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Our ref: AC/2025/132831/01-L01
Your ref: 25/70045/SCOP

Date: 20 June 2025

Dear Hollie,

ENVIRONMENTAL IMPACT ASSESSMENT SCOPING OPINION IN RELATION TO THE GRAFHAM TO CAMBRIDGE PIPELINE SCHEME

MARLOW PARK BUCKDEN ROAD GRAFHAM

Thank you for referring the above scoping request which was received on 04 June 2025. We have reviewed the submitted scoping report and consider the proposed scope acceptable.

Flood Risk

Flood risk has been scoped into the Environmental Impact Assessment (EIA), which we support. Given the scale and nature of the proposed pipeline, including multiple watercourse crossings and areas of designated flood risk, it is essential that a detailed Flood Risk Assessment (FRA) is produced. The proposed pipeline route interacts with areas of both Flood Zone 2 and Flood Zone 3, increasing the importance of a robust FRA that fully considers floodplain function and potential impacts on vulnerable receptors.

The FRA must be prepared in accordance with the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). It should assess flood risk from all sources—fluvial, surface water, groundwater, and infrastructure failure—both to and from the development. The assessment must demonstrate that the development will remain safe for its lifetime, taking account of climate change, without increasing flood risk elsewhere.

We would expect the FRA to demonstrate no increased flood risk as a result of the works.

Pipelines through defences and bank protection measures can impact their stability, increasing their risk of failure. The proposed works should not impact the stability of any main riverbank or defence.

Surface Water Flooding

The LLFA should be consulted with regard to surface water drainage proposals and flood risk associated with watercourses under their jurisdiction.

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Advice to the Applicant - Environmental Permitting

Regarding the associated improvement works - Under the terms of the Environmental Permitting Regulations (EPR), a permit may be required from the Environment Agency for any proposed works or structures within the floodplain or in, under, over or within 8 metres from the top of the bank of the River Great Ouse, which is designated a 'main river'.

The EPR are a risk-based framework that enables us to focus regulatory effort towards activities with highest flood or environmental risk. Lower risk activities will be excluded or exempt and only higher risk activities will require a permit. Your proposed works may fall under one or more of the below:

- Exclusion
- Exemption
- Standard Rules Permit
- Bespoke Permit

Information on how to apply for a permit and application forms can be found on our website at: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits

Any application for a permit should be submitted to the following email address: flood.permitting@environment-agency.gov.uk

Biodiversity

We support the scope of the EIA in terms of biodoversity.

Water Resources

Catchment Information The location of this development is in an area of serious water stress (as identified in our report Water stressed areas - final classification (https://www.gov.uk/government/publications/water-stressed-areas-2021-classification).

Any water required as part of the construction and operation and its source needs to be considered. Water availability is dependent on the catchment. Most water related construction activities, including dewatering and dust suppression are licensable activities and as such, early consideration should be given to where the water can be sourced from. New consumptive groundwater licences are not available, and surface water is restricted to high flows only. Maps noting the preferred route for this instillation intersects with three East Anglia catchments. Information on water availability can be found in the relevant Abstraction Licencing Strategy (ALS).

- Upper Ouse Bedford Ouse: https://www.gov.uk/government/publications/cams-upper-ouse-and-bedford-ouse-abstraction-licencing-strategy

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- Cam and Ely Ouse: https://www.gov.uk/government/publications/cam-and-ely-ouse-abstraction-licensing-strategy
- Essex: https://www.gov.uk/government/publications/cams-essex-abstraction-licensing-strategy

Abstraction and Protected Rights

Development of the Grafham to Cambridge Pipeline Scheme should not detrimentally affect local water features (including streams, ponds, lakes, ditches, or drains) and this includes both licenced and unlicenced abstractions. Any disruption to surrounding abstraction licences during and after construction and operation of the pipeline must be avoided or mitigated.

The EIA Scoping Report has shown evidence that it is considering impacts to licenced and private groundwater and surface water abstractions (Table 14-3 Potential impacts from construction and proposed mitigation – Scoping Report). The report doesn't explicitly list groundwater/surface water interactions (springs and sinks), and licensed discharges to groundwater or surface water as receptors. These factors should be considered. The project notes that detailed information regarding abstractions were produced through 'The Groundsure Report' which we cannot access for a cross comparison of the abstractions considered. In future applications we would like to see the abstraction licences considered section by section. Abstractor information and impact must be fully understood ahead of any construction and we encourage engagement ahead of any construction phases to establish this. The licences identified must not be affected by the construction and operation of the pipeline. Any impacts on water quality, drainage, or hydrological flow caused during construction and operation may impact local and downstream licence holders and their ability to abstract and must be avoided. The impacts of the construction and operation of the pipeline on these abstractions should be investigated, and if there are likely to be impacts, derogation agreements will need to be sought in order to support any abstraction licence applications.

Certain private and small water supplies do not require a licence to abstract water; therefore, we do not necessarily hold extensive records of these. The locations of private domestic sources may be held by the local authority on the register required by Regulation 14 Private Water Supplies Regulations 2016.

Construction and Operational Water Supplies

The water used during the construction phase needs to be considered separately to the water to be used during the operational phase of the development. Early consideration should be given to where the water can be sourced from where the water company isn't the provider due to limited water availability. Anglian Water (AWS) will be aware of the water demand requirements for completing the construction and operation of the pipeline. The pipeline facilitates the transfer of assets from one location to another and water demand for the pipeline will have been factored onto AWS plans and forecasts in their latest WRMP24.

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Licencing Requirements

The Scoping Report (Section 14. Water Environment Potential impacts and mitigation, 14.5) mentions various activities that may temporarily and/or permanently alter surface and groundwater hydrological regimes (e.g. water course diversion, over-pumping, dewatering, surface and subsurface activities/instillations). The applicant will need to consider what type of licences/permits (abstraction, transfer, impoundment, discharge) will be required to facilitate these activities. We encourage Anglian Water to engage with us well in advance of the construction activities to determine a licencing/permit plan for the various phases of the project. Information on whether a licence is required and the type of licence you may need can be found here: https://www.gov.uk/guidance/check-if-you-need-a-licence-to-abstract-water.

Note that dewatering may need to demonstrate that it is non-consumptive to the local environment for it to be licenced. Any temporary and/or permanent field drains that affect dewatering of the site need to consider the effect on the hydrological regime and impact on protected rights. Where licences/permits are required, an enhanced pre1application should be submitted to allow adequate time for determination by the Environment Agency.

Note the project will require dewatering at various phases along the planned installation route for the pipeline. The Scoping Report states that impact along the route as a result of dewatering is likely to be minimal (14.5.1 Construction impacts and mitigation). We encourage engagement well ahead of time to determine if a dewatering plan is required. This will allow us to determine any impacts to its assets and devise a clear licencing plan for the dewatering if required.

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. Note that this does not permit discharge of groundwater to surface waters from a passive or active dewatering activity or permit the abstraction of groundwater.

WFD and Water Body Protection

Developments should not negatively affect any Water Framework Directive (WFD) waterbodies. In addition, no deterioration should occur in any Sites of Special Scientific Interest (SSSI) or Ramsar sites covered by Habitats Regulations. The WFD compliance assessment (14.6.1.1 Assessment Methodology) should highlight the two key objectives of no deterioration in waterbody status and the ultimate aim of improving all waterbodies to ‘Good’ status. Any activities on-site could have an impact upon local wells, water supplies and/or nearby watercourses and environmental interests. Watercourse crossings with WFD designations and the relevant waterbody intersections are noted (Scoping Report, 14.4.1.1 Watercourse crossings and WFD). Where the project intersects with or has a proximity to WFD and Habitat Regulations sites, extra care or evidence may be required relating to the impacts when applying for a water resources licence. The applicant should note that

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ensuring dewatering is non-consumptive will also support achieving WFD outcomes. Additionally, sensitive areas, such as Source Protection Zones (SPZs) surrounding public water groundwater abstraction points must be kept free of any sources of contamination.

Groundwater and surface water effects (both temporary and longer term) should be separately distinguished. It is also important to note that temporary and permanent disruption to the hydrological regime both from construction and operation of pipeline should be assessed separately, which the project does distinguish between (Scoping Report, 14.5.1 Construction impacts and mitigation, 14.5.2 Operational Impacts). Permanent installations (tunnelling, diversion of water courses, culverts) may alter the hydrological regime and thus have impacts for ecology and protected rights. Assessment of temporary disruption should consider how long the temporary impact lasts and whether/how soon the hydrological regime will return to pre-activity status and the relevant derogation agreements are in place to protect abstractors. If long-term/permanent effects are anticipated, we would expect a full assessment of the likely risks to associated groundwater and surface water receptors.

We would encourage a three-tier assessment of water resources on the relevant surface and groundwater receptors: direct impact, indirect impact and no predicted impact as well as cumulative effects, which must also be considered, ensuring all the different types of impact that may arise from the project are factored in.

If further information/data is required to inform water resource assessments, we would encourage this engagement to take place well in advance of any construction phases to establish a water resource assessment of the study area.

Groundwater

In the future we would expect a full Hydrogeological Impact Assessment (Hydrogeological impact appraisal for dewatering abstractions - GOV.UK) to be undertaken that assesses the identified risks to groundwater and their mitigation strategies further.

The scoping report states “it is assumed that once the concrete liner is inserted there should be limited dewatering required.” This is an example of dewatering consideration that needs to be elaborated on quantitatively. The impact assessment must consider sensitive receptors like SSSI’s and GWDTE’s and surface water systems that have linkage to groundwater.

We note that “Watercourses and Riparian corridors and Ponds” are scoped in as receptors. Disruption to the normal hydrological regime of waterbodies, both from temporary and permanent activities, both from construction and operation of the pipeline needs to be investigated. If any impacts are anticipated to any surface water or groundwater abstractions, derogation agreements will need to be in place well ahead of any construction phases in agreement with the licence holder(s).

The report mentions various activities that may temporarily and/or permanently alter

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the hydrological regime both in the construction and operational phases of development. These should be considered as part of the site-specific assessments being proposed (Scoping Report 14.6.1.2 Surface water (quality and hydro morphology) and soils and geology assessments (Scoping Report, 12.7.3 Proposed assessment methodology).

Impact to GWDTE largely depends on the scale and magnitude of the dewatering required, whether any permanent instillations are likely to affect normal groundwater flow, and the hydrological connectivity of underlying geology to groundwater or surface water receptors. We note the project has factored in hydro-connectivity and spatial scale adjustment of the study area as required (Scoping Report, 14.3.3 Study area).

Note that unproductive aquifers should be factored into impact assessments. Shallow or unproductive aquifers may have licences or small private supplies connected to them and should be considered. If the applicant requires abstraction licences for any works, it is likely that monitoring of these features would be required. For more information please see: Check if you need a licence to abstract water - GOV.UK

Assessment of contaminated land must be updated, extending to the proposed radius of influence, as a minimum, from dewatering works as to not mobilise any contaminants as a direct result of dewatering. This is to cover any contaminated land that would otherwise be present between the redline boundary and the radius of influence that could be missed from existing scoping report assessment.

We trust that this advice is useful.

Yours sincerely,

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