works or indirect via in combination effects identified by other discipline assessments during construction and operation. (Parts 1a, 1b, 4a and 4b)	The scoping report states that the proposed development would not result in temporary disruption or reduced access to the canal network for recreational and leisure users in these Parts. Considering these Parts do not feature works to the canal, the Inspectorate agrees that they would be unlikely to result in temporary disruption or reduced access to the canal network for commercial users. This matter can be scoped out of the ES.
3.122	Tables 19-10 and 24-12	Impacts on the use of the canal network for commercial uses via direct works or indirect via in combination effects identified by other discipline assessments during construction and operation. (Parts 1a, 1b, 4a and 4b)	The scoping report states that the proposed development would not result in temporary disruption or reduced access to the canal network for commercial uses in these Parts. Considering these parts do not feature works to the canal, the Inspectorate agrees that they would be unlikely to result in temporary disruption or reduced access to the canal network for commercial users. This matter can be scoped out of the ES.

3.123	Tables 19-10 and 24-12	Impacts on the tourism sector during construction and operation. (Parts 1a, 1b, 4a and 4b)	The scoping report proposes to scope this matter out on the basis that there is no canal-based tourism activity which could be impacted by the proposed development. On this basis, the Inspectorate agrees that significant impacts to the tourist sector in proximity to these parts are unlikely to occur. This matter can be scoped out of the ES.
3.124	Tables 19-11 and 24-12	Permanent direct and indirect employment generation and promotion/ provision of training and apprenticeship opportunities during operation. (All parts)	This matter is proposed to be scoped out on the basis that whilst the proposed development would likely lead to beneficial employment and training/apprenticeship impacts, they would be unlikely to be significant. On this basis, the Inspectorate agrees that this matter can be scoped out of the ES.
3.125	Tables 19-11 and 24-12	Gross Value Added (GVA) generation during operation. (All parts)	This matter is proposed to be scoped out on the basis that GVA generation would be minimal due to the low levels of operational employment associated with the proposed development. On this basis, the Inspectorate agrees that this matter can be scoped out of the ES.
3.126	Tables 19-11 and 24-12	Impacts on local and private assets (including residential properties, local businesses, community facilities, open space and visitor attractions), either via direct works or indirect via in combination effects identified by	The Scoping Report states that impacts on local and private assets beyond the construction phase are unlikely as operational activities such as maintenance would be minimal. The Inspectorate considers that insufficient information on the type, location and duration of maintenance activities has been provided to support this position. As such, the Inspectorate is not able to scope this matter out. The ES should either provide a statement justifying why significant effects are not likely to occur, supported by further information on operational activities, or provide an assessment of effects where significant impacts are likely to occur.

		other discipline assessments during operation. (All parts)	
3.127	Tables 19-11 and 24-12	Permanent disruption to Public Rights of Way (ProW) and canal towpath access during operation. (All parts)	This matter is proposed to be scoped out on the basis that operational maintenance activities would have a minimal effect on PRow and towpath access. The Inspectorate considers that insufficient information on the type, location and duration of maintenance activities has been provided to support this position. As such, the Inspectorate is not able to scope this matter out. The ES should either provide a statement justifying why significant effects are not likely to occur, supported by further information on operational activities, or provide an assessment of effects where significant impacts are likely to occur.
3.128	Tables 19-11 and 24-12	Impacts on accommodation facilities during operation. (All parts)	The Scoping Report proposes to scope this matter out on the basis that the operation of the proposed development is not likely to require a large workforce and so effects on accommodation facilities are expected to be minimal. Whilst limited information has been provided on the number of operational staff required for maintenance activities, the Inspectorate agrees that, due to the permanent nature of operational employment, there are unlikely to be significant impacts on local accommodation facilities. This matter can be scoped out from the ES. However, for the avoidance of doubt, the ES should confirm the total number of operational staff required.
3.129	Tables 19-11 and 24-12	Land use impacts on planned and proposed developments during operation. (All parts)	The scoping report proposes to scope this matter out on the basis that, due to the limited nature of operational activities, impacts to land use on planned and proposed development are not considered to be significant. The Inspectorate considers that insufficient information on the type, location and duration of maintenance activities has been provided to support this position. As such, the Inspectorate is not able to scope this matter out. The ES should either provide a statement justifying why significant effects are not likely to occur, supported by further information on operational activities, or provide an assessment of effects where significant impacts are likely to occur.

ID	Ref	Description	Inspectorate's comments
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3.1210	Section 19.7	Methodology	The Applicant should make effort to agree the approach of the assessment with the relevant consultation bodies, to ensure it is appropriate to the construction, operation and maintenance of the proposed development.
3.1211	Section 19.7	Physical effects on canal users	For the avoidance of doubt, the socio-economic assessment should include consideration of physical constraints to socio-economic receptors such as those caused by an increase in water flow velocity on boat users, the impacts of raising bank levels on moorings and the potential increase in weed growth. The Applicant's attention is drawn to the consultation response from Braunston Parish Council (Appendix 2 of this opinion) in this regard.

3.13 Traffic and transport

(Scoping Report Section 20)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.131	Tables 20-3 and 21-15 and 24-13	Impact on hazardous/large loads during construction. (All parts)	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, the Inspectorate notes that in table 21-15 changes in available landfill capacity have been scoped in as the types and quantities of waste during construction is unknown. Therefore, the Inspectorate 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.
3.132	Tables 20-4 and 24-13 and paragraph 3.5.62	Impact on severance of communities during operation. (All parts)	This matter is proposed to be scoped out on the basis that the proposed development will not significantly impact existing canal navigation and PRow's during operation of the proposed development 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 that there is the possibility that mooring sites and PRow's 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 this scoping opinion) on this matter, on this basis the Inspectorate 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 PRow's and navigation by water during operation of the proposed development and provide evidence demonstrating agreement with relevant consultation bodies.
3.133	Tables 20-4	Impact on pedestrian delay during operation.	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

	and 24-13	(All parts)	basis of the information provided in the scoping report, the Inspectorate can agree to scope this matter out.
3.134	Tables 20-4 and 24-13	Impact on non-motorized user amenity during operation. (All parts)	This matter is proposed to be scoped out on the basis that the proposed development will not significantly impact existing PRow's during operation of the proposed development as it is anticipated that diverted PRow's will be reinstated post-construction. However, it is also noted that in in table 20-4 that there is the possibility that PRow's could be permanently diverted. On the basis that PRow's are reinstated, then Inspectorate can agree this matter can be scoped out of the ES.
3.135	Tables 20-4 and 24-13	Impact on fear and intimidation on and by road users during operation. (All parts)	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, the Inspectorate can agree to scope this matter out.
3.136	Tables 20-4 and 24-13	Impact on road vehicle driver and passenger delay during operation. (All parts)	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, the Inspectorate can agree to scope this matter out.
3.137	Tables 20-4 and 24-13	Impact on hazardous/large loads during operation. (All parts)	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.

ID	Ref	Description	Inspectorate's comments
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3.138	Paragraph 20.5.3 and appendix 20-2	PRoWs intersected or affected by the proposed development	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. It is noted in the scoping report that 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.
3.139	Paragraphs 3.5.32, 20.5.2 and appendix 20-1	Roads intersected or affected by the proposed development	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. 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.
3.13.10	Appendix 7-1 paragraphs 6.2.21 and 6.2.22	Affected road network	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.

3.14 Materials and waste

(Scoping Report Section 21)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Tables 21-15 and 24-14	Waste arising from extraction, processing and manufacture of construction components and products during construction. (All parts)	The 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 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.
3.14.2	Tables 21-15 and 24-14	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 and waste during construction. (All parts)	The 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 scoping report

3.143	Tables 21-15 and 24-14	Changes to safeguarded mineral and waste sites during construction. (Parts 1a, 4a and 4b only)	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.
3.144	Tables 21-15 and 24-14	Changes in availability of materials during operation. (All parts)	<p>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.</p> <p>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.</p>
3.145	Tables 21-15 and 24-14	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 and waste) during operation. (All parts)	The 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 scoping report

3.146	Tables 21-15 and 24-14	Changes in available landfill void capacity during operation. (Parts 1b, 2, 3, and 4b)	<p>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.</p> <p>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.</p>
3.147	Tables 21-15 and 24-14	Changes to safeguarded mineral and waste sites during operation. (All parts)	<p>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 matters can be scoped out of further assessment.</p>

ID	Ref	Description	Inspectorate's comments
3.148	Paragraph 21.5.2	Existing baseline – anticipated quantities of materials	The 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.
3.149	Paragraphs 21.8.2, 21.8.3, 21.8.4	Types and quantities of waste	The 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 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.

3.15 Water environment and flood risk

(Scoping Report Section 22)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Table 22-28	Disturbance of existing contamination in groundwater during construction. (All parts)	This matter is proposed to be scoped out on the basis that disturbance on existing groundwater contamination has been scoped in for assessment in Chapter 14: Ground Conditions. The Inspectorate agrees with this approach and on this basis agrees this matter can be scoped out from the Water Environment and Flood Risk aspect chapter.
3.15.2	Table 22-28	Deterioration of groundwater quality in aquifers, Groundwater Dependent Terrestrial Ecosystems (GWDTEs), abstraction points and Water Framework Directive (WFD) waterbodies by disturbance of existing contamination during construction. (All parts)	This matter is proposed to be scoped out on the basis that this aspect has been scoped in for assessment in Chapter 14: Ground Conditions. The Inspectorate agrees with this approach and on this basis agrees this matter can be scoped out from the Water Environment and Flood Risk aspect chapter. However, the ES should provide cross references to the water chapter where relevant.
3.15.3	Table 22-28	Increase in residual risk of flooding from reservoirs during construction.	This matter is proposed to be scoped out during construction on the basis that Parts 1a, 1b, 4a and 4b are not located in proximity to the risk of flooding from the Daventry and Brayton reservoirs. On this basis, the Inspectorate agrees that these parts of the proposed development are not likely to result in significant risk of flooding of canals during

		(Parts 1a, 1b, 4a and 4b)	construction in these areas of the proposed development, therefore this matter can be scoped out of the ES
3.154	Table 22-28	Increased risk of flooding from canals during construction. (Parts 1a, 1b, 3, and 4b)	This matter is proposed to be scoped out on the basis that there will be no temporary works in parts 1a, 1b, 3 and 4b. On this basis, the Inspectorate agrees that these parts of the proposed development are not likely to result in significant risk of flooding of canals during construction in these areas of the proposed development, therefore this matter can be scoped out of the ES.
3.155	Table 22-29	Reduction in water available for abstractors from the Rivers Tame and Trent during operation. (Parts 1b, 2, 3, 4a, and 4b)	This matter is proposed to be scoped out on the basis that there will not be a reduction in available water as abstractions in these areas will not be sourced from the rivers Tame and Trent. The applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of this scoping opinion) requesting for parts 1b, 2 and 3 to be scoped in for potential impacts from available water used for abstraction, on this basis the Inspectorate does not agree to scope out parts 1b, 2 and 3. The Inspectorate does agree to scope out parts 4a and 4b. The ES should provide an assessment of the likely significant effects on available water used for abstraction from the operation of the proposed development and provide evidence demonstrating agreement with relevant consultation bodies.
3.156	Table 22-29	Sediment transport changes and hydro-ecological condition deterioration in the Rivers Tame and Trent during operation. (Parts 1b, 2, 3, 4a and 4b)	This matter is proposed to be scoped out on the basis that the diversion of the Minworth Wastewater Recycling Centre discharge does not have the potential to change water levels and flow velocities in the rivers Tame and Trent. Table 22-29 refers scoping out this aspect out for parts 1b, 4a and 4b only and does not refer to part 2. On the basis of the information provided in the scoping report, the Inspectorate agrees to scope this matter out, however clarity should be provided in the ES regarding which parts are to be scoped out.
3.157	Table 22-29	Deterioration of water quality in the Rivers Tame and Trent, the canal network and the Daventry and Drayton	This matter is proposed to be scoped out on the basis that as these areas are 'controlled sites' and therefore there is no of change to water levels and flow that could impact water quality. The applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of this scoping opinion) requesting for parts 1b, 4a and 4b to be scoped in for the potential due to potential discharges across all areas of the GUC transfer, on this basis

		Reservoirs during operation. (Parts 1b, 4a and 4b)	the Inspectorate does not agree to scope out parts 1b and 2. The ES should provide an assessment of the likely significant effects on water quality from the proposed development and provide evidence demonstrating agreement on this matter with relevant consultation bodies.
3.15.8	Table 22-29	Increase in flood risk from canals during operation. (Parts 1a and 4b)	This matter is proposed to be scoped out on the basis that these areas of the proposed development are not located in proximity to the canal sections. On this basis, the Inspectorate agrees that these parts of the proposed development are not likely to result in significant risk of flooding from canals during operation, therefore this matter can be scoped out of the ES.
3.15.9	Table 22-29	Changes to flow patterns and sediment mobility during operation. (Parts 1a, 1b, 3, 4a and 4b)	This matter is proposed to be scoped out on the basis that maintenance works that would alter sediment mobility would not be required in these parts of the proposed development. On this basis, the Inspectorate agrees that these parts of the proposed development are not likely to result in significant risk of changes to sediment mobility, therefore this matter can be scoped out of the ES

ID	Ref	Description	Inspectorate's comments
3.15.10	Paragraph 22.4.2	Study area	The scoping report states that the study area is defined as a 1km buffer around the EIA Scoping Boundary, however it is not clear where this study area has been derived. The ES should contain robust justification for the study areas, citing the likely extent of significant effects and any relevant guidance used.
3.15.11	Paragraph 3.5.41	Existing baseline – flood risk and water capacity	The scoping report states in the existing baseline several other named reservoirs and waterbodies which are located within all parts of the proposed development which have a risk or residual risk of flooding. Given that the construction activities to raise banks and works to structures along the route of the GUC and the operation of the GUC with the transfer of water and abstractions, it is currently not clear whether receiving or hydrologically connected waterbodies and the fluvial floodplain would be impacted by the operation of the GUC. For example, the capacity for abstraction capabilities during

			prolonged periods of dry weather or an increase in water in the GUC system and the potential for breaching infrastructure. The ES should make clear how operation of the GUC may impact other connected waterbodies as a result of its operation. The applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of this scoping opinion) on this matter.
3.15.12	n/a	Data and modelling	The scoping report has used modelling and data to assess the potential impacts on water resources, flooding and water quality from the proposed development. The applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of this scoping opinion) as it appears that some of the data and modelling does not reflect the current sources information available, therefore any conclusions used in the assessment of likely significant effects from this data and modelling maybe be inaccurate. The applicant should consult with relevant consultation bodies to ensure that the data used to inform the ES to assess the likely significant effects on water resources, flood risk and water quality are based on up to date information.
3.15.13	Volume 2 figures 12-3 and	Study area - WFD waterbodies	The scoping report states that the study area for the water environment has been determined by hydrological receptors connected to the proposed development, in addition to a 1km buffer around the scoping boundary and a wider buffer for the zone of influence where hydrological features are deemed relevant. A summary of the waterbodies which interact or cross the proposed development has been provided appendix 12-3. However, it appears that some WFD waterbodies or tributaries of these which interact or cross the proposed development have not been included within the figures provided. Therefore, it is not clear to what extent those WFD waterbodies have been taken into account in the assessment. The applicant's attention is drawn to the comments from the Environment Agency (appendix 2 of this scoping opinion) on this matter. The ES should provide an assessment of all affected waterbodies including WFD bodies and provide maps to scale that identifies those waterbodies that are considered in the assessment of likely significant effects.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	Pitstone Parish Council
	Wing Parish Council
	Cheddington Parish Council
	Slapton Parish Council
	Drayton Parslow Parish Council
	Stoke Hammond Parish Council
	Great Brickhill Parish Council
	Little Gaddesden Parish Council
	Markyate Parish Council
	Higham on the Hill Parish Council
	Sheepy Parish Council
	Witherley Parish Council
	Ivinghoe Parish Council
	Mentmore Parish Council
	Edlesborough Parish Council
	Stewkley Parish Council
	Whittlebury Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Paulerspury Parish Council
	Potterspury Parish Council
	Yardley Gobion Parish Council
	Litchborough Parish Council
	Cold Higham Parish Council
	Pattishall parish Council
	Shutlanger Parish Council
	Roade Parish Council
	Tiffield Parish Council
	Gayton Parish Council
	Rothersthorpe Parish Council
	Blisworth Parish Council
	Milton Malsor Parish Council
	Nether Heyford Parish Council
	Kislingbury Parish Council
	Ashton Parish Council
	Hartwell Parish Council
	Quinton Parish Council
	Old Stratford Parish Council
	Alderton Parish Council
	Bugbrooke Parish Council
	Stoke Bruerne Parish Council
	Upper Heyford Parish Council
	Cosgrove Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Braunston Parish Council
	Long Buckby Parish Council
	Yelvertoft Parish Council
	Staverton Parish Council
	Newnham Parish Council
	Daventry Parish Council
	Everdon Parish Council
	Farthingstone Parish Council
	Stowe IX Churches Parish Council
	Weedon Bec parish Council
	Flore Parish Council
	Norton Parish Council
	Brington Parish Council
	Barby Parish Council
	Kilsby Parish Council
	Lilbourne Parish Council
	Watford Parish Council
	East Haddon Parish Council
	Crick Parish Council
	West Haddon Parish Council
	Ravensthorpe Parish Council
	Soulbury Parish Council
	Badby Parish Council
	Welton Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Whilton Parish Council
	Upton Parish Council
	Hunsbury Meadows Parish Council
	Newton Longville Parish Council
	Kingsbury Parish Council
	Coleshill Parish Council
	Shustoke Parish Council
	Curdworth Parish Council
	Lea Marston Parish Council
	Middleton Parish Council
	Nether Whitacre Parish Council
	Over Whitacre Parish Council
	Dordon Parish Council
	Astley Parish Council
	Ansley Parish Council
	Bentley Parish Council
	Mancetter Parish Council
	Hartshill Parish Council
	Grendon Parish Council
	Water Orton Parish Council
	Wishaw and Moxhull Parish Council
	Baxterley Parish Council
	Baddesley Ensor Parish Council
	Corley Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Bentley and Merevale Parish Council
	Atherstone Town Council
	Caldecote Parish Council
	Grandborough Parish Council
	Monks Kirby Parish Council
	Wolfhampcote Parish Council
	Ryton-on-Dunsmore Parish Council
	Brandon and Bretford Parish Council
	Church Lawford Parish Council
	Long Lawford Parish Clerk
	Combe Fields Parish Council
	Stretton under Fosse Parish Council
	Easenhall Parish Council
	Shilton and Barnacle Parish Council
	Withybrook Parish Council
	Dunchurch Parish Council
	Willoughby Parish Council
	Clifton upon Dunsmore parish Council
	Harborough Magna Parish Council
	Churchover Parish Council
	Pailton Parish Council
	Wolvey Parish Council
	Binley Woods Parish Council
	Cawston Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	King's Newnham Parish Council
	Brinklow Parish Council
	Ansty Parish Council
	Newton and Biggin Parish Council
	Burton Green Parish Council
	Stoneleigh Parish Council
	Baginton Parish Council
	Shenstone Parish Council
	Weeford Parish Council
	Hints with Canwell Parish Council
	Berkswell Parish Council
	Castle Bromwich Parish Council
	Smith's Wood Parish Council
	Sutton Coldfield Town Council
	Allesley Parish Council
	Keresley Parish Council
	Finham Parish Council
	Eaton Bray Parish Council
	Totternhoe Parish Council
	Studham Parish Council
	Whipsnade Parish Council
	Dunstable Town Council
	Caddington parish Council
	Leighton-Linslade Town Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Heath and Reach Parish Clerk
	Stanbridge Parish Council
	Houghton Regis Town Council
	Toddington Parish Council
	Woburn Parish Council
	Kensworth Parish Council
	Billington Parish Council
	Eggington Parish Council
	Tilsworth Parish Council
	Hockliffe Parish Council
	Chalgrave Parish Council
	Slip End Parish Council
	West Bletchley Parish Council
	Bletchley and Fenny Stratford Town Council
	Campbell Park Community Council
	Little Brickhill Parish Council
	Castlethorpe Parish Council
	Hanslope Parish Council
	Great Linford Parish Council
	Moulsoe Parish Council
	Loughton & Great Holm Parish Council
	Stony Stratford Town Council
	Wolverton and Greenleys Town Council
	Abbey Hill Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Bradwell Parish Council
	Stantonbury Parish Council
	Bow Brickhill Parish Council
	Woughton on the Green Community Council
	Walton Community Council
	Kents Hill and Monkston Parish Council
	Central Milton Keynes Town Council
	Haversham-cum-Little Linford Parish Council
	Newport Pagnell Town Council
	New Bradwell Parish Council
	Simpson and Ashland Parish Council
	Old Woughton Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	Forestry Commission
Relevant AONB Conservation Boards	Chilterns Conservation Board
	Cotswolds Conservation Board
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant internal drainage board	Buckingham and River Ouzel Internal Drainage Board
	Bedfordshire and River Ivel Internal Drainage Board
The Canal and River Trust	The Canal and River Trust

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant Highways Authority	Buckinghamshire Council Highways
	Central Bedfordshire Council Highways
	Milton Keynes Council Highways
	West Northamptonshire Council Highways
	Coventry Council Highways
	Birmingham City Council Highways
	Warwickshire County Council Highways
	National Highways
Integrated Transport Authorities (ITAs) and Passenger Transport Executives (PTEs)	West Midlands Combined Authority ITA
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The Coal Authority	Mining Remediation Authority
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	West Midlands Police and Crime Commissioner
	Staffordshire Police and Fire Commissioner
	Warwickshire Police and Crime Commissioner
	Leicestershire Police and Crime Commissioner
	Northamptonshire Police, Fire and Crime Commissioner

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Bedfordshire Police and Crime Commissioner
	Hertfordshire Police and Crime Commissioner
	Thames Valley Police and Crime Commissioner
The relevant ambulance service	East of England Ambulance Service NHS Trust
	West Midlands Ambulance Service NHS Foundation Trust
	East Midlands Ambulance Service NHS Trust
The relevant fire and rescue authority	Hertfordshire fire and rescue authority
	Bedfordshire fire and rescue service
	Leicestershire fire and rescue service
	Northamptonshire fire and rescue service
	Stoke-on-Trent and Staffordshire fire and rescue service
	Warwickshire fire and rescue service
	Buckinghamshire & Milton Keynes fire and rescue authority
	West Midlands fire service
	South Central Ambulance Service NHS Foundation Trust

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Bedfordshire, Luton and Milton Keynes Integrated Care Board

STATUTORY UNDERTAKER	ORGANISATION
	NHS Hertfordshire and West Essex Integrated Care Board
	NHS Staffordshire and Stoke-on-Trent Integrated Care Board
	NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
	NHS Birmingham and Solihull Integrated Care Board
	NHS Northamptonshire Integrated Care Board
	NHS Black Country Integrated Care Board
	NHS Leicester, Leicestershire and Rutland Integrated Care Board
	NHS Coventry and Warwickshire Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
	East Midlands Ambulance Service NHS Trust
The relevant NHS Foundation Trust	West Midlands Ambulance Service NHS Foundation Trust
	South Central Ambulance Service NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	The Canal and River Trust
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group

STATUTORY UNDERTAKER	ORGANISATION
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Anglian Water
	South Staffordshire Water Plc
	Severn Trent
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity generator with CPO Powers	Whilton - Breach Farm Energy Storage Limited
	Bulls Head North - Breach Farm Energy Storage Limited
	Clayhill - Breach Farm Energy Storage Limited
	Hale Manor Farm - Breach Farm Energy Storage Limited
	Hermitage - Breach Farm Energy Storage Limited
	Lindridge - Breach Farm Energy Storage Limited
	Blisworth - Breach Farm Energy Storage Limited
	Roade - EDF Energy
	Salcey Farm - Breach Farm Energy Storage Limited
	Swinford - Vattenfall
The relevant electricity distributor with CPO Powers	National Grid Electricity Distribution (East Midlands) Limited
	National Grid Electricity Distribution (West Midlands) Limited
	Advanced Electricity Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited

STATUTORY UNDERTAKER	ORGANISATION
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	UK Power Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Dacorum Borough Council
St Albans District Council
Three Rivers District Council

LOCAL AUTHORITY	
South Oxfordshire District Council	
South Cambridgeshire District Council	
Huntingdonshire District Council	
North Hertfordshire District Council	
Hinckley and Bosworth Borough Council	
North West Leicestershire District Council	
Harborough District Council	
Blaby District Council	
Lichfield District Council	
Tamworth Borough Council	
North Warwickshire Borough Council	
Rugby Borough Council	
Warwick District Council	
Stratford on Avon District Council	
Nuneaton and Bedworth Borough Council	
Bromsgrove District Council	
Cherwell District Council	
Buckinghamshire Council	
Slough Borough Council	
Royal Borough of Windsor and Maidenhead	
Wokingham Borough Council	
North Northamptonshire Council	
Coventry City Council	
Dudley Metropolitan Borough Council	

LOCAL AUTHORITY
London Borough of Hillingdon
Sandwell Metropolitan Borough Council
Solihull Metropolitan Borough Council
West Northamptonshire Council
Walsall Council
Bedford Borough Council
Central Bedfordshire Council
Birmingham City Council
Luton Borough Council
Milton Keynes City Council
Cambridgeshire County Council
Oxfordshire County Council
Staffordshire County Council
Warwickshire County Council
Worcestershire County Council
Hertfordshire County Council
Leicestershire County Council
Gloucestershire County Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Atherstone Town Council
Baginton Parish Council
Bedford Group of Drainage Boards
Birmingham City Council
Braunston Parish Council
Bromsgrove and Redditch Borough Council
Buckinghamshire Council
Bugbrook Parish Council
Cambridgeshire City Council
Campbell Park Community Council
Canal & River Trust
Cherwell District Council
Chilterns Conservation Board
Coal Authority
Combe Fields Parish Council
Cotswolds National Landscape Board
Crick Parish Council
Curdworth Parish Council
Daventry Town Council
Environment Agency
Flore Parish Council

Forestry Commission
Health and Safety Executive
Hinckley and Bosworth Borough Council
Historic England
Hunsbury Meadows Parish Council
Huntingdonshire District Council
Kingsbury Parish Council
Mancetter Parish Council
Milton Keynes City Council
Ministry of Defence
National Grid
National Highways
NATS
Natural England
Network Rail
North Herts Council
North Warwickshire Borough Council
North West Leicestershire District Council
Nuneaton and Bedworth Borough Council
Old Stratford Parish Council
Pitstone Parish Council
Royal Mail
Royal Sutton Coldfield Town Council
Rugby Borough Council
South Oxfordshire District Council and Vale of White Horse District Council
St Albans City and District Council

Stoke Hammond Parish Council
Stratford on Avon District Council
UK Health Security Agency
Walton Community Council
Warwickshire County Council
Weedon Bec Parish Council
Willoughby Parish Council
Wokingham Borough Council
Wolfhampcote Parish Council
Yelvertoft Parish Council

By Email: Planning Inspectorate
GUCtransfer@planninginspectorate.gov.uk

www.anglianwater.co.uk

Our ref: GUCT/ ScopingResponse

28th April 2025

Dear Ms. Wilkinson,

Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development)

Thank you for the opportunity to comment on the EIA Scoping Report for the above project.

It is appreciated in this case the Applicant are Affinity Water and Severn Trent water companies, however, the project area (shown in Figure 1-1) does cross a large part where Anglian Water (AWS) is the appointed water and sewerage undertaker. This includes the area north-west of Braunston traversing south to Houghton Regis and Dunstable near to Luton.

The following response is submitted on behalf of AWS in its statutory capacity regarding water resources, water supply network, water recycling centres (WRC), water recycling assets and the sewer network, as well as the related role of surface drainage.

AWS works to support the construction and operation of national infrastructure projects that are conducted in accordance with the Water Industry Act 1991. AWS works with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers, wastewater and water supply infrastructure are planned to be undertaken with the minimum of disruption to the project and customers.

We would expect the EIA to include reference to any existing infrastructure managed by AWS and the provision of replacement infrastructure and the requirements for new infrastructure. It is noted that the GUC Transfer project will enable Affinity Water (AfW) to reduce the existing import from Grafham, benefiting the Water Resources East region through enabling a new reverse transfer between AfW and AWS, which will ultimately help to support Cambridge Water (Section 4.2.12).

We would encourage on-going engagement to ensure that AWS and the Applicant have reached agreement on the approach to assets and connections in order that these matters are not drawn out during the Examination stage.

The Scheme - existing and proposed infrastructure

AWS welcomes the recognition of risks from the project to water and wastewater infrastructure and, reference should be made within the Scoping Report to the potential construction of the impacts on existing utility infrastructure and services. Given the potential location and extent of the proposed development area, there will be existing AWS assets both above and below ground, which serve the surrounding businesses and community. For instance, there are existing AWS assets including several water mains within the project area such as within the highway or its verges which link to the various settlements. Water abstraction locations may also be within the project area.

In addition, AWS has sewerage assets (drainage networks and above ground facilities including pumping stations and water recycling centres/ sewage treatment works). Connected to these are pipe connections to the corresponding settlements, including sewers and rising mains which can be in areas beyond the highway verges.

Utilities searches should, therefore, be undertaken to establish the extent of AWS's current and planned assets within the scheme's application boundary. These should be mapped to establish interactions with assets and the scheme designed to avoid impacts upon those assets. AWS would want to ensure the location and nature of our assets serving local communities and strategic water supply infrastructure are identified and protected. To reduce the need for diversions and the associated carbon impacts of those works, ground investigations would enable the Applicant to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to supporting infrastructure.

Maps of underground assets are available to view at the following link: <http://www.digdat.co.uk/>

For land investigation questionnaires relating to above ground assets and formal easements, you should contact our estates team on: awsestates@savills.com

Buffers will be required and will inform the construction and operation of the proposed scheme, and its layout and design, following necessary ground investigations. Suitable easements, separation distances and safe working practices will need to be agreed.

The Scoping Report refers to the use of both trenches and trenchless construction work methods. AWS requires the following standoff distances are applied for working each side of the medial line of pipes. This information is taken from our Protective Provisions template which will need to be agreed with AWS for the DCO submission.

- (a) 4 metres where the diameter of the pipe is less than 250 millimetres;
- (b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres; and
- (c) A distance to be agreed on a case-by-case basis and before the submission of the plan under subparagraph (1) is submitted where the diameter of the of the pipe exceeds 400 millimetres.

Baseline work including ground investigation and archaeology geophysical surveys will enable minimisation interfaces with our assets. We recommend that the GUC Transfer team identify the location of AWS assets (both above and below ground) from a desktop study of utilities searches. This should be undertaken to establish the extent of AWS's current and planned assets which may be within the project application boundary. This is also relevant to any AMP8 investment schemes which may be planned in this area.

Management Plans

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 construction this should take account of potential effects on our assets. Further advice on minimising and then relocating (where feasible) existing assets can be obtained from: connections@anglianwater.co.uk

Scheme assessment, design, mitigation and connections

Water recycling/ sewerage services

The Scoping Report is not clear on how any wastewater will be disposed of and how this will be managed such as a connection to an available public sewer. AWS notes a drainage strategy will be prepared (listed under Section 23.3 'Proposed ES Structure'). The situation should be confirmed for all stages (construction and operation) within the EIA.

Drainage and Surface Water

AWS welcomes the statement (Section 7.4) that the Flood Risk Assessment (FRA) will assess all applicable sources of flooding to and identify any mitigation measures required to ensure flood resilience and to prevent any off-site impacts. We consider that this should help to avoid increased risk of ground water infiltration/ surface water ingress to our wastewater networks that may lie in the vicinity of the proposed onshore scheme.

The FRA as part of the EIA, should consider any increased risk of surface water and groundwater flood risks arising from the scheme that could exacerbate sewer flooding risks due to infiltration/ingress to AWS networks, particularly in terms climate change impacts. The likelihood of more extreme weather events leading to higher-than-average rainfall and cumulative impacts of storm events, as recently experienced during Winter 2023/24, mean that infrastructure becomes increasingly vulnerable to flood risk. The project should aim to minimise any flood risks as far as possible by designing in measures to limit increased flood risks to utilities infrastructure.

Any potential embedded design measures such as Sustainable Drainage Systems (SuDS) to be utilised at permanent above ground installations to manage rainfall run-off and achieve sufficient attenuation to avoid increases in flood risk, and compensation flood storage at temporary site compounds to manage flood risk at these locations. AWS is responsible for management of the risks of flooding from surface water which are directed to foul water or combined water sewer systems.

Our preference would be for surface water run-off from above ground permanent buildings and impermeable surfacing to be managed by SuDS with any outfall to a watercourse, in accordance with the drainage hierarchy. The risk of sewer flooding and any required mitigation within the public sewerage network should form part of an FRA and drainage strategy. AWS would wish to be engaged on the preparation of a drainage strategy and consider that this should be required to demonstrate the appropriate management of run-off from the proposed onshore scheme (see Section 7.3.8.10).

Subject to confirmation that all surface water will be managed following the drainage hierarchy including Sustainable Drainage Systems (SuDS), AWS would want to clarify that the DCO as proposed will have no connection to the public sewer network for construction or for operations. This would then negate the need for the draft DCO Order to provide for any connection and so require consequent Protective

Provisions and Requirements to ensure any connections did not compromise the wastewater services of existing customers. AWS will be a consultee set out in Requirements for the approval of drainage strategies and surface water management plans.

Further advice wastewater capacity and options can be obtained by contacting the Pre-Development Team at: planningliaison@anglianwater.co.uk

Water resources

Section 4.2 'Water Resource Management Plan and Regional Plan Process' should also refer to AWS's WRMP [Water resources management plan](#)

As water may be used in the project construction and operation, this indicates that water resources should be assessed in the EA. The project's EIA will need to consider water resources and water efficiency through the preparation of a Water Resources Assessment (WRA). AWS recommends that the WRA is an integral part of Chapter 22 Water Environment and Flood Risk.

Impacts of climate change in terms of water availability for the construction, operation and decommissioning stages are also of relevance. In view of the guidance in the National Policy Statements we would have anticipated that the scoping would have included and then considered the approach to water supply and water resources in more detail.

AWS requests that these points are assessed early in the ES to set out how the project will be supplied with water, the wastewater managed, how water assets serving residents and business will be protected and how design has been altered to reduce the need for new water infrastructure or the diversion of existing assets. AWS also requires that the project seeks to minimise its demand for water and records this in the WRA.

We advise that the WRA is used to inform the Preliminary Environmental Impact Report (PIER) at the Statutory Consultation stage of the Development Consent Order (DCO) process and the Environmental Statement at submission. This will include engagement with environmental regulators.

In the case that an amount of water supply is to be requested from AWS for the project at construction or operation stage, the following additional points are made.

AWS has a statutory duty to supply water for domestic purposes. This means we are legally obliged to supply water to all household properties as well as any domestic requirements (e.g., drinking water, hand-basins, toilets and showers) of non-household properties. In many cases, domestic demand will be the only requirement for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers). Non-domestic demand refers to water use for industrial processes, (e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type of water usage where it might put at risk our ability to supply water for domestic purposes.

AWS has adopted a '[Non-Domestic Water Requests Policy](#)' which states that requests over 20m³/day will be declined. However, for Nationally Significant Infrastructure Projects that are requesting over 20m³/day of non-domestic water (as defined above) for a scheme, a WRA must be completed. This is so we can better understand water demands, water efficiency measures and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth.

The WRA will also need to be submitted to the pre-planning team also, so that the request for non-domestic water can be considered further. A copy of our WRA template is attached with this letter.

AWS recommends that new water supply connections are not sought during construction and that potable water supply for welfare facilities, for example, are served by tanker to reduce the embedded (capital) carbon from providing new connections. The Applicant should further confirm there will be temporary concrete batching facilities with consequent water demands and would be off-site and so not require an on-site supply (Section 3.5.12 etc.). Water requirements for firefighting measures and construction traffic (dust suppression/ wheel washing areas) should also be explained.

Further advice on water capacity and options can be obtained by submitting a pre-development enquiry to the Pre-Development Team at: planningliaison@anglianwater.co.uk and on the InFlow webpages: [InFlow | Development Services \(anglianwater.co.uk\)](http://InFlow | Development Services (anglianwater.co.uk))

Engagement and next steps

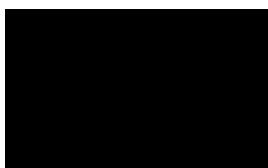
We consider AWS should be included on the list of consultees to be drawn up by the Applicant, as set out in Section 22.3 'Consultation' of the Scoping Report.

AWS would welcome engagement with the Applicant throughout the next stages of the project to address and resolve issues prior to the submission of the DCO including Protective Provisions. The preparation of a Statement of Common Ground should document key issues and the status of whether issues have been resolved or remain under discussion, which helps to reduce the Examining Authority questions for statutory undertakers and removes the possible need for changes to the project during Examination. We would recommend discussion on the following issues:

1. Impact of development on AWS's water and water recycling assets.
2. The design of the project to minimise interaction with AWS's assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.
3. Requirement for potable and raw water supplies (if any) and the inclusion of the WRA in the draft ES.
4. Requirement for water recycling connections (if any).
5. Confirmation of the project's cumulative impacts with any relevant AWS projects.
6. The Draft Development Consent Order (DCO), including draft Protective Provisions and requirements specifically to ensure our services are maintained during construction.

Advice on the form and content of suitable Protective Provisions in the draft DCO should be sought. Please do not hesitate to contact Carry Murphy [REDACTED] on these aspects or should you require clarification on the above response or during the pre- application to decision stages of the project.

Yours sincerely,



Phil Jones
Growth Strategy Manager – Sustainable Growth

Water Resource Assessment

The need for a Water Resource Assessment

Anglian Water is committed to supporting sustainable economic growth across the East of England. However, due to the impacts of climate change and to help protect the environment, the amount of water that businesses, including Anglian Water, can abstract is reducing. This situation is reducing our ability to be flexible with new requests to supply non-domestic connections which were not planned for in the Water Resources Management Plan 2025-2050 (WRMP24).

Whilst Anglian Water are taking steps to respond to this challenge with the construction of two new reservoirs and strategic pipeline transfers, these will take time to deliver. As such it is more crucial than ever that we work together with businesses, to ensure we are aware of their water demands for growth, and that demand management and water efficiency solutions are implemented to maximise what water is available.

Whilst Anglian Water has a statutory duty to supply water for domestic purposes (e.g., drinking water, hand-basins, toilets and showers) for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers), there is no legal duty to provide water for non-domestic usage (e.g., agri-food production or car washes) where it might put at risk our ability to supply water for domestic purposes. When a site is designated as an NSIP or SDO, we will do our utmost to provide the water required for your project. However, this is subject to a director level review within Anglian Water and can take some time to approve. In some instances, even NSIPS and SDOs may ultimately be refused their requested non-domestic water request.

Anglian Water has adopted a [‘Non-Domestic Water Requests Policy’](#) which states that requests over 20m³/day will be declined. However, for Nationally Significant Infrastructure Projects that are requesting over 20m³/day of non-domestic water (as defined above) for a scheme, a Water Resource Assessment must be completed. This is so we can better understand water demands, water efficiency measures and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth.

Water Resource Assessment (WRA)

We advise that the WRA is used to inform the Preliminary Environmental Impact Report at the Statutory Consultation stage of the Development Consent Order (DCO) process and the Environmental Statement at submission. This will include engagement with environmental regulators. The WRA will also need to be submitted to Anglian Water’s pre-planning team also, so that the request for non-domestic water can be considered further. To guide this, we have set out below the information we expect to be included.

1. Contact and project details

Applicant name	
Applicant address	
Applicant contact name	

Applicant contact email	
Applicant contact phone number	

Agent name (if applicable)	
Agent address	
Agent contact name	
Agent contact email	
Agent contact phone number	

Retailer name (if applicable)	
Retailer address	
Retailer contact name	
Retailer contact email	
Retailer contact phone number	
Water SPID	
Sewerage SPID	
Trade Effluent DPID	

Site address/location details	
Site contact name	
Site contact role	
Site contact email	
Site contact phone number	

Site type / usage	
Hours of production	
Days of production	
Peak production period	
When will your connection be required	
Number of full-time employees on site	
Number of jobs supported by new/additional supply and discharge request	
Financial investment linked to request	
Project planning route and status - please provide details and timeframe	

2. Existing site supply and discharge (if applicable)

Non-domestic water demand	
Mains (potable) water consumption	
Annual water consumption (m ³ /year)	
Average daily water demand (m ³ /day)	
Peak daily water demand (m ³ /day)	
Peak hourly water demand (m ³ /hour)	
Borehole water consumption	
Annual water consumption (m ³ /year)	
Average daily water demand (m ³ /day)	
Peak daily water demand (m ³ /day)	
Borehole licence reference (please attach)	
Other water consumption (specify source)	
Annual water consumption (m ³ /year)	
Average daily water demand (m ³ /day)	
Peak daily water demand (m ³ /day)	
Anglian Water/site water connection location (Grid ref)	
Meter Serial Number and size	
Site water supply internal and external pipe diameters	
Site water supply pipe length to first point of use	
On-site water storage volume	
Effective water storage volume (m ³)	
Height above ground level of inlet to storage	
Storage inlet control device (ball-valve, motorised valve, etc)	
Percentage of process supplied by on-site water storage	

Trade effluent	
Total trade effluent volume (m ³ /year)	
Average daily trade effluent discharge (m ³ /day)	
Peak daily trade effluent discharge (m ³ /day)	
Trade effluent consent reference (if applicable)	
Trade effluent connection location (Grid ref)	
Trade effluent treatment plant description	
Trade effluent composition	

3. New (or additional needs) site supply and discharge requirements

This should include any temporary non-domestic water uses for construction.

Water demand

Quantity of water requested for domestic purposes (m ³ /day)	
Quantity of water requested for non-domestic (process) purposes (m ³ /day)	
Any water required for the purposes of firefighting	
Quality of water required i.e. potable or non-potable	
Average daily demand (m ³ /day)	
Peak daily demand (i.e. the highest volume we might have to supply in a day in m ³ /day)	
Diurnal and annual profile (m ³)	
Timescales to require the water, including any 'ramping up' to the full volumes e.g. construction needs and timescales	
Trade effluent	
Total trade effluent volume (including existing if appropriate) (m ³ /year)	
Average trade effluent volume (including existing if appropriate) (m ³ /day)	
Peak trade effluent volume (including existing if appropriate) (m ³ /day)	
Project planning route and status – please provide details and timeframe	

4. Water efficiency measures

As set out above, and in Anglian Water's Non-Domestic Water Requests Policy, there is a need to make best use of what water is available across the region, through implementation of water efficiency measures. We expect evidence of high levels of water efficiencies that you are considering implementing as part of your development and processes.

Potential ideas and solutions that we would want evidence on include:

- Maximisation of existing onsite resources (e.g. own borehole)
- Consideration of non-water based or close-loop cooling systems
- Capture and reuse of water from water-based cooling systems e.g. blowdown
- Sharing of resources with neighbouring facilities, considering all water-based resources such as steam, water/effluent reuse, rainwater harvesting
- Specification of highly rated white goods
- Sub-metering on site
- Evidence of water audit systems
- Infrastructure or systems that could manage the timing of water take e.g. onsite storage and control system, production flexibility
- Onsite measures to improve the water environment e.g. wetland

Please set out below what steps you have undertaken or will implement to ensure your processes (including during construction phases), and development are as water efficient as possible:



Atherstone Town Council

PO Box 2000, Atherstone, Warwickshire, CV9 1YN

Tel: 01827-720 829

clerk@atherstone-tc.gov.uk

www.atherstone-tc.gov.uk

Freepost GRAND UNION CANAL TRANSFER

Telephone: 0121 270 5920

Email: contact@guctransfer.co.uk

21st October 2024

Dear Grand Union Canal Transfer (GUCT),

ATHERSTONE TOWN COUNCIL AND RESIDENTS' COLLATED GUCT CONSULTATION RESPONSE

INTRODUCTION

This response has been collated by Atherstone Town Council (ATC) and represents the views of Atherstone residents that have requested that ATC collate and share their views with the GUCT consultation process. Views expressed here may also be communicated directly by residents to the GUCT consultation.

The position of ATC, with respect to the GUTC proposal is also contained herein.

The views expressed fall into the following categories:

- ATC Position
- Lack of Publicity
- Impacts:
 - Environmental Impacts
 - Water Safety and Ongoing Monitoring
 - Economic Considerations
 - Impacts on Heritage
 - Social Impacts
 - Canal Usage
- Infrastructure:
 - Flow Rates
 - Potential Water Shortages
 - Maintenance Considerations
- Route and Outfall Options:
 - Coleshill Road Option

- Golf Course Option
- Alternative Options
- Benefits to Atherstone
- Conclusion

ATC POSITION

ATC wholeheartedly shares the concerns of the Atherstone residents, expressed below, regarding the quality and flow of the water that will result should this project proceed. It has serious concerns about the potential detrimental impact on nature and heritage.

ATC notes the GUCT project team's stated commitment, as far as possible, to avoid buildings, settlements and ancient woodlands. It is therefore considered that a strong and clear justification is required to support the current plan, as it currently appears to disregard all of those considerations, in that it would clearly disrupt people's lives and businesses over a long period of time. It would also partially destroy long-established woodland and potentially a much needed facility for young, disabled and vulnerable children (Ruby's Yard). Should the project proceed, ATC strongly advocates the use of an agricultural corridor to the East of Atherstone, bypassing the town and causing far less disruption. ATC and Atherstone residents need to know why such a route does not even appear to be under consideration.

LACK OF PUBLICITY

Residents expressed concern at the perceived low number of residents that seem to be aware of the proposed GUCT project, suggesting that a greater effort on the part of the project team should be made in this respect. Some were worried that the GUCT project team have not disclosed enough detail regarding the project.

Some residents stated that friends that reside in areas surrounding Atherstone, such as Wood End and Hurley, have not been notified. Others stated that the proposed pipeline corridor goes through a graveyard in Hurley, yet Hurley residents seem to be completely oblivious to the project. Some residents feel that the project team had been deliberately vague in order not to disclose information to residents.

IMPACTS

Environmental Impacts

The discharge of sewage into the canal in the centre of Atherstone will have a sewage discharge consent. Although treated, it is sewage and will have harmful parameters in it. Water companies are consistently breaking their discharge consents. There is no indication that the Atherstone discharge will be any different. Pollution by water companies is currently inherent and extremely damaging. In appropriate conditions found in canals, bacteria from the discharge may have the ability to double in number every hour to levels, causing a significant negative impact.

Locks have slack water periods when not in use where the water does not move making it ideal for bacteria proliferation. Sewage discharges also release greenhouse gases, which would contribute to detrimental global effects of such emissions.

Flooding of canals does occur if too much water is discharged. If land adjacent to the canal becomes flooded, it will be contaminated with sewage pathogens which are harmful to plants, animals and humans. It is a very expensive job to clean them up.

Climate change was another issue that residents raised. They expressed that water transfer schemes could become redundant if rainfall patterns change, meaning that all the negative impacts of the scheme would be felt whilst the aims of it might be short lived. One resident stated that Bedfordshire, the proposed destination for the water, has recently had its highest rainfall since 1836 and had been flooded for two weeks.

The consultation documentation regarding the water quality at the end point makes no mention of the effect of possible changes to the current water chemistry supplying the area's industry, which could have possible detrimental effects on processes and products. Additionally, changes in pH levels, hardness and salinity may affect processes such as refrigeration, where more water will be used to protect against corrosion, scaling, bacteria and fouling. Additionally, alien species can colonise other water systems if they are forced to move from current locations, to the detriment of destination locations.

Some residents expressed that it is incumbent upon water companies to remedy the high level of water leaks, before implementing a water transfer scheme, otherwise vast quantities of the water being transferred will simply be lost to leaks.

There are also concerns about disturbance of the canal's ecology. Local nature-lovers are thrilled that otters and water-vole are once again being seen in the canal and would clearly not wish them to be driven away. Residents fear that the effect on water balance and wildlife could be huge. They considered that phosphates and/or nitrates in the water will cause algae, taking oxygen out of the water. Consequently, fish will die and other wildlife will be adversely affected, including otters.

One particular resident suggested that a similar transfer project was proposed as a consequence of the 1976 drought. However, it was abandoned because of the potential harm to wildlife that would have resulted from the transfer of water from one area to another, due to varying mineral content in water, depending on specific geographical locations.

Water Safety/Ongoing Monitoring

Residents raised concerns about the safety levels of the water, if the transfer were to be implemented. Given that the canal is used to pursue leisure activities, particularly by children, through Ruby's Yard, residents felt strongly that ongoing close monitoring of the water quality ought to be undertaken. These concerns were also shared by residents whose properties abut the canal and are worried about the flood potential and the detrimental impact that would have on their properties.

Atherstone residents have questioned how the sewage outlet will be monitored, especially when occasional sewage overflows already occur at Mancetter. It was also raised that Ofwat

and the Environment Agency already lack capacity to carry out adequate monitoring and worry that this project increases the probability of further overflows.

Concern was raised that the prospect of further treatment works at Minworth brings with it the increased risk that the system will not cope, which is concerning to Atherstone residents.

Economic Considerations

The diminished financial status of many water companies is concerning to some Atherstone residents. They worry that this could result in the GUCT not being carried out and implemented properly, which could have untold detrimental effects for Atherstone and its residents.

Impacts to Heritage

Residents were concerned about the potential of alterations being made to historically valuable and significant canal bridges to accommodate the proposed changes. Moreover, it 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.

Social Impacts

Some residents are concerned about the potential negative effects on the communities that reside near the canal, as people do not want to live in, or visit, a sewage blighted environment. Such individuals include those who reside on the canal barges. Also, currently, there is a junior canoe club at Ruby's Yard. The young participants will be at risk from any sewage discharge into the canal.

Ruby's Yard is a valued and relatively new facility offering a range of exciting water-sport and other outdoor activities in a socially deprived part of the town, with a considerable focus on residents' physical and mental wellbeing. Even if it is bypassed, it seems bound to have its activities disrupted by the GUCT, and there is concern that new structures might impair the future of paddle-boarding and other water-based activities.

Impacts on the Canal Usage

There is considerable concern regarding the impact on the canal and its usage. During the construction of the weir, it is assumed that there will be disruption to the narrow-boat traffic. Town centre traders benefit from the fact that Atherstone is a regular stopping-off place for canal tourists. Whilst it is expected this disruption would be of a temporary nature, it would still be impactful.

INFRASTRUCTURE

Flow Rates

Concerns have been raised, regarding canal flow rates and the effect that varied flow rates from Minworth may have. Some were not content with the lack of detail in the consultation documentation regarding mitigations for storm overflow. They also considered that flow balance is important and lamented the potential effects that could come about should the increased water volumes being transferred under this proposed scheme flow down the locks, in the direction opposite to which is intended. How will this be monitored?

Atherstone residents contend that there are discrepancies between Ofwat volume figures and those of Affinity.

The question of whether the lock structures will cope with the significant additional pressures placed upon them was raised as a concern. It was felt that more technical detail in this regard, would need to be shared, in order to allay the fears of some residents.

Potential Water Shortages

Some Atherstone residents raised the issue that whilst there might currently be an abundance of water in the Midlands, relative to the South, there seems to be no appetite to build a reservoir to serve the South, which could be an alternative option to this project.

Further, residents asked whether the question has been raised as to how much water is actually needed locally, in the Midlands; especially given the amount of development and housebuilding in the area. How will the water be re-routed and will enough be left behind for local use? Whilst residents concede that modelling must have been carried out in order to inform a response to this question, they considered that it is simply guess work and cannot be relied upon.

Maintenance Considerations

The practicalities of performing maintenance tasks on the pipeline, once installed underground, has alarmed some residents. They consider that it is inevitable that there will be leaks. They are concerned that this may result in long term, continuous disruption as ongoing access would be required in order to remedy leaks. They also questioned what the maintenance regime would be. Will it involve sensors? Further, they questioned how Affinity will ensure an improvement in leak reduction, rectification and management in order to ensure the project yields maximum efficacy.

PIPELINE ROUTE AND OUTFALL OPTIONS:

Coleshill Road Option

Residents were extremely concerned about the prospect of the proposed pipeline being located along the Coleshill Road. It was felt that the negative impact would be devastating. They anticipate that this impact would result from noise and dust pollution and have a significant impact on the day-to-day well-being of residents. It would result in house devaluation for those wishing to sell their house, increased costs relating to insurance premiums and remove access to safe parking of residents' vehicles and cause disruption to local businesses.

Work on the relevant stretch of Coleshill Road would not just affect access for the residents living on the road itself, but also a further 500+ households in the adjacent streets, whose only access is via this stretch of Coleshill Road. It also provides the only access for the well used allotments. It would also negatively impact companies wishing to make deliveries in the vicinity. Businesses located on Coleshill Road would also be negatively impacted. The convenience store offers one of only two post offices in the town, and the chip shop is very popular. Other businesses include a soft furnishings business and a pub. These negative effects are all compounded by the fact that they would be experienced for a prolonged period of time.

Further, Coleshill Road is a major commuting route. On the whole, houses on Coleshill Road and neighbouring streets have neither drives nor garages. Vehicles that normally park in Coleshill Road would struggle to find alternative parking in the vicinity.

The Coleshill Road option may affect property values and the price of home insurance premiums, making selling a house here impossible if there is an extended period of disruption. Will residents be compensated for these tangible losses?

Emergency vehicle access is critical, given such a large number of residents are dependent on access to a relatively short stretch of road. This could be particularly concerning for the largely elderly residents of Merevale View.

Coleshill Road has seen repeated closures already during recent months, probably more than any other road in the town, and possibly more than all the other roads, in Atherstone, combined. Much of this related, ironically, to emergency work on the sewer which would need diverting as part of these works. The diversion route is probably suitable for people travelling further afield, but far too lengthy to be practical for locals.

Golf Course Option

Some residents expressed the view that if this project must proceed then the pipeline across the golf course would be preferable. However, they held concerns regarding the prospect of an access road being constructed parallel to the existing entrance to the golf course, for the heavy construction vehicles. They consider that it would result in noise and dust pollution, that could impact the mental health and well-being of residents in that vicinity.

Some consider that a more suitable and obvious entry/ exit point is further along Coleshill Road, away from residents' homes, where there is already an entry/exit gate. That way vehicular traffic will not impinge on those living on Coleshill Road.

The golf-course is an important leisure facility for the town and a business that seems likely to suffer financially, not just during the disruption, but, in an unquantifiable way, as a result of that disruption, if golfers moved their allegiance permanently to other golf courses, rather than temporarily.

The loss of very old trees on the common land would have also been raised as a concern. Whilst some would likely be replaced, it would take many decades to recreate any semblance of the previous scene. In addition, walkers would presumably be prevented from accessing that area for some time and this is a popular route, especially for dog walkers.

Alternative Route Options

There are options that would be much more acceptable for all parties. These include taking the pipeline across farmland, for instance, between Mancetter and Hartshill.

BENEFITS TO ATHERSTONE

Under all options and proposals for this scheme, Atherstone residents are set to bear the brunt of the negative impacts, but do not currently stand to benefit from the project. They expressed that the usual benefits of such a scheme would be the construction of a reservoir

in the distribution area which has recreational benefits and a new habitat for plants and animals.

CONCLUSION

Having canvassed a number of residents, it is clear to ATC that the vast majority of the residents of Atherstone, and surrounding areas, are not aware of the proposed GUCT project. This submission represents the views of a small number of residents. Many more will have engaged directly with the consultation process. A more effective communication strategy, to alert those who are likely to be affected by the implementation of this project, needs to be implemented, well in advance of any future public consultation on this matter. It is anticipated a far wider range of a views would be harvested, which would be more representative of the views of residents and probably include recommendations for further; alternative route options and proposals for plans that would benefit Atherstone residents.

Yours sincerely,

A black rectangular box redacting the signature of Kate Clover.

Kate Clover

Town Clerk (on behalf of Atherstone Town Council)

From: [REDACTED]
To: [Grand Union Canal](#)
Subject: Grand Union canal transfer.
Date: 01 April 2025 13:08:26
Attachments: [image001.jpg](#)

You don't often get email from [REDACTED]@birmingham.gov.uk. [Learn why this is important](#)

Hello,

This project doesn't seem to have any obvious impacts in Birmingham as it just connects water from Minworth onto the adjacent Grand Union canal. The document gives a link to the website but doesn't list any works on the route so potentially there will be some connection works required which might have a traffic management issue in the area, but nothing confirmed at the moment.

As such I don't have any comments to make apart from being notified if any works in the Birmingham City boundary have an impact on the public highway that would require some form of consent or approval.

Cheers [REDACTED]

[REDACTED]
Manager Transport Development Control
Transport Development and Information
Place, Prosperity & Sustainability Directorate
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A drawing of a building? ? Description automatically generated



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OFFICIAL

From: [Baginton Parish Clerk](#)
To: [Grand Union Canal](#)
Subject: Re: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
Date: 04 April 2025 17:19:36
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Dear [REDACTED]

Thank you for inviting us to comment on this matter.
We discussed this at our Parish Council meeting on 3rd April.
We have no comments to make on the proposal.

Kind regards,

[REDACTED]
Clerk to Baginton Parish Council

On Mon, Mar 31, 2025 at 11:22 AM Grand Union Canal <GUCtransfer@planninginspectorate.gov.uk> wrote:

FAO Parish Clerk

Dear Sir/Madam

Please see attached correspondence on the proposed Grand Union Canal Transfer.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **28 April 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

[REDACTED]



[REDACTED]
EIA Advisor



@PINSgov



The Planning Inspectorate



planninginspectorate.gov.uk

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DPC:76616c646f72



Braunston Parish Council

Braunston Parish Council
Braunston Village Hall
The Green
Braunston. NN11 7HW

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Sent by email to: GUCtransfer@planninginspectorate.gov.uk

Your ref. WA0210001

27 April 2025

Dear Sir/Madam

Thank you for your letter dated 31 March 2025 inviting Braunston Parish Council (BPC), as a consultation body defined in the EIA regulations for nationally significant infrastructure projects, to comment on the EIA Scoping Report prepared for the proposed Grand Union Canal Water Transfer. This letter is our response to the consultation.

As set out in our response to the non-statutory consultation undertaken by Canal & River Trust and Severn Trent Water in 2024, BPC considers that the Oxford and Grand Union Canals are of great importance to Braunston, in terms of their contribution to the history and character of the village, as well as their ongoing economic and social value. The Parish Council is therefore pleased to have the opportunity to comment on the EIA Scoping Report published by Affinity Water, Severn Trent Water and the Canal & River Trust in March 2025.

First, we raise some general points, followed by more detailed comments on specific sections of the EIA Scoping Report, presented in tabular form. BPC's interests relate to Parts 2 and 3 of the proposed development.

As the project will involve pumping water up Braunston Locks and into Drayton and Daventry Reservoirs, BPC recognises that a pumping station, with associated power supply, and pipelines will be required within Braunston Parish in the vicinity of the bottom lock of the Braunston Lock Flight. In this respect, BPC wishes to raise two general points.

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.
2. At presentations given to BPC by representatives of Severn Trent Water and the Canal & River Trust in 2024, while the proposal to incorporate means of refilling Drayton and Daventry Reservoirs was welcomed, BPC assumed that the pumping mains would follow the canal and the existing route between the canal and these two reservoirs. From the Scoping Report, BPC understands that a direct pumping main to the reservoirs is being proposed across private farmland (see Volume 2, Part 1, Figure 3-6, Sheet K). Although BPC would not wish to interfere with negotiations between the promoters of the proposed development and local landowners, we are concerned that the Scoping Report appears to be misinformed and factually incorrect in stating that the pipeline will follow an old railway track which is described as a cycleway. The

Braunston Parish Council

old railway within Braunston Parish is not and never has been a cycleway and this should be corrected. Further details are included in the table below. We understand the landowners have not been consulted.

Braunston receives many visitors who arrive by canal, on boats or on foot, who make a significant contribution to the village in many ways. Any aspects of the proposed project that would interfere with use of the canal are therefore of concern to BPC. In this respect, BPC wishes to raise the following points.

1. In Part 2 of the proposed development, regarding the effects of increased water flow velocities in the canals on navigation, the two major tunnels on the Grand Union Canal section (Braunston Tunnel and Blisworth Tunnel) are pinch points along the transfer route where effects on water velocity will be concentrated and of particular concern. In the tunnels, the canal cross section is limited, there is little, if any, potential for increasing it and the increase in flow velocity will be experienced over a significant distance. Similarly loss of headroom due to increased water levels would also be an issue for boats passing one another in the tunnels, again with no opportunity for mitigation. The western entrance to Braunston Tunnel (1.87 km long) lies within Braunston Parish, so this is of particular interest to BPC. While the issue of increased velocity and potentially reduced headroom are recognised in the EIA Scoping Report in general, the specific issue of effects within tunnels is omitted completely. This does need to be considered in the EIA.
2. While BPC recognises that changes in water surface levels will be required to achieve the desired flow along the canal, particularly where the normal flow is to be reversed, we notice that the concept of inserting additional stop locks to assist in achieving the required flow has been newly introduced in the Scoping Report, although specific locations are not identified. Bearing in mind that queues of boats at Braunston Locks are common during the summer season, BPC is concerned about the effects that these stop locks may have on boat traffic. If queues became common at these additional stop locks, BPC is concerned that visitors may be deterred from using the canals through Braunston. While effects on navigation are included in the EIA scope in general terms, this aspect is not specifically identified in the EIA Scoping Report, BPC requests that the EIA scope should include a detailed examination of the effects on navigation activity of any additional stop locks proposed.
3. While the use of the canal across Branston summit for water transfer would be expected to ensure that periodic restrictions on use or closures of Braunston Locks due to drought would be eliminated, this would depend on some of the water pumped up the lock flight or to Drayton and Daventry Reservoirs being available for lock operations that would return water back down Braunston Locks. Discussion of the control rules to be adopted and the effects on navigation should be scoped in to the EIA, as these may affect the (potentially positive) effects of the proposed development in securing water supply for canal operation during drought periods.
4. As the source of the water to be transferred is treated sewage, there is potential for the water transferred to contain elevated levels of plant nutrients (particularly phosphorus compounds). This could result in increased weed growth in the canals, which can cause disruption to boating (due to submerged macrophytes getting caught in propellers and due to floating plants, such as duckweed, blocking raw cooling water intakes). Changes in trophic status caused by input of nutrients could also cause a deterioration in the nature conservation value of the waterway and could result in the proposed development being non-compliant with Water Framework Directive requirements. While BPC recognises that the project includes additional treatment for the water to be transferred, the Scoping Report gives no details of target nutrient levels in the water produced by the advanced water treatment plant (AWTP) and only raises the topic of aquatic weed growth in relation to nature conservation. The effects of changes in weed growth on navigation should be considered fully in the EIA.

Braunston Parish Council

Table of BPC comments on specific sections of the EIA Scoping Report

EIA Scoping Report reference	Topic	Response to consultation on the EIA Scoping report
Table 1-1: Principal components of the Proposed Development and Table 3-1: Summary of Parts of the Proposed Development by Local Authority and 3.5.41(e)/45/56 and 18.4.26	Introduction and Description of the proposed development	Regarding Part 2 of the proposed development. these sections all mention that additional stop locks are under consideration but nowhere are the effects of additional stop locks scoped into assessment of effects on navigation.
Table 1-1: Principal components of the Proposed Development and Table 3-1: Summary of Parts of the Proposed Development by Local Authority	Description of the proposed development	The description of Part 2 of the proposed development recognises a need for bank-raising to increase surface water level in order to provide a reversal in flow direction where required for the transfer, possibly in conjunction with additional stop locks. However, there is, surprisingly, no mention of the potential contribution of dredging the canal to its original design depth as a means of increasing cross section and thereby reducing the hydraulic head required to drive the required transfer flow. This should be considered as part of the basic design or as mitigation for adverse effects of bank-raising, as appropriate.
3.5.59	Description of the proposed development	The description of Part 2 of the proposed development states that bank raising will be undertaken on a like-for-like basis with the existing bank. BPC is aware that, when straightening of northern part of the Oxford Canal was undertaken in 1831-1834, banks on newly constructed sections were constructed with sloping edges protected by large slabs of stone. An example of this very specific type of construction is present on the section of Puddle Banks that lies within Braunston Parish. BPC asks that the heritage value of this construction should be taken into account in the design of any bank raising on the 'new' sections of the Oxford Canal.
3.5.67 and 3.5.73 and Volume 2, Part 1, Figure 3-6, Sheet K	Description of the proposed development	Regarding Part 3 of the proposed development, the EIA Scoping Report states that <i>The proposed feed pipe (approximately 700 mm diameter) would follow the route of the now disused railway (currently a cycleway) that passes close to the southernmost point of the reservoir.</i> This is incorrect, no part of the old railway within Braunston Parish is or ever has been a cycleway. The old railway is in the hands of several landowners and most of it is integrated into farming operations. This should be corrected and the landowners consulted.
Plate 3-1 Process diagram for water treatment at Minworth AWTP	Description of the proposed development	The EIA Scoping Report describes the advanced water treatment plant proposed but gives no target effluent limit values. BPC is concerned about levels of plant nutrients and their potential effect on canal ecology and on navigation. The EIA should include full details of this topic.
Table 8-21: Potential effects– Soils and Agricultural Land and Table 19-10: Potential effects during the construction phase – Socio-economics	Soils and Agriculture and Socio-economics	The tables scope out agricultural land from Part 3 of the development (Daventry and Drayton Reservoirs), while Volume 2 Part 1, Figure 3-6 Sheet K shows a pipeline route following the old railway in Braunston Parish. This former railway is now an integral part of farming operations of two of the landowners, therefore effects on agriculture should be scoped in for Part 3 of the project.

Braunston Parish Council

EIA Scoping Report reference	Topic	Response to consultation on the EIA Scoping report
Chapter 19	Socio-economics	<p>Boat users and waterway related businesses are identified as receptors at para. 19.5.19 and are scoped in to the EIA in Table 16-10 and Table 19-11. BPC welcomes the inclusion of waterway users in the EIA but is concerned that very little detail is provided in terms of the methodology for assessing effects on boat users of water flow velocity, additional stop locks, reduced headroom or effects of bank raising on moorings and there is no mention of tunnels as pinch points regarding effects of water flow.</p> <p>There is no mention of potential for increase in weed growth affecting boat use.</p> <p>The EIA should assess the effects of the proposed development on the use of the canal by its users in practical as well as economic terms.</p>
Chapter 19	Socio-economics	<p>There is no discussion on the effects of the project on the frequency of lock closures at Braunston due to drought. This should be scoped in to the EIA (and would be expected to be a beneficial effect).</p>
22.3.3(g)	Consultation	<p>This paragraph recognises that consultees raised the issue of <i>Changes in water quality and impacts on water chemistry potentially increasing weed growth and algal blooms</i>. However, this aspect is not mentioned under navigation in the Socio-economics chapter or anywhere else. This aspect should be considered in the EIA in relation to both aquatic ecology and navigation.</p>
Chapter 20	Traffic & Transport	<p>Access to Braunston Bottom Lock pumping station site and associated pipelines is via the centre of Braunston village, a narrow road known as Dark Lane and a farmer's field. The route is not particularly suitable for HGVs.</p> <p>BPC is concerned that there is no mention in the EIA Scoping Report of the potential for bringing in construction materials by waterway, which could reduce or remove adverse effects of HGV use on the village.</p> <p>Vessels up to 4.2 m wide and 22 m long can navigate on the Grand Union section of canal in Braunston Parish, while similar vessels can travel on the Oxford Canal north from Braunston as far as Hillmorton, subject to pre-booking passage with CRT. Narrowboats can use the whole length of waterway included in Part 2 of the proposed development for carriage of materials. Thus there is the opportunity to load vessels at wharves with good road access for onward transport by waterway to construction sites.</p> <p>BPC requests that the alternative of use of the canals for transport of construction materials to the Braunston construction sites is considered in the EIA, in order to mitigate potential adverse effects of HGVs passing through Braunston village.</p>

Yours faithfully

John Pomfret (Councillor)

on behalf of Braunston Parish Council.

From: [REDACTED]
To: [Grand Union Canal](#)
Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
Date: 28 April 2025 13:43:49
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)

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Good afternoon,

**Re: Grand Union Canal Transfer
EIA Scoping Notification and Consultation**

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11
Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development)**

It is understood that the project starts at the Minworth Wastewater Recycling Centre north-east of Birmingham. Thereafter, water will be transferred eastwards to the Coventry Canal at Atherstone. From the Coventry Canal, the site of the project extends in a south-easterly direction connecting to the Oxford Canal followed by the Grand Union Canal. Water will then be abstracted and treated south of Milton Keynes before being transferred to an existing water supply reservoir near Luton.

It is unclear why Bromsgrove District or Redditch Borough Councils would be consulted in relation to this NSIP Pre application request given the proposed location of the development is not in proximity to either LPA areas. In that context, there are no comments from either Council in relation to the proposal,

Kind regards,

David

David Kelly
Planning Officer
Tel: [REDACTED]

Email: [REDACTED][@bromsgroveandredditch.gov.uk](mailto:[REDACTED]@bromsgroveandredditch.gov.uk)

My working days are generally Mondays to Wednesdays

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BEDFORD GROUP OF DRAINAGE BOARDS

3 April 2025

Planning Inspectorate
Environmental Services
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BY E-MAIL ONLY

For the attention of Karen Wilkinson

Dear Sir/Madam

Planning Application Number:	WA0210001
Location:	Grand Union Canal between Old Wolverton and Ivinghoe Bridge
Proposal:	Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development).
Grid Reference:	479702, 242078

This proposal interacts with the Board's Buckinghamshire and River Ouzel district at multiple locations. No development shall take place within 9 m of a watercourse within the Board's district without the prior consent of the Board. Consent under the Land Drainage Act is separate to planning permission and not superseded by it. Development includes planting, fencing and landscaping. The Board has relevant powers under S.23 of the Land Drainage Act and also byelaws made under S.66. A copy of these may be found at:

https://www.idbs.org.uk/wp-content/uploads/2021/07/bo_byelaws_final_sealed-defra-approved.pdf

The Board's policy regarding surface water discharges changed in 2024. The following should be borne in mind.



If surface water (or treated foul water) discharge is proposed to a watercourse within the Board's district (either directly or indirectly), the proposed development requires Land Drainage consent in line with the Board's byelaws (specifically Byelaw 3). Any consent granted will likely be conditional, pending payment of a surface water development contribution (SWDC), calculated in line with the Board's charging policy. The policy may be found at:

<https://www.idbs.org.uk/consent-planning/>

Whilst the consenting process as set out under the Land Drainage Act 1991 and the Board's Byelaws are separate from planning, the ability to implement planning permission may depend on the granting of consent. We strongly recommend that any required consents are sought prior to determination of the planning application.

Please direct any reply to Scott Brewster at the Board's offices.

Yours faithfully


Senior Engineer


From: clerk@badby-pc.gov.uk
To: [Grand Union Canal](#)
Subject: RE: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
Date: 02 April 2025 10:51:37
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

You don't often get email from clerk@badby-pc.gov.uk. [Learn why this is important](#)

Dear [REDACTED]

Badby Parish Council does not wish to make any comment at this stage, but may do so later once we see the details of the application.

Regards, [REDACTED]
Clerk to Badby Parish Council

From: Grand Union Canal <GUTransfer@planninginspectorate.gov.uk>
Sent: 31 March 2025 11:18
Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation

FAO Parish Clerk

Dear Sir/Madam

Please see attached correspondence on the proposed Grand Union Canal Transfer.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **28 April 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

[REDACTED]



[REDACTED] [REDACTED]
EIA Advisor
The Planning Inspectorate
T 0303 444 5028

The Planning Inspectorate

T 0303 444 5028



@PINSgov



The Planning Inspectorate



planninginspectorate.gov.uk

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DPC:76616c646f72





Directorate For Planning, Growth And Sustainability

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Karen Wilkinson
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

28 April 2025
Our Ref: 25/01086/DCO
Your ref: WA0210001

Email to: GUCtransfer@ planninginspectorate.gov.uk

Dear Ms Wilkinson,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Grand Union Canal Water Transfer Project.

Scoping Consultation and Notification

I refer to your letter dated 31 March 2025 providing a time limited opportunity for Buckinghamshire Council ('the Council') as a S43 Local Authority and statutory consultee to provide comments on the Applicant's EIA Scoping Report to inform the Environmental Statement (ES) for the proposed development referred to as the Grand Union Canal Transfer project.

The following information reflects the views of the Council regarding the information contained within each chapter / sub heading of the submitted Scoping Report which is contained within 13 documents and is over 2000 pages long.

Accordingly, we wish to engage positively in the DCO process to ensure that for Buckinghamshire, where there are impacts, these are appropriately mitigated where they cannot be avoided. Our observations in respect of the material provided at Statutory Consultation are set out below.

Chapter 1: Introduction

No comment

Chapter 2: Legislation and Planning Policy Context

Buckinghamshire Council consider that the list of relevant local plans for our area should include the Mineral and Waste Local Plan for Buckinghamshire 2019. This plan is referred to later in the scoping report.

Neighbourhood Plans are also part of the development plan and there are currently made plans for Ivinghoe, Pitstone, Slapton, and Wing. Some other affected Parishes also have emerging Neighbourhood Plans.

Buckinghamshire Council has also published Supplementary Planning Guidance which could be relevant to the project.

Chapter 3: Description of the Proposed Development

It is also noted that section 3.6.6 states that an outline Code of Construction Practice (CoCP) will be submitted with the DOC application which will describe the mitigation measures identified in the ES to be followed and to be carried forward to a Detailed Construction Environmental Management Plan (CEMP) prior to construction. This document will also include a Dust Management Plan and a Soil management Plan (SMP). The submission of this document is welcomed and supported.

Chapter 4: Consideration of Alternatives

No comment

Chapter 5: Consultation

No comment

Chapter 6: EIA Approach

No comment

Chapter 7: Other Assessments

No comment

Chapter 8: Agriculture and Soils

No comment

Chapter 9: Air Quality and Odour

The Council agrees with the size of the study area as outlined within section 9.4 and Table 9-4.

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 states that Part 4a of the Proposed Development is located within Central Bedfordshire Council's administrative area. This is not correct as both Site B and Site H are

located with 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 techniques and mitigation measures will be identified and secured through a Dust Management Plan as part of the Code of Construction Practice (CoCP). 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 agree 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 EPUK & IAQM Guidance on Land-Use Planning & Development Control: Planning For Air Quality 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 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.

Finally construction traffic emissions (within or adjacent to an AQMA) has also been scoped out again due to it being unlikely that traffic flows during the construction phase would exceed threshold volumes outlined within EPUK & IAQM Guidance on Land-Use Planning & Development Control: Planning For Air Quality which indicate when an air quality assessment would be required which we agree with. This row also states that Phase 4A is located within an AQMA which it is not.

Table 9-6 outlines the potential effects during the operational phase – Air Quality and Odour. This states that operational emissions, including use of NRMM will be scoped out as the operation of the proposed development would generate emissions to air at comparable rates to the current baseline scenario. There would be no direct emissions from the operation of the pumping stations along the canal network (Part 2, 3 and 4a) and the final transfer of water in Part 4b. We agree with this.

Operational road traffic emissions has also been scoped out. This is because the operation of the proposed development would generate very limited numbers of operational vehicles. Operational traffic will primarily comprise operators abstraction, storage and treatment site in Part 4a, and maintenance visits, as required, to the two pipelines (Part 1b and 4b) and canal network (Parts 2 and 3). On the basis of professional judgement, it is considered unlikely that traffic flows would exceed threshold volumes in order to meet relevant criteria which we agree with.

Chapter 10: Climate

No comment

Chapter 11: Cultural Heritage

Comments of Buckinghamshire Council Archaeological Service (maintain the local Historic Environment Record and provide expert advice on archaeology and related matters).

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, we do have comments:

11.8.2 Page 36

As stated previously, 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 (following consultation with heritage stakeholders) ...

We welcome this statement but would add that we would expect this to be undertaken where ground works are proposed, to include compounds and access routes.

We would add that 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.

Comments of the Buckinghamshire Council Heritage Team.

We acknowledge 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, we have some observations and suggestions to ensure the thorough assessment and protection of heritage assets.

Study Area

Paragraph 11.4 specifies a study area with a 500-meter 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 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.

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.

Non Designated Heritage Assets (NDHAs)

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 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 (NDHAs). 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 (MHCLG) 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 (NDHA). The link below is to the project's website. All NDHAs identified in the relevant areas listed on the LHL should be considered. A list can be provided if necessary.

[Home - Buckinghamshire's Local Heritage List](#)

Chapter 12: Ecology – Aquatic and Chapter 13: Ecology – Terrestrial

The southern section of this DCO application falls within Buckinghamshire. Those features that are proposed that fall within Buckinghamshire Councils responsibilities include the following:

- Stoke Hammond Pumping Station
- Soulbury Three Locks
- Site B south of Bletchley potential water treatment works and water storage
- Site H Slapton potential water treatment works and water storage
- Southern section potential pipeline corridors

The EIA scoping report splits ecology into terrestrial and aquatic environs. Desk based assessments have been carried out identifying the habitats and species that have been previously identified on site. Further detailed survey effort is required for a range of habitats and species identified.

A comprehensive list of species and habitats considered to be impacted has been drawn up and is largely agreed with. Survey effort in accordance with current standards will be expected for each species group and habitat assessments that accord with best practice as set out within the EIA scoping report.

On reviewing the sites within Buckinghamshire, Site H has sections that can be considered as Priority habitat with remnants of Traditional Orchard still present. The potential pipeline corridors cumulate in sections through the Chilterns National Landscape. Chalk streams are scattered throughout this section of the Chilterns.

A comprehensive Ecological Impact Assessment (EcIA) detailing habitats and species present on the sites situated within Buckinghamshire will be required. Mitigation, compensation and enhancement measures for identified ecological resources on site will need to be included within this report. A separate Biodiversity Net Gain (BNG) assessment reaching current local and national planning policies will also be expected.

Ecological Impact Assessment (EcIA)

The EcIA must be completed by a suitably qualified ecologist and reported in accordance with CIEEM Guidelines for Ecological Report Writing (CIEEM, 2017), the British Standard BS42020:2013 Biodiversity — Code of practice for planning and development, and the Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2018). The EcIA should be accompanied by a completed EcIA Checklist (CIEEM and ALGE, 2019) and fully address the items within the checklist.

All ecological information should be prepared and presented so that it is fit to inform the decision-making process. The EcIA report should clearly set out all the ecological information necessary for a robust decision to be made. Key aspects include a description of the following:

- ecological baseline and trends if the project were not to go ahead, including the survey data used to inform the baseline
- criteria used to evaluate ecological features
- criteria used to assess the significance of effects arising from the impacts of the project
- justification of methods used
- the identification of likely impacts (positive and negative) on ecological features together with an explanation of the significance of the overall effects for each important ecological feature
- mitigation, compensation, and enhancement measures
- legal and policy consequences

- identification of any limitations to the assessment, or the surveys which underpin it, and an explanation of the implications
- a presentation of any analytical techniques used and the analysis itself.

The EclA should set out the ecological monitoring required to audit predicted impacts and effects against the actual situation. This will enable any necessary remedial action to be taken, including adjustment to the activity generating the impacts and adjustment to the mitigation or compensation measures. The EclA should identify where monitoring is required for mitigation, compensation and enhancement measures. It should set out the methods to be used, the criteria for determining success/failure, appropriate timing, mechanisms for implementation, frequency and duration of monitoring, and frequency of reporting.

The assessment needs to include the most up-to-date biodiversity data, sought from the Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC), in accordance with the Guidelines for Accessing, Using and Sharing Biodiversity Data (CIEEM, 2020).

The EclA should provide enough detail and clarity to enable both the applicant and the decision-maker to establish whether the report's proposals and/or recommendations provide a practicable, deliverable, and acceptable means of incorporating biodiversity into the proposed development; and are proportionate and justified. The Ecological Impact Assessment Checklist (CIEEM, 2019) provides an overview of the EclA criteria to ensure decisions are based on adequate information.

Biodiversity Net Gain

It is anticipated that all Nationally Significant Infrastructure Projects will need to deliver Biodiversity Net Gains from November 2025. The EIA scoping report identifies the requirement for BNG to be assessed. The applicant is required to submit a biodiversity metric with this application demonstrating how these gains will be achieved. The proposals need to demonstrate measurable gains in biodiversity in accordance with the National Planning Policy Framework (NPPF) and Local Planning policies.

The statutory metric should be used, and measurable net gains will be expected with any proposed offsite units required linked to the county where the loss occurs. Evidence to be included within the Environment Statement needs to include.

- a) Biodiversity Metric. The information in the metric should be directly related to the Biodiversity Impact Plan and the Proposed Habitats Plan. A copy of the metric in the form of the completed spreadsheet should be submitted. Detailed justifications for the choice of habitat types, distinctiveness and condition should be added to the comments column or provided separately in a report. A copy of the excel spreadsheet needs to be provided.
- b) Biodiversity Impact Plan. Produced using the information from the Preliminary Ecological Appraisal or Ecological Impact Assessment. The plan should clearly show the areas covered by each of the existing habitat types and the area in hectares of each habitat type (or for each habitat parcel, as some habitats may be scattered throughout the site).
- c) Proposed Habitats Plan. This can be taken from the site layout plan, illustrative masterplan, green infrastructure plan or landscape plans (if they are available). The plan should clearly show what existing habitat types are being retained and enhanced, and what new habitat types will be created; it should be colour coded so that each habitat

type is easily identifiable, and the area of each habitat type should be quantified in hectares. Other proposed biodiversity enhancements should also be shown on this plan.

Biodiversity Impact Assessment. Following the Biodiversity Net Gain Good Practice Principles for Development (CIEEM, CIRIA, IEMA, 2016), including full justification of how the principles have been applied as part of the net gain assessment.

These documents will need to be included in the Environment Statement and will be reviewed by the councils Ecologist on submission.

Local plan relevant policy points:

Reasonable Likelihood of Protected Species

Local Plan Policy 'NE1 Biodiversity and Geodiversity' of the Aylesbury Local Plan 2013-2033 states: *"g. When there is a reasonable likelihood of the presence of protected or priority species or their habitats, development will not be permitted until it has been demonstrated that the proposed development will not result in adverse impacts on these species or their habitats. The only exception will be where the advantages of development to the protected site and the local community clearly outweigh the adverse impacts"*.

Light Pollution

Local Plan Policy 'NE5 Pollution, air quality and contaminated land' of the Aylesbury Local Plan 2013-2033 states: *"In developments where external lighting is required, planning permission will only be granted where all of the following criteria are met:*

- a) The lighting scheme proposed is the minimum required for the security and to achieve working activities which are safe*
- b) Light spill and potential glare and the impact on the night sky is minimised through the control of light direction and levels, particularly in residential and commercial areas, areas of wildlife interest or the visual character of historic buildings and rural landscape character*
- c) The choice and positioning of the light fittings, columns and cables minimise their daytime appearance and impact on the streetscape, and*
- d) In considering development involving potentially adverse lighting impacts to wildlife, the council will expect surveys to identify wildlife corridors and ensure that these corridors are protected and enhanced where possible."*

Woodland and Hedgerow Buffer

Local Plan Policy 'NE8 Trees, hedgerows and woodlands' of the Aylesbury Local Plan 2013-2033 states that: *"Developers should aspire to retaining a 10m (with a minimum of 5m) natural buffer around retained and planted native hedgerows (100m with a minimum 25 m natural buffer around woodlands) for the benefit of wildlife, incorporating a dark corridor with no lighting."*

Biodiversity Net Gain

Local Plan Policy 'NE1 Biodiversity and Geodiversity' of the Aylesbury Local Plan 2013-2033 states that: *"Protection and enhancement of biodiversity and geodiversity will be achieved by*

the following c. A net gain in biodiversity on minor and major developments will be sought by protecting, managing, enhancing and extending existing biodiversity resources, and by creating new biodiversity resources. These gains must be measurable using best practice in biodiversity and green infrastructure accounting and in accordance with any methodology (including a biometric calculator) to be set out in a future Supplementary Planning Document”.

Local Plan Policy ‘NE8 Trees, hedgerows and woodlands’ of the Aylesbury Local Plan 2013-2033 states: *“Where species-rich native hedgerow (as commonly found on agricultural land) loss is unavoidable the developer must compensate for this by planting native species-rich hedgerow, which should result in a net gain of native hedgerow on the development site”.*

Chapter 14: Ground Conditions

Section 14.5.44 states that there is very limited resources available to determine historical land use and that only historical landfill mapping has been used to determine the potential for historical sources of contamination at scoping stage. Further detailed current and historical land use reviews will be undertaken as part of planned Phase 1 reporting for the EIA Scoping Boundary. The Strategic Environmental Protection Team at Buckinghamshire Council hold extensive data on historical land uses which may have the potential to cause contamination to the land and should be contacted as part of the future work in connection to contaminated land.

Table 14-17 outlines the potential effects during the construction phase – Ground Conditions. This states that mobilisation and migration of existing potential sources of contamination, due to ground disturbance during earthworks, excavations, trenching and other techniques; open excavations; uncovered stockpiles; and dewatering will be scoped in for effects on human health (adjacent and/or nearby users) in all parts of the proposed development with we agree with but scoped out for effects on human health (construction and maintenance workers). The reason given for scoping out the effects on human health from construction and maintenance workers is because these receptors will be protected by health and safety legislation and mitigation (e.g. identified through health and safety risk assessment prior to work commencing). This reasoning is acceptable and we agree that it may be scoped out. The introduction of new sources of contamination, such as fuels, oils and other fluids used in construction plant has also been scoped in for all parts of the development which we agree with. Land contamination (from existing potential sources of contamination located within the EIA Scoping Boundary) for all parts of the proposed development will be scoped in for effects on all receptors which includes human health which we agree with.

Table 14-18 outlines the potential effects during the operational phase – Ground Conditions. This states that indirect and direct impacts to identified receptors (e.g. human health and controlled waters) may occur as a result of the disturbance of ground for maintenance works and leakage / spillages of stored materials during the operational phase / pollutants bypassing the drainage system (e.g. spills) has been scoped out for all parts of the proposed development. The rationale for this decision is because impacts to human health and controlled waters caused by land contamination are considered unlikely as maintenance and operation of the proposed development will be in accordance with good practice. Any unacceptable risk from contaminated land would have been addressed by remediation during construction stage. Any

required environmental permit(s) for the Proposed Development will control operational discharges as appropriate. We agree with this and therefore agree that it should be scoped out.

Chapter 15: Human Health

No comment

Chapter 16: Landscape and Visual

Buckinghamshire Council comment as follows:

Table 24-9: Summary of the scoping of potential effects – Ch 16, Landscape and Visual, states that for the operational phase:

a. Landscape:

Potential effects on *‘physical and perceptual aspects of the landscape designations and LCAs within the study areas’* will be scoped out.

‘The assessment of pipelines outside the National Landscape (Parts 1b and sections of Part 4b) are scoped out as majority will be underground and reinstated as part of the construction phase. Landscape effects would also be outside the extent of the study areas’.

b. Visual:

Potential for *‘Visual effects on visual receptors, based on identified representative views’* will also be scoped out for the same reasons as above:

Justification given: *‘The assessment of pipelines outside the National Landscape (Parts 1b and sections of Part 4b) are scoped out as majority will be underground and reinstated as part of the construction phase. Landscape effects would also be outside the extent of the study areas’.*

The Council has a number of concerns regarding the intention to scope out the potential effects of pipelines positioned above ground since they may prove to be significantly intrusive. There are many elements which, individually or collectively, would have the potential to significantly affect the landscape or visual amenity of an area such as the use of concrete kerbing on rural lanes, gabions to reinstate the banks of a sunken lane, the use of bunds in flat landscapes to screen intrusive works...

Reinstatement works are extremely important and can have a significant impact on landscape character and visual amenity – adverse or beneficial, depending on the design specification. Restoration proposals and mitigation works should be assessed where there are likely significant changes to landscape features and/or visual harmony. This should cover the reinstatement of rural roads and bridges, areas of woodland or hedgerow, etc. to minimise any harm to landscape or visual amenity, temporary or permanent.

Vale of Aylesbury Local Plan: Policy NE4 Landscape character and locally important landscape: *‘Development must recognise the need to recognise the individual character and distinctiveness of particular landscape character areas set out in the Landscape Character Assessment (LCA), their sensitivity to change and contribution to a sense of place’.*

Areas of Attractive Landscape, a local designation within Vale of Aylesbury Local Plan, are highly valued landscapes. NE4 states: *‘Development in areas of attractive landscape (AALs) and local landscape areas (LLAs) should have particular regard to the character identified in the report ‘Defining the special qualities of local landscape designations in Aylesbury Vale District’ (Final Report, 2016) and the LCA (2008)’*. It is also important to consider their setting.

Table 24-9: Summary of the scoping of potential effects also states that: *‘A separate night-time assessment is scoped out due to anticipated limited lighting associated with the Proposed Development’*. This is a reasonable approach. However, if there are instances where lighting may be more significant this should be assessed.

Potential effects on visual receptors should also be assessed where the pipeline has the potential to result in a material change in visual amenity. This would apply whether the pipeline is below or above ground and should consider, for instance, opening up of views due to the removal of vegetation. It can take several years to recreate a mature hedgerow and even longer to reinstate woodland.

The scoping area in Buckinghamshire tends to run through the clay vales, or, near to a number of AALs, which are invariably elevated above the valley floors. The LCA descriptions for these areas, e.g. LCA 6.1 Brickhills Scarp, all refer to panoramic views. Conservation Area Reports and Neighbourhood Plans also refer to viewpoints and panoramic vistas. These documents should all be referred to when selecting representative viewpoints. Neighbourhood Plans should also be considered in relation to proposed works,

All LCAs along the proposed routes as well as neighbouring LCAs which have the potential to overlook them, should be assessed for visual impact on receptors. I would welcome the opportunity to agree on viewpoints when this is refined.

Plate 3-2 is very helpful but more information should be provided regarding the anticipated time scales for construction of the pipelines. What length of pipeline would be excavated at a time? How long will the groundworks take along a set length of pipe etc.?

More information is required to describe Part 4a treatment works. Site B covers approx. 46.73ha and Site H covers approx. 43.3ha. These are substantial works which will be difficult to hide from view from receptors overlooking them from an elevated position. There is not enough information to assess the potential impact, even at this stage.

Regarding pumping stations, Plate 3-3 is a traditional pumping station with a considerably smaller footprint than that proposed and therefore, not indicative of what might be expected from this proposal. It would be more helpful to include illustrations of contemporary structures including all the various infrastructure elements along the canal as well as the treatment works.

In the interests of transparency, Table 16-12: Sensitivity of Landscape Receptors and Table 16-13 Sensitivity of Visual Receptors, should both give a more detailed description of the criteria for each level from high, medium, low and very low.

As a minimum, the effect on visual amenity should be assessed during the winter when there

are no leaves on vegetation. This would represent the worst-case scenario in line with GLVIA3.

Proposed Study Area

The Council is concerned that the study areas are not sufficient for Part 2 and 4a works including Sites B and H. The treatment works in particular are substantial pieces of infrastructure which may well be viewed from outside the 2km zone such as the Registered Historic Parks and Gardens at Ascott House, Mentmore Towers, or receptors living, working or travelling through the Quainton-Wing Hills AAL. The ZTV for Part 4a, Site H, Fig 16-11 (Vol 2, parts 7-11) shows that the potential for visual impact extends beyond approximately 65-70% of the perimeter of the study area. Extending the study area may take in adjacent LCAs which currently lie just outside the 2km study area, including LCA 4.14 Wingrave-Mentmore Ridge.

Chapter 17: Major Accidents and Disasters

No comment

Chapter 18: Noise and Vibration

No comment

Chapter 19: Socio-economics

No comment

Chapter 20: Traffic and Transport

No comment

Chapter 21: Materials and Waste

We think that Table 21-4: Summary of study areas – Materials and Waste, part 4a and 4b should have East of England listed in the regional column.

Chapter 22: Water Environment and Flood Risk

No comment

Chapter 23: Structure of Environmental Statement Chapter

No comment

24: Summary

No comment

Scoping; In Scope and Out of Scope

The tables at the end of the main report summarise the In Scope and Out of Scope for the topic areas. The project within Buckinghamshire has two parts 4a and 4b. These are described in the report as follows:

Project Part	Principal Components
Part 4a – Abstraction, Storage and Treatment	Water will be abstracted from the Grand Union Canal at one of two locations that are currently being considered where it will be stored and further treated to potable (drinking) water standards in a new Water Treatment Works (WTW). One of the sites (Site B) is located south of Milton Keynes near Bletchley. The other site (Site H) is located south of Leighton Buzzard near the village of Slapton. These are described further in Chapter 3: Description of the Proposed Development .
Part 4b – Pipeline to an underground reservoir near Luton	From the WTW, water will be transferred by a buried pipeline to an existing AfW water supply reservoir located near Luton. A number of pipeline corridors associated with the two Part 4a storage and treatment site options are currently being considered. These are described further in Chapter 3: Description of the Proposed Development .

The construction phase and the operation phase have been separately assessed and summarised.

Specific comments on matters proposed by the applicant to be scoped out is set out below using the same format as the applicants' tables.

Chapter	Effect	Area 4a	Area 4b	Comment
Chapter 8: Agriculture and Soils	Construction: Impacts on agricultural land through restriction to agricultural function within the farm holding	Out	Out	Agree. Scoping deals with this in another chapter.
	Operation: Loss and disturbance of soil resources related to agricultural land may occur in situ, for example through trafficking by vehicles or through soil removal, handling, storage and subsequent reinstatement,	Out	Out	Agree

	which may result in the impairment of soil function, quality or resilience			
	Impacts on agricultural land through restriction to agricultural function within the farm holding	Out	Out	Agree. Scoping deals with this in another chapter.
Chapter 9: Air Quality and Odour	Construction dust and impacts, including the use of Non-Road Mobile Machinery (NRMM)	Out	In	<p>The scoping report states that “Construction activities will include earthworks, pipeline cut and fill, concrete batching plant, steel frame erection, and canal network works, with low to moderate dust generation potential.”</p> <p>The Council agree but only 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.</p>
	Construction odour impacts, including the use of NRMM	Out	Out	Agree.
	Construction traffic emissions (within or adjacent to an AQMA)	Out	Out	Agree.
	Operational emissions, including use of NRMM	Out	Out	Agree.
	Operational odour	Out	Out	Agree.
	Operational road traffic emission	Out	Out	Agree.

Chapter 11: Cultural Heritage	Intrusive construction activities on findspots recorded by the HER	Out	Out	Agree.
	Physical impacts on designated and non-designated heritage assets (including archaeology)	Out	Out	Agree.
Chapter 12: Ecology – Aquatic	Construction and operation: White-clawed crayfish: No impact pathway, therefore, no potential effects	Out	Out	Agree
Chapter 13: Ecology – Terrestrial	Construction and operation: Indirect impacts to statutory designated sites of international importance beyond 2 km of the Proposed Development, potentially hydrologically connected with the EIA Scoping Boundary. Upper Nene Valley SPA / Ramsar site. Ensor Pool's SAC/ SSSI Chilterns Beechwood SAC / SSSI	Out	Out	Agree
	Operation: Indirect effects on designated sites due to disturbance of qualifying species	Out	Out	Agree
	Operation: Indirect effects on nonstatutory designated sites due to disturbance of qualifying species	In	Out	Agree
	Operation: Permanent impacts to ancient woodland from operations	Out	Out	Agree
	Operation: Disturbance/ displacement of protected and notable species through increased disturbance during operation, including on: • Amphibians; • Badger; • Birds; • Bats; • Reptile; • Otter; • Water vole; • Other Mammals; and • Invertebrates.	In	Out	Agree. There is no permanent operational noise or lighting associated with Part 4b.
Chapter 14: Ground	Operation: Indirect and direct impacts as a result of	Out	Out	Agree

Conditions	the disturbance of ground for maintenance works and leakage / spillages of stored materials during the operational phase			
Chapter 15: Human Health	Construction: Air quality: Changes in air pollutants from construction activities	In	Out	Agree
	Construction: Water availability: Changes in water availability during construction.	Out	Out	Agree
	Construction: Health-related behaviours: physical activity; risk taking behaviour; diet and nutrition: Changes to levels of physical activity, risk taking behaviour and consideration for diet and nutrition	Out	Out	Agree
	Construction: Social participation, interaction and support. Changes to opportunities for community participation and interaction, and for social and family support.	Out	In	Agree
	Construction: Social environment: relocation; community safety; community identity; and culture, resilience and influence. Changes to perception and actual level of risk and crime. Changes to community identity such as sense of belonging.	Out	Out	Agree
	Construction: Bio-physical environment – radiation: Changes to exposure to radiation risks	Out	Out	Agree
	Construction: Institutional and built environment – built environment; wider societal infrastructure and resources: Changes to features of the built environment and wider public health environment	Out	Out	Agree

	that contribute to physical and mental health outcomes			
	Operation: Healthcare and other social infrastructure: Permanent changes in access to and demand for healthcare services and other community facilities	Out	Out	Agree
	Operation: Open space, play and leisure: Permanent changes in availability and quality of public areas of open space and recreational walking and cycling routes	Out	Out	Agree
	Operation: Transport modes, access and connections: Permanent changes in vehicles on the local road network and public transport	Out	Out	Agree
	Operation: Economic environment (employment and income, education and training opportunities): Operational direct and indirect job creation and economic activity, as well as educational opportunities and support	Out	Out	Agree
	Operation: Air quality: Permanent changes in air pollutants from operational activities	Out	Out	Agree
	Operation: Air quality. Changes in air pollutants from operational road traffic	Out	Out	Agree
	Operation: Noise and vibration: Permanent changes to noise and vibration and road traffic noise	In	Out	Agree
	Operational: Health-related behaviours: physical activity; risk taking behaviour; diet and nutrition. Permanent changes to levels of physical activity, risk taking behaviour and consideration for diet	Out	Out	Agree

	and nutrition			
	Operational: Housing. Permanent changes to housing need and provision.	Out	Out	Agree
	Operational: Social participation, interaction and support. Permanent changes to opportunities for community participation and interaction, and for social and family support	Out	Out	Agree
	Operational: Social environment: relocation; community safety; community identity; and culture, resilience and influence. Permanent changes to perception and actual level of risk and crime. Permanent changes to community identity and social participation such as sense of belonging.	Out	Out	Agree
	Operational: Bio-physical environment: radiation. Permanent changes to exposure to radiation risks	Out	Out	Agree
	Operational: Institutional and built environment: built environment; wider societal infrastructure and resources. Permanent changes to features of the built environment and wider public health environment that contribute to physical and mental health outcomes	Out	Out	Agree
Chapter 17: Major Accidents and Disasters	Construction and operation: Major accident and disaster risks	Out	Out	Agree
Chapter 18: Noise and Vibration	Operation: Direct permanent noise impacts on sensitive receptors	In	Out	Agree
	Operation: Direct permanent vibration impacts on sensitive receptors	Out	Out	Agree
	Operation: Direct permanent	Out	Out	Agree

	noise impacts on sensitive receptors due to increased road traffic			
Chapter 19: Socioeconomics	Construction: Impacts on the tourism sector	Out	Out	Agree
	Operation: Permanent direct and indirect employment generation	Out	Out	Agree
	Operation: GVA generation.	Out	Out	Agree
	Operation: Promotion/provision of training and apprenticeship opportunities.	Out	Out	Agree
	Operation: Impacts on local and private assets (including residential properties, local businesses, community facilities, open space and visitor attractions), either via direct works or indirect via in combination effects identified by other discipline assessments.	Out	Out	Agree
	Operation: Impacts on the use of the canal network as a recreational and leisure resource directly through operation via direct works or indirectly via in combination effects identified by other discipline assessments	Out	Out	Agree
	Operation: Impacts on the use of the canal network for commercial uses via direct works or indirect via in combination effects identified by other discipline assessments	Out	Out	Agree
	Operation: Permanent disruption to PRoW access and canal towpath access	Out	Out	Agree
	Operation: Impact on accommodation facilities	Out	Out	Agree
	Operation: Impact on the tourism sector	Out	Out	Agree
	Operation: Land use impacts on planned and proposed development	Out	Out	Agree

Chapter 20: Traffic and Transport	Construction impact on hazardous/large loads	Out	Out	Noted that this will be assessed in the Transport Assessment.
	Operational impact on severance of communities	Out	Out	Agree
	Operational impact on pedestrian delay	Out	Out	Agree
	Operational impact on non-motorised user amenity	Out	Out	Agree
	Operational impact on fear and intimidation on and by road users	Out	Out	Agree
	Operational impact on road vehicle driver and passenger delay	Out	Out	Agree
	Operational impact on hazardous/large loads	Out	Out	Agree
Chapter 21: Materials and Waste	Construction: Waste arising from extraction, processing and manufacture of construction components and products	Out	Out	Agree
	Construction: 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, on-site temporary storage or off-site transport of materials and waste	Out	Out	Agree
	Construction: Changes to safeguarded mineral and waste sites	Out	Out	Agree
	Operation: Changes in availability of materials	Out	Out	Agree
	Operation: 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	Out	Out	Agree

	generation, handling, on-site temporary storage or off-site transport of materials and waste			
	Operation: Changes in available landfill void capacity	In	Out	Agree
	Operation: Changes to safeguarded mineral and waste sites	Out	Out	Agree
Chapter 22: Water Environment and Flood Risk	Construction: Disturbance of existing contamination in groundwater	Out	Out	Agree
	Construction: Deterioration of groundwater quality in aquifers, GWDTEs, abstraction points and WFD waterbodies by disturbance of existing contamination	Out	Out	Agree
	Construction: Increase in residual risk of flooding from reservoirs	Out	Out	Agree
	Construction: Increased risk of flooding from canals	In	Out	Agree
	Construction: Operation: Reduction in water available for abstractors from the Rivers Tame and Trent	Out	Out	Agree
	Operation: Sediment transport changes and hydroecological condition deterioration in the Rivers Tame and Trent	Out	Out	Agree
	Operation: Deterioration of water quality in the Rivers Tame and Trent, the canals and the Daventry and Drayton Reservoirs	Out	Out	Agree
	Operation: Increase in flood risk from canals	In	Out	Agree
	Operation: Changes to flow patterns and sediment mobility	Out	Out	Agree

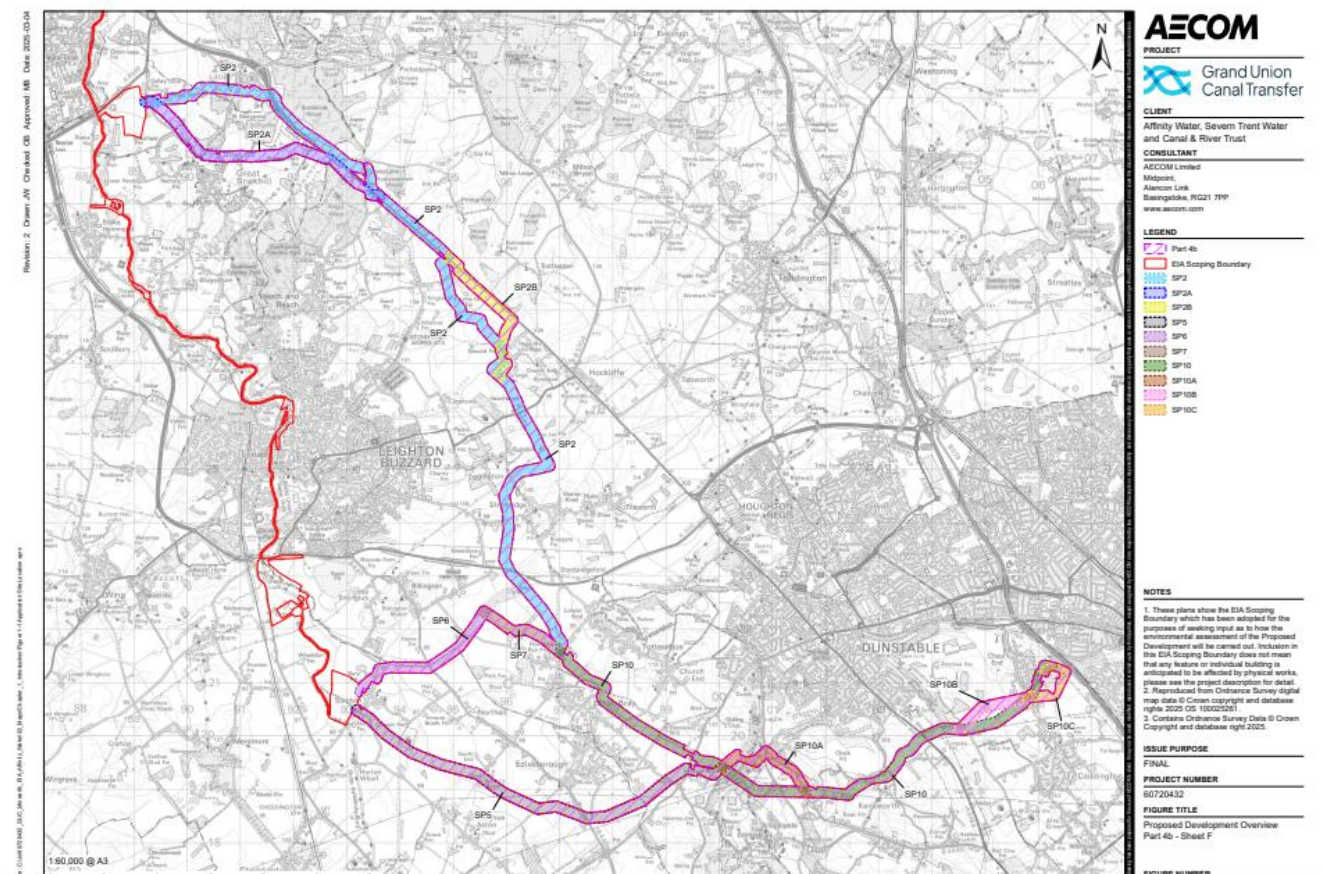
I trust this letter clearly sets out the observations of the Council in respect of the Scoping Report submitted by the applicant.

Yours sincerely

Eric Owens

Eric Owens

Service Director of Planning & Environment



Above: Plan of proposals in Buckinghamshire

From: [REDACTED]
To: [Grand Union Canal](#)
Subject: Bugbrooke Parish Council Response to WA0210001 - Scoping Opinion
Date: 28 April 2025 10:52:20

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To whom it may concern,

RE: Bugbrooke Parish Council Response to WA0210001 - Scoping Opinion

Bugbrooke Parish Council have reviewed the scoping document and believe that this ambition scheme will have little impact on Bugbrooke. The major concern is flooding and the parish council will reply on the relevant flood authorities to properly assess any risk and ensure it is mitigated. Bugbrooke has had flooding recently from the brook. The Section 19 report has not been issued yet to determine if the canal played a part in this flooding too, although this is unlikely.

Bugbrooke Parish Council had no further comments.

Kind regards,
Nicola

Nicola Palmer
Clerk to Bugbrooke Parish Council

Email: Parishclerk@bugbrookeparishcouncil.org
Website: www.bugbrookeparishcouncil.org
Visit our Facebook page: Bugbrooke Parish Council

Please note the email address has changed to parishclerk@bugbrookeparishcouncil.org
bugbrookepc@btconnect.com will no longer be monitored from October 2021. Please update your records.

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Our Ref: 25/01300/SCOP

7 April 2025



The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

www.scambs.gov.uk | www.cambridge.gov.uk

Dear Sir/Madam

CAMBRIDGE CITY COUNCIL
EIA Scoping Report

Proposal: Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development)

Site address: Grand Union Canal Transfer Project

Please find enclosed the Local Planning Authority's response on the above matter.

[REDACTED]

[REDACTED]

Joint Director For Planning & Economic Development For
Cambridge & South Cambridgeshire

Contact: [REDACTED]
Telephone: 01223 457000
Email: Planning@greatercambridgeplanning.org

Our Ref: 25/01300/SCOP

7 April 2025



The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
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South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

www.scambs.gov.uk | www.cambridge.gov.uk

Dear Sir/Madam

CAMBRIDGE CITY COUNCIL

EIA Scoping Report

Proposal: Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development)

Site address: Grand Union Canal Transfer Project

Thank you for your EIA Scoping Report request received on 31st March 2025 on the following matter:

Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development)

at

Grand Union Canal Transfer Project

The Grand Union Canal Transfer project proposes to transfer surplus water from Severn Trent Water's supply area to address water deficits in Affinity Water's supply area. Recycled water will be treated at a new Advanced Water Treatment Plant (AWTP) located at the Minworth Wastewater Recycling Centre, situated to the north-east of Birmingham. From there, the treated water will be transferred eastwards to the Coventry Canal at Atherstone.

Following discharge into the Coventry Canal, the route of the project continues in a south-easterly direction, utilising the existing Oxford Canal and Grand Union Canal networks. In addition to their current role in navigation, these canals will serve as conduits for water conveyance to an abstraction point located on the canal network to the south of Milton Keynes. Here, the water will be stored and undergo further treatment prior to entering Affinity Water's distribution system, ultimately supporting supply to areas west of Luton.

The linear project spans approximately 131 kilometres in length, from the Minworth AWTP through to the abstraction and treatment location south of Milton Keynes, concluding at an existing water supply reservoir near Luton.

Given the significant geographical separation between the project area and the administrative boundaries of Cambridge City Council and South Cambridgeshire District Council, it is considered that the proposed development does not give rise to any likely significant effects on either authority's area. Accordingly, both Councils do not intend to register as Interested Parties for the purposes of the Development Consent Order (DCO) examination and will not be submitting a formal scoping response.

If you have any queries or wish to discuss the above please contact me.

Yours faithfully

[Redacted Signature]

Strategic Sites Team Leader

Email: [Redacted Email Address]

Direct dial: [Redacted Direct Dial Number]

From: [REDACTED]
To: [Grand Union Canal](#)
Subject: Fw: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
Date: 08 April 2025 16:08:02
Attachments: [image339285.png](#)
[image580801.png](#)
[GUC Letter to stat cons Scoping & Reg 11 Notification.pdf](#)

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Good afternoon,

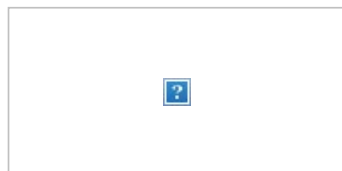
The Planning, Infrastructure & Transport Committee of Campbell Park Community Council reviewed this consultation at their meeting yesterday evening.

Committee noted the proposal and resolved to raise concerns about the ongoing maintenance of the canal banks on the stretch of the Grand Union going through our area. Some areas have eroded which may lead to potential water breaches with an increased water volume. Committee also were also keen that with any development or changes to the water system, the impact on biodiversity is considered, protected and mitigated appropriately.

Kind regards

[REDACTED]

[REDACTED]
Community Officer
Tel: 01908 608559



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Sent: Monday, March 31, 2025 11:37 AM
To: [REDACTED]
Subject: Fwd: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation

Sent from my iPhone

[REDACTED]

Clerk to Council
Tel: 01908 608559



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Begin forwarded message:

From: Grand Union Canal <GUCtransfer@planninginspectorate.gov.uk>
Date: 31 March 2025 at 11:22:35 BST
Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation

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FAO Parish Clerk

Dear Sir/Madam

Please see attached correspondence on the proposed Grand Union Canal Transfer.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **28 April 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

[Redacted Signature]

[Redacted Name]
EIA Advisor
The Planning Inspectorate
T 0303 444 5028

@PINSgov

The Planning Inspectorate

planninginspectorate.gov.uk

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DPC:76616c646f72



Environmental Services
Operations Group 3
Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your Ref WA0210001

Our Ref IPP-266 Scoping

Friday 25 April 2025

Dear Karen Wilkinson

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Scoping Consultation for the Grand Union Canal Transfer project

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a prescribed consultee in the Development Consent Order process.

We understand that:

- the applicants, Affinity Water and Severn Trent, have asked the Planning Inspectorate on behalf of the Secretary of State for its written opinion (a Scoping Opinion) as to the scope, and level of detail, of the information to be provided in the ES relating to the proposed development; and
- the Trust has been identified by the Planning Inspectorate as a consultation body which must be consulted before adopting its Scoping Opinion.

The Trust would be a partner in the development of the proposed scheme, which proposes the use of a substantial length of the Trust's canal infrastructure. Therefore, as owner and navigation authority we have proactively engaged with Affinity Water and Severn Trent on the project as a scheme that we believe will contribute to national infrastructure priorities identified by Government. This included engagement during the drafting of the Scoping report specifically.

Nevertheless, the Trust has, separately, reviewed the Scoping Opinion as a prescribed consultee. In this capacity, we can confirm that addressing all the matters that are scoped in would then result in sufficient information being available in support of the formal DCO application to consider whether the proposals meet the requirements of the relevant NPSs and other considerations.

Please do not hesitate to contact me with any queries you may have.

Canal & River Trust Spatial Planning Team

E: planning@canalrivertrust.org.uk W: canalrivertrust.org.uk T: 0303 040 4040

Yours sincerely,

Richard Forbes MRTPI
Area Planner


<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

Canal & River Trust Spatial Planning Team

E: planning@canalrivertrust.org.uk W: canalrivertrust.org.uk T: 0303 040 4040

Patron: King Charles III. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, Registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW

From: [REDACTED]
To: [Grand Union Canal](#)
Subject: WA0210001 - Affinity Water and Severn Trent Scoping
Date: 10 April 2025 11:25:53

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Dear Sir/Madam,

Thank you for consulting Cherwell District Council on the above Scoping Opinion.

I can confirm that Cherwell District Council has no comment on the submitted Scoping documents.

Kind regards

[REDACTED]

[REDACTED] [REDACTED] [REDACTED] DipTP MRTPI

Principal Planning Officer

Development Management Division

Environment and Place Directorate

Cherwell District Council

Email: [REDACTED]

Web: www.cherwell.gov.uk

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We will soon move to our new council offices in Castle Quay. Our new address will be:

Cherwell District Council
39 Castle Quay
Banbury
OX16 5FD

You will easily find us in the Castle Quay shopping mall, opposite Lock 29. You can still find information through our normal digital channels, such as our website and social media channels, and get in touch and report things as you used to.

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Chilterns
National
Landscape

Contact: Dr Michael Stubbs MRTPI

Email: planning@chilterns.org.uk

By portal upload to

My Ref: F:\Planning\DM\NSIPs\Grand Union Canal Transfer.

28th April 2025 (PINS Deadline)

By email submission only to GUCtransfer@planninginspectorate.gov.uk

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11 Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development) Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested.

Planning Inspectorate Reference: WA0210001

My Ref: F:\Planning\DM\NSIPs\Grand Union Canal Transfer

Submissions on the Scoping Consultation (31st March- 28th April 2025) by the Chilterns Conservation Board (Chilterns National Landscape).

1.0. Background. The Chilterns Conservation Board (CCB) is an AONB Conservation Board as constituted by the CROW Act 2000 and included in the list of statutory consultees for NSIP/DCO applications (as set out in the Infrastructure Planning (National Policy Statement Consultation) Regulations (2009), the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations (2009) and the Infrastructure Planning (Interested Parties) Regulations (2010).

2.0. Our Powers and Responsibilities. The Chilterns National Landscape is still formally designated as an Area of Outstanding Natural Beauty (AONB). However, all AONB in England and Wales are now known as National Landscapes. The renaming is accompanied by rebranding, reflecting our national importance, and is designed to ensure a consistent approach across all national landscapes. The Chilterns Conservation Board (CCB) was established in 2004 under powers vested in the Countryside and Rights of Way Act 2000, section 87, with responsibilities as set out in this Act to, *'in the exercise of their functions, to seek to further (a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and (b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty, but if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a)'*. (extract from the legislation).



Chilterns National Landscape
The Lodge
90, Station Road
Chinnor
OX39 4HA

 01844 355500
 Office@chilterns.org.uk
 www.chilterns.org.uk
   ChilternsNL
 [chilterns-national-landscape](https://www.linkedin.com/company/chilterns-national-landscape)



Chilterns
National
Landscape

3.0. Prelims. The Planning Inspectorate identified the Chilterns Conservation Board as a consultation body which must be consulted before adopting its Scoping Opinion. The Planning Inspectorate sought a consultation response to:

- *Inform the Planning Inspectorate of the information you consider should be provided in the ES,*
- *Or confirm that you do not have any comments.*

4.0. Countryside and Rights of Way (CROW) Act 2000. This submission contains information that the CCB considers necessary to discharge our duties and responsibilities in sections 85 and 87 of the CROW Act 2000. These duties also apply to the Examining Authority and the Secretary of State when discharging their decision-making responsibilities.

5.0. CCB's approach to the ES and PEIR. The CCB is grateful for the opportunity to make these representations on matters of ES scoping. We have reviewed the papers comprising the EIA Scoping Report and accompanying figures. We are grateful that our comments on various details, including guidance and standards, apply to the scoping of the Environmental Statement (ES) and the Preliminary Environmental Information Report (PEIR). In both cases, Schedule 4(4) of the EIA Regulations specifies that the ES should describe the:

"...factors...likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydro morphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape."

6.0. On key matters of **methodology**, the CCB supports three important key principles, contained within,

6.1. A receptor-based approach, i.e., receptors sensitive to change because of this development. In our submission, a key receptor is the Chilterns National Landscape, including Chilterns Chalk Streams, the Chilterns Aquifer and supported habitats, acknowledged as special qualities of the AONB in the Management Plan (a statutory Document).

6.2. The Rochdale Envelope Principle, i.e. consideration of a 'reasonable worst-case scenario' and/or the application of a precautionary principle (as set out in the NSIP Guidance on Linear Projects, 27th Feb 2025),

6.3. Cumulative Assessment i.e. involves optioneering and alternatives covering flexibility and options, which also requires drawing up a spatial and temporal zone of influence (ZOI) as noted in the PINS Guidance Note 17 on Cumulative Effects. This points towards the use of 'bespoke significance criteria' with the application of duration/extent/type/frequency/value and effect resilience.



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7.0 CCB 'Asks' for content in the final Scoping Report

These are to be considered within area 4(b), which includes the northern Chilterns around Tring, Dunstable and Luton.

Scoping consultation	CCB's Key Asks for inclusion in the final ES and PEIR
<p>The Boundary of the Study Area.</p> <p>Scoping Report 3.4.43 states, 'The part 4b EIA scoping boundary for the pipeline route option corridors is 200m wide while the final pipeline corridor is likely to comprise a 50m working width'.</p> <p>Scoping Report Chapter 14 on Ground Conditions and the Future Hydrological Assessment (para 14.7.10) shows that a source-pathway-receptor methodology will examine pollution risks to groundwater during construction and operation. This also notes the impacts on groundwater-dependent terrestrial ecosystems.</p>	<p>CCB Ask</p> <p>The Chalk Streams habitats of the Chilterns are globally scarce and an acknowledged special quality of the Chilterns.</p> <p>The ES Ch 14 hydrological assessment requires a specific Chilterns Chalk Streams assessment component, extending to include Chalk Stream catchments well beyond the 200m pipeline corridor.</p> <p><i>We propose that a mapping exercise denote this catchment in the final ES.</i></p>
<p>Ch 13 Ecology Baseline</p> <p>Table 13-5 sets out the statutory designated sites of importance for nature conservation within the study area.</p> <p>Table 13-5 also refers to Part 4 (b), which includes the Chilterns National Landscape. We could find reference to statutory designated sites (Chilterns Beechwoods SAC and Dunstable Whipsnade Downs SSSI) and non-statutory designations but <u>no mention</u> of the Chilterns Chalk Streams and Chalk Grassland habitat.</p>	<p>CCB Ask</p> <p><i>To explicitly refer to the ecology of the Chilterns National Landscape within the baseline assessment.</i></p> <p>.</p>
<p>Ch 14 Ground Conditions</p> <p>This section deals with the National Policy Statement for Water Resilient Infrastructure and (for phase 4b) the Vale of Aylesbury Local Plan policies. The hydrological assessment is dealt with on page 52 (at 14.7.10), and this mentions the source-pathway-receptor route dealing with</p>	<p>CCB Ask</p> <p>The hydrological assessment specifically deals with groundwater vulnerability mapping within the Chilterns, focusing on groundwater, surface water, and flood risk receptors. Paragraph 22.5.18 confirms that this will be undertaken more generally.</p>



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<p>groundwater risk/pollution during construction and operation.</p> <p>14.9.2 stipulates the avoidance of environmentally sensitive areas.</p>	<p><i>We seek a specific Chilterns section that also considers potential water discharge activity, especially where existing abstractions will be impacted.</i></p> <p>CCB Ask</p> <p><i>The scoping ES at 14.9.2 seeks to avoid 'environmentally sensitive areas'. The CCB at part 4(b) would seek mapping data to show this, which would greatly assist all parties in the NSIP/DCO consultation process.</i></p>
<p>Ch 22 Water Environment and Flood Risk Figure 6-4 Hydrological Zone of Influence.</p> <p>Ch 22 deals with surface water abstractions (at 22.50.50) and in discussion of part 4(b) outlines the key receptors as groundwater, surface water and flood risk receptors.</p> <p>The hydrological zone of influence is of great interest, and we seek information on the catchments for all watercourses, including the Chilterns Chalk Streams and spring line sources. We appreciate that this work is to be refined (at 22.4.1), and we are mindful of the recent NSIP Guidance on linear projects, which deals with 'limits of deviation' (LOD) and the PINS Advice Note 17 and its focus on a 'zone of influence' (ZOI).</p> <p>Table 22-7 Aquifer Designations does not mention the Chiltern Aquifer.</p>	<p>CCB Ask</p> <p><i>We specifically welcome a detailed analysis of all surface water abstractions within the AONB/NL area and confirmation of the implications (adopting a Rochdale Envelope 'worst-case scenario' when applying the 'source-pathway-receptor' methodology).</i></p> <p>CCB Ask</p> <p><i>To specifically clarify in Table 22-7 whether the Chiltern Aquifer is or is not affected.</i></p>
<p>Indicative list of pre-application/Scoping site visits recommended to the Examining Authority (ExA).</p>	<p>This should include a visit to the Chilterns National Landscape and the area covered by the North Chilterns Farmer Cluster. Following an initial review of the options, at least two member farms (of 15 in total, as at 2025) could have the work routed through their farms.</p>
<p>Ch 23 Structure of the ES</p>	<p>CCB Ask</p> <p><i>We are content with the proposed structure.</i></p>



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	<p>To assist all parties, we seek a Chiltern-specific zone of influence (ZOI) evaluation in the section on cumulative effects. Following the PINS 17 Advice Note on cumulative effects, we promote its central message that <i>'criteria should consider capacity of the receiving environment and receptors to accommodate changes likely to occur'</i>. We have listed below some of those Chilterns AONB/NL-specific capacity issues and would welcome an appropriate commentary on them, with supporting maps and figures. When applying to the Chilterns AONB/NL, the new <i>'duty to further'</i> in the CRow Act 2000 will apply.</p> <p>Therefore, when summarising the application of the ES's cumulative content (i.e. matters of duration, extent, type, frequency of effect, the value and resilience of the receptors affected and the likely success of mitigation), the CCB would seek explicit commentary upon the following:</p> <p>(i) Chilterns baseline surveys, as applied to the content below</p> <p>(ii) Chilterns aquifer abstraction/impacts</p> <p>(iii) Chilterns abstractions/impacts within part 4(b)</p> <p>(iv) Sections/topographic drawings showing the nature of the 50m wide construction corridor, schematically showing the nature of disturbance and distinguishing open trenches from non-dig boring machines.</p> <p>(v) Mapping Chilterns' special qualities, as applicable, includes biodiversity and heritage, including chalk grassland and designated and non-designated archaeological heritage assets. There is likely to be a significant archaeological impact in a 50m swathe. We anticipate planning recommendations by the LPAs and would be interested in what non-designated archaeology is uncovered.</p>
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	<p>(vi) <i>These special qualities also include the tangible nature recovery outcomes of the Chilterns Farm Cluster project, which in the North Chilterns Cluster connects groups of farmers who come together to farm with wildlife and climate change in mind to enhance the Chilterns National Landscape's nature, landscape and heritage. The North Chilterns cluster is currently 15 (2025) and is funded by the Farming in Protected Landscape (FIPL) funding as allocated by DEFRA.</i></p> <p>(vii) <i>Mapping any fragmentation of habitats.</i></p> <p>(viii) <i>Setting out the Construction period within 4(a), with timing periods to assist all parties.</i></p> <p>(ix) <i>Commentary on applying the new 'duty to further' (also see below), which seeks proactive outcomes. This commentary must address the core duty to 'prevent, reduce and where possible offset any significant adverse effects', as established in EIA legislation. Mitigation is a part of this matrix but cannot realistically be applied if harm impacts upon the purposes of the AONB designation. Such harm must be avoided, clearly identified, and discussed if alternative options are pursued.</i></p>
Ch 16 Landscape and Visual Impact Assessment	<p>CCB Ask <i>Alongside the table of planning policy, the CCB would seek the inclusion of</i></p> <ul style="list-style-type: none">• The Chilterns AONB Management Plan (a statutory document)• The CCB's Chalk Streams Planning Guidance 2025 (our best practice guidance)
Stakeholder Engagement , as fostered and promoted at PINS advice Note 7 to encourage stakeholder consultees (it's 8.9)	<p>CCB Ask</p> <p>Ch 22 at 22.3.6 sets out a series of (to be) consulted post-EIA scoping groups.</p> <p><i>The CCB is not included, but would welcome being included as a statutory body for NSIP/DCO applications. This</i></p>



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	<p>would include our North Chilterns farm cluster work, which will be heavily affected by this NSIP. Such routing of the infrastructure will, inevitably, disrupt their businesses and potentially our work with them to create/restore more, bigger, better- and better-connected habitats. We consider it highly beneficial to have this assessed and to include the impact it might cause their/our work and any funding/agreements we might work up with them. Such an assessment of impacts would encompass the work of the North Chilterns Cluster in new habitat creation, better management of existing habitat and soil health projects, by way of example. Such work would not necessarily be picked up by the assessment of designated sites / priority habitats but are just as important and worthy of attention in an additional/supplementary study.</p> <p>On archaeological matters, we would seek inclusion as a key body alongside the respective local planning authority, which is involved when non-designated heritage assets are uncovered within the 50 m corridor for construction operations.</p>
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8.0. New Duty in s.85 of the CRow Act 2000 as amended by s245 of the Levelling Up and Regeneration Act 2003

8.1. The new duty now amends section 85 to read, s.85 CRow Act 2000, General duty of public bodies etc. In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority *must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.* (Our emphasis).


8.2. The **National Landscapes Association** (NLA) published a briefing note in November 2024. On development management matters, this stated (on page 6) and of relevance,

8.3. For decisions relating to planning applications:

- Assess what impact the proposal would have on the purpose of designation. Consider how the natural beauty of the area might be affected, were the proposal to go ahead (remember to consider the holistic concept of natural beauty), and consider how the proposal would align with the AONB Management Plan objectives/principles/policies.



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- Consider whether this would cause harm to the natural beauty of the area. Natural England have advised that the strengthened duty underlines the importance of avoiding harm to the statutory purposes of Protected Landscapes. (see footnote 12 - Natural England (2023) 'Natural England's addendum to our Deadline 9 response in relation to the enhanced duty in relation to Protected Landscapes including the Kent Downs Area of Outstanding Natural Beauty'.

8.4. On 16th December 2024 **DEFRA** published its own guidance on the new duty. A relevant extract is the section entitled 'What a relevant authority should do' (Our emphasis is underlined).

The duty is an active duty, not passive, which means:

- a relevant authority should take appropriate, reasonable, and proportionate steps to explore measures which further the statutory purposes of Protected Landscapes
- as far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes
- a relevant authority should be able to demonstrate with proportionate, reasoned, and documented evidence the measures to which consideration has been given when seeking to further the statutory purposes of Protected Landscapes - for example, policies, strategies, operational procedures, estate management plans, investment plans, contracts, works instructions, assessments and reports which should be able to evidence the proper discharge of the duty by the relevant authority
- for ongoing functions, a relevant authority may consider it appropriate to instigate a formal compliance monitoring and reporting system to ensure adherence to the duty
- for development plan making and development management decisions affecting a Protected Landscape, a relevant authority should seek to further the purposes of the Protected Landscape - in so doing, the relevant authority should consider whether such measures can be embedded in the design of plans and proposals, where reasonably practical and operationally feasible
- for the development and management of land, water and estates, relevant authorities should seek to further the purposes of the Protected Landscape when designing and undertaking these activities, where reasonably practical and operationally feasible
- for day-to-day activities, relevant authorities should seek to further the purposes of the Protected Landscape when designing and undertaking these activities where reasonably practical and operationally feasible

8.5. New regulations are anticipated and will be issued, we anticipate, in the period prior to the formal NSIP/DCO examinations.

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8.6. The **first case law** to address this new duty was the recent High Court decision of 27th March 2025 in *New Forest National Park Authority and Secretary of State [2025] EWHC 726 (Admin)*. In paragraph 62, Justice Mould commented that,

‘The strengthened duty is expressed in qualified terms. The planning authority is required “to seek to further” the section 5(1) purposes. It is not under a duty necessarily to fulfil those purposes. Nevertheless, in my view, in any case in which the planning authority determines that a planning application proposes development which is in conflict with the section 5(1) purposes or will undermine their fulfilment, the authority ought both to consider whether and to explain why they have decided that planning permission may justifiably be granted. The planning authority’s consideration of those matters will necessarily be informed by the circumstances of the given case, including the size and scale of the development under consideration and the extent and severity of its conflict with the section 5(1) purposes. These are matters of judgment, but a duty “to seek to further” the section 5(1) purposes necessarily invests the planning decision maker with the responsibility to judge, firstly, whether the planning application before them for decision proposes development which interferes with the fulfilment of those purposes; and if it does, whether and if so why the grant of planning permission is justified.

(Note—The purpose of section 5(1) under National Parks legislation is the same as section 85 in CRow.)

8.7. In our opinion, this judgment is relevant to this future NSIP and its ES scoping, insofar as this legal decision focuses on the degree to which a planning matter *‘interferes with the fulfilment of those purposes’*. This links to the special qualities and their role in helping to deliver the statutory duties vested in AONB legislation.

9.0. Recent Applications of the New Duty in NSIP/DCO Decisions.

9.1. To assist, we would draw attention to recent Development Consent Orders dealing with the **Luton Airport Expansion** and **Lower Thames Crossing** NSIPs. At **Luton**, the Secretary of State’s decision letter of 3rd April 2025 to grant consent deals with this duty in paragraphs 201 and 219. Of interest, the stance of Natural England, Central Bedfordshire Council and the Hertfordshire Host Authorities was not challenged by the Secretary of State, whilst fully acknowledging that she arrived at different conclusions on harm. At paragraph 202 the Secretary of State acknowledged that *‘Natural England, Central Bedfordshire Council and the Hertfordshire Host Authorities considered that the duty to ‘seek to further’ was a stronger, active duty, not a passive one and any relevant authority must take all reasonable steps to explore how the statutory purposes of the protected landscape could be furthered. Further, they considered that this duty goes beyond mitigation and must demonstrate with reasoned evidence what measures could be taken to further the statutory*

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purposes or demonstrate they are not affected [ER 3.8.91]. The Secretary of State notes that the Chilterns Conservation Board suggested that the impact on relative tranquillity (as considered above) would harm the Special Qualities of the AONB and not 'further the purpose'; and the Hertfordshire Host Authorities also considered that the Proposed Development was inconsistent with section 85 of the CRoW Act [ER 3.8.92].

9.2. At the **Lower Thames Crossing** decision on 25th March 2025 the Secretary of State also considered the new duty in paragraphs 427 to 437 and concluded (437) *The Secretary of State notes the comments from NE in relation to compliance with this duty. On the 16 December 2024, the Secretary of State for the Environment, Food and Rural Affairs published guidance for relevant authorities on seeking to further the purpose of Protected Landscapes. The guidance states that relevant authorities must now "seek to further" the statutory purposes of Protected Landscapes, although consideration of what is reasonable and proportionate in the context of fulfilling the duty is decided by the relevant authority and should take account of the context of the specific function being exercised. Given the scale and impact of the Proposed Development the Secretary of State considers that in this case, a financial contribution to support the delivery of the Kent Downs AONB Management plan is sufficient and necessary to meet the duty in this particular case, noting this will be delivered alongside other mitigation and enhancement measures already agreed. (and continues).*

9.3. The Lower Thames Crossing Examining Authority noted a lack of regulations on this new legislation, which are anticipated and will, no doubt, be published well ahead of the anticipated final submission of the Grand Union Transfer Environmental Statement.

9.4. In both cases, various interpretations were arrived at regarding the discharge of the new duty. However, an element of common ground emerges in these decisions in which the delivery of this new duty goes well beyond mitigation. As this Grand Union Transfer project is developed, we would echo that point so that delivering positive outcomes for the ecology, hydrology, landscape, Chilterns North Farm Cluster and cultural heritage of the AONB/National Landscape must be addressed comprehensively and without recourse to mitigation. Mitigation must be considered, but it must be considered separately from the duty in s.85 of CRoW 2000.

9.5. The Chilterns Conservation Board is grateful for the opportunity to submit these scoping representations.

28th April 2025

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For the attention of: Ms K Wilkinson – Senior EIA Advisor
Planning Inspectorate

[By Email: GUCtransfer@planninginspectorate.gov.uk]

24th April 2025

Dear Ms Wilkinson

Re: WA0210001 - Grand Union Canal Transfer project Scoping Opinion; Grand Union Canal, Transfer Project

Thank you for your notification of the 31st March 2025 in respect of the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within parts of the proposed Grand Union Canal project there are coal mining features present at surface and shallow depth which may pose a risk to surface stability and public safety. These features include mine entries and shallow coal workings.

The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

The submission is supported by an Environmental Impact Assessment Scoping Report, dated March 2025 and prepared by AECOM Limited. Chapter 14 of this Report focuses on

ground conditions. This chapter acknowledges that ground stability poses a potential risk and states that a detailed geotechnical desk studies, a Geotechnical Investigation Report (GIR) and a Geotechnical Design Report (GDR) will be undertaken as part of the detailed design to address this issue. A summary of the information available at the time will be included in the ES chapter.

We concur with the authors of the Scoping Report that ground conditions should be included in the ES. We would expect the ground conditions chapter of the ES to consider risks posed by coal mining features, if development works are proposed in areas where these are recorded to be present.

If you would like to discuss this matter further, please contact me on the above number.

Yours sincerely

Melanie Lindsley

Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI
Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority by the Local Planning Authority and/or information that has been published on the Council's website for consultation purposed in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the applicant for consultation purposes.

From: combefieldspc@gmail.com
To: [Grand Union Canal](#)
Cc: [REDACTED]
Subject: Grand Union Canal Transfer - EIA Scoping and Consultation
Date: 08 April 2025 08:35:48

Combe Fields Parish Council initial comments on the above project are as follows:-

1. This scheme is one of genius or one of madness!!
2. What will happen to the discharge from the Minworth pipe outlet at Atherstone if / when it gets overwhelmed in times of excessive rain e.g. storm Darragh?
3. What happens during excessive rain conditions if Minworth must discharge untreated water?
4. It is proposed that there will be an increase of canal water velocity (aiming at less than 0.3 metres / sec.) What effect will this have on the canal banks. What steps will be taken to limit no bank erosion?
5. It is also proposed that there will be an increased canal water level up to 300mm. In certain parts of Combe Fields Parish (e.g. Smeaton Lane C171), in times of excessive rain. it is the overflow / height control gate near The Wharf on Smeaton lane that discharges into Smite brook via the stream on Smeaton lane. It is when this gate is opened and it rains, the houses get flooded on the Stretton side of the tunnel.
6. An up to 300mm increased water level could make the wash from boats get onto the tow path. Even if the level is technically contained.
7. Are the canal levels from Atherstone to London via the Coventry, Oxford and Grand Union Canals all "downhill". If not, how is the flow going to climb "uphill" through a lock(s) - external pump(s) perhaps? What happens if the pump(s) fail?
8. At the Coventry-Oxford and Oxford-Grand Union canal junctions ,how is the flow going to be directed "correctly"?

[REDACTED]
Correspondence Councillor, Combe Fields Parish Council.
[REDACTED]

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**To comply with 2018 General Data Protection
Regulation (GDPR) Requirements
Please use this email address for ALL**

Combe Fields Parish Council Business:-

Combefieldspc@gmail.com

From: [REDACTED]
To: [Grand Union Canal](#)
Cc: [REDACTED]
Subject: RE: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
Date: 31 March 2025 12:35:56
Attachments: [image022.png](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image027.png](#)
[image028.png](#)
[image029.png](#)
[image030.png](#)
[image031.png](#)

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Hi [REDACTED]

Thank you for consulting the Cotswolds National Landscape (CNL) Board on the proposed Grand Union Canal Transfer project.

Given the distance between CNL and the project, we do not consider that the project is likely to impact on the natural beauty of the CNL.

On this basis, we do not consider that it is necessary for the Planning Inspectorate to consult the Board on this project.

Kind regards,

[REDACTED] [REDACTED]



[REDACTED]
Planning Lead
Cotswolds National Landscape

[REDACTED]

Registered address:
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From: Grand Union Canal <GUTransfer@planninginspectorate.gov.uk>

Sent: 31 March 2025 11:01

Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation

Dear Sir/Madam

Please see attached correspondence on the proposed Grand Union Canal Transfer.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **28 April 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,



EIA Advisor
The Planning Inspectorate
T 0303 444 5028



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The Planning Inspectorate



planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

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From: clerk@crickparishcouncil.gov.uk
To: [Grand Union Canal](#)
Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
Date: 17 April 2025 09:01:44
Attachments: [image003.png](#)

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Good morning,

With reference to the above, Crick Parish Council resolved at the Parish Council meeting on Monday 14 April 2025 to not comment on the application.

Regards,

[Redacted]

[Redacted]

Clerk & Responsible Financial Officer

[Redacted]

[Redacted]





Curdworth Parish Council

47 St Pauls Crescent, Coleshill, Birmingham, B46 1BB
Tel : [REDACTED] Email : curdworthpc@hotmail.com
Website : www.curdworthparishcouncil.gov.uk



24th April 2025

Your reference: WA0210001

via email to: GUtransfer@planninginspectorate.gov.uk

Planning Inspectorate

Environmental Services

Operations Group 3

Temple Quay House

2 The Square

BRISTOL BS1 6PN

For the attention of Karen Wilkinson – Senior EIA Advisor

Dear Ms. Wilkinson

We refer to your correspondence reference WA0210001 of the 2nd April 2025 towards us as a local and adjacent parish council that will be affected by a project proposed by Affinity Water and Severn Trent that is entitled 'the Grand Union Canal Transfer project'.

Your correspondence has advised us that an Environmental Statement has been submitted to you on behalf of the applicants, and respecting regulation, we must understand, read, and respond to you within 28 days; Accordingly, this is our response.

In consideration of our procedures, our volunteer status, members' time constraints, members' available skills, their knowledge and sheer volume of the applicant's furnished information, we are disappointed that the Environmental Statements before us appear not to include:

1. high-level description of all structures above and below ground, be it in site context or a development specification

We write this on behalf all residents living within 500m of the proposed new Water Treatment Plant structure which will undoubtedly include associated service roads, and

lighting etc that will have an environmental impact not just during the construction phase, which is reasonably assessed, but will also impact our residents throughout the post construction, operational phase that is relatively dismissed far too often within the statements as being assessed from a 'desk top study'.

Residents who live particularly within the distance contours below 500m of the Minworth WTP expect to experience an operational impact that will impact upon or provide:

- Impact upon our very local land characteristic
- Also, the visual aspect we similarly enjoy, and
- The very local biodiversity we also enjoy
- An increase in lighting and noise pollution
- An increase with the emissions of pollutants such as odours
- A decrease in overall air quality expectations

These bullet points are all matters of parish council concern for our residents' health and wellbeing post construction, the operational and maintenance 'business end' phase.

Moreover, we have yet to find

2. A 'creation of nuisances' assessment, nor
3. A cumulative effects assessment

usually included within an EIA for a Nationally Significant Infrastructure Project.

Nor does the ES before you appear to reference the construction activities in Curdworth civil parish for HS2 which are expected to last for another 8 years, until around 2035, and all local planning applications and proposals since 2024 that are both situate within the EIA land mapping area shown in the applicant's documents.

This latter point could well impact the applicant's design proposal.

These conclude our comments to date.

We respectfully ask you note these concerns within the consideration of your 'scoping opinion' preparation which for us have arisen mostly from the EIA constant reference to 'information assessed from desk top studies'.

Finally, we thank you for confirming that this project is defined as one within the scope of being a Nationally Significant Infrastructure Project (NSIP).

Thank you in advance for taking notice of our concerns

Your sincerely

Louise Baudet, BA Hons, CiLCA, FiLCA

Proper Officer for Curdworth Parish Council

From: [REDACTED]
To: [Grand Union Canal](#)
Subject: Fw: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
Date: 23 April 2025 12:00:52
Attachments: [image006.png](#)
[image007.png](#)
[Outlook-w3eifive.png](#)
[GUC Letter to stat cons_Scoping & Reg 11 Notification.pdf](#)

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Good afternoon,

Thank you for the consultation documents.

From my basic understanding of the documents this should not affect Daventry too much just perhaps the levels of water in the two reservoirs. My main concern is how this will affect the wildlife. I couldn't spot this in the documents but I must admit I did scan many of the pages as the documents are so lengthy.

Kind regards,

[REDACTED]

Councillor [REDACTED]
North Ward (Ashby Fields, Drayton Park, Lang Farm, Micklewell, Middlemore & Monksmoor)

Telephone: [REDACTED]

Email: [REDACTED]

Address: 3 New Street, Daventry, Northants, NN11 4BT **S:** [Facebook](#) | [Twitter](#) | [Instagram](#) | [You Tube](#)



Daventry Town Council – 3 New Street, Daventry, Northants NN11 4BT

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From: DTC Responsible Finance Officer <RFO@daventrytowncouncil.gov.uk>
Sent: 23 April 2025 10:46

To:

Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation

Dear All.

Please see attached correspondence on the proposed Grand Union Canal Transfer.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified Daventry Town Council as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **28 April 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Due to the deadline for the submission of comments there is no opportunity to include this on the upcoming Town Council Agenda, if you have any comments on the scoping opinion, could you please submit them on an individual basis to GUCtransfer@planninginspectorate.gov.uk.

Kind Regards

Interim Chief Officer

Deputy Chief Officer and Responsible Finance Officer

T: 01327 301246 **E:** rfo@daventrytowncouncil.gov.uk **W:**

www.daventrytowncouncil.gov.uk

A: 3 New Street, Daventry, Northants, NN11 4BT **S:** [Facebook](#) | [Twitter](#) | [Instagram](#) | [You Tube](#)



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Planning Inspectorate

Our ref: XA/2025/100342/01

GUCtransfer@planninginspectorate.gov.uk Your ref: WA0210001

Date: 28 April 2025

Dear Sir/Madam,

Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Thank you for referring the above consultation which was received on 31 March 2025.

The Environment Agency has reviewed the Environmental Impact Assessment Scoping Report undertaken by Affinity Water, Severn Trent and Canal & River Trust for the above scheme, referenced: Volume 1: Main Report (March 2025) with supporting documents.

For the topics within our remit, we broadly agree with the topics that have been scoped in. We further recommend inclusion of the following detailed advice that we have addressed below in issue/impact/solution format into the Environmental Statement.

We would like the following topics within Water Quality and Water Resources that are highlighted in bold to be scoped in.

1. Flood Risk

Document Reference(s): Chapter 10 Climate Chapter Section 10.8.3 page 37	
Issue	This section notes that UKCP18 data is limited to the projection period of 2100 and therefore climate impacts beyond this time will not be presented in the ES. The EIA scoping report does not present information on the anticipated development lifetime, however, given the nature of the scheme it is possible that this could be required for a period longer than 100 years.
Impact	The impact of climate change on flood risk to and from the development could be underestimated if the lifetime of the development is beyond 100 years.
Solution	It is important that a credible maximum climate change scenario is tested within any flood risk hydraulic modelling so that the impacts of flood risk to the development and the impacts of flood risk from the development can be understood if climate change projections were to increase. This is particularly important for receptors which are in areas of flood risk such as Minworth Advanced Water Treatment Plant (AWTP) and the abstraction and treatment facilities within Part 4a of the scheme.

Document Reference(s): Chapter 22 Water Environment and Flood Risk Chapter General Comment	
Issue	The vulnerability classification of the proposed development is not described within the EIA scoping report. This will be important to determine and present in the Environmental Statement and Flood Risk Assessment(s) as it will guide the approach to assessing climate change impacts to and from the development.
Impact	The flood risk vulnerability classification of the scheme is not described within the EIA scoping report
Solution	Please determine the vulnerability classification of the proposed development. Please see the additional narrative section below for further information.
Further details regarding flood risk vulnerability can be found online at: National Planning Policy Framework - Annex 3: Flood risk vulnerability classification - Guidance - GOV.UK	

Document Reference(s): Chapter 22 Water Environment and Flood Risk Chapter Section 22.3.6 page 17	
Issue	This section notes that the Environment Agency will be consulted post EIA scoping on aspects relating to water quality, abstraction licence impacts, and WFD impacts. This is welcomed; however, the Environment Agency should also be consulted on aspects relating to flood risk as there are elements of the development which are at risk from Main Rivers. The canal transfer itself also acts as a source and pathway for flood risk.

Impact	Flood risk aspects could be missed
Solution	Please consult the Environment Agency on aspects relating to flood risk particularly where the scheme is near to Main Rivers or within Flood Zone 2 or 3. Furthermore, the Environment Agency should be consulted on aspects relating to flood risk from the scheme in its overarching role in flood risk management

Document Reference(s): Chapter 22 Water Environment and Flood Risk Chapter Section 22.5.26 page 25

Issue	This section notes that the River Tame is the main source of fluvial flooding with regards to Minworth Advanced Water Treatment Plant (AWTP). This risk has been assessed as part of the Flood Risk Assessments undertaken for Minworth AWTP and the pipeline to Atherstone. This is welcomed. Please note that the flood risk hydraulic modelling that the Environment Agency holds for the River Tame in this location is old and may not be representative of current and future baseline flood risk.
Impact	The assessment of fluvial flood risk could be inaccurate if out of date information is used to support the Flood Risk Assessment.
Solution	The Environment Agency would welcome the opportunity to review the Flood Risk Assessment for Minworth AWTP and the pipeline transfer to Atherstone. Please note, flood risk hydraulic modelling that the Environment Agency holds for the River Tame in the vicinity of Minworth AWTP and the pipeline transfer to Atherstone was completed in 2009 for the area to the west of the M42 and 2013 for the area to the east of the M42. Some aspects of this modelling such as the climate change allowances applied are out of date. Please see the additional narrative section below for further information.

Checks should be undertaken to ensure that any existing modelling which is used to inform the Flood Risk Assessment(s) represents current and future baseline conditions and uses the most appropriate and up to date boundary conditions. Some of the modelling held by the Environment Agency for the Main Rivers crossed by the order limits for the development uses climate change allowances which have now been superseded. Please check any modelling data you use in line with guidance on using modelling for Flood Risk Assessments available online at: [Using modelling for flood risk assessments - GOV.UK](#).

Document Reference(s): Chapter 22 Water Environment and Flood Risk Chapter Section 22.5.64 page 34

Issue	This section describes how the Risk of Flooding from Surface Water (RoFSW) mapping can be used as an indicator of flood risk for smaller Ordinary Watercourses. Please be mindful that whilst the RoFSW mapping is a useful starting point for assessing fluvial flood risk from small Ordinary Watercourses this does have some notable limitations. For example, the RoFSW modelling does not include structures or a detailed representation of river channels.
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	Furthermore, a direct rainfall method was used in this product which may not be suitable for representing fluvial flood risk for some watercourses. Whilst the recent update to the RoFSW mapping (January 2025) does include some representation of climate change this is only for the 2050s epoch central allowance and hence flood risk could be underestimated for development with lifetimes beyond 2060.
Impact	The assessment of flood risk for smaller Ordinary Watercourses could be inaccurate
Solution	The new Risk of Flooding from Surface Water (RoFSW) dataset published in January 2025 is a useful starting point for establishing the flood risk associated with smaller Ordinary Watercourses. Further information is available online at: Updates to national flood and coastal erosion risk information - GOV.UK . Please note however, where a reliance is being placed on existing flood risk products such as the RoFSW mapping then clear justification should be provided as to why this is a suitable proxy for representing fluvial flood risk. In some cases, more detailed hydraulic modelling may be required to understand the impacts of flood risk to the development and because of the development

Document Reference(s): Chapter 22 Water Environment and Flood Risk Chapter Section 22.5.27 page 25 and section 22.5.94 page 46	
Issue	Section 22.5.27 page 25 and section 22.5.94 page 46 reference the Flood Map for Planning which is presented in figures 22-3 and 22-14. The Flood Map for Planning presented in these figures has since been superseded by new data which was published on the 25 th March 2025
Impact	The assessment of fluvial flood risk associated with the Flood Map for Planning is out of date.
Solution	Please ensure the Flood Risk Assessment references the latest Flood Map for Planning dataset. This can be downloaded from the Defra Data Services Platform at Defra data services platform
Further information is available online at: Updates to national flood and coastal erosion risk information - GOV.UK .	

Document Reference(s): Chapter 22 Water Environment and Flood Risk Chapter Section 22.5.29 page 26 and section 22.5.94 page 46	
Issue	Section 22.5.29 page 26 and section 22.5.94 page 46 reference the Risk of Flooding from Surface Water dataset which is presented in figures 22-2 and 22-13. The Risk of Surface Water mapping presented in these figures has since been superseded by new data which was published in January 2025

Impact	The assessment of surface water flood risk associated with the Risk of Flooding from Surface Water (RoFSW) mapping is out of date.
Solution	Please ensure the Flood Risk Assessment references the latest Risk of Flooding from Surface Water (RoFSW) dataset. This can be downloaded from the Defra Data Services Platform at Defra data services platform
Further information is available online at: Updates to national flood and coastal erosion risk information - GOV.UK .	

Document Reference(s): Chapter 22 Water Environment and Flood Risk Chapter Section 22.5.152 page 55	
Issue	Within Site B the River Ouzel flows to the west of the site. There is also a small Ordinary Watercourse which bisects Site B which has no associated Flood Zone mapping due to the small size of its respective catchment. There could be flood risk associated with this watercourse, it is just not modelled or mapped
Impact	Flood risk to Site B could be underestimated
Solution	When assessing the flood risk to Site B please ensure the risk from the Ordinary Watercourse which crosses the site is also considered. Typically, this would be determined by undertaking detailed hydraulic modelling. If a reliance is being placed on existing flood risk products such as the Risk of Flooding from Surface Water (RoFSW) mapping, then clear justification should be provided as to why this is a suitable proxy for representing fluvial flood risk taking into consideration the effects of climate change for the lifetime of the development.

Document Reference(s): Chapter 22 Water Environment and Flood Risk Chapter Section 22.7.7 and 22.7.8 page 87	
Issue	This section references the potential for further hydraulic modelling of the canal network and the potential for additional hydraulic modelling if there are additional discharges to surrounding watercourses.
Impact	There is a risk that the assessment of flood risk because of the scheme could be inaccurate if the underlying hydraulic modelling of the canal transfer is not reviewed.
Solution	Please submit any water level hydraulic modelling of the canal network to the Environment Agency for review. This will be particularly important when reviewing the scheme wide Flood Risk Assessment to confirm that any conclusions regarding flood risk impacts from the scheme are reasonable

Document Reference(s): Chapter 22 Water Environment and Flood Risk Chapter	
Issue	The applicant has scoped in the risk of flooding from the canal in both the construction and operational phases. This is welcomed and ongoing engagement with the applicant to ensure this is done appropriately is necessary.
Impact	Flood risk may not be accurately represented if not appropriately assessed
Solution	The applicant should undertake assessment of the capacity of the canal and undertake assessment on the impacts increasing the water in the canal may have on the risk of overtopping and breaching of current infrastructure. Additionally, the applicant should appropriately mitigate for any increases in risk.
The applicant is looking at the raising of parts of the canals walls and infrastructure within the project to reduce the risk of overtopping. However, the applicant will need to ensure any by-pass channels and/or flow routes which connects to floodplains are raised in accordance and not disconnected.	

Document Reference(s): Chapter 22 Water Environment and Flood Risk Chapter	
Issue	The applicant is planning to store water at Daventry and Drayton Reservoirs which will need to be carefully assessed in order to ensure there is sufficient capacity for the additional water.
Impact	If not assessed accurately the risk of overtopping may increase.
Solution	The applicant should assess the risk of the increased input of water into the reservoirs and undertake overtopping and breach analyses. Additionally, the applicant should mitigate for any increases in risk and ensure the reservoirs' conditions are not altered.

Document Reference(s): Chapter 22 Water Environment and Flood Risk Chapter	
Issue	The plans for the pipeline between Minworth and Atherstone crosses the River Tame. The applicant will need to ensure this crossing is appropriately below the river bed to ensure it will not impact the watercourse.
Impact	If not low enough this could lead to erosion of the river bed and have adverse impacts to the watercourse.
Solution	Ensure the crossing is designed appropriately and to mitigate for any impact this may have on the watercourse.
General guidance for crossing under watercourses can be found here Exempt flood risk activities: environmental permits - GOV.UK under exemption 3.	

Document Reference(s): Chapter 22 Water Environment and Flood Risk Chapter	
Issue	We note the applicant will need to undertake embankment raising along some sections of the canals due to the additional volume of water being inputted into the canal. Along sections of the canal fluvial watercourse interact with and may drain into the canal in times of a flood. Raising of embankments may cause this connection to be lost.
Impact	May cause floodwaters previously stored in the canals to be pushed elsewhere.
Solution	The applicant should undertake an assessment of any connectivity between the fluvial floodplain and the canals. The applicant will need to demonstrate any connectivity between the fluvial floodplain and the canal which may be disrupted by the scheme does not increase risks offsite.

Informative:

Flood risk activity permits (FRAPs)

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- On or within 8 metres of a main river (16 metres if tidal)
- On or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- On or within 16 metres of a sea defence
- Involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- In a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549.

It is noted that the developer may be a protected undertaker, for which exemptions could apply. Please refer to the following guidance:

<https://www.gov.uk/government/publications/environmental-permitting-regulations-exempt-flood-risk-activities/exempt-flood-risk-activities-environmental-permits>.

The applicant should not assume that a permit will automatically be forthcoming once a Development Consent Order (DCO) has been approved, and we advise them to consult us at the earliest opportunity.

Disapplication

If any of the works are likely to require a FRAP, we recommend that you inform the Environment Agency at the earliest opportunity, as to whether you are seeking to disapply the Environmental Permitting Regulations (England and Wales) 2016 for flood risk activities as part of the DCO. Please note that the DCO will need to include protective provisions for our benefit if the disapplication of FRAPs is sought.

LLFA/IDB Permits

Works affecting non-main rivers/ordinary watercourse may require the prior consent of the Lead Local Flood Authority (LLFA) under the Land Drainage Act 1991. As such, we advise that you consult with the LLFA in this regard.

2. Water Resources

Document Reference(s): Chapter 22 - Water Environment & Flood Risk		
Section/ pages/ table reference: 22.3.6 Post EIA scope - EA consultation	Issue	The EA (Asset management) and Tamworth Borough Council are omissions from this section
	Impact	The reduction in flow in the Tame has the potential to affect the operation of gauging stations at Lea Marston and Tamworth; to affect the abstraction licence at Cherry Holme paleochannel (near to Fazeley) which is held by the council.
	Solution	These consultees should be added to the post EIA scoping.

Document Reference(s): Main report Chapter 22 - Water Environment & Flood Risk		
Section/ pages/ table reference: Table 22-5; 22.5.47; 22.5.48; 22.5.74 Figure 22-23	Issue	<p>We are concerned that there is the potential for ordinary watercourses and wider waterbody catchments to be omitted from further investigation or assessment.</p> <ul style="list-style-type: none"> It is unclear if the Break Pressure Tank is in anyway connected to the unnamed ordinary watercourse specified in 22.5.47; Merevale Lake is identified as “not classified as a WFD waterbody” however it is online to the Innage brook which is a WFD waterbody. The figures in 22-23 showcase the main river watercourses but not the catchments.
	Impact	<p>The WFD assesses waterbody status and compliance which reflects the whole catchment and tributaries and not just the main WFD river line;</p> <p>In some catchments the Environment Agency may be aware of in-waterbody problems from historic work (e.g. HD; RSA) which are not flagged at WFD waterbody outflow or sample points.</p>
	Solution	WFD waterbody catchments and Ordinary watercourses should be considered in all assessment and not just the statutory river layers. This is typically only used by flood risk colleagues due to our responsibilities for flood risk. Other areas of the Environment agency work across both statutory/main river and ordinary watercourses and should be consulted where the EIA identifies impacts as such.

Construction

Document Reference(s): Main Report – Chapter 3 - Site description; Chapter 22 - Water Environment & Flood Risk		
Section/ pages/ table reference:	Issue	Details of water supply and demand are not described in the project description of the construction phase. Activities described such as trenchless techniques (Horizontal directional drilling) and washing and dust suppression can require significant volumes of water in combination.
3.5.28		
22.8d	Impact	If a mains water connection is not practical, other sources of supply need to be considered. This can mean increased haulage on roads from water tankers, or consideration of a licence to abstract from surface water.
	Solution	We recommend a basic water supply strategy /assessment for consumptive uses of water during construction as this can often be overlooked pre commencement. This should also consider permits required and appraise all sources of supply options.

Operation

Document Reference(s): Main Report – Chapter 3 - Site description		
Section/ pages/ table reference:	Issue	The minimum capacity specified for the pumping stations in the proposal description is 15Mld. This seems inconsistent with the minimum requirement for the Advance water treatment works which is understood to be 23Mld.
Part 1b: The Minworth to Atherstone Pipeline	Impact	A continuous flow will have the same effect of depleting the Tame and Trent outside of operation of the scheme. This water would be deemed additional to the water already/ordinarily in the GUC.
3.5.48	Solution	We would like to understand the lower rate specified. Additionally, there is an opportunity for this water to be used constructively elsewhere in the catchment to receiving waterbodies connected to the canal which fail flow or aquatic ecological objectives. The WFD assessment could seek to identify opportunities to make use of this additional water. <i>In this respect Part 1b and 2 should also be scoped in to Reduction in water available for abstractors from the Rivers Tame and Trent.</i>
Informative: Over the years tributaries to the west of the Coventry canal in places have been intercepted by the canal rather than discharging to the watercourse further east of the canal. At some of these locations this activity may have meant watercourses have been lost		

to the River Anker catchment and the downstream watercourses have run dry. We are aware of two locations SP3111696807 and SP3220195172.

Document Reference(s): Main Report – Chapter 3 - Site description		
Section/ pages/ table reference: Ch3 – 3.2.11	Issue	Mitigation for the reduction of flows in the River Tame and Trent downstream includes the operation of controlled releases from Daventry and Drayton reservoirs. Lead times for the switch in supply from Minworth to the reservoirs is not yet made apparent.
	Impact	The gradual process of ramping up and down of flows described in the project description does not feel conducive to a responsive or agile process should triggers be met to move from one supply to another.
	Solution	Whilst these receptors are scoped in, the EA seeks to have confidence that appropriate triggers can be set in relation to the North Muskham hands off flow threshold to operate this mitigation and assurance that the lead times for operation are proportionate to the changeability of low flows when licence cessations are put in place and removed.
<p>Informative: If flows in the Tame or Trent fall below the hands off flow threshold, abstraction licence holders will be stopped from abstracting. If the compensation releases are not operational in time to prevent this through restoration of the discharge at Minsworth, even a few lost irrigation days during drought conditions can be the difference between losing a crop and not.</p> <p>The River Tame is sensitive and reactive to artificial inputs (discharges); rainfall and run-off particularly in the more urbanised reaches in the headwaters. This has meant that a unique diurnal pattern of flows occurs for which ecology may be sensitive to changes such as those posed by the scheme.</p>		

Document Reference(s): Main Report – Chapter 22 – Water environment and flood risk		
Section/ pages/ table reference: Table 22-29	Issue	Receptors potentially impacted on by the reduction in flows to the Tame and Trent do not include navigation impacts.
	Impact	There are statutory levels required for Navigation in the Trent which could be compromised by the operation of the scheme particularly during prolonged dry weather and drought without appropriate mitigation for the loss in flows.
	Solution	<i>The impact on maintaining levels for navigation should be scoped into the assessment until such assessments deem</i>

		<i>that there is enough confidence in the mitigation proposed to negate this risk.</i>
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Document Reference(s): Main Report – Chapter 3 - Site description		
Section/ pages/ table reference: 3.5.67	Issue	There is insufficient detail regarding the abstraction required to top up the Daventry and Drayton reservoirs.
	Impact	If increased quantities of water are to be released from the reservoirs to supply Affinity Water, this poses an increased demand from the GUC outside of normal operation of the transfer. The Abstraction point proposed for the GUC to top up Drayton & Daventry reservoirs (north of the Braunston tunnel) falls within waterbody GB109054044120 - Leam - source to conf Rains Bk. This catchment is closed to further abstraction. More information can be found here .
	Solution	Further clarification is sought on the design of how Daventry and Drayton reservoirs will operate and nature of the abstraction which will top them up.

Document Reference(s): Main Report – Chapter 3 - Site description		
Informative: 3.5.63 states that "transfer of recycled water out of catchment may be stopped in extreme circumstances". We do not agree with the term extreme, at the time of writing (April 2025) Hands off flows (HoFs) are already in place on the Tame downstream of Minworth.		
Section/ pages/ table reference: 3.5.65; Table 22-29 Reduction in water available for abstractors from the Rivers Tame and Trent	Issue	The scoping report describes modifications to the Daventry and Drayton reservoirs to maximise the capacity available for augmentation of the scheme when water discharge is restored at Minworth. The amount of capacity the reservoirs are able to provide over the year is not yet apparent.
	Impact	If there is not enough water to sustain the requirements of the scheme from the reservoirs, it is unclear whether the scheme will assume to continue at the expense of the Tame and Trent or cease at the expense of supply to Affinity water.
	Solution	The number of days that water will be buffered by the reservoirs should be evaluated against the reliability of water availability for licences which are subject to HoFs. There needs to be confidence that the volumes available (including topping up throughout the year) will not leave a deficit during times when receptors would be impacted by reduced flows attributed to the scheme. <i>Part 3 of the scheme should be scoped into the</i>

		assessment of ‘Reduction in water available for abstractors from the Rivers Tame and Trent.’
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Document Reference(s): Main Report – Chapter 22 – Water environment and flood risk		
Section/ pages/ table reference: 22.5.43 Figures 22-24	Issue	The report identifies abstraction licences on the Tame and Trent which we are pleased to see scoped in. However, other licences within the same catchments have not been identified.
	Impact	Hands off flow licence conditions are calculated based on downstream availability as well as local availability and where no gauging stations exist locally can be set upstream or downstream of the abstraction point depending on comparable flow regimes.
	Solution	The scope of licences affected by the scheme should be wider than the Rivers Tame and Trent and should extend to the wider catchment.

Document Reference(s): Main report – Chapter 12 Aquatic Ecology		
Section/ pages/ table reference: Aquatic Ecology Table 12-4; 12-6 Potential impacts	Issue	Whitacre Heath is a water dependent SSSI and has been scoped out for reasons of there being no SW-GW connectivity and that it receives only flood/high flow water inundation.
	Impact	Without specific details of how the scheme will operate at various times in the year, the impact on the frequency or magnitude of these events is unclear. The report specifies that operational details will be provided in the ES.
	Solution	Until a further understanding is achieved of the relationship between flows in the Tame and the water dependency of the site, we believe Whitacre SSSI should remain scoped in for assessment.

Document Reference(s): Chapter 22 - Water Environment & Flood Risk		
Section/ pages/ table reference: Table 22-1/3	Issue	Abstraction licensing strategies are not explored in the report which detail water availability in catchments and sensitive areas for water resources. Reference to Anglian CAMS is incorrect.
	Impact	The proposal passes through multiple CAMS catchments located in West Midlands, East Midlands; Lincs and Northants and East Anglia areas. Further details can be found here .

	Solution	A fuller appraisal of all abstraction licensing strategies would provide further understanding of the risks posed by reduced water availability in all affected water bodies.
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Document Reference(s): Main Report – Chapter 3 - Site description; Main Report – Chapter 22 – Water environment and flood risk

Section/ pages/ table reference:	Issue	<p>The (re-)abstraction points proposed at Bletchley and Leighton Buzzard are in the Upper and Bedford Ouse CAMS catchment. Currently, CRT transfer water to the GUC from the river Tove at Stoke Bruerne or Great Ouse at Cosgrove for the purpose of maintaining navigation levels. These are subject to transfer licences held by CRT which restricts abstraction to protect the Tove.</p> <p>It is understood that the re-abstraction described in Part 4 of the proposal is designed to be entirely supported by the discharge from Minworth (or alternatively Drayton/Daventry reservoirs). Additionally, we agree that an increased amount should be discharged than is abstracted to allow for losses.</p>
	Impact	If losses are not understood fully, there is the possibility that the water discharged does not fully compensate for the water abstracted resulting in a consumptive abstraction. An abstraction licence issued for a non-consumptive operation would be an unrestricted transfer licence however a consumptive abstraction which incurs losses from the Tove or Great Ouse, would be restricted to flows above Q32.
	Solution	<i>The EA would seek confidence from modelling outputs of the level of risk of losses occurring between Minworth and Leighton Buzzard resulting in reduced levels in the GUC which result in impacts to receiving waterbodies or increases to the abstraction required from the Tove or Great Ouse rivers. The impact to these rivers should therefore be scoped in as part of this assessment.</i>

Document Reference(s): Main Report – Chapter 3 - Site description;		
Section/ pages/ table reference: 3.5.41	Issue	The proposal describes improvements or other works to structures along the route of the GUC to enable increased volumes of water during the transfer. These include raising the height of banks and weirs. The subsequent impact on receiving water bodies has not been scoped into assessment.
	Impact	It is stated that the flows and levels along the route of the GUC will not be affected by the changes the scheme proposes however the need for such modifications seems contrary to this. If waste weirs and overflows are modified, the amount of water being received by some water bodies may be reduced outside of or at reduced operation.
	Solution	The details of how the scheme will operate provided in the ES may include further information about how the changes in levels and improvements to structures can achieve more capacity in the canal and still provide the same (or improved) connectivity to receiving water bodies. <i>Until then we believe that the quantitative impact to connected water bodies should be scoped in.</i>
Informative: Impoundment licences for changes to structures may not be required if provisions of the DCO cover the works required instead. However, the EA expects the same level of impact assessment for a condition of the DCO as there would be for the determination of an impoundment licence.		

Informative

The summary of the proposed development (ref 3.2.1; 4.6.2) uses the term ‘*surplus water*’. It should be noted that STWL have an overall deficit to meet future demand and the discharge from Minworth benefits other river users downstream. The term surplus water risks misinterpretation that the water would otherwise be lost and that the water is available to be transferred out of the catchment without impact.

The Environment Agency has not had the opportunity to comment on the pipeline route to the canal via the gated process. Advice has been that there would be the opportunity via the DCO application only.

- Are there any connections to local tributaries or emergency points for diversion of flows?

The extensive programme of works to the Canal along the route is not yet presented in detail. As such it is difficult to assess whether the appropriate WFD Waterbodies have been screened into the assessment based on potential for impacts to connected watercourses. Further assessment may be required as more detail is known.

WFD waterbody status is currently updated on a triennial basis, it can be assumed that the latest data has been used however it would benefit reviews in future to know the cycle and year used in baseline assessments, this has not been specified in various parts of the report.

There are limited details regarding the energy generated by the hydroelectric turbine element of the scheme and who will benefit from it. This may bring improved green credentials to the scheme or the local area and should be understood further. Further clarification is sought on the intended use of the electricity generated.

With regards to gauged flow data referenced in Table 22-5 (Main report Vol1 Chapter 22 - Water Environment & Flood Risk), the NFRA datasets utilises Environment Agency information but may not be as up to date as the [Environment Agency data portal](#).

3. Water Quality

Document Reference(s): GUC EIA Scoping Report V1 Main report/22.5.7	
Issue	Water Quality Monitoring Locations and results
Impact	Insufficient information. <u>Only 2</u> monitoring locations identified which relate the monitoring of the River Tame and the impact of the reduction of effluent into the River and the associated impact on the River Tame i.e. a depleted reach. During Gates 2 and 3, more locations downstream of Minworth WwRC were monitored and should be listed here. As well, reference of impact of the Minworth discharge only references sanitary determinands and it should include other polluting substances and chemicals, nutrients and temperature.
Solution	Addition of the other monitoring locations on the River Tame should be added to this paragraph. Addition of the other polluting substances, nutrients, temperature should be added to the paragraph.

Document Reference(s): GUC EIA Scoping Report V1 Main report/Table 22-28 Impacts on Surface Water Quality	
Issue	All project parts are scoped in which is good. But only reference is made to dissolve oxygen as a pollutant caused by sediment disturbance.
Impact	Sediment disturbance can release other pollutants including heavy metals and chemicals into the water column such as oils and chemicals.
Solution	Addition of wording to include the potential of other pollutants such as oils/fuels, chemicals, heavy metals and other pollutants can be released from the sediment when it is disturbed.

Document Reference(s): GUC EIA Scoping Report V1 Main report/Table 22-29 Deterioration of water quality in the Rivers Tame and Trent, the canal network and Daventry and Drayton Reservoirs	
Issue	Only Parts 1a, 2 and 3 are scoped in. The reasons for scoping out 1b, 4a and 4b should not relate to velocity and water levels. They should remain scoped in because of the discharge into the canal network and subsequent abstraction and treatment from the canal and into the reservoirs then into potable supply. <i>This EIA is not just for Minworth it is also for the GUC transfer.</i>
Impact	Scoping out 1b, 4a and 4b will mean no assessment of the potential effects of the transfer into the canal via a pipeline.
Solution	<i>Parts 1b and 4a to be scoped in.</i> Editing of the EIA to ensure the GUC transfer is accounted for.

Document Reference(s): GUC EIA Scoping Report V1 Main report/7.7.2 Other permits consents and licences/ chapter 14 14.9.3 parts a-c and Chapter 22	
Issue	<p>A discharge permit may be required for the discharge of abstracted GUC water into the Daventry and/or the Drayton Reservoirs. This is not mentioned here in the report.</p> <p>During the construction phase there will likely be a need for other water discharge permits for settled groundwaters and possibly other wastewaters.</p> <p>14.9.3 part a mentions pollution prevention code of practice which is reassuring.</p>
Impact	<p>Construction and operational water discharges are activities that usually must be authorised with a EPR water discharge permit.</p> <p>(There are some exceptions to this). Failure to control via a permit may cause pollution.</p>
Solution	<p>Addition of text to reflect the issue and impact and necessary mitigation should be added to Chapter 7 and Chapters 14 and 22.</p>

Document Reference(s): GUC EIA Scoping Report V1 Main report / 22.3.2	
Issue	Impact of discharges on the canals.
Impact	Accumulative impact.
Solution	Use appropriate modelling approach.
<p>This recommendation from the G3 WQ Modelling Method Statement tech note, page 5 should be added to the comments and outcomes/agreements summarised in page 16, Consultation section of chapter 22.</p> <p>"Modelling the impact of discharges on canals and other still waters requires a highly site-specific modelling approach. Given the water management within canals careful consideration must be taken on the appropriate modelling approach to use. This should take account of accumulation and the extent to which the water body is impacted. This should include assessment of the mixing zone(s) in the water body and any potential breaches of EQS. Further guidance is included in LIT 13134."</p>	

Document Reference(s): Guidance and Standards 22.2.7	
Issue	EA guidance documents relating to surface waters are not referenced, whilst many relating to groundwater are.
Impact	EA guidance relating to surface waters should also be followed
Solution	The following EA guidance needs to be referenced and considered

	<p>LIT 14339: Supporting implementation of river basin management plans Environment Agency (2023)</p> <p>LIT13134: Permitting of hazardous chemicals and elements in discharges to surface waters. Operational instruction. Environment Agency. (2019).</p> <p>LIT12977: Water quality planning: no deterioration and the Water Framework Directive. Operational Instruction 50_12. Environment Agency. (2012).</p> <p>PR24 WINEP supporting guidance – Modelling discharges into lakes and reservoirs. Version 0.3. Environment Agency (undated).</p> <p>H1 Annex D2: Assessment of sanitary and other pollutants within Surface Water Discharges. Environment Agency. Environment Agency. (2014)</p>
	<p><u>LIT 14339: Supporting implementation of river basin management plans Environment Agency (2023) states the duty on public bodies:</u></p> <p>Under the WFD Regulations (regulation 33), public bodies must, in exercising their functions so far as affecting a river basin district, have regard to the river basin management plan for that district. 'Have regard to' would include taking account of and considering the environmental objectives and summary of measures contained within the river basin management plan when exercising any functions and the effects of those functions on the objectives and measures. Public bodies include, amongst others Water Companies.</p> <p><u>LIT13134: Permitting of hazardous chemicals and elements in discharges to surface waters.</u></p> <p>This guidance describes how to permit discharges of hazardous chemicals and elements to surface waters. Hazardous chemicals and elements include priority hazardous substances, priority substances, specific pollutants and substances with operational Environmental Quality Standards (EQSs). It also includes substances that are not within these categories, but which have ecotoxic properties and are discharged at sufficient concentrations to be of concern in relation to the probable no effect concentration (PNEC).</p> <p><u>LIT12977: Water quality planning: no deterioration and the Water Framework Directive. Operational Instruction 50_12</u></p> <p>This document explains how the no deterioration requirements of the Water Framework Directive (WFD) should be implemented when doing water quality planning in flowing freshwaters. The no deterioration rules set out in this note only apply to the environmental standards for the determinands Biochemical Oxygen Demand (BOD), Ammonia and Phosphate.</p> <p><u>PR24 WINEP supporting guidance – Modelling discharges into lakes and reservoirs.</u></p> <p>This document is to inform discussions over prospective applications for new or varied permits to discharge (including water transfers) affecting reservoirs or lakes. It may also be used to shape any investigations that are carried out into the impact of existing discharges. It outlines the basic data likely to be required to model the impact of a discharge or discharges on the lake and indicates the types of data that need to be collected and the</p>

models that could be used in different circumstances. The list of models is not exhaustive, and other models of the lake or river may be available.

H1 Annex D2: Assessment of sanitary and other pollutants within Surface Water Discharges. Environment Agency.

This guide gives advice on assessing impacts from discharges to surface waters and to smaller infiltration systems when applying for a bespoke permit under the Environmental Permitting Regulations. It covers discharges to surface waters from installations and waste activities as well as point source water discharges and stand-alone water discharge activities.

This revised Annex D version 2.3 provides an overview of the new approach to the permitting of hazardous pollutants across all activities under the Environmental Permitting Regulations.

This guide is part of the Environment Agency's **H1 Environmental Risk Assessment Framework**. This Annex D should be read in conjunction with the **H1 Environmental Risk Assessment – Overview** to understand who needs to use it and how it fits into the H1 framework.

Document Reference(s): Future Baseline 22.5.200/ 22.5.201/ 22.5.202

Issue	It is inferred that the future discharge quality will be represented in WQ modelling as Post AMP8 which runs to 2030 but stated that the first year of scheme operation is 2032 which falls in AMP9. Phosphorous investment schemes at STW's in the Tame catchment are proposed for AMP9 so will not be reflected in the proposed future baseline scenario.
Impact	Omitting AMP9 improvement schemes means that resulting improvements in River Tame/Trent water quality will not be included when assessing the impact of the scheme on the water quality of the rivers.
Solution	Phosphorous investment schemes at STWs in the Tame catchment are proposed in AMP9 and these need to be included, in addition to any AMP8 schemes, when characterising discharge quality for the future baseline scenario.

Document Reference(s): Future Baseline 22.5.200/ 22.5.201/ 22.5.202	
Issue	Phosphorus is the only determinand specified for consideration in the future baseline scenario but the PR24 WINEP also includes revised limits for other determinands e.g. Coleshill STW AMP8 Ammonia permit limit change from 5 to 3 mg/l by 2030.
Impact	The ability to assess the impact of the transfer on the Tame/Trent depleted reach requires accurate future baseline scenarios that incorporates changes in discharge quality, flow and river flows.
Solution	AMP8/PR24 improvement schemes in the Tame /Trent catchments relating to other determinands, including works in the upper Tame, should be reviewed and incorporated in the future baseline model to ensure that the upstream river quality and effluent quality of discharges directly to the depleted reach reflect future investment.

Document Reference(s): Future Baseline 22.5.200/ 22.5.201/ 22.5.202	
Issue	Future baseline scenario for WQ modelling of the Tame/Trent depleted reach does not consider future changes to discharge flow due to growth or river flow due to climate change.
Impact	The ability to assess the impact of the transfer on the Tame/Trent depleted reach requires accurate future baseline scenarios that incorporates future changes in discharge quality, flow and river flows.
Solution	<p>The impact of growth on discharge flows needs to be considered using growth projections to 2035 and 2050 to uplift discharge flows.</p> <p>The impact of climate change allowances to the 2080's epoch on future river flows needs to be included in a future baseline scenario for water quality modelling and not just the flood risk assessment.</p> <p>A matrix of future baseline scenarios using a combination of future discharge quality (AMP8 + AMP9), flow uplifted for growth (2035 and 2050) and river flow adjusted for climate change to the 2080's epoch is required. In- combination impacts of the above need to be considered in the future baseline when assessing the impact of the transfer on water quality of the Rivers Tame &Trent.</p>

Document Reference(s): Table 22-27: Summary of previous water environment investigations and reports	
Issue	Gate 3 WQ modelling reports are not referenced.
Impact	Environment Agency comments on Gate 3 WQ modelling reports are inputs into Gate 4 and the existence of these reports, hence EA comments, need to be acknowledged.
Solution	Add GUC and Tame & Trent G3 WQ Modelling reports to the tables.

Document Reference(s): Table 22-29: Potential effects during the operational phase – Water Environment and flood risk. ‘Deterioration of water quality in the Rivers Tame and Trent, the canal network and the Daventry and Drayton Reservoirs’	
Issue	Considering of water quality impacts appears to be restricted to sanitary determinands, dissolved oxygen, and other polluting substances.
Impact	Omits nutrients and temperature.
Solution	The impact of the scheme on the temperature within the Tame Trent depleted reach and receiving GUC will need to be added and considered. Also explicitly specify that nutrients will be considered.

Document Reference(s): 22.7.3 pt c:	
Issue	Continuation of hydrological monitoring and water quality monitoring programmes, as well as further model simulations for the rivers Tame and Trent, the GUC and Daventry and Drayton Reservoirs (Parts 1a, 2 and 3)
Impact	Lack on detail on WQ modelling methodology.
Solution	Scopes for future modelling tasks should be reviewed by the Environment Agency and agreed in advance.

Document Reference(s): 22.7.6	
Issue	2D dissolved oxygen modelling is also to be completed for the stretch of the River Tame between Minworth WwRC and Lea Marston lakes.
Impact	Agreed in Gate 3 comments that River Tame/Trent temperature will also be assessed using the 2D model.
Solution	Add temperature as additional output from the 2D modelling.

Document Reference(s): 22.7.7 'Further hydraulic and water quality modelling of the canal network (Part 2) is planned to support the EIA'	
Issue	WQ modelling of Daventry and Drayton reservoirs has been omitted.
Impact	Water Quality modelling of the reservoirs is required to assess the impact of the GUC discharge on water quality.
Solution	Acknowledge the need for reservoir water quality modelling, using EA's PR24 WINEP supporting guidance – Modelling discharges into lakes and reservoirs. Version 0.3.

4. Geomorphology

Document Reference(s): EIA scoping; Volume 1 Main Report, Chapter 12 Ecology – Aquatic Section 12.4.18	
Issue	“Minor watercourses and tributaries may be crossed by intrusive methods such as open-cut, and therefore these will be assessed in terms of impacts to aquatic ecological receptors.” - <i>only</i> considering minor watercourses in terms of impacts to ecological receptors
Impact	Just considering ecological impacts may lead to damage to geomorphological features that may be unique to a particular watercourse – e.g. freshwater tufa formations
Solution	Review each crossing site individually and holistically, with consideration to not just ecological receptors, which may be mobile, e.g. fish and otters, but to geomorphological features of the stretch of river concerned in respects to the entire length of watercourse.
<p>Unique geomorphological features may require the chosen crossing method to be re-examined to avoid damage to said features. NB the classifications “Main River” and “Ordinary Watercourse” apply to the body responsible for managing said watercourse for Flood purposes, for “Main River” the body is the EA. The classification does not convey/imply that the waterbody is large or of great ecological/geomorphological importance. A blanket approach to watercourse crossings, where all “main rivers” are crossed via trenchless methods and all “ordinary watercourses” may be crossed by open trench methods may lead to expensive methods being used unnecessarily and possible damage to unique habitats. Crossing locations should be identified following appropriate surveys and classification to determine and attribute conservation values to said watercourses.</p> <p>Further guidance in regard to river/watercourse crossings can be found in the following document:</p> <p>SEPA, 2010. Engineering in the water environment: good practice guide River crossings Second edition. SEPA</p>	

Document Reference(s): Volume 1: Main Report	
Issue	Canals are artificial waterbodies with no natural hydromorphology
Impact	Whilst the above statement is patently true, there are areas of canals that have developed hydromorphological features over the time that the canals have been in existence, especially where moving water is present (albeit temporarily in most cases). To discount hydromorphology within the canal, just because the watercourses were created artificially over 200 years ago, may lead to an underappreciation of supporting habitat and potential ecological niches.

Solution	Treat the canal as a linear lake and consider morphological features that may have developed over time and that may support ecological features and habitats
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Document Reference(s): EIA scoping; Volume 1 Main Report, Chapter 22: Water Environment and Flood Risk, Section 22.5.46

Issue	“The proposed pipeline route also crosses the WFD waterbody, Dog Lane Brook to the east of Kingsbury Water Park (see Figure 22-5, Sheet B). The proposed pipeline also crosses seven Ordinary Watercourses along its route based on ordnance survey mapping. One of the proposed access and working areas also crosses an unnamed Ordinary Watercourse near to Drybrooks Woods” – The maps don’t show the crossings of ordinary watercourses.
Impact	For WFD purposes, all watercourses are part of the WFD catchment, and it is important to know the impact on these tributaries as some tributaries are key in the classification of the waterbody status
Solution	Include all watercourses crossings in the map

While we appreciate that, due to the scale of the maps presented, some water courses and their crossing locations cannot be displayed at the chosen scale. However, it would be desirable to present either separate map sheets at a suitable scale or map in-sets (again at a suitable scale) to highlight the crossing locations proposed for these smaller watercourses

Document Reference(s): EIA scoping; Volume 1 Main Report, Chapter 22: Water Environment and Flood Risk, Section 22.5.69

Issue	“This is WFD waterbody ID GB104028042630, which is not designated as artificial or heavily modified, and hydromorphology supporting elements support good status” – The hydromorphology status is Not-High.
Impact	Check hydromorphology status as the morphology classification has recently been changed
Solution	Correct the hydromorphology status in all sections

The terminology regarding hydromorphology status has recently changed, and “supporting good” is now defined as “not high”. The aim should be to ensure that the hydromorphology status is at a high level and changing the terminology highlights that a watercourse that is “not high” needs work to improve the status, whereas “supporting good” implies that nothing needs to be done.

Document Reference(s): EIA scoping; Volume 1 Main Report, Chapter 22: Water Environment and Flood Risk, Section 22.5.158	
Issue	"The River Ouzel (Ouzel US Caldecote Mill Water Body Water Body [WFD water body ID: GB105033037971]) crosses the Part 4a study area and Site B to the west of Little Brickhill. This water body is designated as heavily modified and hydromorphology supporting elements support good potential" – The hydromorphology status is Not-High.
Impact	Check hydromorphology status as the morphology classification has recently been changed
Solution	Correct the hydromorphology status in all sections

Document Reference(s): EIA scoping; Volume 1 Main Report, Chapter 22: Water Environment and Flood Risk, Table 22-23: WFD Classifications (Part 4b study area)	
Issue	The hydromorphology status is Not-High.
Impact	Check hydromorphology status as the morphology classification has recently been changed
Solution	Correct the hydromorphology status in all sections

Document Reference(s): EIA scoping; Volume 1 Main Report, Chapter 22: Water Environment and Flood Risk, Table 22-20: WFD Classifications (Part 4a study area)	
Issue	The hydromorphology status is Not-High.
Impact	Check hydromorphology status as the morphology classification has recently been changed
Solution	Correct the hydromorphology status in all sections

Document Reference(s): EIA scoping; Volume 1 Main Report, Chapter 22: Water Environment and Flood Risk, Table 22-28: Potential effects during the construction phase – Water Environment and Flood Risk	
Issue	The potential impacts of open cut method on hydromorphology are not listed
Impact	It says the Construction works may affect surface water / watercourse flow patterns and sediment mobilisation". However, it can disturb the habitat conditions on the reach affected
Solution	It needs to be assessed and if there are impacts, it needed to be mitigated.
Open cut crossing methodologies can cause weaknesses in the bed and bank structure, and dependant on the activity level of the watercourses concerned may lead to an exploitation of these weaknesses during high flow events, e.g. increased bank erosion, channel evulsion and bed scour. The decision on whether to utilise open cut methods, rather than trenchless, should be determined on a case-by-case basis following survey.	

Document Reference(s): [GUCT EIA Scoping Report Volume 2 Figures Part 10](#) , Fig 22-16 WFD Surface Waterbodies

Issue	What do you mean by 'ordinary watercourses'?
Impact	For WFD purposes, all watercourses are part of the WFD catchment
Solution	It would be good if you can mark them as watercourses
<p>All watercourses are WER/WFD watercourses. If a watercourse has a catchment area under 10km² and flows into a waterbody with a WFD classification, it takes its classification from the downstream watercourse/waterbody it connects to.</p> <p>While we appreciate that, due to the scale of the maps presented, some water courses and their crossing locations cannot be displayed at the chosen scale. However, it would be desirable to present either separate map sheets at a suitable scale or map in-sets (again at a suitable scale) to highlight the crossing locations proposed for these smaller watercourses</p>	

Document Reference(s): GUCT EIA Scoping Report Volume 2: Figures Part 2 of 11. Fig 6.4

Issue	Hydrological Zone of Influence
Impact	Does this assessed based on WFD impacts?
Solution	Redraw map?
<p>From the text "Volume 1 Main Report (Table 6-6)", it appears that the Hydrological Zol covers all WFD waterbodies/catchments. However, the map does not support this view, areas that appear hydrologically connected to the proposed development, including Canals specifically mentioned within the text are not covered by the illustrated Zol. Some of the areas specified in the illustrated Zol cut across rivers/watercourses and miss upstream and downstream sections of the same waterbody. It may be that the Zol was drawn using WFD waterbody boundaries, but it should not be forgotten that some rivers are split into multiple WFD waterbodies to allow for easier reporting of status. It does not mean that the WFD waterbodies are not hydrologically connected, especially if they are part of the same river! How was the Zol determined? Please redraw the map to reflect <i>all</i> hydrological connections.</p>	

5. Fisheries

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; 12.6.4	
Issue	The assessment on fish passage appears to have focusses on upstream fish migration. Potential changes to the passability of structures during downstream fish migration as a result of operation may not have been assessed.
Impact	Certain fish such as smolts that have critical downstream migration life stages may experience damage and potential death where the head drop difference is great enough and the receiving pool is too shallow.
Solution	The assessment of impacts to fish passage on the River Tame and River Trent as a result of the plan should include downstream fish passage.

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; 12.6.5	
Issue	EIA scoping has not considered the changes in flow in the River Tame and Trent as well as weirs and the impact on spawning gravels
Impact	Changes to flows, velocities in the Tame and Trent could lead to loss of clean gravel spawning habitat. Where flows at weir sites decrease, this may lead to loss of spawning habitat as well as oxygenated water for all life stages of fish.
Solution	The EIA should assess changes to spawning habitat on the Tame and Trent with particular focus on weir sites as a result of changes to flow and velocity.

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; 12.6.6	
Issue	Loss of lateral connectivity not considered.
Impact	With reduced flow in the River Tame and Trent, marginal and riparian habitat with fish refugia may become disconnected and therefore a loss of habitat.
Solution	The EIA should assess the loss of marginal and riparian fish habitat as a result of reduced flows on the Tame and Trent. The ES should include proposals for mitigation and compensation. The BNG plan should include improvement to marginal and riparian habitat for fish.

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; Table 12-6, pg 48-49	
Issue	Potential barriers to fish passage on the Tame and Trent is scoped in and reduced fish passage due to reduced flow in the River Tame is scoped out. This is confusing and seems contradictory.
Impact	Reduced flows may impact on fish passage but may not be included in the EIA.

Solution	Clearer text and detail required to understand why barriers to fish passage is scoped in for the Tame and Trent and reduced fish passage due to reduced flow in the Tame is scoped out. This should be presented in the PEIR.
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Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; Table 12-4, Part 4 and Table 12-6, pg 51 – Fish – European eel

Issue	The choice of wording to describe how eels using the canals alludes to them being less important. The notion that a single record of European eel was identified in the Oxford Canal suggests the species may only be present sporadically.
Impact	<p>The reader may have the impression that the species presence is insignificant or that the regulations may not apply.</p> <p>Given the installation of pumps, bypasses, outfalls and abstractions, eels will be impacted unless appropriate mitigation is in place. Regardless of whether the canals are a migratory pathway, the canals do offer suitable habitat for eels.</p>
Solution	The Eel Regulations do apply, and Best Achievable Eel Protection (BAEP) should be applied to protect eel at structures. The Eels (England and Wales) Regulations 2009 state that 17 (1) requires that any diversion structure capable of abstracting at least 20 cubic metres of water through any one point in any 24-hour period must be screened appropriately or exempted. Best Achievable Eel Protection should be included with the design at diversion structures.

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; 12.9

Issue	Proposed mitigation not being detail in the scoping, when it has already been developed through Gates 1,2 and 3.
Impact	Mitigation may not be suitable and thus not allow for early commentary before the PEIR.
Solution	Given the potential severity of impacts to fish described in Chapter 12, robust mitigation and potentially compensation will be required. This will need to be detailed, robust and agree on by the EA. Early engagement is encouraged. Given the wording in this section, known mitigation should be presented at PEIR.

Document Reference(s): EIA scoping; Chapter 22 Water Environment and Flood Risk; Table 22-29; Part 1a, pg 81

Issue	Reduction in water to the River Tame and Trent due to the proposal, affecting abstractors in those systems.
Impact	A change in flow regime at points of downstream abstraction could affect the approach velocities around intakes. In turn this may impact fish through impingement or entrainment at intakes.
Solution	The EIA should include an assessment of the risk (as a result of the proposal) of increased impingement and entrainment of fish at downstream abstraction points.

Document Reference(s): EIA scoping; Chapter 22 Water Environment and Flood Risk; Table 22-29; Part 1a, 2 and 3, pg 82

Issue	Water quality deterioration in the Tame, Trent, canal network and Daventry and Drayton Reservoir can be mitigated or are minimal as a result of modelling.
Impact	The text is assumptive without detailing the results of the modelling. A deterioration in WQ could lead to fish mortality and fish stress.
Solution	The results of the modelling and any proposed mitigation should be detailed here in order to evidence this statement. This detail should be presented in the PEIR.

Document Reference(s): EIA scoping; Chapter 12 Ecology - aquatic

Issue	Habitat compensation required outside of the red line boundary.
Impact	Vital habitat work to compensate for the changes in flow and level on the Tame and Trent may not be delivered due to being outside of the red line boundary.
Solution	The ES should detail how habitat compensation will be delivered.

Document Reference(s): EIA scoping; Appendix 12-1; Table 1-2

Issue	Fish refuge at Tameside LNR not listed here.
Impact	Impacts from the scheme on fish habitat at Tameside may not be assessed leading to damage or loss of habitat.
Solution	Include the hydrological connectivity of Tameside LNR with the River Tame and include fish habitat in the EIA.

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; 12.3.2	
Issue	Natural England are not part of the NAU but are a separate Consultee.
Impact	Misleading responsibility description.
Solution	This text should be amended in the PEIR.

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; 12.3.5. a	
Issue	This point has not included concerns around modification of lock bypasses and waste weirs and the addition of diversion structures such as pumps and the final intake.
Impact	Where impact-pathways are not assessed in the EIA, there may be a risk to fish migration potential as well as fish mortality through entrainment and impingement.
Solution	These impact-pathways should be included and assessed within the EIA.

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; 12.3.5. a	
Issue	This point has not included concerns around the potential for the increased risk of pathogen spread to and from Daventry Reservoir and the Grand Union Canal.
Impact	Where impact-pathways are not assessed in the EIA, there maybe a risk to fish in the form of mortality and/or impact on recreational fisheries. Additionally, there is a risk to the wider biodiversity.
Solution	This impact-pathways should be included and assessed within the EIA.
Drayton Reservoir is an important recreational fishery with regular matches taking place. It is essential that this activity is conserved, and the fishery is not damaged by the potential spread of fish pathogens and INNS.	

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; 12.4.12	
Issue	The control strategy for the Proposed Development aims to maintain the volume of overflows at waste weirs similar to the pre-development situation.
Impact	‘Aims’ sounds vague. If this not maintained this could affect the connectivity potential with adjacent watercourses.
Solution	The EIA should give assurance that the volume of overflows at waste weirs will match those currently (pre-development).

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; Table 12-4, Part 1a	
Issue	The list of species receptors is those to which records are kept. The list is not all species that the Tame and Trent could support.
Impact	The impact on species that may currently be present could be overlooked including those of the designated Humber estuary (river and sea Lamprey). With the recent commissioning on Holmes Sluice fish pass a greater range of species could be affected than are in historic records.
Solution	Include a row in the table for species likely to be present but not in historic records. Denote eDNA vs physical records.
<i>Petromyzontidae</i> is only listed to genus level - does this suggest eDNA record and not physical capture of sea lamprey?	

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; 12.5.6	
Issue	RCP scenarios not specified
Impact	Need assurance that the assessment will include RCP8.5
Solution	State the scenarios to be tested

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; 12.6.1. o and Table 12-5: Fish – European eel	
Issue	Text suggests that only European eel will be considered for entrainment/entrapment risk.
Impact	Potential impact on coarse fish fry and eggs being the most vulnerable to entrainment.
Solution	Mitigation should be included which manages construction activities outside of spawning and migration periods to limit the impact. Additionally, appropriately screen any intakes.

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; Table 12-5, European Habitats sites, Humber Estuary	
Issue	Humber Estuary SAC scoped out. River lamprey and sea lamprey (designated species of Humber Estuary SAC) expected to migrate into the River Trent.
Impact	Impact-pathways to the Humber Estuary potentially not considered leading to damage to the Humber Estuary SAC.
Solution	Include the designated species of the Humber Estuary SAC (river lamprey and sea lamprey) in the EIA and potential impact-pathways on these species.

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; Table 12-5: Fish – European smelt	
Issue	European smelt are scoped out based on the impacts of the hydrological regime.
Impact	By scoping this species out, potential other impact-pathways will not be assessed leading to harm to the species.
Solution	Give assurance that no influence of hydrological effects will exist downstream of the tidal limit in the future abstraction and future flow scenarios and additionally that no deterioration in olfactory chemicals will occur.

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; 12.6.7. d	
Issue	Water quality parameters temperature and dissolved oxygen have been identified in previous reports as being significant.
Impact	These parameters and could deteriorate WQ below WFD standards and significantly affect aquatic life.
Solution	Highlight these as known issues and give assurance that solutions will be sought to avoid WFD deterioration and/or mitigate against changes.
River Tame has historically suffered from sudden oxygen crashes from summer storms. With a change in flow as a result of the scheme, such environmental conditions from summer storms should be considered.	

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; 12.6.7. e	
Issue	Increased turbidity caused by boats moving in elevated flow due to higher propulsion effort of craft.

Impact	Turbidity increases could cause deterioration in water quality leading to negative effects on fish life.
Solution	Undertake further assessment of likely effects.

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; Table 12-6: Potential effects during the operational phase: Designated site, Humber Estuary (fish passage)

Issue	Predicted negative effects on fish passes limited to weir 7& 8 and Holmes sluice.
Impact	The potential impact could be greater than currently predicted given limited data on fish passes and an incomplete picture of abstraction and climate scenarios being considered.
Solution	Undertake a full assessment using design drawings for all fish passes, predicted future abstraction licence and climate scenarios for the life of the scheme.

Document Reference(s): EIA scoping; Chapter 12 Ecology – Aquatic; 12.5.8

Issue	Impacts on fish passage not considering future abstractions.
Impact	This was a concern at the time the fish passage assessment was made, being based only on the current "picture." Need assurance that this will be representative and associated impacts predictably modelled.
Solution	Robust data gathering, forecasting and modelling to ensure a representative picture of abstraction at time of scheme operation and through its predicted lifecycle.

6. Biodiversity

Document Reference(s): Volume 1: Main Report, Chapter 3: Description of the Proposed Development – Section 3.6.1	
Issue	<p>Construction is estimated to take approximately 4 years to complete, and the Terrestrial Ecology Chapter (Chapter 13) does not mention whether pre-construction surveys are planned for otters and water voles in addition to baseline surveys.</p> <p>CIEEM's Advice Note 'On the lifespan of ecological reports & surveys' states that species survey data may be out of date around 12-18 months following a survey.</p>
Impact	Changes in the baseline of species presence and distribution. For example, otters are highly transitory species, therefore an otter could construct a holt prior to, or during construction. This may result in damage or destruction of holts or disturbance during construction, which are offences under the Conservation of Habitats and Species Regulations 2017 (as amended).
Solution	Riparian mammal pre-construction checks/surveys should be conducted prior to the construction of each route section, to determine any changes in presence or distribution of otters and water voles.

Document Reference(s): Volume 1: Main Report, Chapter 12: Ecology – Aquatic	
Issue	<p>Whilst a lot of survey effort has been invested in identifying the INNS baseline within the DCO boundary (e.g. Table 12-4), the report is lacking in detail regarding potential management. There is also a risk of spreading INNS into watercourses connected to the canal network via outfalls, once flow is increased.</p> <p>'Biosecurity Management Plan' has been defined within the abbreviation list (page 24), yet such a plan has not been discussed within the report.</p>
Impact	Lack of detail regarding the practical management of the INNS identified within the baseline, and the prevention of spread (i.e. biosecurity protocols).
Solution	<p>An invasive non-native species management plan will be required as part of the Environment Statement. A strict and robust Biosecurity Plan must also be included within the Environment Statement. Provide further detail on how the spread of INNS on the canals will be mitigated (e.g. INNS screens?).</p> <p>A pathway specific risk assessment should be considered identifying any pathways for spread during construction, operation and decommissioning. Where the presence of INNS has been identified, a specific method statements for the INNS species identified (and the locations within which they are present) could be produced, along with specific measures to be</p>

	implemented during construction works and/or vegetation and soil removal to ensure that there is no spread of INNS.
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Document Reference(s): Volume 1: Main Report, Chapter 12: Ecology – Aquatic – Section 12.4.18	
Issue	Main Rivers will be crossed by HDD, and small watercourses and tributaries will be crossed by open-cut methods.
Impact	Compounds and trenches associated with cable installation present a risk of entrapment of mammals such as otters.
Solution	Cover-over open trenches to prevent wildlife from falling in and place a ramp to enable wildlife to escape. Securely fence compounds and trenches during construction.

Document Reference(s): Volume 1: Main Report, Chapter 13: Ecology – Terrestrial – Section 13.5.71	
Issue	Both water vole and American mink were recorded along the canal network during targeted water vole surveys in 2023 and 2024.
Impact	Predation from American Mink is the greatest threat to populations of water voles. Construction works and associated impacts from the project (such as water level rise) could negatively impact an already threatened population of water voles along the canal network.
Solution	Recommend that the applicant coordinates the management of American Mink along the canal network within the DCO boundary, as part of their INNS Management Plan.

Document Reference(s): Volume 1: Main Report, Chapter 13: Ecology – Terrestrial	
Issue	The applicant has completed a UKHab Assessment to determine the BNG Baseline (Section 13.5.34) but has not committed to delivering BNG nor have they identified an intended percentage of net gain.
Impact	Although BNG has not yet become a legal requirement for NSIPs, the guidelines will likely require developers to achieve a minimum of 10% BNG. Delivery of BNG is now also best practice, and many NSIPs have committed to deliver BNG prior to the release of government guidelines. By refusing to commit to BNG early in the project, they run the risk of not considering BNG appropriately and needing to plan delivery further along in the project, when resources may not be available.
Solution	I appreciate that at this stage there is little specific design information, however we have the following points for the applicant to consider moving forward.

	Propose to deliver at least 10% BNG through the scheme. For potential biodiversity net gain opportunities, we recommend the applicant refers to both the mitigation measures within the Water Framework Directive and opportunities identified within the Local Nature Recovery Strategies.
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Document Reference(s): Volume 1: Main Report, Chapter 22 – Water Environment and Flood Risk

Issue	It is assumed that access tracks over watercourses (such as culverts) will be required for vehicles during the construction phase, yet there is no reference within the EIA Scoping report to the proposed vehicle-crossing methodology.
Impact	Culverts have the potential to fragment habitats and reduces connectivity, making dispersal and commuting for some species difficult. Culverts also put an added pressure on otters during periods of high water-levels, as culverts offer little room for conveyance and put otters at risk of being killed when crossing roads.
Solution	Should any access tracks cross watercourses or ditches, we would expect to see open-span bridge design. There may be potential for existing watercourse crossing points to be improved for ecology. For example, removal of a culvert and replacing with an open span bridge.

Document Reference(s): Volume 1: Main Report, Chapter 22 – Water Environment and Flood Risk

Issue	There is no reference within the EIA Scoping report to the establishment and maintenance of a riparian buffer during construction of the pipelines or infrastructure.
Impact	The applicant should ensure there is a sufficient buffer between the development, any fences and any watercourse or ditch. This will allow for the natural river corridor to be maintained and the free movement of riparian mammals up and down the system.
Solution	Maintain a riparian buffer around all watercourses. As a minimum we would expect this to be 10m from the bank top. During the construction phase, temporary construction compounds within 15m of watercourses could be screened with fencing on sides adjacent to the watercourse, and working lighting could be positioned to avoid light-spill onto sections of the watercourse. Both measures would lower the risk of disturbance to riparian mammals occupying the watercourse.

Document Reference(s): Volume 1: Main Report	
Issue	Scoping out of designated sites adjacent to the River Tame. Inconsistent scoping of receptors between the aquatic and terrestrial chapters.
Impact	<p>There is inconsistency between the aquatic and terrestrial ecology chapters in the scoping of impacts in regard to designated sites. For example, Whitacre Heath SSSI is scoped out in the aquatic chapter but not the terrestrial chapter.</p> <p>The proposed scoping of several LWS associated with the Tame (e.g. Lady Walk, RSPB Middleton Lakes) is unclear: they appear to have been scoped out from the aquatic chapter but are scoped in under part 1b of the terrestrial chapter.</p> <p>Impacts upon groundwater and surface water dependent habitats are scoped in in the terrestrial chapter.</p>
Solution	<p>It is considered that further assessment is required to determine whether reductions in flows in the Tame could affect adjacent water dependent habitats including designated sites through surface water or ground water associations and they should therefore be scoped into the assessment.</p> <p>Ensure consistency between chapters.</p>

Document Reference(s): Volume 1: Main Report	
Issue	Table 12-7 on-going and proposed aquatic ecology baseline surveys
Impact	<p>Part 1a appears to be excluded from additional survey work. Given that potential impacts to habitats and species within the Tame are not discounted, further habitat and species survey in this part of the zone of influence may be required.</p> <p>Recommend a hydro-ecological assessment to investigate how flow changes on the Tame could affect ecology.</p>
Solution	<p>Add part 1a in proposals for additional survey.</p> <p>Undertake Hydro-ecological assessment on flow changes to the Tame.</p>

Document Reference(s): Volume 1: Main Report	
Issue	WFD Table 5-2
Impact	The scoping summary table details the reason for 'scoping in' the Tame waterbodies as Fish, though for two of the three waterbodies lists potentially impacted WFD quality elements as including receptors other than fish (i.e. invertebrates, macrophytes and hydro-morphological regime). It is considered that the reduction in flow in the Tame have potential to affect all biological/ hydro-

	morphological receptors and accordingly these should all be subject to stage 3 impact assessment.
Solution	Scope Tame waterbodies including all biological and hydro-morphological quality elements into stage 3 WFD impact assessment

Document Reference(s): Volume 1: Main Report	
Issue	Main Report, 3.2 & 3.2.5 - The Tame, Tame Valley and Trent are not mentioned with regards to impacted areas. The non-work area also does not include the Tame mitigation (3.2.5).
Impact	Risk of not considering the potential impacts of the scheme to hydrologically connected sites.
Solution	Amend to include a consideration of the impacts of the scheme on the River Tame, Tame Valley and River Trent, in addition to potential mitigation required on the River Tame.

Document Reference(s): Volume 1: Main Report	
Issue	Main Report, 3.4 - Impacts from the scheme on the River Tame and the River Trent (such as depleted reach) have not been adequately assessed, nor has sufficient monitoring post-completion been proposed.
Impact	The applicant has not considered the impact of the reduction in discharge from STW Minsworth to the River Tame, and the associated habitats, species and aquatic ecology. The lack of monitoring also poses the risk of missing potentially negative impacts from the scheme.
Solution	Recommend that the applicant considers the impact of the depleted reach, and proposes mitigation for the River Tame and River Trent. Also recommend that the applicant proposes sufficient monitoring post-completion to determine if there has been a negative impact. Monitoring could include the measuring of phosphate levels and the completion of hydro-ecology surveys.

Document Reference(s): Volume 1: Main Report	
Issue	Main Report, 6.9 - In combination effects have not considered the cumulative impact of the GUC, the Severn to Thames Transfer (STT) scheme and the smaller transfer schemes (e.g. from the Blythe in the Trent Catchment to Finham brook in the Severn Catchment) on the River Trent Catchment.
Impact	By not considering the combination effects of all water transfer schemes, the report does not adequately consider the impact of the scheme on future water resource/availability in the Midlands for biodiversity.

Solution	We'd recommend that the report acknowledges ALL water transfer schemes and their cumulative impact.
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Document Reference(s): Volume 1: Main Report	
Issue	Appendix 12.1 p5 - Broadmeadow LNR, Dosthill Park LNR, Kingsbury Meadow LNR and Lea Marston Lakes LWS are not mentioned.
Impact	Broadmeadow LNR and Dosthill Park LNR have river tame margins. Broadmeadow LNR has rare snakeshead fritillary plants associated with flood plain meadow MG4. Both LNR's have river Tame margin and are connected during floods. Kingsbury Meadow LNR has a tributary that flows through it and into the tame. Lea Marston Lakes LWS is a significant lake and is on-line with the tame.
Solution	Include Broadmeadow LNR, Dosthill Park LNR and Kingsbury Meadow LNR in assessment of impacts.

Document Reference(s): Volume 1: Main Report	
Issue	Main report table 12-6 p43 - Whitacre heath SSSI ruled out of impacts from drop in level as flooding and high flows not changed.
Impact	Not confident that this is the case, and some reconnection will be required so that high flow events remain connected.
Solution	Recommend that impacts on Whitacre Heath SSSI is not ruled out and that it is included on a monitoring plan. Recommend that test pits are dug to determine what the hydrological connection is.

Document Reference(s): Volume 1: Main Report	
Issue	Main report table 12-6 p45 - River Tame LWS has no improvements listed.
Impact	Lack of ambition with regards to enhancing the River Tame LWS. The LWS designation is due to the functional connectivity between the River Tame and the Tame valley area, which is necessary for biodiversity.
Solution	Recommend that a river restoration plan for the River Tame is drafted to ensure WFD elements, hydro-ecology and functionality maintained/enhanced to reflect new flow regimes.

7. Groundwater & Contaminated Land

EIA Scoping Report – Sections 3.5.23 and 3.5.87	
Issue	<p>The Applicant provides details on the proposed construction detail of the transfer pipelines from Minworth to Atherstone and from the Grand Union Canal to the existing underground reservoir at Luton. It is indicated that water would be pumped from Part 1a to the proposed BPT at a high point approximately 15km from Minworth, before transferring via gravity to the discharge point at Atherstone.</p> <p>The applicant should note that there are substantial superficial deposits around Water Orton and Lea Marston resulting from historic meandering of the River Tame, and infilled historic ground workings from mineral extraction, which may result in the presence of significant shallow groundwater in this area.</p>
Impact	Dewatering from open cut trenches and launch/reception pits for trenchless crossings is likely to be required. This may require abstraction permits and possible discharge consent to the River Tame to support the Proposed Development.
Solution	The applicant is advised to take timely pre-application engagement with the National Permitting Service. The preparation of a Dewatering Management Plan is recommended.
<p>The Applicant has identified several crossing points where the transfer pipeline would need to be progressed via trenchless methods, notably including Main Rivers, WFD waterbodies, Ordinary Watercourses and the High Speed 2 (HS2) railway route. It is presumed that the depths at which these crossings will be required are still to be determined. A brief comparison of the proposed HS2 scheme layout and the route of the Proposed Development suggests that at the crossing point HS2 may partially lie within a cutting, which may require the pipeline to cross at a substantial depth. This may result in significant fluctuations in elevation along the pipeline route.</p> <p>An informative about dewatering is provided at the end of this section.</p>	

Issue	<p>The Applicant proposes to submit an outline CoCP alongside the DCO, from which mitigation measures would be carried forward into a Detailed CEMP.</p> <p>The Applicant proposes to agree the scope of the Detailed CEMP with the local planning authorities following grant of the DCO and prior to the start of construction, under a requirement of the DCO.</p>
Impact	Potential for mitigation measures established within the Detailed CEMP to be insufficient to manage risks to groundwater quality.
Solution	The outline CoCP submitted in support of the DCO should include reference to all proposed environmental mitigation that would normally

	be provided in an outline CEMP. The Environment Agency should also be consulted on the Detailed CEMP to ensure Controlled Water risks will be adequately managed.
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EIA Scoping Report – Section 14.2.6	
Issue	The report references Environment Agency guidance ‘Guidance Note on Piling / Penetrative Ground Improvement Methods on Land Affected by Contamination NC/99/73, 2001 (ref. 45 in the report). As of March 2025 this has been superseded by new guidance from CL:AIRE, ‘Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention’.
Impact	Potential for aspects of the design not to be in accordance with newest guidance.
Solution	The applicant should refer to the new CL:AIRE guidance for future submissions.
The CL:AIRE guidance document is available at the following location: Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention	

EIA Scoping Report – Section 14.5.29 to 14.5.36, Table 14-8	
Issue	The Applicant discusses the presence and extents of groundwater Source Protection Zones (SPZs) within the Study Area. The Environment Agency has recently updated Groundwater Source Protection Zones (SPZs) which have currently yet to be updated in MAGiC online maps, therefore the SPZ extents shown on that system may be inaccurate.
Impact	Potential for risks to groundwater to be inaccurately determined.
Solution	The Applicant should ensure that up to date SPZ maps are used to determine the extents of, and risks to, these zones.

Issue	Various route options for Part 4b of the Proposed Development pass through designated groundwater SPZ1 and 2.
Impact	Some of the route options pose a greater risk of impact to groundwater SPZ1 and SPZ2 than alternatives.
Solution	In selecting the preferred option for the proposed underground pipeline routes, we would encourage the Applicant to ensure that designated

	groundwater SPZ1 and SPZ2 areas are avoided. Where this is unavoidable where possible the preferred option should be the one posing the lowest risk to SPZ1 and 2 areas, typically overlapping these areas the least. Where possible the route should be positioned as far from the SPZ abstraction source as possible.
Current SPZ maps can be found at the following location: Source Protection Zones [Merged] .	
The reservoir at the eastern end of Part 4b of the Proposed Development is in an SPZ1 established around one of Affinity Water's own sources.	
Our records show the following abstraction SPZ1 and 2 areas to extend into the Scoping boundary for Part 4b:	
<ul style="list-style-type: none"> • Sandhouse (SP2 and SP2A); • Battlesden (SP2B); • Icknield Way (SP10 and SP10A); and • Runley Wood (SP10, SP10B, SP10C). 	

EIA Scoping Report – Section 14.5.47 and Table 14-16	
Issue	<p>Potential current and historic sources of land contamination are stated to have been established using current and historic landfill maps and Ordnance Survey (OS) maps.</p> <p>The temporal and spatial coverage provided by the historic OS maps is not clearly indicated in the report, therefore there may be significant gaps in coverage. This could result in some potentially contaminative land uses not having been identified in the Scoping Report.</p> <p>No discussion of sites designated as Contaminated Land under Part 2A of the Environmental Protection Act 1990, or in Local Authority Contaminated Land inspection strategies, is included in the report.</p>
Impact	Potential for unidentified sources of land contamination to be present which may affect the Proposed Development.
Solution	As stated in Section 14.5.45 the Applicant proposes to carry out further detailed reviews of current and historic land use as part of Phase 1 reporting, which is presumed will include a review of Contaminated Land sites. We look forward to reviewing this information.
The Applicant should note that areas of historic ground working such as pits and quarries have sometimes been backfilled with material of unknown origin which may include contaminants. These may not always be identified as potential sources of contamination by desk study search providers.	

EIA Scoping Report – Section 14.5.47	
Issue	The report lists sensitive controlled water receptors, which includes surface water features, groundwater aquifers and groundwater Source Protection Zones (SPZs) but does not include private or public potable water abstractions or Groundwater Dependent Terrestrial Ecosystems (GWDTEs). Although the list of ecological sensitive sites listed in Table 14-15 includes some GWDTEs this considers sites within 250m only, consistent with the adopted approach to land contamination assessment.
Impact	Potential for sensitive groundwater receptors not to be assessed accordingly.
Solution	The applicant should include private and public potable water abstractions and GWTDEs as potential receptors.

EIA Scoping Report – Section 14.7.9, Table 22-28 Potential effects during the construction phase – Water Environment and Flood Risk	
Issue	<p>The report lists potential pathways considered present regarding land and groundwater contamination. The list does not include all potential groundwater contamination receptors, as these are considered elsewhere in Chapter 22 Water Environment and Flood Risk. However, in Chapter 22 the Applicant proposes to Scope Out construction phase impacts ‘Disturbance of existing contamination in groundwater’, ‘Deterioration of groundwater quality in aquifers, GWDTEs, abstraction points and WFD waterbodies by disturbance of existing contamination’ on the basis that these items are Scoped In within Chapter 14: Ground Conditions.</p> <p>This introduces contradictory statements, for example impacts to GWDTEs are not specified as pathways in Chapter 14 but are Scoped Out in Chapter 22 based on their inclusion in Chapter 14 of the EIA.</p>
Impact	Lack of clarity over which impacts are Scoped into Chapter 14.
Solution	The Applicant should ensure that the Water Environment and Flood Risk Chapter in the EIA clearly directs readers to Chapter 14 for discussion of those impacts Scoped Out for Chapter 22 due to proposed inclusion in Chapter 14.
<p>We agree with the approach of collating risks to groundwater quality in a single Chapter on principle, provided all of the potential impacts are adequately captured within Chapter 14. We do have concerns that by explicitly Scoping Out these impacts in the Water Environment and Flood Risk Chapter there is a risk these impacts could be misinterpreted as being Scoped Out from the overall project.</p>	

EIA Scoping Report – Table 14-17	
Issue	The report identifies potential effects during the construction phase from the mobilisation and migration of existing potential sources of contamination, which includes identified authorised and historical landfill boundaries within the Project boundary and Study Area. While the Rationale section discusses potential disturbance and migration of contaminants, the applicant does not directly refer to the potential for the breaching of designed or incidental containment at these features.
Impact	Potential for the release and migration of mobile contaminants from authorised or historic landfills if risks are not adequately assessed and managed.
Solution	The applicant should ensure that key areas of potential concern such as authorised and historic landfills are assessed adequately.

EIA Scoping Report – Table 14-19 Receptor Sensitivity	
Issue	High sensitivity aquifers covered by thin or variable thickness unproductive superficial deposits, e.g. Clay with Flints overlying Chalk bedrock locally along Part 4b of the Proposed Development are not taken into account.
Impact	Potential for credible impacts to high sensitivity aquifers to be overlooked in some areas where unproductive superficial deposits are recorded at surface.
Solution	The Applicant should take account of the anticipated thickness of low sensitivity superficial deposits where these overlie high sensitivity aquifers.

EIA Scoping Report – Table 14-20 Magnitude of impact and descriptions	
Issue	<p>The report refers to sensitivity criteria provided in LA113 for high, medium, low and very low impacts to groundwater. Although this is commonly used as a framework for determining impact magnitude, there are some inherent ambiguities to the cited table.</p> <p>The phrasing used in LA113 suggests that change in classification (e.g. deterioration from Good to Poor WFD classification) would be considered major adverse, but that change within a class would be considered moderate adverse. However, according to guidance (Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive - GOV.UK) where a water body already lies within the lowest (Poor) WFD status class, any deterioration is still considered to be</p>

	deterioration in status under the WFD. Under these circumstances any negative impact would be potentially considered major adverse. Furthermore, not all magnitude classes in LA113 refer to the likely impact on WFD waterbodies.
Impact	Potential for lack of clarity over the magnitude of WFD impacts posed by the Project
Solution	Recommend that the applicant provides greater clarity over the proposed impact magnitude classifications regarding WFD waterbody status.
<p>We presume that the applicant's intended meaning is as follows:</p> <p>If the Project in isolation were likely to change a waterbody's WFD class from Good to Poor or prevent a waterbody from improving from Poor to Good this would be considered major adverse.</p> <p>If the Project in isolation were not sufficient to impose this magnitude of change but is likely to be a contributing factor to such a change, that this would qualify as a moderate adverse magnitude.</p>	

EIA Scoping Report – Table 22-5 Sources of Baseline Data	
Issue	The list of information sources does not include the Thames River Basin Management Plan.
Impact	Potentially significant source of information not considered.
Solution	The baseline assessment should include review of all relevant River Basin Management Plans.
<p>Part 4b of the Proposed Development passes through groundwater and surface water bodies within this RBMP area.</p> <p>The applicant should note that all WFD groundwater bodies are also groundwater Drinking Water Protected Areas.</p>	

EIA Scoping Report – Section 22.5.45, Section 22.5.46, Section 22.5.163 and Section 22.5.164	
Issue	<p>The applicant identifies that the proposed Part 1b pipeline route crosses one Main River (the River Tame) at Lea Marston, one WFD waterbody (Dog Lane Brook) and seven Ordinary Watercourses. It is anticipated that all of these watercourses will be crossed via directionless drilling methods such as horizontal directional drilling (HDD). Pipe jacking is also mentioned as a possible crossing technique.</p> <p>The proposed Part 4b pipeline route does not cross any Main Rivers, although one Main River, the River Ouzel, crosses the western extent of</p>

	<p>the study area. Six WFD waterbodies and three Ordinary Watercourses have been noted to cross the EIA Scoping boundary.</p> <p>No reference is made to the preparation of a hydrogeological risk assessment for these proposed trenchless crossings, or the preparation of a Drilling Fluid Breakout Plan to mitigate risks from loss of drilling fluid.</p>
Impact	HDD or other trenchless installation methods could locally introduce drilling fluids or mobilise contamination into controlled waters if not suitably managed.
Solution	Recommendation to carry out a Hydrogeological Risk Assessment where HDD or other trenchless drilling methods are required and may interact with Principal or Secondary A aquifers or pass beneath surface watercourses or sensitive ecological receptors, and for all trenchless installation methods using drilling fluids to be conducted in accordance with a Drilling Fluid Breakout Plan.
<p>Where trenchless methods are used to cross watercourses, the Applicant would need to assess whether this would affect local licensed or unlicensed abstractions by carrying out a water feature survey.</p> <p>Trenchless construction methodology is indicated as an option for crossing the Chiltern Area of Outstanding Natural Beauty. The example diagram for trenchless crossings shows short distance tunnelling below comparatively narrow linear features. We would want to see further information on how this technique would be applied for greater distances, and for the potential impacts and mitigation measures to groundwater quality – this may require a Hydrogeological Risk Assessment.</p>	

EIA Scoping Report – Table 22-29 Potential effects during the operational phase – Water Environment and Flood Risk	
Issue	<p>The Applicant has Scoped In potential deterioration of groundwater quality resulting from accidental spillage during the operational phase, but no other potential source of deterioration of groundwater quality.</p> <p>Potential for contaminative impact to groundwater quality resulting from leakage or overflow of the GUC or leakage from other transfer infrastructure has not been discussed by the Applicant.</p>
Impact	Potential for unanticipated impacts to groundwater quality in the event of losses from transfer infrastructure.
Solution	The Applicant should assess impacts from leakage or overflow from transfer infrastructure.

EIA Scoping Report – Appendix 7-2 Water Framework Assessment Screening Assessment	
Issue	<p>Table 5-4 'Groundwater scoping assessment summary table' presents a summary of each identified WFD Groundwater body within the Scoping Area, and whether this is proposed to be Screened In or Out for further assessment.</p> <p>The rationale for selecting which element of the Proposed Development (i.e. which Part) may impact specific WFD Groundwater bodies appears to include some errors or omissions.</p>
Impact	Risk that the rationale behind which WFD Groundwater bodies have been identified as potentially affected by parts of the Proposed Development may be flawed.
Solution	The Applicant should check and confirm which WFD Groundwater Bodies may potentially be affected by each Part of the Proposed Development.
<p>We agree with the proposed Screening Out of certain WFD Groundwater bodies (Table 5-4 of Appendix 7-2) from further assessment based on the rationale provided by the Applicant, provided the proposed CoCP and CEMP are developed with adequate methods of controlling impacts on groundwater quality from construction and operational activities. Those Parts of the Proposed Development which have been Screened out on the basis of adherence to a CoCP or CEMP (Part 2 and Part 3) are not anticipated to require construction works sufficient to result in a likely significant effect on the underlying WFD bodies as a whole.</p> <p>The Applicant states that WFD Groundwater body GB40901G300700, 'Warwickshire Avon – PT Sandstone Warwick/Avon Confined' potentially affects Parts 2 and 3 of the Proposed Development, and that WFD Groundwater body GB40902G990900, 'Warwickshire Avon – Secondary Mudrocks' potentially affects Part 2 of the Proposed Development only. However, our records indicate that Part 3 lies within the Warwickshire Avon – Secondary Mudrocks' WFD body and also within 100m of WFD Groundwater Body GB40502G402400, 'Nene Mid Lower Jurassic Unit', which is not identified in the table as potentially affected by this Part of the Proposed Development.</p>	

Additional information:

EIA Scoping Report – Section 14.3 Consultation
The report lists stakeholders proposed to be consulted as part of the EIA process, which includes The Coal Authority. The Applicant should note that the Coal Authority has recently been renamed to the Mining Remediation Authority. A brief review of

Mining Remediation Authority maps shows that the majority of Part 1b of the Proposed Development and a significant proportion of Part 2 lie within a coal mining Development High Risk Area.

An informative about coal mine grouting risks is provided at the end of this response.

[Mining Remediation Authority Map Viewer](#)

EIA Scoping Report – Section 3.4.11 and 3.5.31

The report states that the Part 1b EIA Scoping Boundary crosses several key features including an area safeguarded for High Speed 2 (HS2), at West of Hams Hall Substation.

No specific crossing methodology is defined at this stage. We anticipate that there will be established lateral and vertical easements relative to current and future HS2 assets at the crossing location that may affect the crossing methodology and design at West of Hams Hall Substation. This may complicate achieving the desired transfer flows within Part 1b.

It is anticipated that the HS2 team would hold groundwater monitoring data for the vicinity of the crossing, which would assist in understanding local ground conditions and hydrogeological characteristics.

The Applicant is advised to contact the HS2 team (HS2enquiries@hs2.org.uk) to discuss the proposed crossing methodology for the Proposed Development, the timescale for HS2 scheme construction at this location relative to that of the Proposed Development, and to request copies of groundwater level monitoring data local to the crossing point which may be held by the HS2 project team.

EIA Scoping Report – Table 14-17

The table presents potential construction phase effects proposed to be Scoped In or Out of further assessment. Effects on groundwater are Scoped In, with a list of activities and effects provided in the table.

Dewatering activities are listed as a potential cause of mobilisation and migration of existing potential sources of contamination in the Potential Effects section but referred to as groundwater abstractions in the Rationale section. This could potentially cause confusion in the reader, and it is recommended that this activity is described consistently. An informative about construction dewatering is provided at the end of this response.

EIA Scoping Report – Section 22.7.9

The report states that surface water drainage strategies will be prepared, outlining the approach to managing surface water runoff from key aspects of the Proposed Development. The report does not explicitly commit to following the principles of Sustainable Drainage Systems (SuDS) in the development of these strategies, although it is stated that these will be prepared in line with current policy and guidance, and in liaison with the relevant Lead Local Flood Authorities.

An informative on SuDS, and the Environment Agency's position on the use of such systems, is provided at the end of this response.

EIA Scoping Report – Sections 22.3.2 and 22.8

The report states that there is inherent uncertainty regarding the interaction between surface water and groundwater, and that the understanding of these will be enhanced by data collection.

Interactions between groundwater and surface water will require careful consideration should not be overlooked when assessing impacts on water dependent sites. This will not only apply to GWDTEs but also concerns aquatic habitats and surface water interactions.

1. Land Contamination Assessments

We expect land contamination assessments to follow the tiered approach laid out in our [Land Contamination Risk Management \(LCRM\)](#) guidance. The preliminary risk assessment (PRA) should include historical plans of the site, an appraisal of the environmental setting (including geology, hydrogeology, groundwater and surface water receptors, potential contaminants of concern and source areas), an initial conceptual site model (CSM) describing possible pollutant linkages for controlled waters, and identification of potentially unacceptable risks. Land contamination investigations should be undertaken by suitably qualified and experienced professionals and in accordance with [BS 5930: Code of practice for ground investigations](#) and [BS 10175: Investigation of potentially contaminated sites – code of practice](#). Soil and water analysis should be fully MCERTS accredited. Investigation, demolition, remediation, or construction works must not create new pathways or linkages to controlled waters. Clean drilling techniques may be required for boreholes that penetrate contaminated ground.

2. Piling

Refer to our 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination' National Groundwater & Contaminated Land Centre Project NC/99/73. Please note that this guidance document is currently in the process of being updated. The selected method, including environmental mitigation measures, should be presented in a 'Foundation Works Risk Assessment Report', guidance on producing this can be found in Table 3 of 'Piling Into Contaminated Sites';

3. Information about dewatering

If dewatering is required, it will require an abstraction licence if it doesn't meet the criteria for exemption in [The Water Abstraction and Impounding \(Exemptions\) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works](#). It may also require a discharge permit if it falls outside of our [regulatory position statement for de-watering discharges](#).

If the applicant does not meet the exemption and requires a full abstraction licence, they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on our website: [Abstraction licensing strategies \(CAMS process\) - GOV.UK \(www.gov.uk\)](#) and [Apply for a water abstraction or impounding licence - GOV.UK \(www.gov.uk\)](#)

If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.

Please note that the typical timescale to process a licence application is 9-12 months. [The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.](#)

Temporary dewatering of wholly or mainly rainwater that has accumulated in an excavation may be exempt from an Environmental Permit for a Water Discharge Activity. More information can be found on our website: [Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK \(www.gov.uk\)](#). Note that this does not permit discharge of groundwater from a passive or active dewatering activity or permit the abstraction of groundwater.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found on our website: [Discharges to surface water and groundwater: environmental permits - GOV.UK \(www.gov.uk\)](#)

The use of drilling muds for any necessary directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

4. Waste

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
- Our website at <https://www.gov.uk/government/organisations/environment-agency>

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 includes:

- 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 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.

5. Coal Mine Grouting Risks

There will need to be a thorough investigation if the Proposed Development would include grouting of old mine shafts and levels. If levels are flooded and minewater is not pumped dry, this could be construed as discharge direct to groundwater for which there would be need for risk assessment and permit or may be prohibited if there is a high risk to water quality. Many cement-based grouts contain pulverised fly ash (PFA) and depending on contaminants of concern (CoC) some may be prohibited. If displacing groundwater in tunnels, grout may also have high barium content. Any pumping would require a permit for abstraction and discharge after treatment, as mine water will be ferruginous. In addition, pumping can cause localised subsidence.

The Mining Remediation Authority should be consulted with any proposals for capping or grouting, and in carrying out a Mining Risk Assessment the consultants should check local archives at the County Records Office in case the MRA records are incomplete.

6. Sustainable Drainage Systems (SuDS)

1. Infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins shall only be used where it can be demonstrated that they will not pose a risk to the water environment.
2. Infiltration SuDS have the potential to provide a pathway for pollutants and must not be constructed in contaminated ground. They would only be acceptable if a phased site investigation showed the presence of no significant contamination.
3. Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters.
4. The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels.
5. Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction).
6. SuDS should be constructed in line with good practice and guidance documents which include the SuDS Manual ([CIRIA C753](#), 2015) and the [Susdrain website](#).

For further information on our requirements with regard to SuDS see our Groundwater protection position statements (2017), in particular Position Statements G1 and G9 – G13 available at: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Final comments

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the details below.

Yours sincerely

Ms Noreen Nargas (MRTPI)

Planning Specialist

Direct dial [REDACTED]

Direct e-mail [REDACTED]@environment-agency.gov.uk

From: clerk@flore-pc.gov.uk
To: [Grand Union Canal](#)
Cc: [REDACTED]
Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
Date: 09 April 2025 09:37:23

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Flore Parish Council thanks you for including us in the consultation on this. The Councillors have read the the information provided and are excited to see how this will work.

We only have one comment on the consultations which may affect us:

The Council has concerns over potential flooding in our area and hope that this issue is adequately assessed in the 17 mile stretch that runs from Whilton Locks to Stoke Bruerne, Northamptonshire.

Many thanks and we hope to see more info in due course.

Kind regards

[REDACTED] [REDACTED]

Clerk to the Council.

From: [REDACTED]
To: [REDACTED]
Subject: FW: WA0210001 - Grand Union Canal Transfer - consultation response (25/10053/SCOPE)
Date: 24 April 2025 14:26:35

You don't often get email from [REDACTED]@hinckley-bosworth.gov.uk. [Learn why this is important](#)

Dear Karen,

I attempted to send a response from HBBC to the email address set out below but unfortunately the message came back as undeliverable. Your colleague advised that I could send the response directly to you? Please could you let me know that you have received and accept this as the formal response from Hinckley Bosworth Borough Council to the above consultation request?

Kind Regards

Alex Jelley BA MSC MRTPI
Development Services
Planning Consultant
Hinckley & Bosworth Borough Council

Email: [REDACTED]
Phone: [REDACTED]

Hinckley & Bosworth Borough Council, Hinckley Hub, Rugby Rd, Hinckley, Leics LE10 0FR

From: Alex Jelley
Sent: 24 April 2025 14:09
To: 'GUCtransfer@planninginspectorate.gov.uk.' <GUCtransfer@planninginspectorate.gov.uk.>
Cc: Planning Folder New <PlanningFolderNew@hinckley-bosworth.gov.uk>
Subject: WA0210001 - Grand Union Canal Transfer - consultation response (25/10053/SCOPE)

To whom it may concern,

Thank you for consulting us on the scoping process for the above Nationally Significant Infrastructure Project.

Hinckley Bosworth Borough Council (HBBC) notes that whilst we have been formally consulted, we do not believe the proposed development falls directly within our local authority boundary, but we are a neighbouring authority and would like to provide some comments which we hope will be considered as part of the scoping process for the EIA.

The closest point to our local authority area (Hinckley and Bosworth) which would be affected by the proposed development is Atherstone. The details provided state that there is an outfall location proposed here but there are two options and the final option has not yet been decided. Depending upon the location of the outfall, Hinckley Bosworth Borough Council may object to any outfall proposed into the River Anker. The River Anker is located reasonably close by to the canal near Mancetter (c.500m) but then goes on to flow to Witherley which is located within our Borough. The River Anker frequently floods at Witherley, particularly around Mythe Lane, Chapel

Lane and the top of Kennel Lane and may be the most frequently flooded part of the Borough, with some dwellings affected each time it floods. The LLFA (Leicestershire Drainage Team) are no doubt aware of this and may also comment on outfall locations, but HBBC want to flag this issue for consideration as part of any scoping response/EIA.

In addition to the flooding concerns, we would also like to flag odour as a consideration within the scoping response. Within the information provided, there is mention of treated water as part of this proposal. This could result in odour issues at the outfall location proposed near Atherstone, which could potentially affect amenity for local residents within our Borough/local authority area.

We have also considered heritage impacts, but can confirm that there are not considered to be heritage assets within HBBC which would be directly affected by the proposal.

Kind Regards

Alex Jelley BA MSC MRTPI
Development Services
Planning Consultant
Hinckley & Bosworth Borough Council

Email:

Phone:

Hinckley & Bosworth Borough Council, Hinckley Hub, Rugby Rd, Hinckley, Leics LE10 0FR

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Visit us online: www.hinckley-bosworth.gov.uk

Main office: Hinckley Hub, Rugby Road, Hinckley, Leics LE10 0FR. Main switchboard:
01455 238141

From: [REDACTED]
To: [Grand Union Canal](#)
Subject: Grand Union Canal Transfer - EIA Scoping Consultation - WA021001
Date: 28 April 2025 16:14:22
Attachments: [image001.jpg](#)

You don't often get email from [REDACTED]@forestrycommission.gov.uk. [Learn why this is important](#)

Thank you for consulting the Forestry Commission on this project.

As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.

The scoping report states that there are 25 areas of Ancient Woodland within, adjacent or in close proximity to the scoping boundary.

Potential impacts and relevant policy

Ancient Woodland:

Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

Section 4.3.18 of the National Policy Statement for Water Resources Infrastructure (April 2023) states:

"Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. Developers should identify ways to avoid negative effects on ancient woodland or ancient and veteran trees. This could include selecting an alternative site for development or redesigning the scheme. The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland and the loss of ancient or veteran trees found outside ancient woodland, unless there are wholly exceptional reasons for the development, and a suitable compensation strategy exists."

We would particularly refer you to further technical information set out in Natural England and Forestry Commission's [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide](#) and ["Keepers of Time" – Ancient and Native Woodland and Trees Policy in England](#).

The Standing Advice states that proposals should have a buffer zone of **at least** 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction.

For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be **at least** 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area.

Where possible, buffer zones should contribute to wider ecological networks and be part of the green infrastructure of the area. They should consist of semi-natural habitats such as including woodland, scrub, heathland and wetland. There is a need to consider both the direct and indirect impacts resulting from

construction.

Direct impacts can include, but are not limited to, damaging or compacting soil, damaging functional habitat connections and changing the woodland ecosystem by removing the woodland edge or thinning trees. Indirect impacts can also include reducing the amount of semi-natural habitats next to ancient woodland, increasing the amount of dust, light, air or soil pollution and changing the landscape character of the area.

It is essential that fuels, chemicals or materials such as topsoil, minerals or hardcore are stored outside of the buffer zone and are not stored on Ancient woodland soils or under the woodland canopy.

We would expect to see a detailed assessment of any impacts to all of the ancient woodlands affected, including details of measures to be taken to reduce and mitigate any effect.

Temporary effects identified in the Scoping Report include dust pollution, run off of ground pollutants, changes in hydrology and tree root compaction.

Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage.

Priority Habitat:

It is noted there are also several areas of mixed deciduous woodland within the scoping boundary.

Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Fragmentation is one of the greatest threats to lowland mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic and dust, particularly during the construction phase of a development.

Net Loss of Woodland:

The Scoping Report states there is likely to be a permanent loss of priority habitat woodland, habitat degradation and potential severing of habitat connectivity. It also states that wet woodland is likely to be affected by changes in water level and water quality during construction.

Section 4.10.11 of the National Policy Statement for Water Resources Infrastructure (April 2023) states:

"Existing trees and woodlands should be retained where possible. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable,

compensation schemes should be required and the long term management and maintenance of newly planted trees should be secured"

Avoiding impacts and good landscape design

To meet planning policy and Government guidance, we advise that the EIA scoping and future environmental assessments for this project should include the following:

- Robust adherence to the Standing Advice to rule out loss and deterioration of ancient woodland, ancient trees and veteran trees as far as possible. For example, this may include the need for a larger buffer area than the 15m buffer which is a minimum required for a single dwelling and *might* be sufficient for ruling out impacts to roots in many cases but a larger buffer may be required to avoid other impacts (eg hydrological changes). The Assessment Guide in the Standing Advice can help the applicant to establish what further assessments may be needed as part of the EIA process to avoid unexpected problems later on in the design process.
- A thorough assessment of all trees within the project boundary to identify any ancient or veteran trees in line with good arboricultural practice (BS 5837), to assess any net loss of trees and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.
- Hedgerows, individual trees and woodlands within a development site should be considered in terms of their overall connectivity between woodlands affected by the development.

The Forestry Commission would welcome the opportunity to engage with the applicants early during the application process to help them set effective mitigation and enhancement measures which are proportionate to the projects type and its landscape scale.

This is likely to include:

- Maintain and, where possible, improve existing woodland condition, especially ancient woodland.
- Utilise biodiversity gains as part of avoiding woodland and tree impacts (especially ancient/veteran) which can also maximise biodiversity benefits by embracing irreplaceable and high priority habitats – for example focussing on ecological enhancements/creation of woodland edges.
- Woodland creation and improvements to ecological connectivity. For example, the creation of some larger woodland blocks and hedgerow/hedgerow trees between the existing woodland blocks on site, to link them and ensure maximum gains to increase habitat connectivity, making woodlands more resilient and to benefit biodiversity across the whole project area. We would like to see woodland creation carried out in 5ha blocks or that connecting planting with existing woodlands, should create blocks of at least 5ha as part of a mosaic of habitat types that maximise benefits for biodiversity in the landscape.
- Prioritise use of nature based solutions.
- Overall increase in the tree canopy cover to contribute to the Government's target to increase tree and canopy cover to 16.5% of land area in England by 2050.

The Forestry Commission is seeking to ensure that tree planting is a consideration in every development, not just as compensation for loss. However,

the species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate.

The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases, particularly in areas where there are ancient woodlands.

Plans should also be in place to ensure the long term management and maintenance of new and existing woodland, perhaps by the creation of a UK Forestry Standard compliant management plan, including plans for deer and squirrel control with access also needing to be considered for future management.

We can provide more advice regarding this to help the applicant ensure that the right trees are planted in the right places and for the right reasons.

We hope these comments have been useful to you. If you require any further information, please do not hesitate to contact me.

Best wishes

Sandra

Sandra Squire

**Local Partnership Advisor
East & East Midlands**

Tel: [REDACTED]
[REDACTED] [@forestrycommission.gov.uk](mailto:[REDACTED]@forestrycommission.gov.uk)



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For the attention of: [REDACTED]
The Planning Inspectorate
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Chemicals, Explosives and
Microbiological Hazards
Division – Unit 4

NSIP Consultations
Land Use Planning Team
Building 1.2,
Redgrave Court,
Bootle L20 7HS

Date: 11th April 2025

NSIP.applications@hse.gov.uk

References: CM9 Ref: 4.2.1.7347.
NSIP Ref: WA0210001

<http://www.hse.gov.uk/>

Dear [REDACTED]

**PROPOSED GRAND UNION CANAL TRANSFER PROJECT
PROPOSAL BY AFFINITY WATER AND SEVERN TRENT
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017
(as amended) REGULATIONS 10 and 11**

Thank you for your email of 31st March 2025 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's Land Use Planning Advice

Will the proposed development fall within any of HSE's consultation distances?

1. With reference to the **Northern, Canal** and **Southern Sections** of the proposed development shown on **GUC-full-scheme-map-2.pdf** contained in **Maps of the scheme** [<https://guctransfer.co.uk/resources/document-library/>] sections of the proposed development fall within HSE public safety zones associated with a number of Major Accident Hazard Pipeline(s) and Major Hazard Installation(s).
2. There is currently insufficient information available for HSE to provide its' public safety Land Use Planning Advice. However, by way of general guidance HSE would not advise against the proposed development providing no population(s), either temporary or permanent, is introduced within any of HSE's public safety zones nor would HSE advise against Workplaces (DT1.1 - Workplaces)*, *providing for less than 100 occupants in each building and less than 3 occupied storeys.*

* HSE's Land Use Planning Methodology **Table 1 Development type: People at work, Parking**
[<https://www.hse.gov.uk/landuseplanning/methodology.htm>]

3. Should a new Major Accident Hazard Pipeline be introduced, or existing Pipeline modified prior to the determination of the present application, then the HSE reserves the right to revise its advice.
4. If prior to the determination of the present application, a Hazardous Substances Consent be granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed development, then the HSE reserves the right to revise its advice.

Would Hazardous Substances Consent be needed?

5. The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015.
6. Hazardous Substances Consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.
7. Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Explosives sites

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Electrical safety

No comment from a planning perspective

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours faithfully,

**CEMHD4
NSIP Consultation Team**



Historic England

Sir/Madam
Grand Union Canal Transfer Project

Direct Dial: [REDACTED]

Our ref: PL00798557
25 April 2025

Dear Sir/Madam

Your Ref: WA0210001

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) - Regulations 10 and 11

Scoping consultation regarding application by Affinity Water and Severn Trent (the applicants) for an Order granting
Development Consent for the Grand Union Canal Transfer project

Thank you for your consultation of 31st March 2025 in relation to the above.

Advice

Historic England has reviewed the information submitted in the scoping report from the applicant and our own records for the proposed development area. We note that the EIA scoping report acknowledges that development may have an impact upon a number of both designated and non-designated heritage assets and their settings. The importance of the historic environment is acknowledged that the Scoping Report, in respect of built heritage and archaeology, and thus would be included in the scope of the future assessment.

Comments on Content of Scoping Report

We have the following specific comments to make regarding the current proposed content of the Scoping Report:

We note the precautionary approach that has been taken to scoping and where there is no strong evidence base, insufficient baseline or the significance is uncertain at this stage, the impact has been scoped in to the EIA, which we support in principle.

We welcome the indication in the Scoping Report that transport, noise and vibration assessments would be considered for impact on the historic environment, amongst others, in terms of their indirect effect, and overall welcome the integrated approach to assessment of impact and harm.

We note the statement that avoidance by micro-siting and route refinement will be



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone [REDACTED]
HistoricEngland.org.uk

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embedded into the design of the Proposed Development where possible. We take this opportunity to express a strong preference for total avoidance of designated assets, where they fall within the study boundary, such as Butler's Manor moated site (NHLE 1013961), which is located partly within the Part 4b EIA Scoping Boundary.

It is acknowledged that archaeological evaluation works, including geophysical survey and trial trench evaluation may be required to establish the survival of recorded heritage assets within the EIA Scoping Boundary, which again is an approach we would support.

The Scoping report states that isolated findspots recorded by the HER within the EIA Scoping Boundary are proposed to be scoped out; we do not have any concerns with this scoping decision.

The Scoping Report acknowledges the potential for Indirect effects including hydrological changes, which have the potential to cause desiccation and drying out of any wetland deposits and associated preserved waterlogged archaeological or geo-archaeological remains. It highlights that this is particularly relevant in proximity to the proposed Minworth AWTP (Part 1a) where the Proposed Development is located in proximity to recorded deposits of geoarchaeological potential and the River Tame. We ask that this approach to dewatering and changes in groundwater level is applied across the assets that could be reliant on a stable source of ground water or have water based features, such as Drakenage Farm moated site, a fishpond and associated closes (NHLE 1013769) and a Double moated site 60 m east of Baxterley Church (NHLE 1014683) .

Further recommendation

We acknowledge that a sound EIA report is the basis on which to identify (and where possible avoid, minimise or mitigate) what may be substantial direct and indirect impacts on assets of local, regional and national importance, and we broadly agree with the scoping as set out in the report. We welcome further engagement with the applicant as the proposals develop.

We hope that this information is of use to you at this time. If you have any queries about any of the above, or would like to discuss anything further, please do not hesitate to contact me

Yours sincerely,

H James

Hayley James

Inspector of Ancient Monuments

██████████@historicengland.org.uk



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

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Historic England



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From: [REDACTED]
To: [Grand Union Canal](#)
Cc: [REDACTED]
Subject: GUC Letter to stat cons_Scoping & Reg 11 Notification - Hunsbury Meadows Parish Council
Date: 15 April 2025 14:28:06
Attachments: [image001.png](#)

You don't often get email from [REDACTED]@hunsburymeadowspc.gov.uk. [Learn why this is important](#)

Good afternoon,

We are in receipt of your e mail correspondence of 31st March in relation to the above. Hunsbury Meadows Parish Council has been identified as a consultation body in respect of Scoping Opinion for the *Grand Union Canal (water) Transfer Proposal (WA0210001)*

I therefore reply on behalf of **Hunsbury Meadows Parish Council** as follows:

1. It is our understanding that we have been included in this consultation due to fact that the Northampton Arm of the Grand Union Canal passes through our Parish.
2. Relevant to the consultation however is that it is our understanding that in fact the Water Transfer using the Grand Union Can will not affect the Northampton Arm of it due to the fact that the arm is protected from the level and flow of the main canal passage above Lock 1 at Gayton. Indeed, the water level of the main canal passage is substantially higher than the arm below Lock 1 and there is no run off link to the Arm at that point.
3. That said, were that protection not to be in place, our concern would be the ongoing level of the canal water relative to the banks. The Northampton Arm whilst lower now, has been very high for some months relatively and we have witnessed the gradual erosion of the banks and into the tow path as a result of moving water. The canal forms an important part of our flood defences for the wider flood plain on its route in to Northampton and link with the River Nene, and we would always be concerned if this project in any way increased the likelihood of higher water levels in the Northampton Arm – either directly or because of the levels in the main corridor at Gayton - which may then give rise to flooding and “run off” into our flood defence ditches. We therefore trust that should this project go ahead, the Canals & River Trus will carefully monitor canal heights to prevent this happening.

We otherwise have no other comment to make.

[REDACTED]
Chair
Hunsbury Meadows Parish Council

Mobile: [REDACTED]



From: [REDACTED]
To: [Grand Union Canal](#)
Cc: [Implementation](#)
Subject: RE: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
Date: 17 April 2025 08:19:25
Attachments: [image006.jpg](#)
[image007.jpg](#)
[image008.jpg](#)
[image009.jpg](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[GUC Letter to stat cons_Scoping & Reg 11 Notification.pdf](#)

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Dear [REDACTED]

Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development)
Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

I am responding on behalf of Huntingdonshire District Council (HDC) to your emailed letter dated 31st March 2025.

Thank you for writing to us in relation to the application by Affinity Water. In relation to the Scoping Consultation on the submitted application for a Development Consent Order (DCO). For information this is the first time we have received a letter regarding this DCO and do not have any record of this team or the service receiving any other pre-application. Notwithstanding this, we advise PINS that HDC does not intend to participate in the DCO process for this scheme.

Having reviewed the application information, it is noted:

- The development is some distance from Huntingdonshire (we are consulted as neighbouring authority)
- From a Local Highway Authority perspective it will be for Cambridgeshire County Council to respond on the consideration of any impact upon local roads, but noting the proposal and location it is not anticipated that there would be anything of note.
- The nature of the development means that, subject to approval, once constructed there would be limited future road movements in relation to the project.

In light of the above, Huntingdonshire District Council wishes to advise PINS that it does not intend to participate in the DCO process.

Kind regards

[REDACTED]

| [REDACTED]



Implementation Team Leader

Phone 01480 388274

Pronouns: [REDACTED]

Upcoming Leave: 22 – 25 April inclusive

From: Grand Union Canal <GUTransfer@planninginspectorate.gov.uk>

Sent: 31 March 2025 11:04

Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation

FAO Head of Planning

Dear Sir/Madam

Please see attached correspondence on the proposed Grand Union Canal Transfer.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **28 April 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

[REDACTED]



[REDACTED]
EIA Advisor
The Planning Inspectorate
T 0303 444 5028



@PINSgov



The Planning Inspectorate



planninginspectorate.gov.uk

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DPC:76616c646f72



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Kingsbury Parish Council

Working for the local community in North Warwickshire

Email: kingsburypc@outlook.com

Mobile: [REDACTED]

28th April 2025

Planning Inspectorate
Operative Group 3
Temple Quay House
2 the Square
Bristol BS1 6PN

Dear Sir or Madam

Application by Affinity Water and Severn Trent for an Order granting Development Consent for the Grand Union Canal Transfer Project.

Kingsbury Parish Council are not against the project or the infrastructure.

Kingsbury Parish Council are very concerned around the impact on the village of Hurley and Hurley Common.

Hurley and Hurley Common are already impacted on the Solar and Battery Farms already in the pipeline and the route seems to be on the same lines for the Grand Union Transfer Project.

- The route on the plan given to Kingsbury Parish Council shows the route from Water Orton to Atherstone and there are areas where the canal can be moved lower down and across the countryside below Hurley and Hurley Common.
- There is no justification of this route that drastically effects the residents and business in Hurley Village when the environmental impact would be reduced by using the countryside to the east/west in place of impacting the village.
- The impact of the route in Hurley is to close Brick Kiln Lane which is the access for transport, bus service, school runs. This will impact the businesses in the village, the residents getting out of the village and the children attending the senior schools. This bus service would be suspended whilst the road is closed for the construction. This road is the exit from the village.
- At the top of the village this route is very close to the churchyard and burials would not be able to take place which will also impact the residents and Hurley Primary School in Heanley Lane.

Hurley already floods in some of the areas they are using.

Severn Trent needs to justify why there is a dog leg on the map to go in to Hurley Village and look for an alternative route to release Hurley Village of this up evil and distribution to all.

Yours sincerely

J. E Thomas

Councillor Jean Thomas
Chair
Kingsbury Parish Council

From: parishclerk@mancetterparishcouncil.gov.uk
To: [Grand Union Canal](#)
Cc: [REDACTED]
Subject: Environmental Impact Assessment Scoping Report feedback
Date: 28 April 2025 15:13:57
Attachments: [image002.jpg](#)

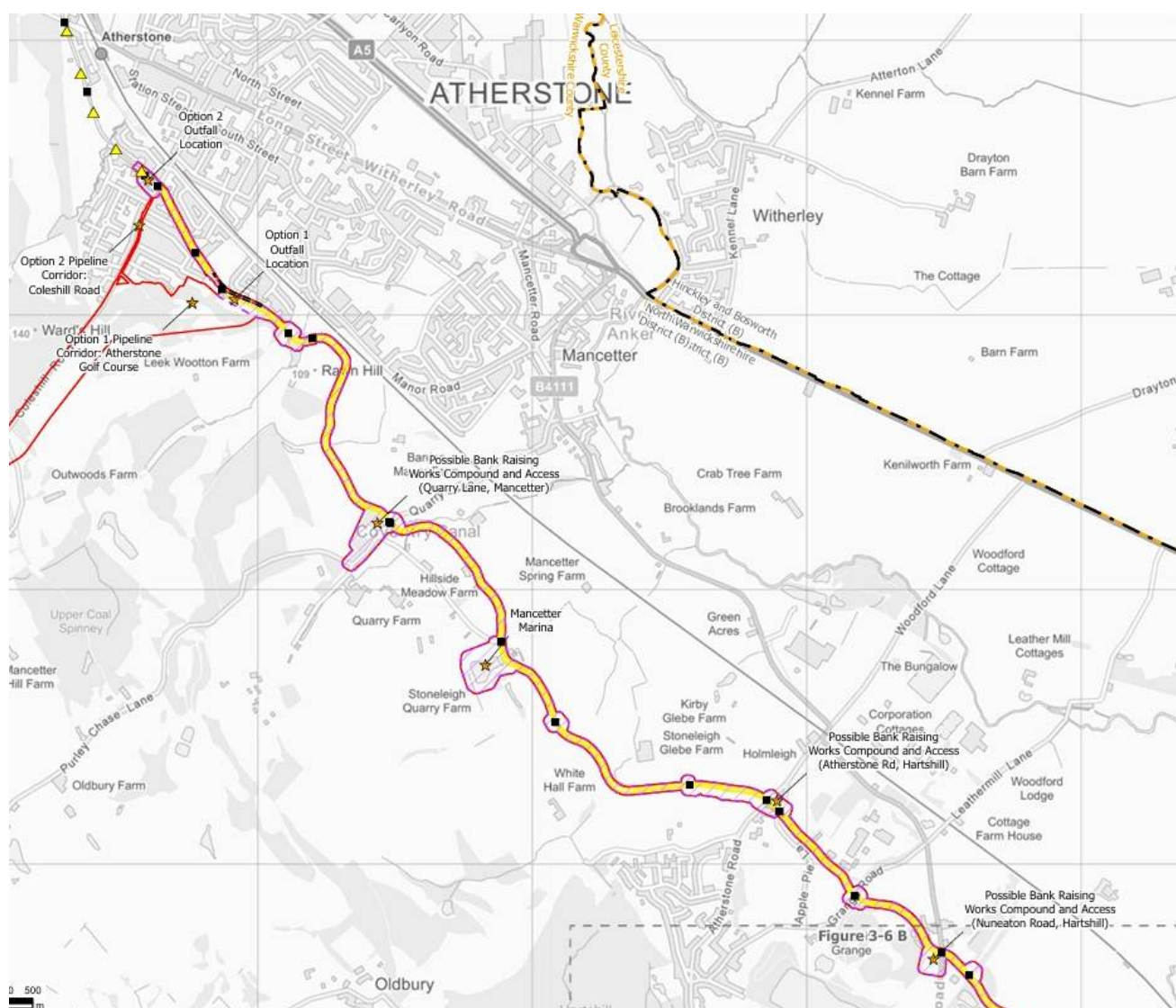
You don't often get email from parishclerk@mancetterparishcouncil.gov.uk. [Learn why this is important](#)

Good Afternoon,

Mancetter Parish Council have read through the 92 pages of the Environmental Impact Assessment scoping report. Following on from a productive meeting with two members of the Severn Trent team, we were able to focus on part 1b relating to land directly within Mancetter Parish.

We note from page 65 of the Indicative layout plans, references to two locations for a works compound and access along Quarry Lane.

The use of the former Quarry Site prior to full restoration, would potentially lessen the impact on nearby agricultural land and afford some protection for the investigate work taking place in this area, around the location of the Battle of Watling Street between Boudicca and the Romans. The 97 hectares that make up these sites are an ideal place to replace and enhance the natural habitat, as part of the 10% target for Biodiversity Net Gain.



Registered Office:
Mancetter Memorial Hall
Old Farm Road
Mancetter

Warwickshire
CV9 1QN



parishclerk@mancetterparishcouncil.gov.uk
www.mancetterparishcouncil.gov.uk

Usual Working Hours Monday - Friday 9.30am - 2.30pm

Zero Tolerance

Our workers have the right to be treated with dignity and respect at all times. They should be able to do their job without being physically or verbally abused. Most people respect this.

Thank you for being one of them.

The Planning Inspectorate

Via email to:

GUTransfer@planninginspectorate.gov.uk

28th April 2025

Our Ref: PLN/2025/0711

Your Ref: WA0210001

Dear Planning Inspectorate,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

I write in relation to the consultation on the Scoping Opinion for the above development.

Milton Keynes City Council has reviewed the applicant's EIA Scoping Report (Grand Union Canal Transfer Environmental Impact Assessment Scoping Report, dated: 31/03/2025).

In general, it is considered that the Scoping Report clearly sets out a comprehensive scope within each topic area for inclusion within the Environmental Statement. Comments have been received from specialist officers within the Council. The following specific comments relating to each chapter are noted below:

Chapter 1: Introduction

No specific comments on the scope of assessment required.

Chapter 2: Legislation and Planning Policy Context

No specific comments on the scope of assessment required.

Chapter 3: Description of the Proposed Development

No specific comments on the scope of assessment required.

Need to contact us?

planning.services@milton-keynes.gov.uk

01908 691691

Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ

www.milton-keynes.gov.uk

Chapter 4: Consideration of Alternatives

No specific comments on the scope of assessment required.

Chapter 5: Consultation

No specific comments on the scope of assessment required.

Chapter 6: EIA Approach

No specific comments on the scope of assessment required.

Chapter 7: Other Assessments**MKCC Ecology comments on Biodiversity Net Gain:**

Statutory Biodiversity Net Gain (BNG) for NSIPs is due to come into force in November 2025. If permission is granted prior to the commencement of statutory biodiversity net gain for NSIPs, it is expected the project would provide net gains for biodiversity in line with local policy. It is also expected that faunal enhancement features would be provided in line with local requirements set out in the Biodiversity Supplementary Planning Document (SPD).

Chapter 8: Agriculture and Soils

No specific comments on the scope of assessment required.

Chapter 9: Air Quality and Odour

No specific comments on the scope of assessment required.

Chapter 10: Climate**MKCC Sustainable Construction & Site Waste Management comments:**

It is considered that the Scoping Opinion information appropriately addresses the environmental effects of the proposal with respect to pollution, the environment, and climate change. The generation of waste by the development should be considered by way of an Outline Site Waste Management Plan at the application stage and a detailed Site Waste Management Plan thereafter. The proposed scope of the EIA with respect to pollution, the environment, and climate change is considered to be appropriate.

Chapter 11: Cultural Heritage**MKCC Conservation Officer comments:**

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

MKCC Archaeology comments:

Parts 2, 4a, and 4b of the proposed scheme have potential indirect impacts on heritage assets of archaeological interest within the Milton Keynes City area. Parts 2 and 4b also have potential direct impacts.

The scope of assessment is considered appropriate. In relation to Part 4b, the inclusion of the following is particularly welcomed:

- Aerial photographic and LiDAR assessment,
- Geophysical surveys,
- Geoarchaeological deposit modelling and monitoring,
- Trial trench evaluation.

Further engagement with archaeological officers is encouraged as the project progresses.

Chapter 12: Ecology – Aquatic

MKCC Ecology comments:

Blue Lagoon Local Nature Reserve (LNR) is scoped into the Aquatic ES Chapter on the basis of direct impacts to qualifying features during construction and potential changes to water quality and hydrological connectivity during operation. However, the terrestrial ES Chapter does not consider Blue Lagoon LNR at all, which is inconsistent as the terrestrial assessment does include hydrological impacts. A full explanation is required to address the inconsistency between the aquatic and terrestrial chapters regarding impacts on Blue Lagoon LNR.

Chapter 13: Ecology – Terrestrial

MKCC Ecology comments:

Both the aquatic and terrestrial assessments fail to identify Milton Keynes Wildlife Corridors within the scope of non-statutory designated sites. Milton Keynes Wildlife Corridors are equivalent to Local Wildlife Sites and must be assessed. The Grand Union Canal forms a critical wildlife corridor through Milton Keynes and will be impacted by the proposals. It is imperative that impacts on the wildlife corridor are assessed and that appropriate mitigation and/or compensation measures are put in place to maintain its ecological functionality in accordance with local policy.

Regarding habitats and species surveys, while the proposed scope is broadly agreeable, it is expected that bat static detector surveys will be supplemented by night-time bat walkover surveys in line with good practice guidelines.

Chapter 14: Ground Conditions

No specific comments on the scope of assessment required.

Chapter 15: Human Health

No specific comments on the scope of assessment required.

Chapter 16: Landscape and Visual

MKCC Landscape Architect comments:

An objection is raised to any routing of the pipeline through the proposed Brickhill's Special Landscape Area (SLA). While the principle of the development is accepted, the pipeline route through the Brickhill's SLA is not supported.

The scoping report acknowledges that consultation with local planning authorities and statutory consultees will take place during the LVIA process to inform viewpoint selection and mitigation approaches. Landscape officers would welcome early discussions on viewpoint selection, though sample photographs have not yet been provided.

- Viewpoints near VP24 (Fenny Lock) and VP29 (Little Brickhill) are provisionally accepted, subject to further review once detailed designs are known.
- Viewpoints should also include the new housing at Eaton Leys, Waterhall Park, and views of the pipeline route through the Brickhill's SLA.

The Zone of Theoretical Visibility currently only considers the water treatment works near Bletchley and should be expanded to consider changes to landscape character from the pipeline route. The LVIA baseline survey photography must be undertaken in winter.

References in the LVIA chapter must include:

- *Milton Keynes Landscape Character Assessment (May 2022)*
- *Milton Keynes Review of Local Landscape Designations (May 2024)*

Assessment of impacts must include:

- Landscape and visual impacts from tree and hedgerow removal for pipe laying,
- Loss of landscape features where easements prevent replanting,
- Visual impacts from new infrastructure such as pumping stations.

Wherever possible, trenchless construction techniques rather than open-cut trenching should be used in sensitive areas. Future public consultation documents and the EIA must factor in the proposed Special Landscape Areas designated in the 2024 evidence base.

Route option SP2 through the Brickhill's SLA should be avoided. If unavoidable, trenchless methods must be employed to minimise harm.

Chapter 17: Major Accidents and Disasters

No specific comments on the scope of assessment required.

Chapter 18: Noise and Vibration

No specific comments on the scope of assessment required.

Chapter 19: Socio-economics

No specific comments on the scope of assessment required.

Chapter 20: Traffic and Transport

MKCC Local Highway Authority comments:

The NSIP proposes a water transfer scheme from the Midlands to Luton/Dunstable. A small section of the scheme could fall within Milton Keynes (Water Eaton and Little Brickhill areas).

Local transport impacts are likely to be limited. The scoping report appropriately identifies that the construction phase will generate the greatest impacts, with minimal operational phase impacts expected.

The scope for assessment of Non-Motorised User (NMU) impacts and general traffic impacts, including for both construction and operation phases, is considered appropriate. No objections are raised to the scheme proceeding to the next stage based on transport grounds.

Chapter 21: Waste

MKCC Sustainable Construction & Site Waste Management comments:

The proposed scope for the EIA concerning the production of waste is supported. It is appropriate that the generation of waste should be addressed through an Outline Site Waste Management Plan at application stage and a more detailed Site Waste Management Plan thereafter.

Chapter 22: Water Environment and Flood Risk

MKCC Lead Local Flood Authority (LLFA) comments:

The Environmental Impact Assessment Scoping Report includes information regarding the water environment proposals. The principles of surface water drainage outlined are acceptable; however, the LLFA expects a full Flood Risk Assessment (FRA) and/or Surface Water Drainage Strategy at the application stage. This must include:

- How the surface water scheme follows the drainage hierarchy,
- Pre-development runoff rates,
- Post-development runoff rates and calculations,
- Discharge location(s),

- Drainage design calculations,
- Drawings including sub-catchment breakdowns,
- Maintenance and management plans for the lifetime of the development.

The applicant must also demonstrate compliance with local policies and Strategic Flood Risk Assessments (SFRA).

The LLFA raises a specific query about how the Grand Union Canal Transfer project could impact other developments intending to discharge into the Grand Union Canal, including the Bedford-Milton Keynes Waterway Park. Clarity is needed on whether adjacent developments would require greater water quality treatment or revised discharge principles.

Further detailed points include:

- Sustainable Drainage Systems (SuDS) must be preferred over conventional piped systems,
- Land Drainage Consent will be required for works affecting ordinary watercourses,
- Riparian Ownership Responsibilities must be acknowledged,
- Internal Drainage Board (IDB) Consent may be required,
- Pollution Controls during Construction must be appropriately considered with interceptors included.

Chapter 23: Structure of Environmental Statement

No specific comments on the scope of assessment required.

Chapter 24: Summary

No specific comments on the scope of assessment required.

This letter forms the Council's response to the applicant's Scoping Report.

Yours sincerely

Nathan Makwana
Senior Planning Officer
Development Management
on behalf of the Head of Planning

From: [REDACTED]
To: [Grand Union Canal](#)
Subject: 20250423_MOD_Response_WA0210001_DIO_10066910
Date: 23 April 2025 11:31:05

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FAO: [REDACTED]

Thank you for consulting the Ministry of Defence (MOD) on Section 36 Scoping Opinion reference WA0210001, MOD reference DIO 10066910.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I can confirm that, following review of the application documents, the proposed development would be considered to have no detrimental impact on the operation or capability of a defence site or asset. The MOD has no objection to the development proposed.

The MOD must emphasise that this email is provided specifically in response to the application documents and supporting information provided on the Planning Inspectorate website as of the date of this email.

Amendments to any element of the proposed development (including the location, dimensions, form, and/or finishing materials of any structure) may significantly alter how the development relates to MOD safeguarding requirements and may result in detrimental impact(s) on the operation or capability of defence sites or assets.

In the event that any:

- revised plans;
- amended plans;
- additional information; or
- further application(s)


are submitted for approval, the MOD, as a statutory consultee, should be consulted and provided with adequate time to carry out assessments and provide a formal response whether the proposed amendments are considered material or not by the determining authority.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Best wishes,

[REDACTED] | Estates Safeguarding Officer

Defence Infrastructure Organisation
Estates | Safeguarding
DIO Head Office | St George's House | DMS Whittington | Lichfield | Staffordshire | WS14 9PY
Email: [REDACTED]

Tiffany Bate
Development Liaison Officer
Land, Planning and External Affairs
 [\[REDACTED\]@nationalgrid.com](mailto: [REDACTED]@nationalgrid.com)

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
GUCtransfer@planninginspectorate.gov.uk

28 April 2025

Dear Sir/Madam

APPLICATION BY AFFINITY WATER AND SEVERN TRENT (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE GRAND UNION CANAL TRANSFER PROJECT (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

I refer to your letter dated 31st March 2025 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure in close proximity to the current red line boundary.

NGET has high voltage electricity substation, overhead transmission lines and underground cables within close proximity the scoping area. The substation and overhead lines forms an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure

Substation

- HAMS HALL 275 kV Substation
- HAMS HALL 400 kV Substation
- Associated overhead and underground apparatus including cables
- LONG BUCKBY 25 kV Substation

Overhead Lines

4YJ 400 kV OHL

EAST CLAYDON - LEIGHTON BUZZARD - SUNDON
COWLEY - LEIGHTON BUZZARD - SUNDON

ZA 400 kV OHL	GRENDON - SUNDON 2
ZL 400 kV OHL	EAST CLAYDON - ENDERBY - PATFORD BRIDGE 1 EAST CLAYDON - ENDERBY - PATFORD BRIDGE 2
4WP 400 kV OHL	COVENTRY - RATCLIFFE ON SOAR HAMS HALL - WILLINGTON EAST
ZF 400 kV OHL	DRAKELOW - HAMS HALL BERKSWELL - OCKER HILL
4VU 400 kV OHL	COVENTRY - NECHELLS 1 HAMS HALL - NECHELLS 2

Cable Apparatus

- PATFORD BRIDGE 400 kV Substation. LONG BUCKBY WHARF 3 25 kV underground cable. PAFB41LK
- Cable Fibre. Reference: 8323
- BERKSWELL-OCKER HILL CABLE A. Ref: BESW2 OCKH2 1 K1 01.
- Cable Fibre. Reference: 5883

I enclose a plan showing the location of NGET's apparatus in the scoping area.

New infrastructure

Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network. <https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd>

NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects>. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 5 (2019)”.
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above.
- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

To download a copy of the HSE Guidance HS(G)47, please use the following link:
<http://www.hse.gov.uk/pubns/books/hsg47.htm>

Further Advice

We would request that the potential impact of the proposed scheme on NGET's existing and future assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.

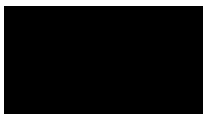
Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully



**Tiffany Bate
Development Liaison Officer
Customer Connections
Land, Planning and External Affairs**



Legend

Buried Cable

Buried Cable

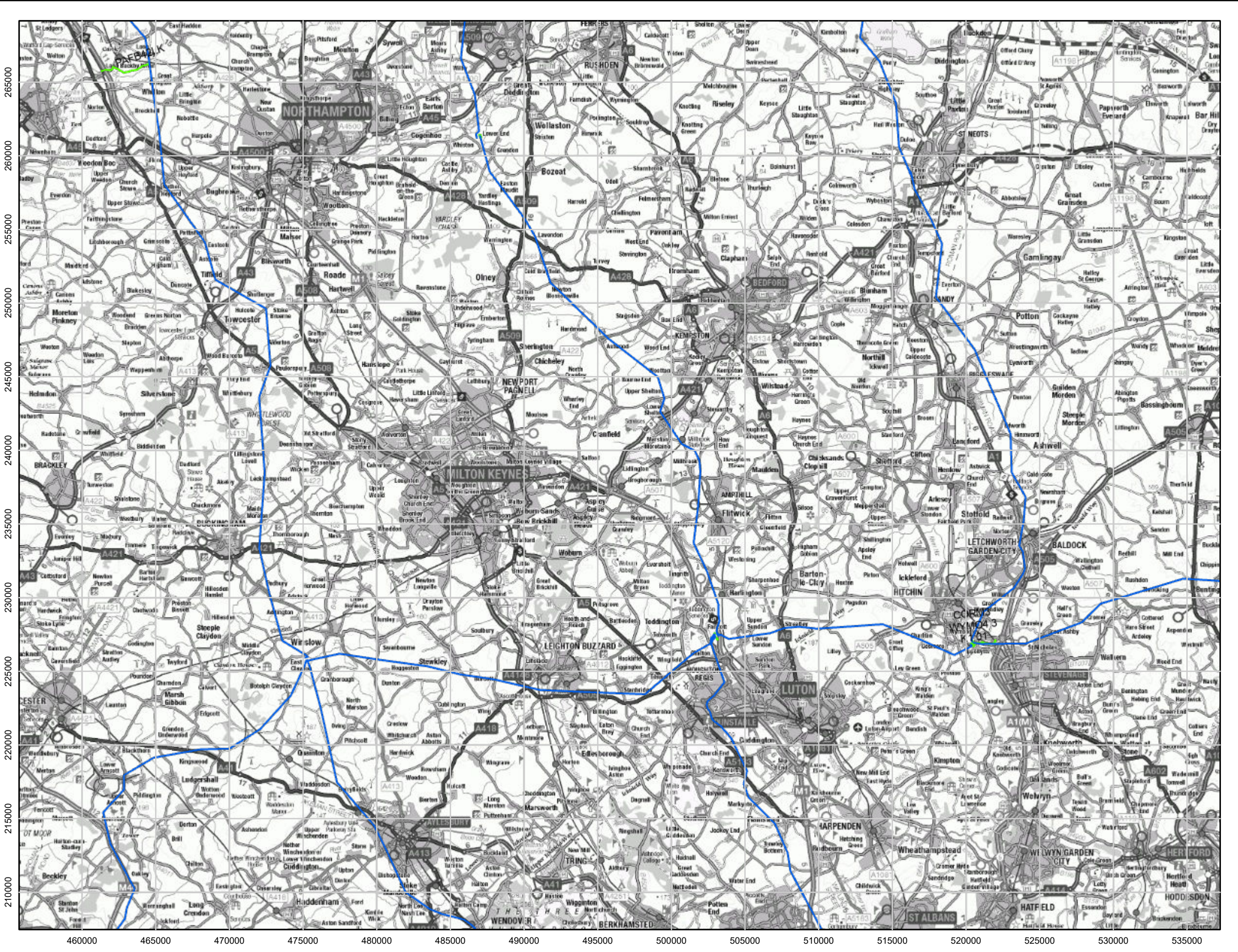
Commissioned

OHL 400kV

OHL 400kV

Commissioned

Notes





Legend

Buried Cable

Buried Cable

Commissioned

OHL 132Kv & Below

OHL 132Kv & Below

Commissioned

OHL 275Kv

OHL 275Kv

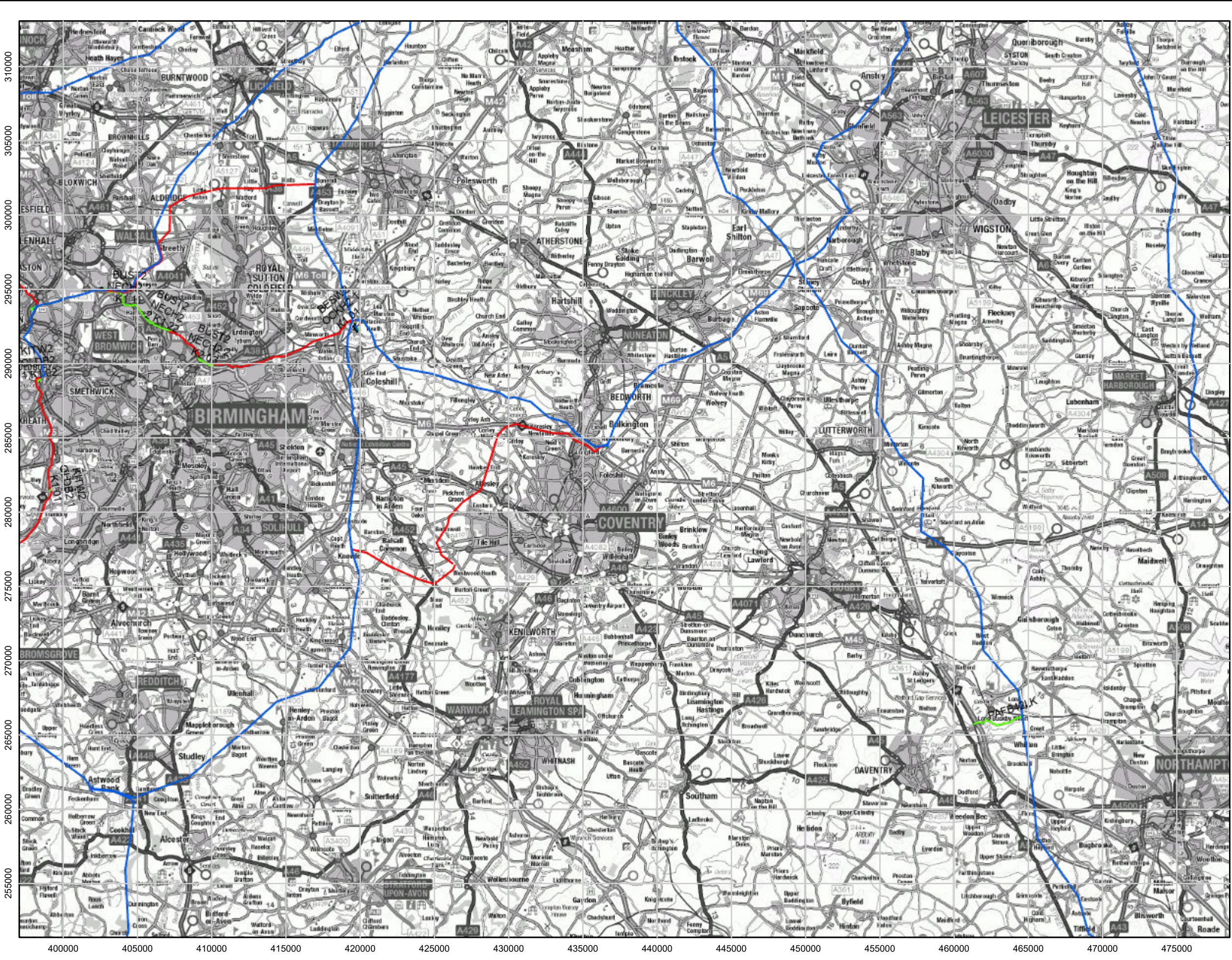
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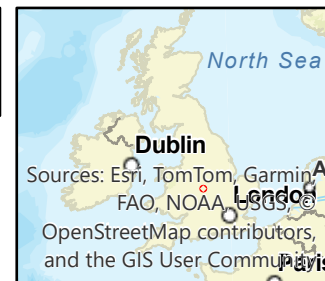
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Commissioned

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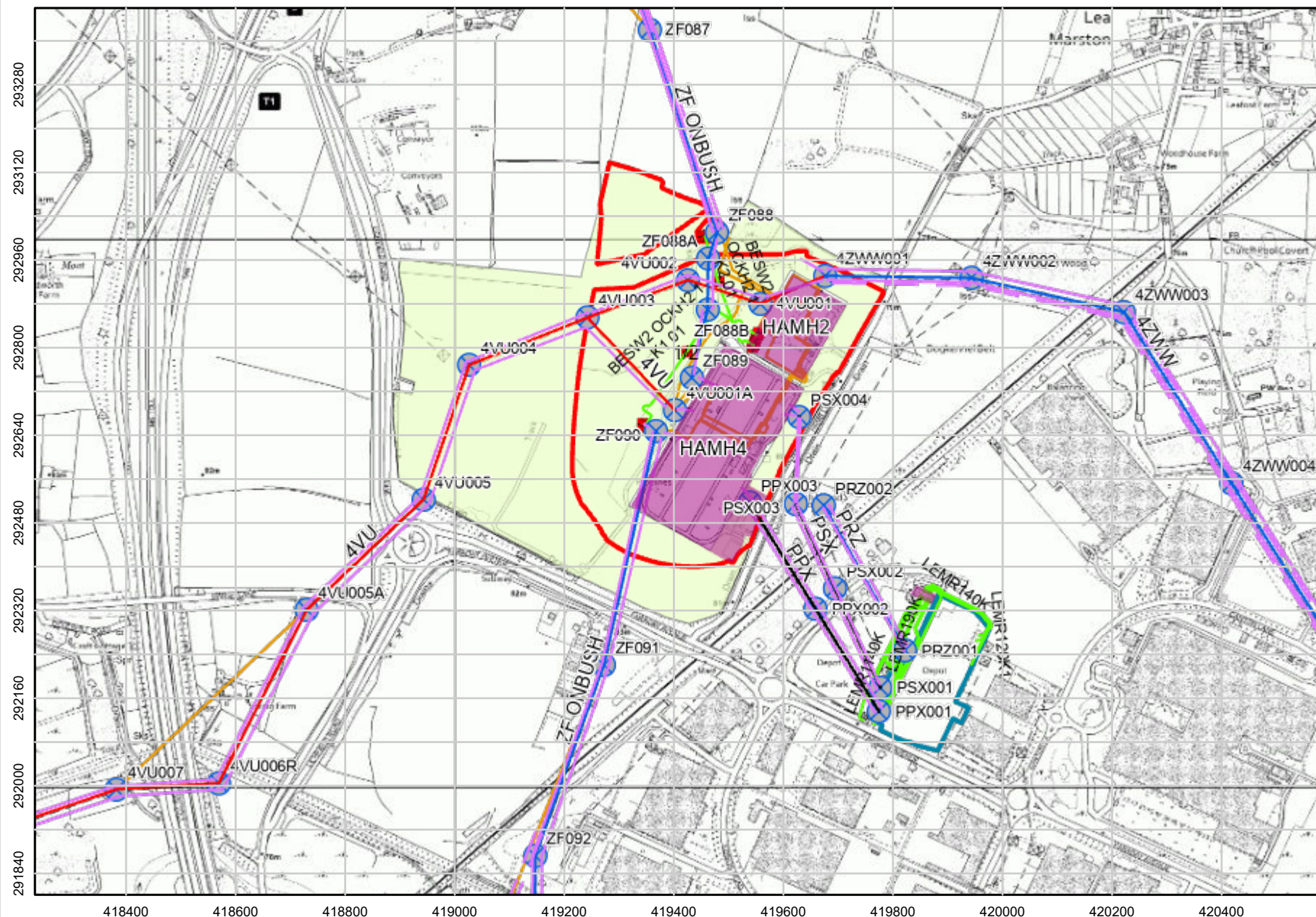




Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Legend

Electric Land Ownership	Towers
Tenancy	Towers Commissioned
Electric Land Ownership - Leasehold	OHL 132Kv & Below
Electric Land Ownership - Freehold	OHL 132Kv & Below Commissioned
Telecoms	OHL 275Kv
RAMM	OHL 275Kv Commissioned
Cable Accessories	OHL 400Kv
Joint Bay	OHL 400Kv Commissioned
Link Box	OHL Circuits
Oil Tank	Commissioned
Fibre Cable	Decommission
Buried Cable	Group
Buried Cable Commissioned	Substations
	Substations Commissioned

Notes

0 0.4 0.8 1.6 2.4 3.2 km

OS Disclaimer: Background Mapping information has been reproduced from the Ordnance Survey map by permission of Ordnance Survey on behalf of The controller of His Majesty's Stationery Office. ©Crown Copyright Ordnance Survey National Grid Electricity Transmission (100024241) & National Gas Transmission (100024886)

Date: 10/25/2024 Page size: A4 Landscape
Time: 3:33 PM Printed By: Tiffany.Bate
Scale: 1:10,000



NG Disclaimer: National Grid UK Transmission. The asset position information represented on this map is the intellectual property of National Grid PLC (Warwick Technology Park, Warwick, CV346DA) and should not be used without prior authority of National Grid.
Note: Any sketches on the map are approximate and not captured to any particular level of precision.

Our ref: NH/25/10817
Your ref: WA0210001

Grand Union Canal Transfer Project

Eve Gibson-Field
Assistant Spatial Planner
The Cube
199 Wharfside Street
Birmingham
B1 1RN

Tel: 0300 470 8319

Monday 28 April 2025

Via email: guctransfer@planninginspectorate.gov.uk

Dear Karen Wilkinson

Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development).

National Highways welcomes the opportunity to review and comment the Environmental Impact Assessment (EIA) Scoping Report regarding the forthcoming planning application for the above proposal.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In responding to strategic sustainable development consultations, we have regard to DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of plans and development management proposals. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

The Grand Union Canal Transfer project will transfer surplus water from Severn Trent's supply area to areas of water deficit in Affinity Water's supply area. Recycled water will be treated in a new Advanced Water Treatment Plant (AWTP) before being transferred east, to the north-east of Birmingham and discharged into the Coventry Canal. Thereafter, the existing Oxford and Grand Union canals, in addition to their navigation role, will convey water to an abstraction point on the canal network south of Milton Keynes, where water will be stored and further treated prior to its entry into Affinity Water's distribution

system to the west of Luton. The project is linear in nature and extends to approximately 160km.

National Highways undertook a review of the Proposed Development, and comments are outlined below. This response also provides details of National Highways' requirements to enable the developer's consultants to prepare the relevant supporting documents for the DCO application. The EIA Scoping Report provides limited information regarding the assessment of the SRN and therefore, in addition to reviewing the information provided, this response includes further recommendations / to consider as part of a Transport Assessment (TA), which is proposed to be provided during the forthcoming stages of the DCO application.

Site Location / Study Area

Section 20.4 of the EIA Scoping Report sets out the study area for the Proposed Development, proposed to encompass any roads and PRowS intersected by the EIA Scoping Boundary. The Traffic and Transport Scoping Chapter is supported by Figures 20-1 to 20-6 and Appendix 20-1, which outline the road links to be affected by the Proposed Development, either in respect of temporary closures / diversions or temporary increase in traffic flow. It is noted that the chosen study area is yet to be fully established and will be dependant on construction traffic routes and potential closures (and associated diversions) to road links, associated with the Proposed Development. This information will be presented at the PEIR and ES stages of the DCO application. It is expected that this will identify any likely effects on the SRN.

A review of Figures 20-1 to 20-6 and Appendix 20-1 suggests there are multiple links within the SRN which are anticipated to be impacted by the Proposed Development. National Highways will have a particular interest in understanding the detailed impacts on the SRN at these locations, whether it be related to route closures and / or temporary increase in traffic flow.

Planning Context

The EIA Scoping Report refers to several local and national policy and guidance documents. It is also recommended that reference is made to the DfT Circular 01/2022, which guides how the impact of the Proposed Development on the SRN should be assessed, together with 'The strategic road network and the delivery of sustainable development (National Highways and the strategic road network)'.

Consultation

Section 20.3 of the EIA Scoping Report sets out that consultation will be undertaken with National Highways during the PEIR and ES stages, which is welcomed. National Highways is particularly concerned with the traffic-related effects at all sections of the SRN that intercept the Proposed Development study area.

Establishing Baseline Conditions

In addition to the use of publicly available information to inform the traffic and transport baseline, Section 20.7 of the EIA Scoping Report indicates a potential necessity to conduct traffic surveys at roads / junctions which are likely to experience a significant traffic impact. Any requirement for traffic surveys should be agreed with National Highways, with respect to roads / junctions forming part of the SRN.

Traffic count data should be included that reflects the typical (neutral) flow conditions on the network (for example, non-school holiday periods, typical weather conditions, etc) in the Study Area and should be valid for the intended purposes.

Assessment Scenarios

An assessment is proposed to be undertaken for the anticipated peak construction period, in order to provide a worst-case scenario. This approach is accepted. As referenced later in this response, an assessment of the operational phase is proposed to be scoped out.

The Applicant should consider the use of the most recent version of TEMPro factors to be applied to baseline flows for future assessment years as an appropriate tool in order to apply anticipated growth in the area to the road network. The version of TEMPro, road type and geographical area used should be presented within the Transport Assessment to allow the relevant checks to be undertaken upon review.

National Highways also seeks to be included in any discussions related to committed schemes within the vicinity of the SRN, and will review the full list of committed schemes once this has been confirmed.

Assessment Methodology

IEMA guidance will be used to measure the environmental impacts from traffic, which is welcomed. The scope of the highway network is proposed to be assessed based on the two Rules set out in the IEMA guidance:

- Rule 1: include highway links where flows increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and
- Rule 2: include any other specifically sensitive areas (e.g., accident black spots, conservation areas, hospitals, links with high pedestrian flows etc.) where traffic flows have increased by 10% or more.

The EIA Scoping Report indicates that magnitude of change will be assessed during each of the development peak hours. It would be expected that magnitude of change is also assessed across a 24-hour period, for the anticipated peak construction year. As indicated by Rule 1, the number and proportion of HGV's should be identified.

Construction Phase

For the construction phase assessment, all aspects of the IEMA assessment criteria have been scoped in aside from abnormal / hazardous loads. National Highways requests that once further information is known, the elements of the assessment criteria scoped in/out are amended accordingly.

Section 20.8 of the EIA Scoping Report indicates that transport and traffic impacts will primarily be associated with the delivery of materials and associated contractor movements to and from construction compounds. A daily breakdown of vehicle trips by type during the construction period should be provided.

Once determined, a review of proposed methodology for distribution and assignment of construction traffic can be undertaken by National Highways as part of ongoing discussions.

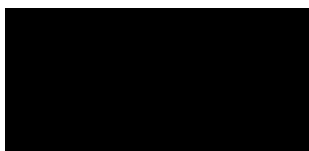
Operational Phase

Due to the nature of the Proposed Development, it is acknowledged that traffic associated with the operational phase will be minimal and largely attributed to maintenance visits. Table 20-4 of the EIA Scoping Report proposed to scope out all traffic and transport matters associated with operation of the Proposed Development. This is considered to be an acceptable approach and we are content that operational traffic is unlikely to have an impact on the SRN.

It is important to note that these comments imply no pre-determined view of the acceptability of the Proposed Development in traffic, environmental or highway terms and that these comments relate specifically to matters arising from National Highways' responsibilities to manage and maintain the SRN in England in line with DfT's Circular 01/2022 to support sustainable delivery of growth. Comments relating to the Local Road Network should be sought from the Local Highway Authority.

If I can be of any further assistance on this matter, please do not hesitate in contacting me.

Yours sincerely,



Eve Gibson-Field
Midlands Operations Directorate
Email: [REDACTED]@nationalhighways.co.uk

From: [REDACTED]
To: [Grand Union Canal](#)
Subject: RE: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation [SG39193]
Date: 02 April 2025 09:51:51
Attachments: [REDACTED]

You don't often get email from [REDACTED] [Learn why this is important](#)

Our Ref: SG39193

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

[REDACTED]

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL

[REDACTED]



NATS Internal

From: Grand Union Canal <GUCtransfer@planninginspectorate.gov.uk>

Sent: 31 March 2025 11:01

Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached correspondence on the proposed Grand Union Canal Transfer.

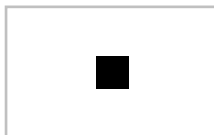
The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **28 April 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

[Redacted]



[Redacted]
EIA Advisor
The Planning Inspectorate
T [Redacted]



@PINSgov



The Planning Inspectorate



planninginspectorate.gov.uk

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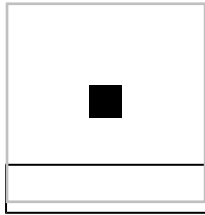
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Date: 25 April 2025
Our ref: RAPID - A015668/A015674
Your ref: WA0210001 The Grand Union Canal Transfer



Karen Wilkinson
Senior EIA Advisor
on behalf of the Secretary of State
The Planning Inspectorate
GUCtransfer@planninginspectorate.gov.uk

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

BY EMAIL ONLY

Dear Ms Karen Wilkinson,

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: The Grand Union Canal Transfer

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 31 March 2025, received on 01 April 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development. The Environmental Statement (ES) should particularly consider the following:

- Water Quality
- Protected Species
- Environmental Data
- Ancient Woodland
- Protected Sites
- National Landscapes

Detailed advice on scoping the Environmental Statement is available in the attached Annex.

Natural England welcome further engagement from the Applicant with pre-application through our Discretionary Advice Service.

For further advice on this consultation please contact the lead case officers Gillian Driver and Gertruda Zieniute and copy to consultations@naturalengland.org.uk.

Yours sincerely



Claire Minett
Principal Manager
West Midlands Area Team

Annex A – Natural England’s Advice on EIA Scoping

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1.0 Cumulative and in-combination effects

1.1 In-Combination/Cumulative impacts

The Environmental Statement should fully consider the implications of the whole development proposal including all supporting works and infrastructure, and any other developments which in the area which may contribute to in-combination or cumulative impacts.

We welcome section 6.9 in the Grand Union Canal EIA Scoping Report - Volume 1 and appendix 6-1 in Volume 3, where a cumulative effect assessment is discussed. We advise this is updated for the Environmental Statement to include any new developments, including those which are reasonably foreseeable, which may cause in-combination or cumulative impacts. These should include:

- a. existing completed projects
- b. approved but uncompleted projects
- c. ongoing activities
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before this project is consented.

2.0 Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

3.0 Biodiversity and geodiversity

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) and an [EclA checklist](#) have been developed by the

4.0 Designated nature conservation sites

The Environmental Statement should thoroughly assess the potential for the proposal to directly or indirectly affect nationally and internationally designated sites of nature conservation importance. This should be in accordance with the 'avoid, mitigate, compensate' hierarchy requirements as set out in the National Planning Policy Framework (NPPF) (paragraph 193). If impacts cannot be avoided, the options with the least impact should be fully explored.

Further information on designated sites within the National Sites Network is provided below.

4.1 International and European sites

European site conservation objectives are available at <http://publications.naturalengland.org.uk/category/6490068894089216>.

Evidence Plans are a useful mechanism NSIP applicants can use to agree what information should be provided to the Planning Inspectorate and Natural England when undertaking Habitats Regulations Assessment (HRA). Agreeing the evidence-needs of the project early prior to applying for Development Consent will help reduce delays in the process. More information on Evidence Plans is available [here](#).

Natural England's Impact Risk Zones incorporate internationally designated sites and features and can be used to help identify the potential for the development to impact on a European Site. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

The Environmental Statement should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

The development site is within or may impact on the following European/internationally designated nature conservation sites:

- Ensor's Pool SAC
- River Mease SAC
- Humber Estuary SAC / SPA/ Ramsar
- Upper Nene Valley Gravel Pits SPA/ Ramsar site
- Chilterns Beechwoods SAC

Further information on the location of designated sites and their special interest features can be found at www.magic.gov.uk. Further information on European site special interest features, their conservation objectives, and any relevant conservation advice packages for designated sites is available at <http://publications.naturalengland.org.uk/category/6490068894089216> and <https://designatedsites.naturalengland.org.uk>.

4.1.1 Habitats Regulations Assessment

Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a SPA, SAC or Ramsar, either individually or in combination with other plans or projects.

European sites fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended 2019) (the 'Habitats Regulations'). Under Regulation 63 of the Habitats Regulations, an appropriate assessment must be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are qualifying features of the site, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a designated site, for example by being linked hydrologically or geomorphologically.

Should a likely significant effect on a designated site be identified (either alone or in combination) or be uncertain, the competent authority (in this case the Secretary of State) may need to prepare an appropriate assessment in addition to the consideration of impacts through the EIA process.

This should also take into account any agreed strategic mitigation solution that may be being developed or implemented in the area to address recreational disturbance, nutrients, or other impacts.

4.2 Nationally designated sites

4.2.1 Sites of Special Scientific Interest

Sites of Special Scientific Interest (SSSI) are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

The development site is within or may impact on the following Sites of Special Scientific Interest:

- River Mease SSSI,
- Humber Estuary SSSI
- Upper Nene Valley Gravel Pits SSSI
- Ensor's Pool SSSI
- Chilterns Beechwoods SSSI
- River Blythe SSSI;

- Middleton Pool SSSI;
- River Mease SSSI;
- Lockington Marshes SSSI;
- Attenborough Gravel Pits SSSI;
- Holme Pit SSSI;
- Mother Drain, Misterton SSSI;
- Humber Estuary SSSI;
- Whitacre Heath SSSI;
- Kingsbury Wood SSSI;
- Bentley Park Wood SSSI

It is noted Table 14-3 of the Grand Union Canal EIA Scoping Report - Volume 1 does not include Griff Hill Quarry SSSI within the Table Geological sites within EIA Scoping Boundary and the study area, despite being within 110m from Part 2 EIA scoping boundary, and should be included in the scope.

Similarly, Bugbrooke Meadows SSSI was also not listed and needs to be taken into consideration for effects to water quality (deterioration) and hydrological pathways (e.g. reduced flows) during construction due to connectivity of Nene catchment, which includes designated sites such as the Upper Nene Valley Gravel Pits SSSI and the Nene Washes Special Area of Conservation (SAC), to the Grand Union Canal.

Section 9.4.9 of the Grand Union Canal EIA Scoping Report - Volume 1 provides several references to Boon's Quarry as an ecological receptor. Boon's Quarry is notified as a SSSI solely for geology.

These sites should be included within the Environmental Statement, or justification given if they are excluded.

5.0 Regionally and Locally Important Sites

We are aware that the applicant has considered regionally and locally important sites through our current engagement. The Environmental Statement should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.

6.0 Protected Species

6.1 Protected Species Advice

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).

Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing [Natural England wildlife licences](#). Applicants can also make use of Natural England's charged service [Pre Submission Screening Service](#) for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information

reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See [Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning](#) for details of the LONI process.

The Environmental Statement should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the Environmental Statement. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

Regarding 13.2.6 of the Grand Union Canal EIA Scoping Report - Volume 1, Standard Advice for Protected species has been updated (April 2025), and as baseline ecological surveys have been undertaken, reference should be made to all guidance used for species, and subsequently updated as further assessment is undertaken.

6.2 Water Vole

Natural England has previously highlighted concerns regarding impacts on water vole populations in the proposed route of the Grand Union Canal Transfer project.

We advise consideration of the current guidance on survey methodology, as eDNA surveys cannot be relied on in isolation to confirm presence/absence of water voles. This has been discussed in pre application engagement. Natural England welcomes the survey effort provided in pre application engagement. Depending on the commencement of works, further survey effort may be required to update findings prior to a licence application.

Section 13.3.2 of the Grand Union Canal EIA Scoping Report - Volume 1 relates to mitigation strategies. Natural England was previously consulted and gave advice on mitigation requirements but how this has been taken into consideration has not been incorporated in Consultation (13.3.4). Natural England's advice is that capture of water voles should be a last resort, and mitigation and other alternatives should be sought before considering this approach. Where functional, suitably connected mitigation areas for water vole are required, these should be in place prior to impact. NEWLS welcomes further engagement on a suitable mitigation approach to water voles.

6.2 Other Protected Species and Surveys

In Table 13-3 of the Grand Union Canal EIA Scoping Report - Volume 1 the desk study area distance is 2km. We recommend reviewing this to account for international designated sites and for species specific behaviours for example up and downstream impacts and foraging

habitats.

Natural England advises current guidelines on study distances for bat roosts and associated habitat should be referred to. Other ecological assessments, including habitats, botanical features, habitat condition assessment, breeding birds, terrestrial invertebrates, reptiles and bat activity should be linked to the Zone of Influence, to ensure assessment of any potential indirect disturbance.

7.0 Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement
- Trends in condition, distribution and population size

Regarding aquatic species, please be aware of sensitive species of fish within the development's boundary, and the river system affected by the export of water. These include Atlantic Salmon, Brook Lamprey, European Eel, Glass Eel, ammocoete, and Lamprey sp.

Appropriate consideration of all priority species and habitat affected should be included in the Environmental Statement.

8.0 Ancient Woodland, ancient and veteran trees

The chosen route of the development passes through and adjacent to ancient woodland habitat. The Environmental Statement should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

Natural England maintains the [Ancient Woodland Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

The Environmental Statement should give consideration to the study area distance of 200m for Ancient woodland and UK priority habitats where banks will be raised, to assess for any impacts relating to changes in the local hydrology and ground water

9.0 Biodiversity net gain

The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025. Some organisations have made public BNG commitments, and some projects are already delivering BNG on a voluntary basis.

The biodiversity baseline should include all land contained within the site's red line. We encourage developers to:

- Develop BNG proposals in adherence with well-established BNG principles:
 - BS 8683:2021 Process for designing and implementing Biodiversity Net Gain
 - CIEEM/IEMA/CIRIA good practice principles (2016) and guidance (2019).
- Use the statutory metric to calculate BNG and adhere to the rules and principles set out within the metric guidance¹.

Biodiversity gains should be secured for a minimum of 30 years and be subject to adaptive management and monitoring. BNG plans should be secured as a requirement in the DCO.

10.0 Landscape

10.1 Nationally designated landscapes

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The development site is within or may impact on the The Chilterns National Landscape,

¹ [Statutory biodiversity metric tools and guides - GOV.UK](#)

previously Area of Outstanding Natural Beauty/National Park. This will need to be considered in the Environmental Statement. More information can be found in [The Chilterns Profile](#) publication.

Public bodies have a duty to seek to further the statutory purposes of designation in carrying out their functions (under section 245 of the Levelling Up and Regeneration Act 2023). This duty also applies to proposals outside the designated area but impacting on its natural beauty.

Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.

11.0 Landscape and visual impacts

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by LI and IEMA. For National Parks and National Character Areas/AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

12.0 Heritage landscapes

The Environmental Statement should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital

taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

13.0 Connecting people with nature

The Environmental Statement should consider potential impacts on access land, common land, public rights of way, in line with NPPF paragraph 104 and section 4.10.21 of the [Water Resources National Policy Statement](#) (2023). It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

14.0 Soils and agricultural land quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

The following issues should be considered and, where appropriate, included as part of the Environmental Statement:

- The degree to which soils would be disturbed or damaged as part of the development.
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The Environmental Statement should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.

- The Environmental Statement should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

14.0 Air quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)²¹. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts of air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Natural England has produced guidance for public bodies to help assess the impacts of road traffic emissions to air quality capable of affecting European Sites. [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001](#)

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development
<https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions
<https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) –

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

15.0 Water quality

NSIPs can occur in areas where strategic solutions are being determined for water pollution issues and they may not have been factored into the local planning system as they are delivered through National Policy Statements.

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The Environmental Statement needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

15.1 Water Flows and Levels

Section 22.5.41 of the Grand Union Canal EIA Scoping Report - Volume 1 shows there is a high risk to the water flows and levels in the Tame, Trent and Humber as stated within the EIA. It has been suggested that Hands off Flow (HoFs) will be used to protect environmental flows and previous reports have highlighted that the number of days when HoF has to be applied will be increased. Prolonged periods of low-flow conditions could cause large shifts within the ecology of the rivers e.g. kick-start earlier migration periods, algal blooms, encourage siltation and erosion. We advise that future assessments take a more holistic approach to evaluating the risk of low flows to the ecology and fluvial geomorphological processes. Protected sites and species should not be assessed in isolation, but also alongside the habitat they depend on, such as for food sources.

Section 3.5.60 of the Grand Union Canal EIA Scoping Report - Volume 1 demonstrates existing canal waste weirs already pose a large risk to surrounding protected sites and nature reserves from a point of poor Water Quality and INNS. The Environmental Statement should ensure clarity as to how water level can be managed to reduce risks to other water bodies. This could be a significant opportunity to provide local benefits and could be explored in the form of alternative water level management practices, including lower levels in winter to accommodate for increased rainfall.

In general, waste weirs pose a large and currently unmanaged risk to the wider environment from increased silt, poor Water Quality and spread of Invasive Non-Native Species (INNS). Unless addressed properly, that risk would increase even further as the canal infrastructure will be carrying more water.

15.2 Climate Considerations

Due to climate change conditions which are already impacting river flows on the Trent, the Environmental Statement should consider the impacts of constant HoF requirements on the River.

15.3 Connectivity

Table 24-5 of the Grand Union Canal EIA Scoping Report - Volume 1 demonstrates the complete disconnection cannot be ruled out on the ground of "intervening urban environment". There is a need to consider connectivity through the urban drainage networks, overflows, waste weirs pathways and how bank raising might impact those pathways. There is a new development due to be built near Ensors Pool SSSI with creation of additional water features/wetlands and Sustainable Drainage Systems (SuDS), and these could change flow pathways in the area.

15.4 Water Transfer

The Environmental Statement should provide clarity on how the system will operate during periods of increased droughts to ensure no harm to the Rivers Tame, Trent, and Humber. We advise consideration of a water source if the canal requires additional water. This includes demonstrating that, if reservoirs are utilised, there is sufficient supply to ensure the canals can be operated. We will work with the Applicant to seek clarity on how the use of reservoirs to augment water depth in the Grand Union Canal, such as Drayton Reservoir, will change or be maintained as part of the project. The Environmental Statement should clarify the methodology that would link with drought plans for Severn Trent and Affinity Water.

The Environmental Statement should also clarify whether more water with silt and nutrients will pass into the Grand Union Canal or if it will be diluted. If there are increased levels of silt and sediment then consideration should be given to whether dredging or silt traps should be employed and what mitigation may be required relating to protected species and habitats.

15.5 Maintenance

The Report contains no information regarding the current maintenance regime or future capital maintenance works. The Environmental Statement should highlight if the operation of the canal becomes more or less sustainable, needing increased management, during and following the development works, and whether this will have an ongoing impact on aquatic and protected species that utilise the canal habitat.

16.0 Climate Change

The Environmental Statement should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and, if relevant, peatland restoration, should be considered. The Environmental Statement should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's](#) (CCC) [Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme](#) (NAP), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides

extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The Environmental Statement should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

17.0 Contribution to local environmental initiatives and priorities

The Environmental Statement should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

18.0 General Comments

The EIA Scoping Report is sufficient in terms of process and the information on strategic drivers. It would have been strengthened by reference to other relevant plans such as Flood Risk Management Plans, and to additional baseline information on the receiving environment such as channel dimensions, typical flows, current management regime, presence of assets (other than locks). This information will be required in the Environmental Statement to ensure the assessment criteria are adequate in relation to the significance of predicted changes.

Natural England has provided technical advice on topics during the RAPID consultation process and this should be considered within the Environmental Statement. We note a number of issues raised during the consultation process have not yet been adequately addressed.

The optioneering and detailed design of the project should promote the use of green infrastructure and green engineering, such as erosion protection, to create opportunities for nature and landscape benefits as part of the development.

The section on consultation in the Scoping Report describes the process but not the outputs of consultation.

We welcome further engagement with the Applicant on the Grand Union Canal Transfer project through our Discretionary Advice Service.

From: [REDACTED] on behalf of [Town Planning NWC](#)
To: [Grand Union Canal](#)
Cc: [Grand Union Canal Transfer](#)
Subject: Planning Inspectorate - Grand Union Canal Transfer - Proposed DCO Scoping Report
Date: 16 April 2025 13:21:05
Attachments: [image004.png](#)
[Plan of Pipeline from Minworth \(East of Water Orton\).pdf](#)
[Plan of Potential Pipeline Corridors.pdf](#)

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FAO Planning Inspectorate and Grand Union Canal Transfer Team

Network Rail has been contacted by the promoter of the proposal however, we have not received notification from the Planning Inspectorate. Notwithstanding, Network Rail has the following comments.

The Public Consultation document dated September/October 2024, shows potentially Network Rail land may be impacted by this scheme in respect of a water pipeline to be installed beneath rail lines in a couple of locations:

- The attached “Plan of Pipeline from Minworth (East of Water Orton)” shows the potential pipeline corridor in green which will cross under two rail lines
- The attached “Plan of Potential Pipeline Corridors” shows potential pipeline corridors, which may/may not affect NR, in the Bletchley and Leighton Buzzard areas

From a Network Rail viewpoint, there is currently no clarity as to how we will be affected as this DCO matter is at the pre-application stage and as the Order is not to be submitted until Q4 2026, any property requirements affecting Network Rail will be picked up at that point in time.

From

[REDACTED]

Town Planning Technician NW&C
AssocRTPI
Network Rail
Email: TownPlanningNWC@networkrail.co.uk

From: Grand Union Canal Transfer <contact@guctransfer.co.uk>
Sent: Friday, April 11, 2025 11:27 AM
To: Town Planning NWC
<TownPlanningNWC@networkrail.co.uk>
Subject: RE: Grand Union Canal Transfer - Scoping Report
consultation Network Rail

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Dear [REDACTED]

Thank you for your email.

The consultation on the Scoping Report is managed by the Planning Inspectorate, who are responsible for consulting those bodies they deem relevant at this stage.

Although we have not been provided with the list of stakeholders they have consulted, we have tried to contact relevant parties based on Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, who may have an interest in the project.

The scheme's Planning Inspectorate reference is WA0210001 and you can find the Scoping Report documents, and the relevant Planning Inspectorate contact details at: <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/WA0210001>

If you have any further queries please don't hesitate to get in touch.

Kind regards,
Grand Union Canal Transfer team

From: [REDACTED] [REDACTED] **On Behalf Of** Town Planning NWC
Sent: 07 April 2025 10:31
To: Grand Union Canal Transfer
Subject: Grand Union Canal Transfer - Scoping Report consultation
Network Rail

OFFICIAL

Network Rail has not received any notification from the Planning Inspectorate as of today.

Do you have the reference number of the consultation from the PI?

From

[REDACTED] [REDACTED]
Town Planning Technician NW&C
AssocRTPI
Network Rail
Email: TownPlanningNWC@networkrail.co.uk

From: Grand Union Canal Transfer <contact@guctransfer.co.uk>
Sent: Friday, April 4, 2025 3:52 PM
To: Grand Union Canal Transfer <contact@guctransfer.co.uk>
Subject: Grand Union Canal Transfer - Scoping Report consultation

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Good afternoon

We are emailing regarding the Grand Union Canal Transfer, which is a partnership between Affinity Water, Severn Trent, and the Canal & River Trust charity, to help transfer clean, recycled water from the Midlands to the south east. The scheme will use the Coventry, Oxford and Grand Union canals, supported by some new pipelines and pumps, to transfer up to 115 million litres of water per day to help improve water supply in the south east.

We have recently submitted our EIA Scoping Report to the Secretary of State, via the Planning Inspectorate, to seek a Scoping Opinion about the scope, assessment methodology and level of detail to be provided in our Environmental Statement for the Grand Union Canal Transfer.

We understand the Planning Inspectorate has now shared this with you as they carry out the required consultation to inform their Scoping Opinion.

If you have any questions regarding the Grand Union Canal Transfer scheme, please don't hesitate to get in touch with us at contact@guctransfer.co.uk.

Kind regards
Grand Union Canal Transfer team



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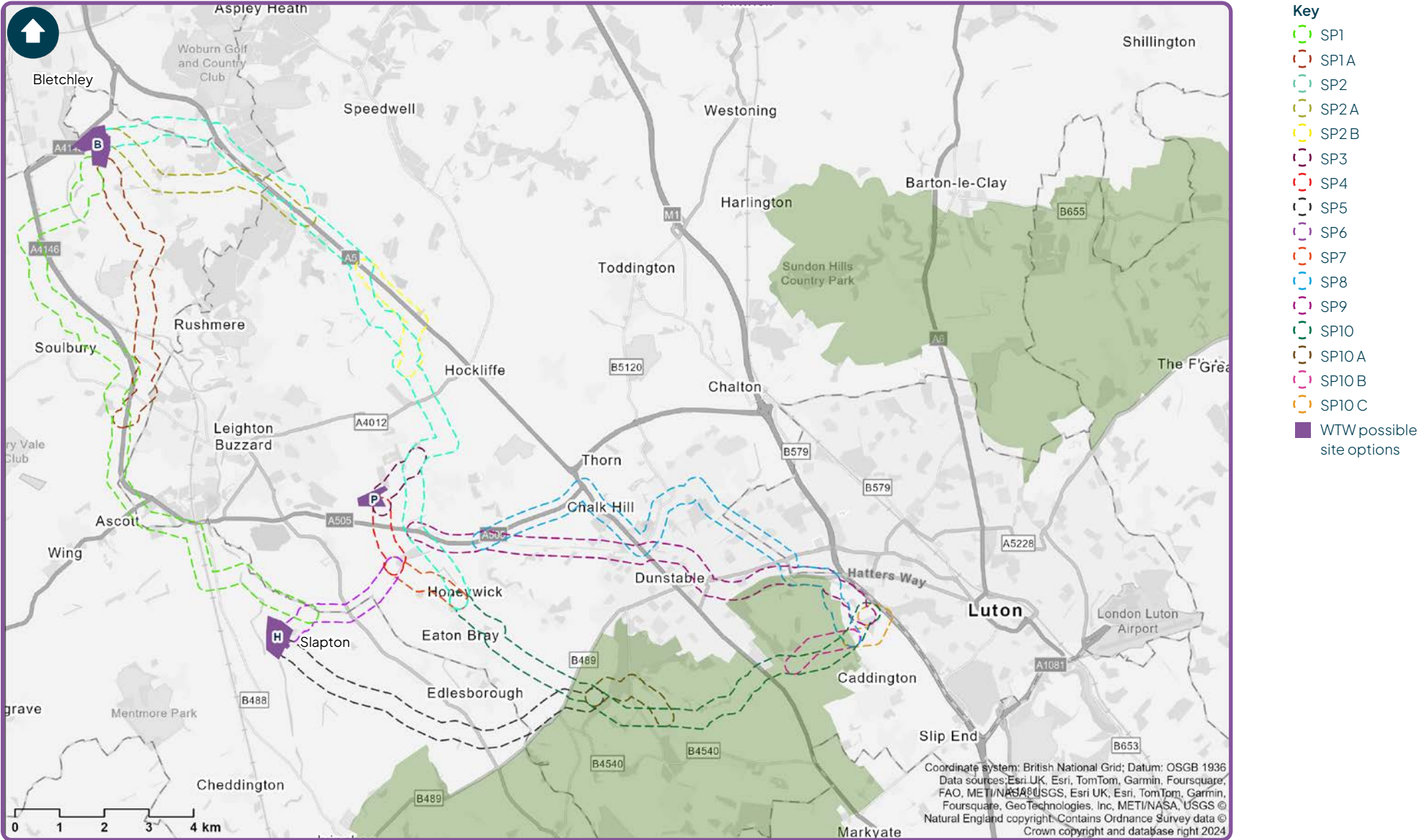
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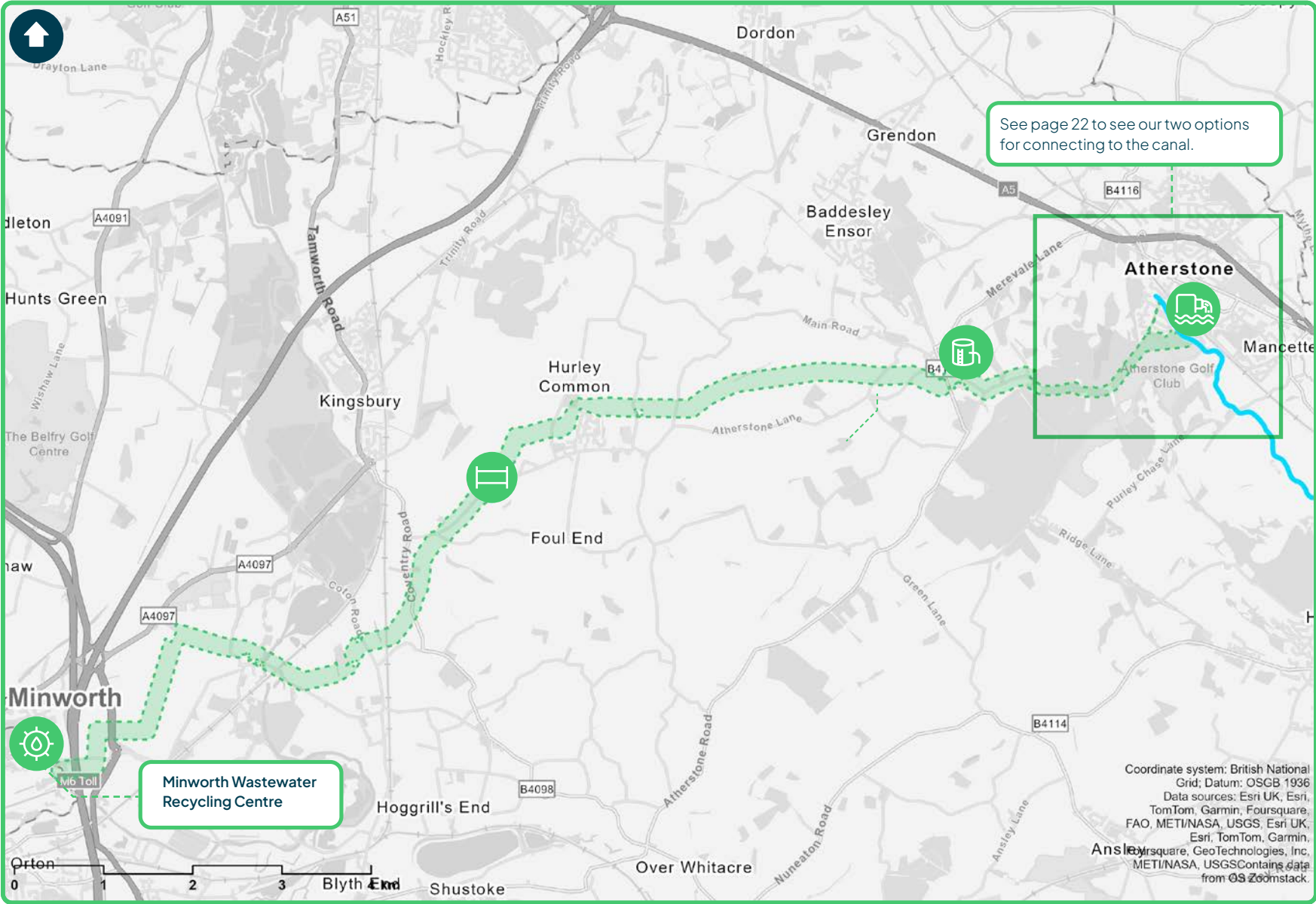
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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered
office Network Rail, Waterloo General Office, London, SE1 8SW.

Identified potential pipeline corridors



Minworth to Atherstone proposed infrastructure – this map shows the new infrastructure we'll need in this area.





www.north-herts.gov.uk

The Planning Inspectorate

Our Ref: 25/00910/ADJ

Contact:
Direct Line:
Email:
Date:

16 April 2025

Dear Sir/Madam

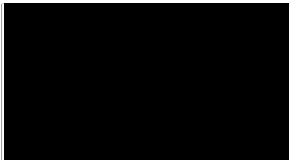
**Adjoining Authorities Consultation : EIA Scoping Notification and Consultation
Grand Union Canal Transfer**

Please quote the following reference: 25/00910/ADJ on all correspondence.

Thank you for consulting North Herts Council (NHC) on the above mentioned planning application, which proposes development located adjacent to the boundary between the two authorities.

We will aim to provide our consultation response by the date detailed in your letter. Alternatively the Case Officer will be in contact with you should an extension of time be required.

Yours faithfully



Development and Conservation Manager

From: [REDACTED]
To: [Grand Union Canal](#)
Subject: GUC Transfer - WA021001 - EIA Scoping Notification
Date: 22 April 2025 12:06:56
Attachments: [REDACTED]

You don't often get email from [REDACTED] [Learn why this is important](#)

Thank you for your email of 31 March enclosing the letter from [REDACTED] relating to the above.

We have already been heavily engaged with the Applicant and his consultants on this Project and therefore have no comments to make in respect of the request, as its content has already been discussed informally.

The only comment we would make is that the routeing alternatives in the Atherstone area in order to connect into the Coventry Canal here, are fully explored and evaluated with regard to identifying the relevant harms, impacts and benefits together with their respective weights, such that an informed balance can be assessed.

Many thanks

[REDACTED]
[REDACTED]
Head of Development Control
North Warwickshire Borough Council

Phone: [REDACTED]

Web: www.northwarks.gov.uk

Social:



THRIVE



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██████████ - EIA Advisor
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

10 April 2025

Dear Sir/Madam

PLANNING CONSULTATION RESPONSE

Proposal: Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

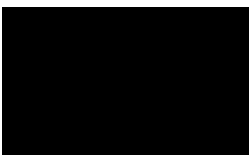
OUR APPLICATION REFERENCE 25/00518/NAC

PLANNING INSPECTORATE REFERENCE: WA0210001

With reference to your consultation on the above, I am writing to advise you that North West Leicestershire District Council has no comments on the proposals.

The planning application has not been formally reported to the District Council's Planning Committee. In these circumstances the comments made are those of an officer of the council under delegated power arrangements agreed by the Planning Committee.

Yours faithfully



██████████
Planning and Development Team Manager
Proper Officer Of The Council

From: [REDACTED]
To: [Grand Union Canal](#)
Subject: RE: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
Date: 28 April 2025 16:31:17
Attachments: [image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)
[image017.png](#)
[image018.png](#)
[image019.png](#)
[image020.png](#)
[image021.png](#)
[image022.png](#)
[image023.jpg](#)

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Good afternoon,

Thank you for your email.

No comments from NBBC in relation to the Scoping Opinion request.

Kind regards,
Rebekah

Rebekah Hill BSc (Hons) MSc MRTPI
Principal Planning Officer
Follow us: [@nbbcouncil](#)

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From: Grand Union Canal <GUtransfer@planninginspectorate.gov.uk>
Sent: 31 March 2025 11:04
Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation

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FAO Head of Planning

Dear Sir/Madam

Please see attached correspondence on the proposed Grand Union Canal Transfer.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **28 April 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones



Joseph Jones
EIA Advisor
The Planning Inspectorate
T 0303 444 5028

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DPC:76616c646f72



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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered
office Network Rail, Waterloo General Office, London, SE1 8SW.

From: clerk@oldstratfordparishcouncil.gov.uk
To: [Grand Union Canal](#)
Cc: [REDACTED]
Subject: RE: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
Date: 23 April 2025 22:49:02
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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Dear Mr Jones

Thank you for inviting Old Stratford Parish Council's comments upon the proposed Grand Union Canal Transfer. With regard to the information presented, the Council would like to feedback the following observations:

General Comments:

There is no mention in the EIA regarding the possibility of a canal bank breach in the event of flooding. This should be considered in the ES.

There are a great many assumptions from desktop reviews, the ES should involve field surveys.

Page 275 - List of List Structures close to the development site.

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

Page 312 - List of Fish Species in the Grand Union Canal

There is no mention of Carp or Zander, which are known to be in the canal. Surveys or accurate records should be drawn upon in the ES.

Page 331 - Stated increase to flow rates down the canal.

It does not mention the direction of the increased flow rate but you should assume it is in one direction. This increase, as defined in the EIA states that some bank erosion and vegetation detachment.

No mention of mitigation procedures to deal with this but some mention is made in the use of Engineering Design Statements. We must assume that these mitigation procedures will be strengthened at the ES stage.

Page 857 - Table 22-15 Potential Flooding sites:

The Grand Union Canal at Cosgrove does not mention the potential flood risk from water entering the Rivers Tove and Great Ouse due to surface water during construction stages. The flooding impact upon these catchments and adjacent settlements must be considered in the ES Should you wish for any clarification on the above, please do not hesitate to contact me

Kind regards
Nicky Laurence

Clerk, Old Stratford Parish Council

email clerk@oldstratfordparishcouncil.gov.uk

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From: Grand Union Canal <GUCtransfer@planninginspectorate.gov.uk>

Sent: 31 March 2025 11:18

Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation

FAO Parish Clerk

Dear Sir/Madam

Please see attached correspondence on the proposed Grand Union Canal Transfer.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **28 April 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones



Joseph Jones
EIA Advisor
The Planning Inspectorate



@PINSgov



The Planning Inspectorate



planninginspectorate.gov.uk

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DPC:76616c646f72



From: [REDACTED]
To: [Grand Union Canal](#)
Subject: 20250425 - GUCTS EIA Scoping Document
Date: 25 April 2025 11:09:52

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Dear Sirs

Pitstone Parish Council had no comments on the Scoping Application other than –

- There appears to be no reference to the Ivinghoe Freight Strategy
- There appears to be no reference to the planning application (currently with Buckinghamshire Council under ref CM/0020/24, but also being considered by Herts Council) for the development of Pitstone Quarry.

The Council noted that some of the pipeline options would impact the Chilterns AONB, and may comment on this, and other aspects of the proposal, at planning application stage.

We would therefore be obliged if you could keep us updated with this application.

Yours faithfully

Laurie Eagling

Parish Clerk, Pitstone Parish Council, Pitstone Pavilion, Marsworth Road, Pitstone, LU7 9AP. Email: parishclerk@pitstone.co.uk. Tel: 01296767261.



Proposed DCO Application by Affinity Water and Severn Trent Water for the Grand Union Canal Transfer Project

Royal Mail response to EIA Scoping Consultation

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail and its advisor BNP Paribas Real Estate have reviewed the EIA Scoping consultation documents dated 31 March 2025. This infrastructure proposal has been identified as having potential for impact on Royal Mail operational interests. However, at this time Royal Mail is not able to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Therefore, Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

Holly Trotman ([REDACTED]@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited

Luke Willis ([REDACTED]@struttandparker.com), Planner, Strutt & Parker/BNP Paribas Real Estate

Please can you confirm receipt of this holding statement by Royal Mail.

End

28th April 2025

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your Ref: WA0210001

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

To whom it may concern,

Thank you for consulting Royal Sutton Coldfield Town Council on the above proposed Nationally Significant Infrastructure Project (NSIP) EIA Scoping consultation. On behalf of the Town Council, I can confirm the Town Council does not have any comments on this consultation.

Royal Sutton Coldfield Town Council reserves the right to comment on the subsequent EIA, once submitted.

Yours faithfully



Olive O'Sullivan
Chief Executive Officer



Development Team
Rugby Borough Council
Town Hall
Evreux Way
Rugby
CV21 2RR

Reference: PR25/0241

Date: 15-Apr-2025

██████████

Dear ██████████

**Proposal: Planning Inspectorate Consultation WA0210001 - EIA Scoping Opinion on application for Development Consent for the Grand Union Canal Transfer project.
Site Address: GRAND UNION CANAL
RUGBY**

I refer to the above and to your letter of 31 March 2025.

It is accepted that Rugby Borough Council should be consulted on the proposals as a "host local authority" in accordance with sections 42 and 43 of the Planning Act 2008 due to work taking place within the administrative area of Rugby Borough Council.

Consultation should also be carried out with the relevant Parish Councils and I understand this has occurred.

The submitted EIA Scoping Report has been reviewed and comments are detailed below.

The Council is currently carrying out consultation on the Local Plan Preferred Options and this must be taken into consideration in the relevant policy sections: <https://www.rugby.gov.uk/local-plan-review-preferred-options-consultation>

Based on the works proposed within the administrative area of Rugby Borough it is considered that key areas for consideration are:

- Heritage
- Flooding & Drainage
- Ecology
- Highway impacts
- Impacts on canal users including residents, businesses and recreational users.

It is noted that the above topics are to be included within the proposed Environmental Statement.

Comments should also be sought from the Lead Local Flood Authority (Warwickshire County Council), Highway Authority, County Ecologist and the Canal & River Trust.

The Council's Environmental Health team commented on the Scoping Report and advised they have no objections to the proposed developmental details provided at this stage, subject to the observations and comments below:

With the proposed use of the Grand Union canal for transferring larger quantities of water from the Midlands to the Southeast, it is likely that there will be a need for significant works on some sections of the network. Along some sections in Hillmorton the canal banks have collapsed with farmer's fields routinely inundated.

With respect to pumping stations there is consideration of the construction impacts followed by noise from operation. Plate 3-3 illustrates brick built enclosure for an above ground pumping station, which would assist with noise attenuation and 3.5.51 notes that designs limiting above ground structures would be preferred.

Works may be required to the existing lock gates due to amount of water leaking through those that are damaged or ill-fitting.

Weirs may require attention to ensure correct flow and avoid unnecessary losses.

There is the potential for significant construction impacts upon canal users, towpath users and businesses reliant upon the transit of shipping upon the canal.

The 'Grand Union Canal Transfer Environmental Impact Assessment Scoping Report Volume 1: Main Report Affinity Water, Severn Trent and Canal & River Trust March 2025' is noted and I have the following comments.

Section 3.5.55 identifies that some bridges may require modification.

Section 3.5.56 notes some sections of the canal may require bank raising. This will be required given the inundation of farmers' fields along sections of failed banking in Hillmorton.

Section 3.5.60 notes improvements and repairs will be needed to the 50 existing control and waste weirs.

Part 3: Daventry and Drayton Reservoirs comments upon the linkages from the canal to the reservoirs, with a new pumping station north of Braunston Tunnel.

Section 3.6.3 notes that proposed construction working hours will be set out in the Environmental Statement and 3.6.6 notes that a detailed Construction Environmental Management Plan will be submitted. 3.6.8-9 notes the development and submission of a Construction Traffic Management Plan.

With respect to Chapter 9: Air Quality and Odour, the Environmental Impact Assessment (EIA) will need to consider the interim PM guidance:

Pending the publication of new DEFRA guidance, applicants shall aim to provide evidence that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of PM2.5 and its precursors as far as is reasonably practicable as per the UK Air Information Resource at <https://uk-air.defra.gov.uk/pm25targets/planning>

I note in table 9-5 Potential effects during construction phase – Air Quality and Odour includes the intention to scope out construction traffic within AQMA's. This may need to be revisited once further information is obtained on the quantity of canal bank raising and repairs that will be necessary.

Chapter 14 Ground conditions notes that a stage 1 tier 1 assessment shall be undertaken as per Land Contamination Risk Management guidance.

Chapter 16 Landscape and visual incorporates discussion of potential construction phase effects.

Chapter 18 Noise and vibration includes references to construction and operational activities. The comments concerning Best Practicable Means and other relevant guidance are noted. 18.3.2 confirms that various topics are to be covered at next stage of EIR.

Section 18.4.56 notes that operational phase plant will generate significant levels of vibration however 18.4.57 and 18.4.58 scope out vibration impacts as mitigation can be included in the

design of such systems. This suggests a typo and omission of 'not' in 18.4.56 however this will need confirmation.

I do not agree with only relying upon the continuous vibration levels as per table 18-11. As part of any condition for a CMP/CEMP I would expect a recommendation for vibration risk assessment and this should consider Table B.1 Guidance on effects of vibration levels within 'BS5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites Part 2: Vibration' for the impacts at vibration sensitive receptors.

The following is provided as information which may be useful in the setting of vibration limits:

Prior to commencing piling operations, a piling risk assessment document shall be submitted and agreed, as a separate document linked to the main construction (environment) management plan. Agreement of piling types, monitoring and if necessary, mitigation in advance should help avoid unplanned stopping of works once piling commences. It will also help to reduce concerns from residents about the impact and disturbance of piling works upon them.

A desktop risk assessment shall include proposed boundary vibration limits, both as a trigger level for investigation and a stop level.

The risk assessment will need to show that Best Practicable Means (BPM) shall be employed to control noise and vibration in relation to this site. With reference to the relevant Codes of Practice, including 'BS 5228-1:2009+A1:2014' and 'BS 5228-2:2009+A1:2014' 'Code of Practice for noise and vibration control on construction and open sites, Part 1: Noise' and 'Part 2: Vibration' an initial boundary stop level of 5mm/s Peak component Particle Velocity should be calculated for.

Vibration monitoring shall be undertaken to demonstrate compliance with the relevant standards, it shall be ensured that any monitors are within calibration with a second monitor available to allow for readings to be taken both at the site boundary and within the curtilage of nearby properties in order to demonstrate that the levels of vibration are within the limits stated in BS 5228-2:2009+A1:2014 Part 2: Vibration table B.2.

Regard shall be had to the effects of vibration on people as per table B.1 in addition to Table B.2 for Transient vibration guide values for cosmetic damage (to buildings) and an advisory letter drop shall be undertaken to all surrounding properties in advance of the piling work.

Chapter 20: traffic and transport is noted.

Chapter 21: Materials and Waste includes references to guidance including the CL:AIRE Definition of Waste: Development Industry Code of Practice.

I trust this is useful.

Yours sincerely



Principal Planning Officer
Rugby Borough Council

From: [REDACTED]
To: [Grand Union Canal](#)
Subject: WA0210001 - Grand Union Canal Transfer project
Date: 04 April 2025 09:04:57

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Dear Karen

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (The EIA Regulations)
– Regulations 10 and 11**

**Application by Affinity Water and Severn Trent (the applicants) for an Order
granting Development Consent for the Grand Union Canal Transfer project
(the proposed development)**

**Scoping consultation and notification of the applicant's contact details and
duty to make available information to the applicant if requested**

My councils of South Oxfordshire District Council and the Vale of the White Horse District Council are not affected by this proposal. The documents submitted confirm that no Oxfordshire Authorities are affected by this development.

We have no comments on the scoping proposal.

Regards

[REDACTED]
Team Leader
Planning West
South Oxfordshire District Council

Please note I work part time. I work a six hour day.

Email [REDACTED]

Thank you for your email. I will aim to respond to your email as quickly as possible, however a full response to more complex enquiries may take up to 10 working days in line with our service standards. Please note that we treat e-mail correspondence in the same way as other written communication with the Council.

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**South Oxfordshire and Vale of White Horse District Councils
Abbey House
Abbey Close
Abingdon**

OX14 3JE

**Community and Place Delivery
Development Management**

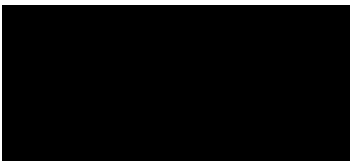
By email only to:
GUCtransfer@planninginspectorate.gov.uk

Our Ref: 5/2025/0676
Please ask for: Lee Stannard
E-mail: planning@stalbans.gov.uk
Date: 24 April, 2025

Dear Sir/Madam,

Application by Affinity Water and Severn Trent for an Order granting Development Consent for the Grand Union Canal Transfer Project (Your Ref: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation)

Thank you for consulting St Albans City and District Council – Development Management in respect of the above. We have no comments to make.



Christine Traill
**Strategic Director- Community and Place Delivery
St Albans City & District Council**

From: [REDACTED]
To: [Grand Union Canal](#)
Subject: WA0210001 Grand Union Canal Transfer
Date: 22 April 2025 09:32:55

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Dear Sir/Madam

****Re: Grand Union Canal Transfer - Scoping Opinion****

We write to you regarding the above planning application, currently under consideration.

While we appreciate the applicant's efforts to engage with the community, Stoke Hammond Parish Council has significant concerns regarding the earlier consultation process.

In July 2024, we attended a presentation regarding the proposal. However, the potential impact on our Parish was significantly understated, particularly given recent developments concerning the site selection for the Southern Water treatment and storage facility. It has come to our attention that a new site—now one of the favoured options—is located adjacent to our Parish, a development of which we were previously unaware.

Furthermore, the public consultations held in September included neighbouring areas such as Leighton Buzzard and Great Brickhill, yet Stoke Hammond was notably omitted from direct engagement efforts. We are unsure when this new site was first considered, but there seems to be little recognition of its significance to our village and its residents.

The map of identified potential pipeline corridors included one that would pass directly through Stoke Hammond village. Curiously, our village was not labelled on the map, even though the smaller village of Soulbury was included. While the 'indicative pipeline option' suggests an alternative route may be preferred, the lack of visibility and consultation for Stoke Hammond residents - both in the village and along the canal - is deeply concerning.

Based on our experience to date, we request that the scoping opinion take into account the following considerations:

1. ****Improved Consultation Process**** – Engagement with Stoke Hammond Parish has been inadequate thus far and must be significantly improved going forward.
2. ****Impact on Local Infrastructure**** – The main northern access to our village is adjacent to the proposed site and the canal. The implications for residents - particularly regarding living conditions and traffic disruption - must be thoroughly assessed.
3. ****Flood Risk Assessment**** – The flood plains surrounding the canal and the nearby River Ouse must be comprehensively investigated. Historical flooding data and future risks associated with water management should be fully considered.
4. ****Heritage Considerations**** – Any potential impact on Grade II listed buildings in the vicinity of Lock 23 should be carefully examined.

In conclusion, Stoke Hammond Parish Council respectfully requests that the Planning Inspectorate incorporate these concerns into the scoping report. We appreciate your consideration and look forward to further engagement on this matter.

Yours faithfully,

Kind regards

[REDACTED]

Clerk & RFO to Stoke Hammond Parish Council

Tel. [REDACTED] | URL: www.stokehammondpc.com

-

From: [REDACTED]
To: [Grand Union Canal](#)
Cc: [REDACTED]
Subject: Your ref. WA0210001 Our ref. 25/00837/NSIPCO
Date: 15 April 2025 11:12:37
Attachments: [REDACTED]

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Dear [REDACTED],

Thank you for your letter dated 31st March 2025.

Upon reviewing the content of your consultation letter, I advise that Stratford on Avon District Council has no comments to make at this time.

Kind regards,

[REDACTED]

[REDACTED] BSc MSc Spatial Management
([REDACTED])
Planner

[REDACTED]

Stratford on Avon District Council, Elizabeth House, Church Street, Stratford upon Avon,
Warwickshire, CV37 6HX, Switchboard: [REDACTED]
email: [REDACTED], web: www.stratford.gov.uk



UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: WA0210001
Our Ref: CIRIS92288

██████████
Senior EIA Advisor
Environmental Services
Operations Group
3 Temple Quay House
2 The Square
Bristol, BS1 6PN

17th April 2025

Dear ██████████,

Nationally Significant Infrastructure Project Grand Union Canal Transfer Project - WA0210001 Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following comments and recommendations:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Recommendations

Emissions to air:

As the scheme's final route has not been defined yet, and as the EIA scoping boundary envelope shows that there are residential receptors in close proximity to the site boundary, we recommend that the impact on human receptors from construction dust is scoped in for all parts of the Project Development.

Furthermore, our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

It is noted that the current proposals do not appear to consider possible health impacts of Electric and Magnetic Fields (EMF) and Noise.

¹

[REDACTED]

[REDACTED]

[REDACTED]

Yours sincerely,

On behalf of UK Health Security Agency
nsipconsultations@ukhsa.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

From: [REDACTED]
To: [Grand Union Canal](#)
Cc: [REDACTED]
Subject: Walton Community Council response for Scoping Opinion
Date: 23 April 2025 14:09:31
Attachments: [REDACTED]

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The Environmental Statement should have careful modelling of different scenarios for water use, water shortages, housing developments or industrial use.

Regards

[REDACTED]

[REDACTED]
Administrator

WALTON COMMUNITY COUNCIL

Striving to improve our community

T: 01908 694758

FROM 1 APRIL 2025 OUR NEW ADDRESS IS:

**The Vaughan Harley Building
The Open University
Walton Hall
Milton Keynes
MK7 6AA**

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Your understanding is appreciated.

From: Grand Union Canal <GUtransfer@planninginspectorate.gov.uk>

Sent: 31 March 2025 11:18

Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation

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FAO Parish Clerk

Dear Sir/Madam

Please see attached correspondence on the proposed Grand Union Canal Transfer.

The Applicant for the Proposed Development intends to make an application for

Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **28 April 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

[Redacted]

[Redacted]

[Redacted]

EIA Advisor
The Planning Inspectorate
T 0303 444 5028



@PINSgov



The Planning Inspectorate



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DPC:76616c646f72



Archaeological Information and Advice

Ms K. Wilkinson,
Planning Inspectorate,
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Anna Stocks
Senior Historic Environment Officer
Archaeological Information and Advice
Warwickshire County Council,
Shire Hall, PO Box 43
Warwick, CV34 4SX
Tel: 01926 412276

██████████@warwickshire.gov.uk

GUCtransfer@planninginspectorate.gov.uk

your ref WA0210001
my ref CC25_Grand Union Canal Transfer.1
date 28th April, 2025

Dear Ms Wilkinson,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11.

Application by Affinity Water and Severn Trent (the applicants) for an Order granting Development Consent for the Grand Union Canal Transfer project (the proposed development).

ARCHAEOLOGICAL COMMENT

Thank you for your consultation. The comments below relate to the potential archaeological implications of this proposal and are without prejudice to any comments that the relevant District Council Conservation Officers and Historic England may have on any potential implications on non-archaeological heritage assets within and/or in the wider vicinity of the proposal site.

I have the following comments on Volume 1: Main Report of the Environmental Impact Assessment Scoping Report.

There is a potential for as yet unidentified archaeological features to survive across the proposed application site and to be disturbed or destroyed by the proposed development. Desk-based assessment and walkover survey alone are unlikely to provide sufficient baseline information to enable any potential archaeological impacts to be assessed and an appropriate mitigation strategy developed.

We are pleased to note that para. 11.7.8 references the ES being informed by the results of various other evaluative techniques such as geophysical survey and trial trench evaluation. We would, however, highlight that there is limited reference for such surveys being undertaken elsewhere in this chapter of this scoping report, which primarily focuses on desk-based assessment being undertaken. For example, Table 11-1: National policies, plans and strategies – Cultural Heritage only references desk-based assessment being undertaken under the 'Relevance to the assessment' column, whilst the only other reference to further surveys potentially being necessary being included under section 11.9: Approach to Mitigation.

We would therefore request that the potential need for evaluative fieldwork to be undertaken and detailed in the ES, as well as the desk-based assessment primarily referred to in Chapter 11 of this report, be highlighted to the applicant at this stage.

We would also note that whilst Table 11-1, referenced above, sets out how para. 207 of the NPPF refers to applicants being required to describe the significance of any heritage assets effected by a proposal, it does not include reference to that part of that paragraph that states:

‘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**’ [emphasis mine]’

We would note that para. 11.3.1 references potential impacts on ‘**known** archaeological remains and areas [emphasis mine]’ having been key topics raised during non-statutory consultation. There is also a potential for this scheme to impact as yet unidentified archaeological features.

We would advise that the Warwickshire County Council Archaeological Information and Advice team should be consulted in their role as archaeological advisors (under Service Level Agreements) to the Warwickshire district councils referenced in para. 11.3.4.

If you have any questions please do not hesitate to contact me.

Yours sincerely

Anna Stocks
Senior Historic Environment Officer
Warwickshire County Council

From: [REDACTED]
To: GUCtransfer@planninginspectorate.gov.uk
Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
Date: 09 April 2025 17:18:18

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Hi

Weedon Bec Parish Council look forward to hearing more about this project.

Our only comment so far is regarding flooding and raised water levels after the experiences this past winter where the Grand Union overflowed its bank twice and flooded areas around the church in Weedon Bec.

Kind regards

[REDACTED]

Disclaimer:

The views expressed are personal and may not reflect Weedon Bec Parish Council, unless explicitly stated otherwise. The information contained herein is confidential and may also be subject to legal privilege. It is intended for the addressee only. Anyone reading this e-mail, other than the addressee, is hereby notified that any unauthorised disclosure or copying of its contents is strictly prohibited. As a public body, the Council may be required to disclose this email (or any response to it) under the Freedom of Information Act 2000 unless the information in it is covered by one of the exemptions in the Act.

Sue Halkett, Parish Clerk
Weedon Bec Parish Council. 16 St Mary's Way, Weedon Bec, Northants, NN7 4QL.
Tel: 01327 341057. [REDACTED]

GUC Water Transfer.

Comments for Scoping Document

Willoughby Parish Council with the Willoughby Flood Action Group have been identified as a consultation body in the formulation of the Scoping Document for the above project.

We have made input to the initial consultation process and our submission is appended to this document.

We would propose the main investigations to address our concerns as follows;-

1. Investigate the impact of water flows upon water levels and effect of interruption in water flow caused by operation of devices on pump assisted transfer between changes in levels of the canal, by-passing locks and the possibility of overtopping as result of potential surges.
2. Means of accommodating excess water resulting from arrested flow caused by interruption in flow due to valve closure or pump tripping.
3. Control strategies to maintain level and to cater for flows in the canal under normal flow circumstances and to cater for local increase in water volume due to flash flooding and input to lock system from local storage reservoirs. Possible use of controlled overflow and transient storage lagoons.
4. Replacement of antiquated waste overflow weirs with modern high volume equivalents with modern control techniques and suitable drainage that does not impact on the environment. The need for additional overflows should be included.
5. Investigate the need for raising canal banks in areas known to flood.

THE GRAND UNION CANAL TRANSFER - CONSULTATION RESPONSE

The Canal Section

5. Do you have any comments on how we are considering the flow of water, or any information that will help us identify other potential impacts on the canal as a result of the water transfer?

6. We have presented locations where we think we will potentially need to locate new equipment such as pumping stations or gravity bypasses. Do you have any comments that could help us develop our plans for these?

7. Do you have any comments or information that can help us plan for construction associated with our work along the canal?

The village of Willoughby floods regularly as a result of high volumes of rain, either persistent over several days or from violent thunderstorms, but the most severe

flooding has occurred when the canal overtops. This last happened in 1992 and was the result of the overtopping into the Willoughby Brook where it passes beneath the Oxford Canal. The canal banks local to this length of towpath were subsequently raised causing other lengths of bank to be vulnerable which is what happened in 1998 when the overflow occurred further North (Flooding of crossroads at Longdown Lane/A45) and further South, adjacent to Bridge 88, the latter giving rise to excess floodwater reaching the old Great Central Railway bridge on the A45 and entering the drain to the South of the village. The drain was installed in 1938 to prevent flooding at the old station.

The levels which arise from EA mapping are, by their own admission, questionable and based upon the 1998 flooding. The EA do not have integrated maps which combine fluvial and pluvial flooding, perhaps because, in most cases, fluvial flooding may be caused by separate events such as tidal in the case of the sea or time delayed events such as the flooding of towns along the River Severn.

The situation in Willoughby is different in that the floodwater due to overflow of the canal, almost always, occurs at virtually the same time as the causal rainfall and is therefore additive. Unquestionably there will be more overtopping incidents in the future, as climate change takes effect, with greater impact on Willoughby unless measures are taken to prevent them and the implementation of The Grand Union Canal Transfer can only serve to increase the possibility of increased flooding unless ameliorative measures are taken.

Our main concern regarding the proposed water transfer scheme relates to the perturbations in water level caused by:-

- a) Interruption in flow caused by downstream pump trip or valve closure. Even if a dual pump back up system is envisaged the transient caused by changeover could be sufficient to cause overtopping.
- b) The differential flow rates which must be catered for over the system when the canal is subject to water ingress due to heavy rain and thunderstorms. The Oxford Canal, originally designed to be fed by local streams when it was a contour canal, still retains some feeds from local streams.

Our solution to overtopping protection would be:-

- Eliminate all low points along the length of bank between Longdown Lane and Bridge 89 (A45 road bridge). Recognise that banks cannot be dramatically raised due to freeboard on canal boats.
- Introduce larger overspill weir in location of old waste weir adjacent to Bridge 88 with P+I control and increased depth channel to River Leam. (Including increased culvert sizing).

- **New waste weir to discharge into brook which drains part of Barby hill and joins Willoughby Brook beyond sewage facility on the Woolscott Road.**
- **Address the sizing and control of principal waste weir at Puddle Bank, allowing excess water to flow directly into the River Leam..**

A. W. Ogle CEng, MIMechE (Chair Willoughby Flood Action Group)

Any other comments

12. Do you have any comments on any of the other information we have provided, or any other comments you would like us to consider?

It is assumed that the Project Management will be calling upon the services of an organisation such as HR Wallingford to perform analysis and simulation of the system and recommend control strategies.

Date: 15 April 2025
Application: 250845



**WOKINGHAM
BOROUGH COUNCIL**

Development Management &
Compliance

P.O. Box 157

Shute End, Wokingham

Berkshire, RG40 1BN

Tel: (0118) 974 6000

Minicom No: (0118) 974 6991

Dear [REDACTED],

ADJOINING LOCAL AUTHORITY CONSULTATION RESPONSE

Application Number: 250845

Site Address: Grand Union Canal

Proposal: Consultation from Planning Inspectorate for the following proposal:
Application by Affinity Water and Severn Trent (the applicants) for an Order granting
Development Consent for the Grand Union Canal Transfer project (the Scoping
Opinion)

I refer to your consultation request registered on 31 March 2025. I can confirm that
the Local Planning Authority raises **no objection** to the proposal and trust the
application will be considered in accordance with the relevant planning policies.

Yours sincerely,

[REDACTED]

[REDACTED]

Head of Development Management - Place & Growth

From: [REDACTED]
To: [Grand Union Canal](#)
Cc: [REDACTED]
Subject: Fwd: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation RESPONSE
Date: 22 April 2025 18:04:23
Attachments: [REDACTED]

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Dear Planning Inspectorate,

Re: Scoping Consultation Response – Grand Union Canal Transfer Project (WA0210001)

We are writing on behalf of Wolfhampcote Parish Council, a statutory consultee for the proposed Grand Union Canal Transfer project, to provide our response to the Environmental Impact Assessment (EIA) scoping consultation under Regulations 10 and 11 of the EIA Regulations 2017.

Our parish lies directly along the proposed route of the Grand Union Canal and may be affected by construction and long-term impacts associated with the project. After reviewing the Scoping Report, we wish to make the following comments:

- Key Environmental Topics to be Included in the Environmental Statement:
 - 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.
 - Noise, Vibration, and Air Quality: Impacts from construction activities near residential areas must be carefully assessed, particularly in relation to working hours, noise levels, dust, and vehicle emissions.
 - Landscape and Visual Impact: The canal and surrounding countryside form an important part of the rural character of the parish. The Environmental Statement should include detailed visual assessments from key viewpoints within the parish.
 - Biodiversity and Ecology: Local habitats, including watercourses, hedgerows, and woodlands, should be assessed for species impacts. We request that survey work includes known sites of ecological interest in our parish.
 - Heritage and Archaeology: Our parish contains several heritage assets and is historically linked to the Grand Union Canal. The potential impacts on listed buildings, conservation areas, and archaeological remains must be addressed.
 - Public Rights of Way and Canal Towpaths: 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 towpaths are closed, that these closures are overnight or small walkable diversions are made.
 - That towpaths are repaired to their current condition or improved.
- Additional Requests:
 - We request that the applicant consult directly with the parish council as more detailed route planning and mitigation measures are developed.
 - We would appreciate the opportunity to receive spatial data (e.g. GIS shapefiles or maps) for the proposed development in our area.

We look forward to engaging further as the project progresses.

Yours sincerely,

[REDACTED]
Wolfhampcote Parish Clerk

Sent securely from Spacemail

Forwarding email from wolfhampcote.pc@gmail.com at April 22, 2025, 6:55 PM

From: wolfhampcote.pc@gmail.com
To: clerk@wolfhampcote-pc.gov.uk
Date: April 22, 2025, 6:55 PM
Subject: Fwd: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation

****Our email address is changing to clerk@wolfhampcote-pc.gov.uk**.**

Please use this address for all future correspondence.



Parish Clerk
Wolfhampcote Parish Council

----- Forwarded message -----

From: **Grand Union Canal** <GUTransfer@planninginspectorate.gov.uk>
Date: Mon, 31 Mar 2025 at 12:22
Subject: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
To:

FAO Parish Clerk

Dear Sir/Madam

Please see attached correspondence on the proposed Grand Union Canal Transfer.

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Kind regards,





EIA Advisor

The Planning Inspectorate

T 0303 444 5028



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DPC:76616c646f72



From: [REDACTED]
To: [Grand Union Canal](#)
Subject: RE: WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation
Date: 15 April 2025 08:34:44
Attachments: [REDACTED]

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Dear [REDACTED],

Before we can comment further we would like to know how this will affect Yelvertoft parish and what impact it will have.

Kind regards

[REDACTED]

[REDACTED], CiLCA
Clerk, Responsible Finance Officer, & Burial Officer

[REDACTED]

Yelvertoft Parish Council
www.yelvertoft-pc.gov.uk

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[Redacted]

[Redacted]

[Redacted]

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