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9<sup>th</sup> August 2024

Laura Underhill  
Anglian Water

Sent by email to: [info@fensreservoir.co.uk](mailto:info@fensreservoir.co.uk)

cc: [Underhill@anglianwater.co.uk](mailto:Underhill@anglianwater.co.uk)

Dear Ms. Underhill

## **Fens Reservoir and Associated Water Infrastructure Proposals - Phase Two Consultation**

I am writing on behalf of Huntingdonshire District Council (HDC) in relation to the above non-statutory consultation on the Fens Reservoir and associated water infrastructure proposals project.

Thank you for confirming in the email dated 8<sup>th</sup> July 2024 to Mrs. Burton that HDC's comments would be acceptable in letter and table form.

The Council's response is attached as appendix 1 to this letter. The Council recognises that the project is still in development and a further consultation will be undertaken in the summer months of 2025. For that reason, and through a continued collaborative approach, further detailed responses will be shared as the scheme progresses and the Development Consent Order process is taken forward.

While this consultation primarily focusses on the technical aspects of the proposal the Council would welcome continued close collaboration with Anglian Water to ensure opportunities to enhance wider infrastructure to support residents, businesses, and the visitor economy of Huntingdonshire, supporting the ambitions of Huntingdonshire District Council, as set out in our Huntingdonshire Futures Place Strategy ([Huntingdonshire Futures | Let's Talk Huntingdonshire \(letstalkhuntingdonshire.net\)](http://HuntingdonshireFutures.com)). We wish to maximise every opportunity to ensure our ambitions are met, delivered and will establish an enduring legacy ensuring Huntingdonshire remains one of the best places in the country to live, work and invest. It is recognised that this scheme offers opportunities to enhance the health and wellbeing of our residents through active travel, we would wish to see environmental net gain maximised to create a visitor destination within the wider unique fens landscape and we also wish to work with you to ensure that as the scheme develops employment and skills development opportunities are made available to local residents working alongside local businesses.

If you have any further queries on any of the comments raised within this response please email [implementation@huntingdonshire.gov.uk](mailto:implementation@huntingdonshire.gov.uk) .

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Kerr'.

**Clara Kerr**

**Chief Planning Officer**

## Appendix 1

- 1.1 Huntingdonshire District Council Cabinet met on the 16<sup>th</sup> July 2024 and approved the preparation and submission of formal comments on the current Phase 2 non statutory consultation on the Lincolnshire Reservoir and associated water infrastructure proposals project.
- 1.2 Comments are only provided in the main on the associated infrastructure elements that fall within Huntingdonshire District Council rather than on the overall scheme.
- 1.3 It is considered that the Lincolnshire Reservoir and associated water infrastructure proposals project is seen as a key opportunity to support the water needs of our communities and meet the growth agenda set out in our Local Plan 2036.
- 1.4 The Council has liaised with its specialist officers and the responses are set out in the table below.

Specialism	Proposal aspect referred to	Comments
Planning Policy	Options Appraisal Report Page 11, para 2 Loss of Habitat	Option A: Loss of habitat from Ouse washes should ensure habitat restoration and betterment post scheme completion, due to European designated status. The same would apply if Option B were to be chosen. Regard should be had to acceptable water levels to ensure habitat status is not adversely impacted.
	Page 11 – General comment:	Agree that both schemes (A and B) should look to reduce flooding. Schemes should work towards achieving betterment in relation to risk of flooding from all sources.
	Page 91 – 6.2.2 –	Abstraction from the Ouse Washes would result in loss of habitat. The scheme should ensure habitat restoration and betterment post scheme completion, due to European designated status. Consideration of water quality treatment to mitigate against invasive species (paragraph 6.2.4) is commended and requires serious consideration. Regard should be had to acceptable water levels to ensure habitat status is not adversely impacted. Scheme should look to reduce flooding. Schemes should work towards achieving betterment in relation to risk of flooding from all sources, this is especially pertinent to Earith which has significant flooding at points in the year resulting in the closure of the A1123 for safety reasons.
	Page 92, paragraph 6.2.11.	“The downstream pipeline corridor towards Madingley and Bluntisham runs initially in a south-west direction from the water treatment works towards Somersham. From here it continues south, with a spur connection to the service reservoir at Bluntisham. The route continues south, followed by routing around the east of Fen Drayton Lakes near to Swavesey. The route is 43.3km of pipeline and would be installed by open cut installation techniques except where it crosses the constraints, such as A roads, detailed in Paragraph 3.3.8.” These rural settlements are relatively isolated and a transport assessment and impact on traffic and transport

Specialism	Proposal aspect referred to	Comments
		movements would be welcomed to ensure minimal impact to residents.
	Page 92, paragraph 6.2.13 & 14	<p>“The area of land identified for siting of a new service reservoir at Bluntisham is located directly north-west of the village, north of Wood End Road.</p> <p>6.2.14 The new reservoir at Bluntisham would require a spur from the downstream transfer to Madingley. This spur would start north of Wheatsheaf Road and west of Pidley Sheep Lane. The circa 3.5km pipeline would cross the B1040 north of existing dwellings, routing in an east-southeasterly direction towards the new service reservoir.”</p> <p>These rural settlements are relatively isolated and a transport assessment and impact on traffic and transport movements would be welcomed to ensure minimal impact to residents.</p>
	Page 94, paragraph 6.3.1	<p>“WSO-B would take water from the Great Ouse at Earith and the River Nene and its Counter Drain. Water from the Great Ouse at Earith would be piped directly to the reservoir or the Middle Level system.”</p> <p>Abstraction from the Ouse Washes would result in loss of habitat. The scheme should ensure habitat restoration and betterment post scheme completion, due to European designated status. Consideration of water quality treatment to mitigate against invasive species requires serious consideration. Regard should be had to acceptable water levels to ensure habitat status is not adversely impacted. Scheme should look to reduce flooding. Schemes should work towards achieving betterment in relation to risk of flooding from all sources, this is especially pertinent to Earith which has significant flooding at points in the year resulting in the closure of the A1123 for safety reasons.</p>
	Page 94, paragraph 6.3.2	<p>“Water would be conveyed directly to the Fens Reservoir from the Great Ouse at Earith using a 1,500mm diameter pipeline of approximately 19.3km in length. It would be installed via open cut installation techniques except where it crosses the constraints, such as A roads, detailed in Paragraph 3.3.8.”</p> <p>Earith is relatively isolated and a key commuting route for many residents in and outside the district, a transport assessment and impact on traffic and transport movements would be welcomed to ensure minimal impact to residents.</p>
	Page 94, paragraph 6.3.3	<p>“The proposed pipeline corridor follows a route from south of Bluntisham within the RSPB Hanson Ouse Fen Nature Reserve north-west towards Pidley. Following crossing of the B1040 it realigns northwards between Pidley and Somersham, before heading north-east, skirting Somersham towards Chatteris.”</p> <p>These rural settlements are relatively isolated and a transport assessment and impact on traffic and transport</p>

Specialism	Proposal aspect referred to	Comments
		movements would be welcomed to ensure minimal impact to residents.
	General comment, chapter 6	There are opportunities that should be considered to enhance active travel opportunities in conjunction with the installation of associated infrastructure, there is an opportunity to enhance provision in areas such as Somersham, Bluntisham, Pidley, Earith etc.
	General comment, chapter 6	Both schemes should ensure no deterioration of water quality and habitat status and look towards betterment.
	General comment	Downstream transfer pipelines for both options A and B run through Huntingdonshire Local Plan's Green Infrastructure Priority Area of the Great Ouse Valley, and some County Wildlife sites. In addition, the pipeline will pass north of Holywell conservation area. These sites can be found on our interactive policies map: <a href="https://3csharedservices.org">HDC Local Planning Policies (3csharedservices.org)</a> and can be provided as shape files on request. The relevant Local Plan policies are LP 3 Green Infrastructure, LP 11 Design Context. Local Plan policy LP 3 notes that "A proposal within the Ouse Valley Landscape Character Area, defined in the Huntingdonshire Landscape and Townscape Assessment Supplementary Planning Document will be supported where it contributes to the landscape, wildlife, cultural and historical value of the area." The policy also includes improvements to accessibility, naturalness and connectivity of green spaces, assisting in achieving Natural England's ANGST standard, maintaining and enhancing rights of way network amongst its criteria. As a strategic policy for the district, it is requested that any pipeline and service reservoir development aim to meet the aims of this policy and contribute to these objectives in a positive manner. Policy LP 11 looks towards the <a href="#">Huntingdonshire Landscape and Townscape Assessment SPD 2022</a> and our <a href="#">conservation areas</a> asking that regard is had to these and their valued characteristics. Likewise, it is requested that any pipeline and service reservoir development aim to meet the aims of this policy and contribute to these objectives in a positive manner.
Environmental Protection	General comment	The impact of construction and operational noise on nearby residents would need to be considered. It is possible for a new river intake with treatment equipment and a pumping station to be located on land to the south of Bluntisham known as Gull Field (south of the old railway). There are a number of dwellings along Station Road and Rectory Road to the north of this. It is also possible for a new service reservoir to be located to the north-west of Bluntisham on land known as "Colne Heath". This is situated north of The Heath (road). There are a number of dwellings situated alongside The

Specialism	Proposal aspect referred to	Comments
		Heath. These dwellings would need to be considered with regard to construction and operational noise. Dwellings located along the pipeline corridors would also need to be considered during the construction phases. A Construction Environmental Management Plan would need to be agreed prior to the start of any work.
	General comment	Land contamination would need to be assessed throughout the whole scheme in order to protect construction workers, end users and uncontaminated land and water.
	General comment	The air quality would need to be considered, in particular, any change of traffic movement through villages such as Bluntisham and Earith.
	General comment	The noise, land contamination and air quality assessments proposed by the specialist consultants during the Local Authority Associated Infrastructure Forum – round 1 meeting on 15 May 2024 were acceptable and will be required.
Built Heritage (excl archaeology)	Introduction	The proposals are at an early stage for above ground heritage, the proposed 500m route has been identified and a methodology established for the assessment of heritage assets – ( Built Heritage Methodology doc no SROP-MML-XXX-XX-RPT-TA 000193) the methodology however has yet to be applied and at this stage it is not possible to identify which heritage assets are likely to be affected by the works and what the impact is likely to be. The Council therefore is unable to provide a full and detailed response at this time.
	Para 3.2.3	States that the building heritage methodology has been designed to consider impacts arising from the reservoir and associated built infrastructure only. The Council would encourage the scope of the assessment to be extended to extend the methodology to address transfer works which may be limited in time but which may have impacts on the built heritage.
	Table 3.1 p15	Heritage Value Criteria. There is some confusion regarding the High and Medium heritage values, particularly as both categories refer to grade II listed buildings and conservation areas. Listed buildings by definition are of national importance it therefore seems unreasonable to group their significance with non designated sites of regional importance. It is unclear what criteria are used to determine what is substantial significance and good significance
	General	The Options Appraisal Report identifies two routes WSoA and WSoB, it is noted that WSOA is the preferred route as it states p11 that WSOA would likely result in lower level of impact on the value of designated heritage assets in the villages of Bluntisham and Earith ( are these assets scheduled monuments in which case these are the remit of Historic England). Minimising the impact of development on heritage assets through the

Specialism	Proposal aspect referred to	Comments
		consideration of initial design options is welcomed however it is not clear which assets will be affected by either route and why route A is better than route B The identification of ‘the setting of both Bluntisham and Earith Conservation Areas, including the Grade I Parish Church of St Mary, Grade II Bluntisham and Earith War Memorial and Grade II* Bluntisham House within the Bluntisham Conservation Area.’ It appears arbitrary when there is no mention of the impact on heritage assets in Holywell.
Landscape	General comment	This was a high-level overview of the emerging design of the proposed Fens Reservoir. This includes the proposed main reservoir site and associated water infrastructure. The proposed reservoir site, between Chatteris and March is of a purposely synthetic feature with indicative landscape elements emerging, which include woodland, wetland, floating wetland, grassland and other areas of land set aside for potential environmental mitigation and/or enhancement.
	General comment	Opportunities are emerging through the project vision which could be steered to create significant and lasting opportunities for the biodiversity and the emerging landscape. Care must be taken as the project evolves, to ensure that the emerging landscapes are not fragmented withing the wider landscape and to not feel alien within the receiving landscape character. Connectivity is key to deliver lasting benefits to biodiversity.
	General comment	The associated water infrastructure is currently shown as a 500m wide corridor. This is due to be narrowed down to a 50m wide corridor as the project further develops. The impact on the landscape at this stage is unclear. However, there is a real concern for how this will be routed particularly in the areas of Bluntisham, Holywell, the Great River Ouse and RSPB Fen Drayton Lakes in terms of visual impact of the receiving landscape and associated wildlife.