My ref: 24/02051/COA
Date: Thursday 21st November 2024
Contact: Claire Burton
Email: Implementation@huntingdonshire.gov.uk

Huntingdonshire DISTRICT COUNCIL
Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN
www.huntingdonshire.gov.uk

Sent via email to:
fensreservoir@planninginspectorate.gov.uk

Dear PINS,

Environmental Impact Assessment (EIA) Scoping consultation by Anglian Water and Cambridge Water ("the Applicant") for the Fens Reservoir Development Consent Order (DCO) proposals

I am writing on behalf of Huntingdonshire District Council (the Council) in response to your request dated 24th October 2024 regarding the Applicant's EIA Scoping Report for the Fens Reservoir proposals. The Council understands that the Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008, and that the Applicant has sought a Scoping Opinion from the Planning Inspectorate (PINS), 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 Council acknowledges that it has been identified by PINS as a consultation body to inform the Scoping Opinion. Attached to this letter is a table containing the Council's views on this matter.

If you have any queries regarding this submission or require any further information, please contact Implementation@huntingdonshire.gov.uk

Yours sincerely,

Clara Kerr

Chief Planning Officer

Huntingdonshire District Council

Our Reference: 24/02051/COA

Fens Reservoir: Comments on the Applicant's EIA Scoping Report

This document sets out the comments by Huntingdonshire District Council (**the Council**) regarding Anglian Water and Cambridge Water's EIA Scoping Report for the Fens Reservoir proposals.

The following table contains comments across a number of technical specialisms.

Scoping Report chapter	Specialism	Proposal aspect referred to	Comments
1		Introduction	Noted
2		Project description	Noted
3		Consideration of Alternatives	Noted
4		Legislation, Planning Policy & Guidance	Any revisions to the National Planning Policy Framework (NPPF), as recently consulted on by the Government, will need to be reflected. The Applicant should also monitor the Council's progress in preparing and adopting a replacement of the current Adopted Local Plan which, at the time of writing, envisages Preferred Options (Regulation 18) consultation in Summer/Autumn 2025 and Pre-submission Consultation (Regulations 19 and 20) in Spring 2027. The Local Plan, whilst not the starting point for consideration of NSIP projects, is nonetheless a material consideration.

Scoping Report chapter	Specialism	Proposal aspect referred to	Comments
		Legislation, Planning Policy & Guidance	Appendix 4.1 Table 3.1 correctly identifies no Made Neighbourhood Plans as currently forming part of the statutory development plan for Huntingdonshire, relevant to the proposed development. This may change over time and the Applicant should monitor the status of Neighbourhood Planning within the Parish Council areas listed below.
5		Consultation & Engagement	The Applicant should engage with the following Town/Parish Councils within Huntingdonshire: - Bluntisham Parish Council - Colne Parish Council - Earith Parish Council - Fenstantion Parish Council - Holywell-cum-Needingworth Parish Council - Pidley-cum-Fenton Parish Council - St Ives Town Council - Warboys Parish Council
6		EIA Approach & Methodology	Noted
7	Landscape and Visual	EIA Scoping Report 1 Chapter 7	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 Guidelines for the Landscape and Visual Impact Assessment, Third Edition (GVLIA3) have been used to guide the extent of the study area, which is suitably extensive to allow for the ongoing refinement of the proposed development. The impact on the landscape at this stage is unclear. However, there is a real concern for how this will be routed. Of particular concern is the potable water connection point in the areas of Bluntisham: there would need to be a 200m x 200m concrete service reservoir, 8m tall (earth bunded), together with a 30m x 15m control building, security fencing, access road etc. with red line areas covering traditional orchards (Priority Habitats) and other County Wildlife Sites.

Scoping Report chapter	Specialism	Proposal aspect referred to	Comments
			Care must be taken as the project evolves, to ensure that the emerging landscapes are not fragmented within the wider landscape and to not feel alien within the receiving landscape character. Landscape connectivity is key to deliver lasting benefits to biodiversity. The series of photomontages and representative viewpoints will be formed for the proposed development to accompany the LVIA as the project further develops, and the 500m wide corridor currently shown is narrowed down to a 50m wide corridor. Further work is required to fully define the extent of the visual assessment and to confirm the representative receptors. The selection of locations to be agreed through future consultation, with focus on a range of potential visual receptors identified within the scoping report. The emerging design of the proposed development should demonstrate processes applied to further identify and refine a landscape-led design and mitigation strategy and identify opportunities for landscape improvements and enhancements. The scheme will result in direct and/or indirect impact to sites of local importance for nature conservation and should be focussed and designed to avoid adverse impacts and to protect, restore and expand these habitats.
8 & 9	Ecology	Terrestrial & Aquatic Biodiversity	The Council is not the statutory consultee for this subject area and defers to Cambridgeshire County Council to make detailed comment on these chapters at this time. Whilst reserving the right to comment further in the future, at this point the Council makes the following high-level observations: The Environmental Statement should consider whether the proposed development would have any effect on any Water Framework Directive waterbodies or any deterioration in any RAMSAR site or SSSI covered by the Habitats Directives. The Environmental Statement should consider any impacts on local wildlife and geological sites, including Local Nature Reserves, setting out proposals for the mitigation of any impacts

Scoping Report chapter	Specialism	Proposal aspect referred to	Comments
			and if appropriate compensation measures as well as opportunities for enhancement and improved connectivity with wider ecological networks. All stages of the proposed development should be assessed within the Environmental Statement with regard to protected species, including but not limited to great crested newts, reptiles, birds, water voles, badgers and bats. Records of protected species should be obtained from the appropriate local biological record centres, nature conservation organisations and local groups. Whilst the Wildlife Trust has declined to comment at this time, you should nonetheless engage with them in the preparation of the Environment Statement. Consideration should be given to the wider context of the site in terms of habitat linkages and protected species populations in the wider area. The area likely to be affected by the proposed development should be thoroughly surveyed by competent ecologists at appropriate times of the year for relevant species and the survey results, impact assessments and accompanying appropriate mitigation strategies included as part of the Environmental Statement. An appropriate level habitat survey should be carried out onsite to identify any important habitats present, in addition to ornithological, botanical and invertebrate surveys in order to establish whether any scarce or priority species are present. Based on the information presented the surveys already undertaken are sufficient in their scope, subject to compliance with the CIEEM's Advice note on the Lifespan of Ecological Reports and Surveys (attached) regarding their expiry. The baseline biodiversity value of the site needs to be correctly assessed in accordance with Paragraph 6 of Schedule 7A of the Town and Country Planning Act 1990, an anti-avoidance provision designed to prevent a site's pre-development biodiversity value being artificially lowered through activities such as vegetation clearance. The baseline biodiversity assessment therefore needs to account for any/all habitat removed since 30th January 2020. Paragraph 6B within the same Schedule describes how to assess the biodiversity value of the

Scoping Report chapter	Specialism	Proposal aspect referred to	Comments
			removed habitat if there is insufficient evidence of its value immediately before the degradation occurred. The Environment Statement should contain details of: • Any historic data for the site (including from previous surveys) • Additional surveys carried out as part of the proposed development • The habitats and species present • The status of these habitats and species • The direct and indirect effects of the proposed development on these habitats and species • Full details of any mitigation or compensation measures • Opportunities for biodiversity net gain or other environmental enhancement All surveys should follow CIEEM's Advice note on the Lifespan of Ecological Reports and Surveys regarding their expiry. A detailed assessment of Biodiversity Net Gain will be required, as well as information and details on the conducted ecological surveys mentioned in the Scoping Report. The effect of the proposed development on any ancient woodland, ancient and veteran trees should be taken into account, including the scope to avoid and mitigate for adverse impacts and any opportunities for enhancement. A Tree Survey and Arboricultural Impact Assessment should accompany the application, along with a separate Hedgerow Assessment. Whilst it will be acceptable for these documents to form part of the related assessments submitted with the application, their findings should inform the baseline within the Environmental Statement.
10	Water Resources and Flooding	EIA Scoping Report Volume 1, section 10.6:	HDC agrees that the provision of a reservoir and associated infrastructure is essential to the future water supply for the district and the wider area. The National Policy Statement for Water Resources Infrastructure (Defra, 2023) states that effect on water quality and the

Scoping Report chapter	Specialism	Proposal aspect referred to	Comments
		Baseline conditions	requirement in to not increase flood risk elsewhere for the lifetime of the development, taking into account climate change is an important consideration. It is considered that the requirement for betterment should be included within the scope of the EIA. Most waterbodies within Huntingdonshire are also highly sensitive when considering ammonia, Flood zone 3b in the areas of Somersham, Earith, Bluntisham, Holywell & Needingworth and Fenstanton, with flood zone 2 and 3 extending further. Surface water flood risk is also present in these areas, with groundwater at either or very near the ground surface in the 100 year return period event. It is therefore proposed that Huntingdonshire's stage 1 Water Cycle Study and Strategic Flood Risk assessment are taken into account in the baseline assessment in all aspects relating to the impact on flooding and water. Evidence Library for Local Plan Update - Huntingdonshire.gov.uk Maintenance and quality of drainage networks within the proposed development will also need to be considered to ensure flood risk is not increased elsewhere and within existing settlements.
10	Water Resources and Flooding	EIA Scoping Report Volume 1, paragraph 10.7.7	Good practice examples should include a long-term maintenance plan for infrastructure, including open channel transfers to ensure continued flood risk mitigation.
10	Water Resources and Flooding	EIA Scoping Report Volume 1, paragraph 10.8.5	It is difficult to ascertain if the potential effects should be scoped out in Table 10-2 without further information to support this decision, a specific example of this is "good construction and operational practice".

Scoping Report chapter	Specialism	Proposal aspect referred to	Comments
11	Historic Environment	EIA Scoping Report 1 chapter 11 11.3.2	There is no evidence that advice provided in our letter dated 9th August 2024 (appended) has been considered in the submitted Scoping Report, the issues previously set out are therefore reiterated. 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 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.
11	Historic Environment	11-5 Heritage value criteria	Listed buildings are included on the National Heritage list for England. Buildings are identified against national criteria and regardless of their grade they are of national significance. The intention to include some grade II listed buildings within the medium heritage value which equates to regional importance is therefore not supported.
11	Historic Environment Historic Environment	11.9.16	The Scoping Report says here: *"However, the designation of an asset may not determine its value in every instance. The level of* heritage *value will be assessed individually and professional judgement will be used to determine the appropriate level of value for each asset."* This forms the justification for table 11-5 which is not considered appropriate, significance has been assessed by Historic England/ the Government through a national designation It is unclear what criteria are used to determine what is considered to be substantial significance and good significance if national designations are not applied
11	Historic Environment	11.9.18	The Scoping Report says here: *"The condition of an asset will be considered when assessing its heritage value. The exception is where there is evidence of deliberate neglect of, or damage to, the heritage asset."*

<table>
<tr><th>Scoping Report chapter</th><th>Specialism</th><th>Proposal aspect referred to</th><th>Comments</th></tr>
<tr><td></td><td></td><td></td><td>It is unclear how the applicant will assess intent associated with deliberate neglect or damage. It also suggests that the condition of the building will be a factor in assessing heritage value – NPPF para 202 does not suggest this approach rather that in these cases where deliberate neglect can be shown then condition should be disregarded.</td></tr>
<tr><td>11</td><td>Historic Environment</td><td>Volume 3 part 3 Appendix 11.2 Historic environment gazetteer</td><td>
<table>
<tr><td>FR_1902</td><td>MCB19481</td><td>Old Ferry Boat Inn, Holywell cum Needing worth</td><td>Non-designated</td><td>N/A</td><td>16th century</td><td>Commercial</td><td>Inn</td><td>Low</td><td>Inner</td></tr>
</table>

This appears to be incorrect this is a grade II listed building List Entry Number: 1128427</td></tr>
<tr><td>11</td><td>Historic Environment</td><td>Archaeology</td><td>The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County Council on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council’s boundary. The Council would defer to Cambridgeshire County Council for a detailed response.</td></tr>
<tr><td>12</td><td>Geology, Soils, Agriculture & Land Quality</td><td>Paragraph 12.3.3</td><td>Paragraph 12.3.3 notes that “It is proposed that engagement will be undertaken with individual farm owners and tenants as part of the assessment to determine any likely significant effects on agricultural businesses from the Proposed Development.” As the definition of proposed development includes associated infrastructure, the Council would like confirmation that this includes land affected within the HDC area.</td></tr>
<tr><td>12</td><td>Geology, Soils, Agriculture & Land Quality</td><td>Paragraph 12.4.2</td><td>Paragraph 12.4.2 notes “For the assessments relating to geology and land quality, a 250m buffer from the Scoping boundary has been used (Figure 12.1, and Figure 12.2). This is extended to 1km when considering groundwater abstractions. This study area has been selected based on professional judgement considering the distance beyond which migration of contamination is likely to be minimal.”
It is considered that any works that are within a reasonable distance of the Ouse washes and the Great River Ouse and tributaries should also be considered to ensure no significant</td></tr>
</table>

Scoping Report chapter	Specialism	Proposal aspect referred to	Comments
			environmental effects. This is especially pertinent if contaminated land is disturbed creating potential run-off into rivers and streams.
12	Geology, Soils, Agriculture & Land Quality	Paragraph 12.6.15 & 12.6.73	In paragraph 12.6.15 it is noted peat is present within some of the scoping boundary. The reinstatement and betterment of peat is encouraged due to the significant climate implications resulting in its deterioration and/or removal of peat. The baseline condition of the peat and climate implications should be assessed within the scope. The same applies to paragraph 12.6.73
12	Geology, Soils, Agriculture & Land Quality	Table 12-4: Loss or deterioration of a geodiversity or sensitive site.	The table notes that "There are no geodiversity sites (comprising geological Sites of Special Scientific Interest (SSSI), or regionally or locally important geological sites or non-designated outcrops/features of interest) within 250m of the Scoping boundary." It is considered that 250m is too small a distance and that this should be extended to ensure no wider impact to any sites of special importance. The assessment is urged to consult with the Cambridgeshire Geological Society to establish areas of importance.
13		Material Assets & Waste Management	The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County Council (in its capacity as the Minerals & Waste Authority) on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council's boundary. The Council would defer to Cambridgeshire County Council for a detailed response.
14	Traffic and Transport	Paragraph 14.4.6	The Council is not the statutory consultee for this subject area and defers to Cambridgeshire County Council (in its capacity as the Local Highway Authority) to make detailed comment on these chapters at this time. Whilst reserving the right to comment further in the future, at this point the Council makes the following high-level observations: The study area should include the A1123 and the impact that diverted traffic movements may have on the surrounding area including St Ives, Bluntisham, Earith, Colne and Somersham during the construction phase including also impacts on the B1089, B1050 and B1040.

Scoping Report chapter	Specialism	Proposal aspect referred to	Comments
			Careful consideration should be given to the timing of any road closures in the area which will affect the wider area not only along the A1123 towards and within St Ives (which is already heavily congested), but also to the East. Key settlements which may be affected may include Earith, Bluntisham, Colne, Somersham, Holywell and Needingworth and St Ives, especially as diversion routes will be lengthy. Outside HDC settlements affected could include those along the A1123, B1050 and B1381, B1089 and B1040.
14	Traffic & Transport	Public Rights of Way (PROW)	The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County Council (in its capacity as the Local Highway Authority) on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council's boundary. Whilst reserving the right to comment further in the future, the Council would defer to Cambridgeshire County Council for a detailed response.
15	Air Quality	Paragraph 15.5.4	The Environmental Impact Assessment Scoping Report Volume 1 makes reference to the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 in Section 15.5.4. DEFRA is in the process of producing planning guidance on how developers and decision-makers should take the targets into consideration in the planning process. However, ahead of the publication of the finalised guidance next year the department has issued interim guidance, which should be taken into account.
15	Air Quality	Paragraph 15.8.3	The proposed modelling will consider both operational and construction traffic and construction work impacts will also be assessed. Section 15.8.3 of the Environmental Impact Assessment Scoping Report Volume 1 confirms nothing has currently been scoped out with regard to air quality, so all aspects will be assessed further. No comment at this time.
16		Carbon & Greenhouse Gases	The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County Council on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council's boundary. The Council would defer to Cambridgeshire County Council for a detailed response, whilst reserving the right to comment in the future.

Scoping Report chapter	Specialism	Proposal aspect referred to	Comments
17		Climate Resilience	The Council is not the statutory consultee for this subject area and defers to Cambridgeshire County Council to make detailed comment on these chapters at this time. Whilst reserving the right to comment further in the future, at this point the Council makes the following high-level observations: The ES should identify how the development affects the ability of the natural environment (including habitats, species and natural processes) to adapt to climate change. This should include an assessment of the impacts on the vulnerability or resilience of a natural feature as well as impacts on how the environment can accommodate change for both nature and people. Nature-based solutions should be considered to address impacts.
18	Noise & Vibration	Construction Noise	There is a potential water supply source in Bluntisham Where a pump-house could be constructed. BS 5228 Code of Practice for Noise and Vibration Control on Construction and Open Sites will be followed. Noise limits from BS5228 Table E.1 have been repeated in Table 18-7 of the Scoping Report. A baseline noise survey with an agreed method and monitoring location has been undertaken but not submitted.
18	Noise & Vibration	Operational Noise	A potential water supply source in Bluntisham may include a noisy water pump. BS 4142 Methods for Rating and Assessing Industrial and Commercial Sound will be followed. Mitigation measures will consider a reduction of noise at source, use of noise absorptive material and significant distance from noise source to noise sensitive receiver. A baseline noise survey with an agreed method and monitoring location has been undertaken but not submitted.
19		Public Access & Amenity	The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County Council on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council's boundary. The Council would defer to Cambridgeshire County Council for a detailed response, whilst reserving the right to comment in the future.

Scoping Report chapter	Specialism	Proposal aspect referred to	Comments
20		Socio-economics & Community	The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County Council on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council's boundary. The Council would defer to Cambridgeshire County Council for a detailed response, whilst reserving the right to comment in the future.
21		Human Health	The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County Council on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council's boundary. The Council would defer to Cambridgeshire County Council for a detailed response, whilst reserving the right to comment in the future.
22		Major Accidents & Disasters	The Council is not the statutory consultee for this subject area and so would expect PINS to consult Cambridgeshire County Council on this matter regarding the site and any associated infrastructure that falls within Cambridgeshire County Council's boundary. The Council would defer to Cambridgeshire County Council for a detailed response, whilst reserving the right to comment in the future.
23		Cumulative Effects	An impact assessment should (subject to available information) identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out, including: • Existing completed projects • Projects with planning permission which have not yet commenced • Approved but uncompleted projects • Ongoing activities that are not already included in the baseline assessments • Plans or projects for which an application has been made and which are under consideration by the consenting authorities

Scoping Report chapter	Specialism	Proposal aspect referred to	Comments
			• Plans and projects which are reasonably foreseeable and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects Further discussion in respect of the precise methodology for undertaking cumulative assessments is recommended. Planning application reference 24/01082/OUT (Compass Point Business Park, St Ives) should be added to the list of developments at Appendix 23.1
24		Summary	Noted

ADVICE NOTE

ON THE LIFESPAN OF ECOLOGICAL REPORTS & SURVEYS

APRIL 2019



It is important that planning decisions are based on up-to-date ecological reports and survey data. However, it is difficult to set a specific timeframe over which reports or survey data should be considered valid, as this will vary in different circumstances. In some cases there will be specific guidance on this (such as for the age of data which may be used to support an EPS licence application). In circumstances where such advice does not already exist, CIEEM provides the general advice set out below.

For some projects the time taken between commencing the scoping or design and submitting a planning application can be several years, and this can result in the early ecology surveys becoming out-of-date (based on the advice set out below); this can lead to additional costs for developers associated with updating survey data. Nevertheless, there are considerable advantages associated with undertaking surveys early during the scoping or design phases of a project.

Ecological consultants should give careful consideration to which, if any, surveys need to be updated; design their data collection in a way which maximises the benefits of early surveys whilst minimising the costs to developers; and provide clarity on the likely lifespan of surveys in their reports.

AGE OF DATA	REPORT / SURVEY VALIDITY
Less than 12 months	Likely to be valid in most cases.
12-18 months	Likely to be valid in most cases with the following exceptions: • Where a site may offer existing or new features which could be utilised by a mobile species within a short timeframe (see scenario 1 example); • Where a mobile species is present on site or in the wider area, and can create new features of relevance to the assessment (see scenario 2 example); • Where country-specific or species-specific guidance dictates otherwise. Report authors should highlight where they consider it likely to be necessary to update surveys within a timeframe of less than 18 months.
18 months to 3 years	A professional ecologist will need to undertake a site visit and may also need to update desk study information (effectively updating the Preliminary Ecological Appraisal) and then review the validity of the report, based on the factors listed below. Some or all of the other ecological surveys may need to be updated. The professional ecologist will need to issue a clear statement, with appropriate justification, on: • The validity of the report; • Which, if any, of the surveys need to be updated; and • The appropriate scope, timing and methods for the update survey(s). The likelihood of surveys needing to be updated increases with time, and is greater for mobile species or in circumstances where the habitat or its management has changed significantly since the surveys were undertaken. Factors to be considered include (but are not limited to): • Whether the site supports, or may support, a mobile species which could have moved on to site, or changed its distribution within a site (see scenario 1&2 examples); • Whether there have been significant changes to the habitats present (and/or the ecological conditions/functions/ecosystem functioning upon which they are dependent) since the surveys were undertaken, including through changes to site management (see scenario 3 example); • Whether the local distribution of a species in the wider area around a site has changed (or knowledge of it increased), increasing the likelihood of its presence (see scenario 4 example).
More than 3 years	The report is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated (subject to an assessment by a professional ecologist, as described above).

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www.huntingdonshire.gov.uk
implementation@huntingdonshire.gov.uk

9th August 2024

Laura Underhill
Anglian Water

Sent by email to: info@fensreservoir.co.uk

cc: lUnderhill@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 8th 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). 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 .

Yours sincerely,



Clara Kerr

Chief Planning Officer

Tel: 01480 388388 **Fax:** 01480 388099

Appendix 1

1.1 Huntingdonshire District Council Cabinet met on the 16th 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	"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. 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." 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.
	Page 94, paragraph 6.3.1	"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." 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.
	Page 94, paragraph 6.3.2	"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." 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.
	Page 94, paragraph 6.3.3	"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." 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.
	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: HDC Local Planning Policies (3csharedservices.org) 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 Huntingdonshire Landscape and Townscape Assessment SPD 2022 and our conservation areas 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 trafic 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 afected 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 arbitory when there is no mention of the impact on heritage asssets 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.