



Anglian Water – Fens Reservoir DCO Team

sent via email to info@fensreservoir.co.uk

Cllr Dee Laws – Portfolio Holder for Building Control, Flooding, IDBs & Planning

Kirsty Paul - Planning Policy Manager

Fenland Hall, County Road, March

8<sup>th</sup> December 2025

Dear Sir/Madam,

#### RESPONSE TO FENS RESERVOIR PHASE 3 CONSULTATION

Fenland District Council (FDC) welcomes the opportunity to comment on Anglian Water and Cambridge Water's Phase 3 consultation for the proposed Fens Reservoir. We recognise the national and regional importance of securing long-term, sustainable water supply and we remain committed to working constructively with project partners to help shape a scheme that delivers maximum benefit for local communities, the environment and the wider region.

Over recent months, FDC officers and technical specialists have engaged closely with Anglian Water's project team through meetings, workshops, site visits and written exchanges. We would like to acknowledge the constructive nature of this engagement and thank all involved for their time, expertise and openness. Feedback gathered through these discussions has directly informed the Council's response.

The accompanying document sets out FDC's detailed comments on the emerging proposals. These reflect the breadth of issues raised by internal service areas, external advisers and key stakeholders.

At this stage, the Council's focus is on ensuring that the Development Consent Order (DCO) submission is based on a robust, well-evidenced design that:

- maximises opportunities for nature recovery, placemaking and inclusive access.
- mitigates adverse impacts on local communities, businesses and the environment.
- delivers genuine long-term social, economic and health benefits.
- reflects the distinctive character, constraints and opportunities of the Fenland landscape.

We would welcome the opportunity for continued dialogue on the matters raised, and we remain committed to working collaboratively with Anglian Water, Cambridge Water and other key stakeholders as the project progresses.

Please do not hesitate to contact <u>planningpolicy@fenland.gov.uk</u> if you require any further clarification or input from FDC at this point in the process.

Yours sincerely,



Portfolio Holder for Building Control, Flooding, IDBs & Planning

**Kirsty Paul** 

Planning Policy Manager Fenland District Council

Enc. FDC Response to Anglian Water – Fens Reservoir Phase 3 Consultation. Attached separately are two reports we received from consultants we have employed to help support FDCs engagement with the Fens Reservoir Project. There is one report from LATCHAM as transport masterplanning consultant and another from WWA Landscape our landscape impact and design consultants.

# FDC Response to Anglian Water – Fens Reservoir Phase 3 Consultation

## INTRODUCTION

Fenland District Council (FDC) recognises the strategic importance of securing resilient, long-term water supplies for the East of England, and welcomes the ambition and vision underpinning the Fens Reservoir. The Council strongly supports the intention to go beyond the delivery of a single-purpose water asset — to create a place where water, people and nature come together, delivering lasting social, economic and environmental value for the region.

This is a once-in-a-generation opportunity to create nationally significant infrastructure that enhances regional water resilience while also addressing some of the deep-rooted socio-economic challenges within the host area. According to the 2025 Indices of Multiple Deprivation, Fenland ranks 66th most deprived local authority in England, with approximately 9% of local neighbourhoods among the most deprived 10% nationally. The district faces persistent inequalities in health, education, access to services, and economic opportunity.

The Council therefore views the reservoir as an opportunity to act as a catalyst for inclusive and sustainable growth — supporting the ambitions of national and local policy to improve wellbeing, create accessible green and blue spaces, and strengthen community identity and resilience. In line with the principles set out in the National Policy Statement for Water Resources Infrastructure (2023) and the National Planning Policy Framework (NPPF), major infrastructure projects of this scale are expected to deliver positive outcomes for people, places and the environment, helping to tackle social inequalities and enhance natural capital.

FDC is broadly supportive of the project's aims and recognises its potential to deliver multiple benefits for the area and beyond. However, the Council remains concerned that some opportunities have not yet been fully explored, and that potential local impacts require further mitigation. We therefore welcome continued dialogue with the project partners to ensure that the final design and delivery of the reservoir maximise local benefit, strengthen placemaking outcomes, and create a legacy of lasting value for the communities of the Fens.

## **GENERAL/OVERARCHING COMMENTS**

# CPCA Local Growth Plan – Importance of the Fens Reservoir

The Cambridgeshire and Peterborough Combined Authority has recently published its Local Growth Plan (LGP) setting out its ambitions for the region by 2025. The LGP will be a material consideration in the assessment of the DCO application.

### C220817 CPCA Prospectus

The importance of the Fens Reservoir to the LGP is set out at various places in the document:

It is recognised as an important visitor and recreational opportunity within the Fens Growth Triangle: "Fens Visitor Experience: A space featuring walking and cycling paths, water sports and a visitor centre, creating a new destination for recreation and education." (page 139)

Its importance as a secure, sustainable, future water supply is also recognised (page 158), and additionally "the Fens Reservoir will be transformational with business use, housing unlocked, and travel and tourism opportunities opened up - all set within an outstanding, accessible natural landscape."

The Wisbech link (e.g. rail, light rapid transit, busway) is identified as an important transport element of the LGP (page 171). At the same time, it highlights the importance of bringing the Fens Reservoir and Chatteris into the assessment: "In parallel, it will be important to examine the alignment around access to the potential Fens Reservoir and Chatteris, ensuring that the scheme is designed to maximise wider benefits, including opportunities for sustainable travel, enhanced accessibility, and integrated growth across the corridor."

#### **ACTION:**

• Ensure that the key aims for the Fens Reservoir in the CPCA's Local Growth Plan are embedded in the project's design, construction and operation.

# Design Approach

Anglian Water has indicated that a degree of design flexibility will be required as the project progresses. This flexibility is described as necessary to accommodate technological development and innovation, respond to ongoing consultation feedback, and allow for refinement through detailed design as more information about the site and its conditions becomes available. AW have also indicated that flexibility will need to extend beyond DCO submission, to enable efficient delivery, good value for money, and responsiveness to site circumstances identified during groundworks. Reference has been made to the use of a 'Rochdale Envelope' approach, defining parameters for consent while allowing scope for adaptation within agreed limits.

The Council is broadly comfortable with this principle and recognises the importance of maintaining flexibility where appropriate. However, there is concern that an over-reliance on

worst-case assumptions or a high degree of design tolerance could dilute the quality of key design outcomes or introduce uncertainty around fundamental elements of the scheme. It should also be noted that certain aspects will need to be more fully defined prior to submission to provide confidence that the project can deliver its stated environmental, landscape and placemaking benefits.

The Council understands that Design Principles are set out in the Design Refinement Report and will be commenting on these separately. However, the status and scope of the proposed Design Code remain unclear, including whether it will form part of the DCO submission and be formally secured through consent. The Council considers the Design Code to be a critical mechanism to ensure design quality, consistency and accountability across the project.

To that end, the Council recommends that the Design Code should include clear and practical guidance covering areas such as (but not limited to):

- Car parking and access design, including landscape treatment, surface materials and integration with pedestrian and cycle routes.
- Integrated playful environments for all ages and abilities, supporting inclusive and engaging public spaces aligned with the project's social value objectives.
- Materiality and finishes, ensuring that structures, paths and visitor infrastructure reflect the local Fenland character and landscape context.
- Landscape, biodiversity and public realm design standards that deliver a high quality, coherent and legible environment around the reservoir.

These examples are illustrative rather than exhaustive, and the Council would welcome early collaborative input into the development of the Design Code and associated design governance arrangements. This would help ensure the right balance between necessary flexibility and secured design quality that delivers meaningful, place-based outcomes for the Fenland area.

# Design Principles

FDC welcomes the inclusion of a clear and comprehensive set of design principles in the Consultation 3 material. These principles provide an important foundation for shaping the reservoir as a nationally significant infrastructure project that is landscape-led, community-focused and environmentally responsible. At this stage, FDC's priority is to ensure that the principles are applied consistently and robustly across the emerging masterplan and the detailed design that will accompany the DCO submission.

Overall, our position is that the scheme should deliver a balanced, resilient and people-centred landscape, grounded in the character of the Fens while maximising opportunities for nature recovery, sustainable movement, recreation and long-term socio-economic benefit.

### Placemaking as the guiding principle

FDC strongly welcomes the new design principle on Placemaking, which states:

"In addition to its water supply function, the reservoir will be designed to create a unique and stimulating place to provide health and wellbeing and educational benefits for local and regional communities where visitors will be keen to return and where they can enjoy an accessible, safe and nature-rich environment for leisure and recreation in perpetuity."

FDC sees this principle as critical. It should act as the guiding light for the entire design approach, informing how other principles are interpreted and how the masterplan evolves. Placemaking must not be a secondary theme or an outcome of other decisions—rather, it should shape how the reservoir looks, feels and functions for people, nature and surrounding communities from day one.

This includes embedding human scale, inclusive access, diverse experiences and a clear sense of identity across the whole site—not only at the main Recreation Hub.

## Connecting Nearby Communities - broader and stronger commitments needed

FDC also welcomes the principle of Connecting Nearby Communities, which acknowledges the reservoir's role in enhancing connectivity for settlements such as Chatteris, Doddington, Wimblington and March. However, this principle must be broadened and strengthened in two important ways:

- Manea must be explicitly included: Manea lies at an equivalent distance to the
  reservoir as other named communities, sits on existing desire lines towards Honey
  Bridge, and is already referenced in the masterplanning work for the western zone.
  Excluding Manea risks underplaying a key opportunity to connect a village that is well
  positioned to access the site via active travel and public transport links.
- The commitment to active travel needs to be more explicit and ambitious: The current wording—that active travel could be promoted "where practicable"—lacks clarity and does not reflect the scale of opportunity presented by the reservoir. For FDC, a firm commitment to safe, direct and attractive walking, cycling and horse-riding connections is essential to delivering the health, wellbeing and environmental legacy that the project claims.

Active travel is not an optional add-on at the end of the design process; it must be a core structural element of the masterplan and a defining legacy for surrounding communities.

## Towards a varied, context-sensitive Fenland landscape

FDC supports the ambitions behind principles such as "Wetland First," "Restored Fenland Landscape," and "Narrative Landscape." However, successful delivery will depend on ensuring that the reservoir's edge and surrounding land do not become uniform or overly dominated by a single habitat type.

A richer mosaic—wetlands, grasslands, wet woodland, scrub, open space and varied landform—will be essential both ecologically and recreationally. This aligns with FDC's earlier masterplanning comments and must be reflected in the detailed design and illustrative visualisations.

## A unified, inclusive and culturally rich destination

The design principles rightly recognise the potential for the reservoir to deliver health, wellbeing, education and economic benefits. To achieve this, design decisions across the site must reinforce a coherent sense of place, with accessible routes, distinctive character areas, engaging interpretation and inclusive facilities that enable people of all ages and abilities to benefit.

#### **ACTIONS:**

- AW to confirm that the new Placemaking design principle will be treated as a primary guiding principle, informing all elements of the masterplan and detailed design development.
- AW to strengthen the "Connecting Nearby Communities" principle, explicitly including Manea and setting a clear commitment to delivering safe, direct and attractive active travel connections as a core project objective.
- AW to work with FDC, CCC and CPCA to prepare an overarching Active Travel and Access Strategy aligned with the design principles, to guide masterplanning and avoid piecemeal provision.
- AW to demonstrate how the landscape principles ("Wetland First", "Restored Fenland Landscape", "Narrative Landscape") will translate into a varied, multi-functional and context-sensitive perimeter, avoiding a uniform treatment around the reservoir edge.
- AW to prepare a clear strategy for nature-based solutions and low-carbon design, including how these principles will shape water treatment processes, habitat creation and renewable energy infrastructure.
- AW to provide updated illustrative sections, visualisations and narrative explanations showing how the design principles will be delivered at human scale across different parts of the site.

## **Boundary extent**

FDC considers there is still too much narrow focus on what happens within the existing physical boundaries (between that A141, A142, Forty Foot and Sixteen Foot Drains) and insufficient thought about how surrounding areas and settlements will relate to the reservoir. A wider and clearer approach to what and how the reservoir can offer people in surrounding towns and villages in a sustainable way needs to be integral to the design at this stage to maximize benefits and opportunities in the future.

The reservoir continues to appear cramped within its prescribed site limits. Expansion further northwards towards Manea Road should be considered to allow for a larger capacity of the reservoir and provision of associated facilities.

It is important March and Manea are fully factored into the project as nearby settlements – not just Chatteris, Doddington and Wimblington. The southern part of March and the northern part of Chatteris will be equidistant from the Primary Recreational Hub – circa 4.0 km. The implications for March are therefore as important as those for Chatteris. AW and CW therefore need to show March and Manea on relevant plans. This point has been raised previously with AW on several occasions and at earlier consultations.

The implications for villages further afield (Benwick, Warboys, Somersham, Mepal and Sutton) and towns and cities (Cambridge, Ely, Huntingdon, Whittlesey and Wisbech) also need to be fully acknowledged and considered.

#### **ACTION:**

• The project needs to look wider than just the narrow, current perimeter boundaries.

# Creating a Vibrant, Inclusive, Year-Round Destination

FDC considers that the reservoir must be more than a functional piece of water infrastructure: it should become a vibrant, dynamic and socially rich place that delivers year-round benefits for local communities and visitors from further afield. This ambition aligns strongly with several of AW's proposed design principles—particularly Placemaking, A Destination Where People Enjoy Water and Nature, Connecting Nearby Communities, and A Narrative Landscape—and should be treated as a unifying thread running through the entire design process.

Fenland experiences longstanding challenges relating to health, physical activity, social isolation, educational attainment and access to cultural opportunity. The reservoir therefore has a unique opportunity to improve health and life outcomes, help tackle inequalities, and create welcoming places where people can come together, interact with nature, and enjoy shared cultural and recreational experiences.

To achieve this, the reservoir should be envisioned as a multi-layered cultural, recreational and social landscape, supporting:

- Active recreation, in line with the principle of "A Destination Where People Enjoy Water and Nature"—including trails, watersports, destination play and seasonal outdoor events.
- Passive enjoyment through quiet, reflective spaces and opportunities for nature connection, supporting the Narrative Landscape and Wetland First principles.
- Cultural expression consistent with the Placemaking principle—delivered through public art, storytelling, creative installations and partnerships with local artists, schools and cultural organisations.

- Intergenerational activity, building on AW's commitment to inclusive design and varied user experiences.
- Learning and skills development, complementing AW's emphasis on education and interpretation linked to landscape, water and the historic Fenland story.

FDC sees significant potential for the reservoir to become one of the most inclusive and engaging destinations in the region, strengthening wellbeing, tourism, environmental education and community cohesion. However, realising this vision requires a consistent sitewide approach, deeply rooted in AW's design principles and carried through all zones—not only at the main Recreation Hub.

To ensure this coherence, FDC recommends that AW prepare a Site-wide People, Culture and Experience Strategy, which would:

- Translate the Placemaking principle into a clear, actionable vision for the whole site.
- Reinforce the Connecting Nearby Communities principle by ensuring a rich and engaging visitor experience across multiple access points and movement routes.
- Interpret the Narrative Landscape principle into a coherent programme of interpretation, storytelling and sense of place.
- Guide the delivery of play, public art, cultural installations, community learning opportunities and inclusive recreation.
- Ensure the right balance of free-to-access and paid-for activities, supporting equity and broad community benefit.
- Inform and align with the evolving masterplan, Design Code and any DCO-secured design commitments.
- Ensure that human-scale experiences—consistent with multiple design principles—are embedded throughout the reservoir, not confined to focal hubs.

By putting people and everyday experience at the heart of the design, the reservoir has the potential to deliver a powerful and lasting legacy—a place where water, nature, culture and community genuinely come together and help improve health, wellbeing and pride of place for generations.

#### **ACTIONS:**

- AW to prepare a Site-wide People, Culture and Experience Strategy translating the Placemaking, Narrative Landscape and Connecting Nearby Communities principles into a clear vision and framework for play, art, culture, learning and recreation across the whole site.
- AW to work with FDC, CCC and local cultural, education and community partners to identify opportunities for intergenerational activity, cultural programming and outdoor learning that reflect Fenland's character and needs.
- AW to set out how free-to-access and paid-for activities will be balanced, ensuring inclusivity and supporting health, wellbeing and community benefit.

#### Vision for Nature

The Fens Reservoir represents a once-in-a-generation opportunity to deliver a step-change in biodiversity across Fenland and to make a substantial contribution to the emerging Local Nature Recovery Strategy for Cambridgeshire. The scale of the project—combining a major new waterbody with extensive areas of wetland and terrestrial habitat—has the potential to reverse long-term ecological decline, create large, connected habitat networks, and complement the internationally important designated sites at the Ouse Washes, Nene Washes and The Wash.

To fully realise this potential, the design of the reservoir, its shoreline, embankments and surrounding landscape must be genuinely landscape-led and ecologically ambitious, delivering a rich mosaic of habitats that reflect the diversity of the historic Fenland environment. While extensive new wetland creation is welcomed, FDC considers that the landscape must be multi-functional, with a balance of wetlands, grasslands, woodland and species-rich transitional habitats that can accommodate both nature recovery and sustainable public access. Habitat design should also reflect the reservoir's operational realities—such as fluctuating water levels—and take full advantage of opportunities at the reservoir margins and embankments to create varied, resilient and ecologically productive spaces.

The project must also deliver coherent ecological connectivity, strengthening wildlife corridors along the Forty Foot Drain, Sixteen Foot Drain and the wider fen drainage network so that the reservoir becomes an integral component of a wider Nature Recovery Network extending beyond its boundary.

Given the sensitivity and complexity of habitats likely to be created, a strong emphasis on peat protection and reuse, long-term habitat management, species conservation and robust monitoring will be essential. Long-term management and oversight will also be critical, supported by dedicated ecological expertise and a long-term Ecology Technical Group to guide adaptive management.

Finally, habitat creation and enhancement should begin early in the construction programme to avoid irreversible species displacement and to secure early benefits for nature and local communities. Recreational access must be sensitively managed to protect vulnerable species, with clear interpretation, defined quiet zones, appropriate routing, and specialist infrastructure such as bird hides, bat barns and floating nesting structures.

The detailed sections that follow set out FDC's specific expectations for habitat types, wetland design, peat management, connectivity, species conservation, construction impacts and recreational management.

# Habitat Connectivity and Nature Recovery Networks

The Fens Reservoir has the potential to act as a major ecological node within the emerging Local Nature Recovery Strategy (LNRS) for Cambridgeshire. To achieve this, the design must go beyond creating isolated on-site habitats and instead deliver meaningful ecological connectivity across the wider Fenland landscape.

The Forty Foot and Sixteen Foot Drains already function as important wildlife corridors, providing linear movement routes for water voles, amphibians, invertebrates and a broad range of wetland birds. Enhancing habitat quality along these corridors—through improved vegetated margins, varied ditch profiles, buffer zones and naturalised riparian edges—would help create a stronger, landscape-scale Nature Recovery Network extending beyond the reservoir boundary.

To secure these benefits, AW will need to:

- Integrate the reservoir's habitat strategy with the LNRS
- Restore and enhance ditch networks and drain-side habitats where opportunities exist
- Work proactively with surrounding landowners, drainage boards and environmental partners to explore off-site habitat improvements and land management agreements
- Consider extending habitat enhancement works to adjacent land parcels where this could improve corridor continuity and ecological function.

#### **ACTION:**

 AW to incorporate Nature Recovery Network principles into the habitat masterplan, strengthening ecological connectivity and working with FDC, Natural England, IDBs and neighbouring landowners to enhance corridors beyond the site boundary.

## Peat Management

Peat is a defining feature of the Fenland landscape and plays a critical role both as a carbon store and as a foundation for rare and valuable wetland habitats. Its protection, careful handling and appropriate reuse must therefore be a central consideration in the design and delivery of the Fens Reservoir project. FDC recognises that some impact on peat is unavoidable given the scale and nature of the scheme but expects this to be minimised wherever possible and managed to the highest environmental standards.

Where peat and deep organic substrates can be retained in situ, this should be the clear priority, recognising the significant carbon emissions associated with peat disturbance. Where peat cannot be avoided, a dedicated Peat Management Plan will be required to set out how peat will be excavated, transported, stored and reused in ways that minimise carbon loss and maximise ecological benefit. This Plan should be prepared as a standalone document and inform all elements of construction activity, including the reservoir earthworks, the pipeline corridors and any associated infrastructure.

Where peat must be excavated, there are opportunities for it to contribute positively to the creation of new wetland habitats—particularly lowland raised bog, fen and wet grassland systems. Peat can be used to shape bunds, cells and substrate transitions that support the establishment of these habitats, provided it is handled in a way that preserves its structure and ecological functionality.

The current project boundary may not provide sufficient space to accommodate all peat that needs to be stored or reused sustainably. In such circumstances, additional land in the immediate vicinity—potentially including areas west of the A141 and north or south of the Forty Foot Drain, or east of the Sixteen Foot Drain—should be considered. This approach would also support the emerging Local Nature Recovery Strategy, which seeks to strengthen the ecological network along the main fen drainage channels.

Where areas south of the Forty Foot Drain do not contain deep peat, the most appropriate habitat end-states may be fen, open water or wet woodland rather than bog. In these areas, relocated peat could still be used strategically at habitat margins to support hydrological control, soil moisture retention and vegetation establishment.

Given the scale and nature of the reservoir works, the importance of peat extends beyond biodiversity and landscape value; it also represents a key component in the project's overall climate resilience and carbon accounting. The Peat Management Plan should therefore quantify carbon implications, assess opportunities for carbon sequestration, and set out how losses will be minimised through design choices.

#### **ACTIONS:**

- Prepare a comprehensive Peat Management Plan, setting out how peat will be avoided, minimised, excavated, transported, stored and reused throughout all phases of the project.
- Investigate opportunities for off-site peat reuse or habitat creation in adjacent areas that align with the emerging Local Nature Recovery Strategy.

# **Biodiversity Net Gain**

FDC recognises that the Fens Reservoir project has the potential to deliver an exceptionally high level of biodiversity gain, far beyond that typically achievable on standard development sites. The combination of large-scale habitat creation, wetland restoration and opportunities for peat-based environments means that the scheme could play a transformative role in the ecological recovery of Fenland and the wider region.

However, the standard Defra Biodiversity Metric is not well suited to assessing habitat creation of this complexity or scale. In particular, the metric can undervalue the creation of "difficult" habitats—such as lowland raised bog or complex fen systems—and may

inadvertently discourage the restoration of restorable peat, which FDC considers should be treated as an irreplaceable habitat, even where its current ecological condition is degraded.

Given these factors, there is a strong justification for applying Rule 4 of the statutory BNG guidance, which allows deviation from the metric in "exceptional ecological circumstances" where:

- the site has optimal conditions for restoring a wildlife-rich or historically natural habitat, and
- the project team has the expertise and resources to deliver that habitat with negligible risk of failure, and
- the proposals involve complex, landscape-scale ecological change.

The Fens Reservoir clearly meets these thresholds.

The site's hydrological potential, substrate conditions and scale of opportunity mean that the restoration and creation of priority peatland and wetland habitats could be delivered successfully if properly designed and managed. Using Rule 4 would allow AW, FDC and Natural England to agree a more ecologically meaningful BNG framework that focuses on ecological outcomes rather than simply numerical scores.

Irrespective of the BNG approach used, securing a very long-term commitment to habitat management, monitoring and adaptive stewardship will be essential. Given the sensitivity of peatland and wetland systems, a minimum management timeframe of 30 years is unlikely to be sufficient. A Section 106 obligation, or a suite of linked obligations, will be required to ensure these habitats are maintained, monitored and actively managed for the long term.

To support this long-term management, FDC recommends establishing an Ecology Technical Group—comprising AW, FDC, Natural England, CCC, local ecological specialists and other relevant stakeholders—to meet at regular intervals (e.g., bi-annually over at least the first 10 years). This group would oversee habitat creation, ecological monitoring, species conservation, and the adaptive management processes required to ensure habitats develop as intended.

## **ACTIONS:**

- Develop a bespoke BNG approach, potentially including the use of Rule 4, to better reflect the landscape-scale habitat creation proposed.
- Secure long-term habitat management and monitoring through a Section 106 obligation or equivalent mechanism.
- Establish an Ecology Technical Group to oversee long-term ecological delivery, monitoring and adaptive management.

# **Species Management and Reintroduction Opportunities**

The construction and operation of the reservoir have the potential to affect a wide range of notable species associated with the Fenland landscape, including:

- Wintering birds, such as Bewick's and Whooper Swans, and numerous waterfowl and waders linked to nearby designated sites
- Raptors
- Reptiles
- Water voles
- Great crested newts
- Badgers
- Bats (primarily foraging species)
- Aquatic invertebrates associated with existing ditch systems
- Aquatic and marginal plants

Given the scale of new habitats proposed, FDC considers that it should be possible not only to safeguard these species but also to enhance their long-term conservation status, if habitat creation, construction sequencing and monitoring are carefully managed.

To ensure that species receive adequate protection, AW will need to undertake comprehensive baseline surveys covering all relevant protected and notable taxa. These surveys should inform a detailed Species Conservation Strategy, setting out measures for avoidance, mitigation, compensation and enhancement.

Where species associated with ditch networks are likely to be displaced—particularly aquatic invertebrates, water voles and amphibians—species translocation may be required, subject to appropriate licensing and best practice protocols.

#### **Bats**

Although new wetland and open-water habitats will greatly improve foraging opportunities for bats, the surrounding landscape currently lacks suitable roosting features. While future woodland planting will help address this, maturity will take time.

To avoid an early deficit in roosting opportunities, FDC recommends installing dedicated bat barns or roosting structures at strategic points around the reservoir, so they are available during the early operational phase.

## **Nesting Birds**

Before new habitat planting matures, there will be a need to support nesting and roosting bird species during the transition period. AW should therefore incorporate floating nesting islands, rafts and a range of bird boxes in suitable locations. These early-stage features will also benefit long-term species diversity and provide visible opportunities for public engagement and education.

## **Species Introductions**

The creation of large, restored wetland and fen-edge habitats offers an important opportunity to support the return of species historically associated with the Fens. While many mobile species will colonise naturally, introductions may be appropriate for certain less mobile or locally extinct species, provided this follows national guidelines and is ecologically justified.

#### Potential introductions could include:

- Iconic species such as beavers, where hydrological conditions support reintroduction and where wider ecological and flood-management benefits can be secured
- Specialist wetland invertebrates, amphibians or small mammals associated with fen and ditch systems, where suitable habitat has been established
- Fish species, where required, given the offline nature of the reservoir.

Any species introductions must be supported by:

- Full feasibility and risk assessment
- Habitat suitability evaluations
- Long-term monitoring plans
- Compliance with Natural England licensing and national reintroduction protocols.

Handled correctly, species introductions could deliver significant biodiversity, educational and visitor-experience benefits and strengthen the reservoir's role as a flagship nature recovery project.

#### **ACTIONS:**

- AW to prepare a comprehensive Species Conservation Strategy at the next design stage, informed by full baseline surveys and covering avoidance, mitigation, compensation and long-term enhancement for all relevant protected and priority species.
- AW to identify and progress species translocation requirements, particularly for ditchassociated species likely to be displaced by construction, working with FDC, Natural England and other relevant stakeholders.
- AW to install dedicated bat barns or roosting structures early in the project, ensuring roosting opportunities are in place ahead of major habitat establishment works.
- AW to integrate a suite of bird nesting features, including floating nesting islands, rafts and nesting boxes, into the early operational design and to agree their locations with FDC at the next stage of masterplanning.
- AW, working with FDC, CCC and Natural England, to assess the feasibility of species introductions, including beavers and other appropriate fen-associated species, ensuring compliance with national protocols and supported by long-term monitoring and management commitments.

# Water Quality

Ensuring high water quality throughout the reservoir system—including abstraction points, transfer routes, the main water body and the proposed lagoon—is essential for the long-term success of the project. At present, the Council considers that important elements of the water quality strategy remain unclear and require further detail before the implications for people, wildlife and recreation can be fully understood.

A key issue is the quality of the water sources within Fenland that are intended to supply the reservoir. AW has not yet confirmed the baseline water quality of watercourses within the district, nor provided clarity on how water will be safely and efficiently transferred between catchments—particularly between the River Nene (north of Whittlesey) and the Middle Level system (south of Whittlesey). The hydrological, ecological and regulatory implications of transferring water between these systems must be fully explained, alongside safeguards for preventing the spread of pollutants, invasive species or accumulated nutrients.

To inform its understanding of local water quality conditions, FDC has been investigating the water quality at Saxon Pits in Whittlesey for the past 18 months. This work has focused on analysing contaminants associated with historic imported materials and current industrial processes within the locality, as well as understanding how such contaminants can behave within still or slow-moving water bodies. A full report is expected to be published in January, and AW will need to take the findings of this study into account when finalising their water quality assessments and management strategy. The evidence emerging from Saxon Pits is likely to be directly relevant to the reservoir project, particularly in relation to contaminant transfer, sediment pathways and risks to recreational users.

Water quality management within the lagoon also requires significantly more clarity. The lagoon is being promoted as a recreational and leisure destination, yet its water condition will depend both on the quality of incoming water and the nature and intensity of activities taking place within it. Without a robust, adaptive strategy, the lagoon could face issues such as blue—green algae, nutrient build-up, turbidity, and contamination from birds or human activity—all of which would undermine safe use and the long-term viability of the lagoon as a visitor attraction.

The Council therefore expects AW to prepare a clear Water Quality Management Plan covering:

- baseline water quality of all abstraction points and transfer routes
- how water will be moved safely between the Nene and Middle Level systems
- predicted lagoon and reservoir water quality under different climatic, operational and recreational conditions
- monitoring of algae, turbidity, pathogens, contaminants and nutrient levels

- operational interventions to maintain safe water (e.g. aeration, circulation, temporary closures)
- measures to limit contamination from birds, sediment sources and adjacent land uses.

Given the ambition for the reservoir to become a major public destination, water quality management is central to both public safety and public confidence. A clear, evidence-based strategy—supported by local data, including FDC's Saxon Pits investigation—will be essential to ensure the lagoon and wider reservoir remain safe, resilient and enjoyable for local communities and visitors.

#### **ACTIONS:**

- AW to confirm baseline water quality for all proposed abstraction points and transfer routes, including how water will be safely moved between the Nene and Middle Level catchments.
- AW to review and incorporate the findings of FDC's forthcoming Saxon Pits water quality report, ensuring that contaminant behaviour, sediment pathways and local industrial influences are fully considered in the reservoir design and operational planning.
- AW to prepare a comprehensive Water Quality Management Plan covering the main reservoir and lagoon, including predicted water quality under different operational, climatic and recreational scenarios.

## Vision for Movement

FDC has appointed an independent transport and movement masterplanning consultant to support our review of the proposals. Their assessment has informed the Council's overall position, and the following comments set out the strategic transport expectations that should underpin the development of the Fens Reservoir. More detailed comments on specific areas and elements of the scheme are provided in subsequent sections of this response.

The reservoir presents a significant opportunity to deliver a well-connected, accessible and sustainable landscape that supports local communities, enhances the visitor experience, and aligns with the transport priorities of Fenland, the wider CPCA area and neighbouring authorities. To achieve this, the project must be supported by a coherent, integrated and future-facing transport strategy that accommodates all modes of travel from the outset.

The overarching transport vision should prioritise:

- Safe, inclusive and attractive active travel routes for walking, wheeling, cycling and horse-riding, both within the site and extending to surrounding towns and villages.
- Strong, realistic connections to nearby rail stations in March and Manea, enabling multimodal journeys from Ely, Peterborough, Cambridge and beyond.

- Early alignment with emerging regional transit ambitions, including opportunities to connect with future Mass Rapid Transit (MRT) concepts being explored across the CPCA area and neighbouring regions, ensuring the reservoir can adapt to changing travel patterns over its lifetime.
- High-quality public transport access into the site itself, reducing reliance on private cars and widening access for those without private vehicles.
- Provision for e-bikes, including charging, secure storage and wayfinding, supporting longer-distance, low-carbon access well suited to the Fenland landscape.
- Safe, efficient and well-designed vehicular access that does not compromise placemaking goals or undermine sustainable access choices.
- A clear, legible and user-centred internal movement network, with a defined hierarchy for all modes and a fully deliverable circular route around the reservoir.

This high-level strategy must be supported by robust evidence, including a complete Transport Assessment, and developed into a movement framework that works coherently across the reservoir's hubs, the wider landscape, nearby settlements, and regional transport corridors.

The detailed sections that follow set out specific transport observations, requirements and expectations for the main reservoir site, the western and eastern zones, and construction transport.

# Potential Impacts on Wider Hydrology and Drainage Networks

FDC is concerned that the current proposals do not yet demonstrate a comprehensive understanding of how the reservoir may affect the wider hydrological behaviour of the Fens. The introduction of a very large impounding structure—supported by embankments up to approximately 15 metres in height—represents a major new hydrological influence within an already sensitive and highly engineered landscape.

It is not currently clear whether the physical loading of the embankments and reservoir water could alter groundwater levels, groundwater flow pathways, or the functioning of surrounding drains and IDB-managed systems. While such impacts are not inevitable, large reservoirs on soft or compressible soils have, in other contexts, caused:

- Changes to the local water table, with potential implications for agriculture, drainage function and soil stability
- Lateral groundwater displacement, increasing waterlogging or affecting infrastructure
- Altered drainage gradients, particularly significant in the Fens where many drains operate with minimal fall
- Deep seepage or preferential flow pathways, requiring long-term monitoring and mitigation

In addition to groundwater effects, the reservoir will also require the temporary diversion, alteration, or reconfiguration of existing drainage channels during construction, as well as the long-term re-routing of flows in some locations. These changes could have consequences for:

- Surface water conveyance and storage capacity
- Catchment hydrodynamics, particularly during periods of high rainfall
- Interactions between IDB drains, counter drains and main rivers
- Flood risk, both within the construction footprint and in adjacent areas

The Fens' drainage network is exceptionally sensitive to even small changes in flow paths, gradients or storage. Any diversion or interruption—temporary or permanent—must therefore be assessed with robust hydrological modelling that accounts for seasonal conditions, extreme rainfall scenarios and cumulative impacts with other major projects.

FDC would also welcome clarity on proposals for pre-, during- and post-construction monitoring, including the installation of perimeter boreholes and drainage flow gauges to identify any emerging issues early.

#### **ACTION:**

 AW to provide a comprehensive hydrological and drainage impact assessment covering groundwater, embankment loading effects, temporary and permanent diversion of drainage channels, and implications for local flood risk—supported by modelling and proposals for long-term monitoring and mitigation agreed with Mid-Level Commissioners and relevant IDBs.

# MAIN RESERVOIR SITE (not including the Water Treatment Works)

# Indicative reservoir shape

The Council notes that since the previous phase of consultation, the overall shape and configuration of the reservoir appear to have become more circular and uniform, with reduced variation in form and fewer areas of visual or ecological interest around the perimeter. During earlier stages of engagement, the Council highlighted the importance of creating a more varied and distinctive reservoir outline, with undulations, inlets, and focal points that could help integrate the structure into the surrounding Fenland landscape and provide opportunities for habitat creation, recreation, and placemaking.

The Council remains concerned that the current iteration of the design lacks the level of visual and experiential diversity required to deliver the stated ambition of a place where "water, people and nature come together." A more expressive and locally distinctive form, reflecting the patterns and character of the Fens, would help to create stronger landscape identity, improve habitat diversity, and enhance opportunities for public engagement and interpretation.

The Council would therefore support further exploration of design options, ranging from a more radical rethinking of the overall form to achieve a stronger and more distinctive landscape presence, through to a less dramatic alternative that retains the broad geometric concept but introduces greater variation by selectively exaggerating elements of the ammonite shape at random intervals. Either approach could help enrich the visual and experiential qualities of the reservoir, ensuring that the final scheme is rooted in the Fenland landscape and contributes meaningfully to its evolving sense of place.

In developing the next stage of design, the Council also asks AW to consider how the reservoir and its surrounding landscape can be experienced and understood at a human scale — ensuring that spaces, edges, and access routes feel inviting, legible and connected to everyday community use, rather than experienced solely as a large-scale piece of infrastructure.

## **Ecological opportunities**

The wildlife value of large open water bodies can be significantly enhanced by creating a diverse mosaic of marginal habitats where water meets land. These transitional zones are among the most productive ecological areas within wetland systems, supporting species-rich communities and offering essential feeding, resting and breeding opportunities for a wide range of birds, amphibians, invertebrates and aquatic plants. Habitats such as wet woodland, fen, reedbed, swamp, wet grassland and mudflats can all be established within these margins, each contributing differently to structural diversity and ecological resilience.

At present, the design of the Fens Reservoir waterbody appears to provide relatively limited variation in shoreline form. Long stretches of smooth, uniform reservoir edge are unlikely to support the level of habitat diversity that could otherwise be achieved. Without greater structural variation, much of the shoreline will be exposed to wind and wave action, restricting opportunities for emergent vegetation, limiting sediment retention and reducing the range of ecological niches available.

There is considerable scope to enhance the ecological value of the reservoir margins by creating more varied, undulating or irregular edges. This could involve the introduction of small inlets, coves and bays, where wave action is naturally dampened and quieter, more sheltered pockets of water can form. These areas would allow for gradual sediment accumulation and provide suitable conditions for the establishment of marginal and emergent vegetation. Even relatively modest adjustments to shoreline geometry can dramatically increase ecological complexity and habitat availability.

In addition, the incorporation of floating islands or floating reedbeds, positioned close to the reservoir's edge but outside main wind fetch zones, could further increase habitat diversity. These features can provide nesting and roosting opportunities for waterbirds and waders, assist with water quality improvement through root-mass filtration, and offer refuge areas that are protected from shoreline disturbance. Floating islands have been used successfully in reservoirs and gravel pits across the UK to deliver rapid and measurable biodiversity gains.

Collectively, these interventions would help ensure that the reservoir's biodiversity potential is fully realised, supporting AW's stated aim of creating a place where "water, people and nature come together" and contributing meaningfully to local and regional nature recovery objectives.

## Fluctuating Water Levels in the Reservoir

FDC acknowledges that fluctuations to water levels in the Reservoir are inevitable; these fluctuating levels can provide opportunities for wildlife as banks are periodically exposed and inundated, for new foraging and as refuges.

Assuming that the embankments of the Reservoir will need to be re-enforced to prevent erosion from wave action with robust substrates (rock armour or similar?), consideration should be given to designing this bankside re-enforcement to maximise available ecological niches during fluctuations in water levels, and to the use of more forgiving substrates to cover rock armour which could provide opportunities for use by invertebrates and birds, and/or be able to be colonised by marginal vegetation.

#### **ACTIONS:**

- Revisit the reservoir form AW to explore alternative design options, including a more radical reworking or selective exaggeration of the ammonite concept, to enhance visual, ecological and experiential quality.
- Hold further masterplanning sessions AW to meet with FDC and relevant partners to review design variations, landscape integration and placemaking objectives, ensuring the emerging design aligns with local priorities.
- Design changes to Reservoir margins and embankments for greater habitat diversification.

# Masterplanning - Landscape design/impact

Fens Reservoir is proposed as a new non-impounding reservoir with an approximate capacity of 55 million cubic metres. AW note that typical embankment heights will range between 6 and 15 metres, with slope gradients still to be refined following further investigation. The reservoir will sit within the distinctive landscape of the Fens – a predominantly flat, low-lying environment shaped by centuries of drainage, characterised by long views, wide skies and subtle shifts in level. Villages, historic "islands" and a network of waterways provide reminders of how people have long adapted to this expansive and open setting.

The Council acknowledges progress in illustrating how the surrounding landscape might accommodate the scale of the reservoir. The earlier embankment sections shared during masterplanning sessions between AW, FDC and CCC helped show how the visitor experience could vary along different stretches of the perimeter. However, this level of detail was not included in the Consultation 3 materials, limiting the Council's ability to understand how the embankments, gradients and landscape treatments will work together as a coherent whole. While the Council accepts the need for a degree of flexibility within the DCO to respond to ground conditions, more information is required now to assess likely landscape and visual impacts. Having sight of additional illustrative sections and sensitivity testing of gradient scenarios is therefore important.

AW state that the landscape will include moments of enclosure and shelter to counterbalance the openness of the Fenland setting. The emerging concept of 'scallops' along the embankment edge also shows potential for localised variation. However, when viewed within the wider masterplan, the perimeter still appears largely uniform, with limited evidence of how meaningful shifts in landscape character such as with shallow valleys and higher ridges will be achieved around the full circumference. Without greater variation in physical structure, planting and topography, there is a risk that visitor activity will remain concentrated around the primary hub, with insufficient incentive for people to explore the eastern and more remote edges.

To support a more diverse and engaging perimeter experience, the Council would welcome further clarity on how the full circumference of the reservoir will be activated. A series of focal points would provide interest and greatly assist in engaging the curiosity of the visitor. Occasional interpretation or resting points, incidental play or learning opportunities, or carefully positioned creative interventions could help create a rhythm of different experiences. These elements should be subtle and sensitive, but sufficient to encourage wider movement and engagement without undermining the tranquillity intended for quieter areas.

The Council also notes emerging concerns regarding the drainage approach, which appears to rely on long, linear channels at the base of the embankments. While the functional need for drainage is understood, if not carefully designed these features could create unnecessary severance, impede movement and detract from the overall naturalistic character of the landscape. Further detail is needed on their purpose, alignment and treatment, along with consideration of opportunities to reduce their visual and physical impact.

In addition, more information is required on the planting strategy for the outer embankments, including species mixes, intended character, management considerations and the phasing of planting works. Opportunities for advanced planting should be actively explored to help soften visual impacts early and support long-term integration into the wider Fenland landscape.

Overall, the Council supports the broad direction of the landscape masterplan but considers that further detail, visualisation and refinement are needed to demonstrate how the reservoir will be fully integrated into its landscape setting, and how a high-quality, varied visitor experience will be achieved around the entire perimeter. With additional development, the reservoir has the potential to become a more engaging, contextually sensitive and landscape-led environment that reflects and enhances the character of the Fenlands.

#### **ACTIONS:**

- Provide additional embankment illustrative sections AW to share further embankment sections and sensitivity testing of slope gradients to support assessment of landscape and visual impacts.
- Supply photo visualisations from key viewpoints AW to prepare visualisations demonstrating how the reservoir and embankments will sit within the wider Fenland landscape.
- Demonstrate how variation around both the internal reservoir edge and external embankments will be achieved - AW to clarify how 'scallops', planting structure and landscape features will create meaningful changes in character around the full perimeter.

- Review and refine the drainage strategy AW to provide additional detail on drainage channels and explore options to minimise severance and integrate drainage more sensitively into the landscape.
- Set out the planting strategy and phasing AW to share details on species mixes, intended character and maintenance, and to explore opportunities for advanced planting on the outer embankments.

# Masterplanning – New Habitats Around the Reservoir

FDC welcomes the intention to create a diverse range of new habitats around the reservoir, including woodland, scrub, wetlands and grassland. However, the emerging masterplan places a strong emphasis on extensive wetland creation, and FDC would encourage a more balanced and multifunctional habitat strategy that reflects both ecological and visitor experience objectives.

While it is acknowledged that the historic Fenland landscape was predominantly wetland—and that well-designed wetland habitats can deliver exceptional biodiversity benefits—wetlands are also among the most sensitive and access-restricted habitat types. Many wetland assemblages are highly vulnerable to disturbance from public access, dogs, lighting and noise. As such, a landscape dominated by wetland alone risks limiting opportunities for inclusive public access to nature, as well as missing opportunities to create the more robust and accessible habitat types that support the reservoir's wider placemaking objectives.

In line with earlier masterplanning comments, the reservoir landscape should be shaped as a varied, distinctive and engaging environment, where different habitat types contribute to different visitor experiences and ecological functions. This includes providing quieter, nature-led areas while also delivering spaces that comfortably accommodate recreation, education, movement and community use.

FDC therefore encourages AW to consider a more balanced habitat mosaic, incorporating:

- Robust, accessible habitats such as species-rich grasslands and native woodlands,
   which can sustain public access without compromising ecological value
- Wet woodlands and transitional fen-edge habitats in locations such as the southwest area north of Forty Foot Drain and east of the A141, where hydrological conditions lend themselves to wetter habitat types
- Mixed woodland and open grassland in the northeast corner west of the Sixteen Foot Drain, where hydrology and topography restrict large-scale wetland creation
- Varied marginal and embankment vegetation to enhance the ecological and experiential diversity along the reservoir perimeter, complementing earlier design concerns about uniformity of edge treatment

FDC recognises that significant areas of wetland may still be required to achieve biodiversity net gain at the scale expected of this project. Where very sensitive or specialist wetland

habitats are needed, off-site wetland creation—particularly adjacent to existing wetland complexes—may offer better long-term ecological outcomes and reduce conflicts between habitat sensitivity and public access.

Before finalising the habitat masterplan, AW will need to undertake a full suite of detailed surveys, including hydrology, soil condition, nutrient status and substrate characteristics. These will be critical in determining the viability, resilience and long-term management requirements of each habitat type.

While woodland cannot be located on the impounding embankments due to the need for ongoing structural inspection, the embankments provide strong potential for species-rich grassland, especially if constructed with clay cores overlain by nutrient-poor subsoils to support diverse flora. This approach aligns with the wider ambition for a more varied and engaging perimeter landscape, as referenced in the masterplanning comments.

#### **ACTION**

Ensure a balanced and varied habitat strategy, incorporating robust, accessible
habitats alongside wetlands to deliver multifunctional landscapes that support both
nature recovery and sustainable public access.

#### Wetland Habitat Creation

FDC recognises that full details of the proposed wetland habitats cannot yet be finalised, as they will depend on water level management, water quality, hydrology, substrates and the sources used to supply and circulate water within the system. Nonetheless, several key principles for wetland design can already be established to ensure that the emerging masterplan delivers ecologically robust, diverse and resilient wetland environments.

The reservoir and its surrounding landscape should incorporate a range of wetland habitat types, rather than relying on a single model of wetland creation. A rich habitat mosaic could include:

- lowland raised bog cells
- multiple fen types
- areas of open water and scrapes
- · wet woodland and carr
- varied ditch and backwater systems

This diversity is important for increasing overall species richness, enhancing visitor understanding of historic Fenland landscapes, and providing ecological resilience if some wetland types prove more successful than others.

It is recognised that any future wetland habitats will require a reliable and carefully controlled water supply. At this stage, AW has not provided detail on how water for these areas would be sourced or managed. FDC therefore sets out only high-level expectations: any future

proposals relating to water sources—whether involving existing drains, the reservoir, groundwater or alternative systems—must be subject to robust ecological, hydrological and water-quality assessment. No approach should be adopted unless it can be demonstrated to be environmentally acceptable, sustainable and effective in the long term.

To safeguard ecological integrity, any water entering the wetlands will need to be filtered, screened and monitored to prevent the introduction of invasive species or pollutants. Managing nutrient levels will also be crucial to avoiding eutrophication, with semi-natural systems such as reedbeds offering opportunities to enhance water quality.

FDC supports the principle that some wetland areas—particularly rare or sensitive ditch systems—will require restricted access. However, as noted in the wider masterplanning comments, the landscape must also remain multifunctional, balancing ecological protection with opportunities for controlled public access, interpretation and NMU movement. Well-designed routes and viewing points can enable people to experience these habitats without undermining their ecological value.

#### **ACTION:**

 AW to provide more detailed wetland habitat proposals, including hydrological design, water sourcing, water quality management and access arrangements, as part of the next stage.

# Masterplanning - Primary Recreation Hub

AW's proposals for the Primary Recreation Hub identify this area as a focal point for visitor activity within the main reservoir site. The hub would include a crescent-shaped visitor centre designed to complement the reservoir's curved form and provide views across the water. The visitor centre is described as offering recreational, leisure and educational opportunities, including changing facilities, showers, storage and equipment hire, together with flexible indoor spaces for year-round use. The building would also provide spaces for food, drink and social interaction, helping to create a welcoming environment where people can gather and engage with the reservoir.

In addition, AW propose a lagoon within this zone to provide consistent water levels for water-based activity. The lagoon would complement the main water body by creating a safer, more controlled environment for introductory or family-oriented water sports, while the reservoir itself would support activities such as sailing and rowing.

The Council welcomes the inclusion of the Recreation Hub and shares AW's ambition for it to act as an accessible, inclusive and engaging destination for both residents and visitors. FDC sees significant potential for the hub to become a transformational visitor experience, consistent with the vision set out in the CPCA's Local Growth Plan, which identifies the Fens

Reservoir as a key infrastructure asset capable of unlocking wider opportunities for business, housing, travel and tourism.

### Lagoon area

FDC is supportive of the lagoon and the opportunities it presents for water-based recreation such as open water swimming and enjoyment of large inflatables. The beach areas around the lagoon and reservoir should be designed to be of a meaningful size and depth, enabling groups to gather, relax and safely enjoy being at the water's edge.

## Recreation on main water body

The Council would also support boating, wind use and other activities on the main water body, creating a strong and varied water sports offer. These include sailing, rowing, canoeing, windsurfing, kite surfing, windfoiling, wingsurfing, diving, non-polluting motorised boat excursions and fishing.

#### Visitor centre

While the Council supports the concept of the visitor centre, it considers that the range of built facilities within the primary hub area should be broadened to include other linked leisure, retail and community uses. This could include small-scale retail or crafting spaces, an RSPCA facility, and pop-up or meanwhile use spaces to support local enterprise, seasonal activity and community engagement. Providing a richer mix of uses would strengthen the hub's role as a multi-purpose destination, help extend the visitor season, and ensure the site contributes to the local economy throughout the year.

The Council also emphasises the importance of offering a mix of paid-for and free-to-access leisure activities to appeal to a broad range of users and promote inclusivity. This could encompass open water swimming, non-motorised water sports, sculpture or activity trails, and destination play spaces. The concept of a ride-on railway linking the main visitor hub to secondary activity areas is also supported, as it could provide a distinctive attraction that enhances connectivity across the site and draws additional visitors into the area. It is recognised that not all these features would be delivered directly through the DCO, but that the project should be designed to enable and unlock such opportunities through early and meaningful engagement with potential partners, investors and community organisations.

#### North of the reservoir

To the north of the main reservoir site, the Council believes there is an opportunity to utilise land currently identified for reinstatement to agriculture to deliver woodland planting and complementary recreational uses. This area could form part of a wider green infrastructure corridor, connected to the historic deer park and the emerging Ox-Cam National Forest, which is currently being developed through design work and partnership discussions. Integrating this northern land into the reservoir masterplan could enhance biodiversity, offer

opportunities for camping, glamping and touring caravans, and create a stronger landscape framework around the reservoir.

#### Peninsula landform

The Council also notes AW's proposal for a landform of around 18 metres in height intended to act as a viewing feature. While the inclusion of an elevated point is supported, the Council considers that the current concept lacks ambition and does not yet reflect the reservoir's potential to become a defining landscape landmark within the Fens. The Council would like to see this element developed as a high-quality covered observatory space that sits atop the hill — a sculptural, architecturally distinctive structure capable of providing shelter, interpretation and long-distance views. The observatory could include etched glass panels highlighting key visual connections both within and beyond the site, such as views towards Ely Cathedral, reinforcing the project's sense of place and orientation within the wider Fen Landscape.

#### Outdoor venues and other facilities

In addition, the Council considers there to be clear potential for an outdoor amphitheatre suitable for concerts, performances and community celebrations, together with flexible internal spaces that could accommodate public and private functions. These facilities would enhance the year-round social and cultural role of the Recreation Hub and contribute to its identity as a regional destination.

Taken together, these enhancements — broadening the scope of built facilities, integrating the lagoon and beach areas effectively, utilising the northern land for woodland and recreation, and elevating the ambition of the landmark feature — would collectively strengthen the identity, functionality and long-term appeal of the Recreation Hub.

Finally, the Council reiterates the importance of inclusive and accessible design throughout the Recreation Hub. Facilities, routes and public spaces should be usable and enjoyable for people of all ages and abilities, with accessible paths, varied seating and shade, sensory and play features, and clear wayfinding. Designing at a human scale will ensure the hub feels welcoming and connected, establishing the reservoir as a truly inclusive, year-round destination for both local communities and visitors from further afield.

#### **ACTIONS:**

- Share further design detail on key Recreation Hub components AW to provide updated information on the visitor centre, lagoon, beach areas, landmark feature and overall hub layout so FDC can assess functionality, inclusivity and alignment with local priorities.
- Work jointly with FDC on the future mix of hub uses AW to engage with FDC to explore and refine options for additional leisure, retail and community uses (e.g. small

- enterprise units, pop-up spaces, RSPCA facility, event spaces) to ensure the DCO enables future delivery.
- Co-develop a Recreation Hub operating and activity vision AW to collaborate with FDC and relevant partners to shape a shared vision for how the hub will function as a year-round visitor destination, including the balance of paid/free activities and opportunities such as a ride-on railway or amphitheatre.
- Explore integration of northern land through joint masterplanning AW to work with FDC, landowners, the Forestry Commission and other relevant partners to consider how the northern land could contribute to woodland, recreation and greeninfrastructure-led opportunities.
- Hold further masterplanning workshops AW to meet with FDC and relevant partners to review design variations, landscape integration and placemaking objectives, ensuring the emerging design aligns with local priorities.

# Recreational Access, Disturbance Management and Visitor Infrastructure

While the reservoir will provide important public access opportunities, unmanaged recreational pressure has the potential to disturb sensitive wildlife, particularly wintering birds, breeding waders, and species utilising open water for feeding and roosting. A clear strategy for managing visitor behaviour and recreational routes will therefore be essential.

To minimise disturbance while supporting access:

- Polluting and/or noisy watercraft should be prohibited, with quiet motorised watercraft, sailing, rowing and canoeing limited to designated areas
- Circular paths around the reservoir should be routed away from the water's edge in the most sensitive locations, reducing visual disturbance to open-water birds
- In such areas, well-designed bird hides and viewing structures should be provided, allowing visitors to enjoy wildlife without causing harm
- Clear interpretation and educational signage should help visitors understand the ecological importance of quieter areas and encourage responsible use
- A long-term commitment to Rangers or Education Officers would support effective onsite management, provide education programmes and help embed positive visitor behaviours

This approach aligns with the wider ambition to balance nature recovery with inclusive public access and learning.

## **ACTION:**

• AW to prepare a Recreation and Disturbance Management Plan outlining watercraft controls, path routing, viewing infrastructure, interpretation and ranger provision.

# Economic Development and Visitor Economy – Recreation hub

The Council recognises that the proposed Recreation Hub presents a significant opportunity to strengthen the local visitor economy, support enterprise growth, and create skills development pathways within Fenland. The hub has the potential to become a central economic driver, attracting visitors, stimulating local spending and providing wider social and economic benefits for nearby communities.

The Council considers that the visitor centre should be delivered as a core component of the DCO, as it will form the main year-round anchor for visitor activity. By providing a focal point for food, drink, education, indoor recreation and water-based activities, the visitor centre will serve as the gateway through which economic and tourism benefits are channelled. Delivering this element through the DCO will ensure the hub is established from the outset as a functioning destination capable of generating early economic momentum.

Beyond this, the Council believes there is strong justification for including space within the Recreation Hub to enable a broader range of built elements that, while not necessarily delivered directly by the DCO, are essential to unlocking the hub's full economic potential. These include locally focussed, small-scale retail, craft and food units, pop-up and meanwhile spaces, and facilities for organisations such as the RSPCA. Such uses support economic development in several ways:

- They help create a diverse and resilient commercial offer, attracting different types of visitors and encouraging longer dwell times.
- They provide low-barrier opportunities for local micro-businesses, start-ups and social enterprises, which is particularly important in Fenland where small business formation rates are lower than regional averages.
- They encourage seasonal, event-led and creative economic activity, helping to animate the hub throughout the year rather than focusing solely on the summer peak.
- They enable collaboration with local producers, makers and cultural organisations, strengthening the authenticity and distinctiveness of the visitor experience.

For these reasons, the Council expects the DCO to enable these future uses by safeguarding appropriate land, utilities, access, servicing and flexible building parameters. This will ensure that AW and future partners are able to bring forward these uses in a phased manner as the hub evolves.

The Council also sees the Recreation Hub as an important catalyst for skills development and local employment, particularly in hospitality, visitor management, water sports operations, catering, events and environmental education. Partnering with local training providers and the CPCA Skills Board would help establish structured pathways into these sectors, ensuring local residents can access the employment opportunities created by the hub's construction and operation.

To maximise these benefits, the Recreation Hub should be supported by a clear visitor economy and enterprise framework, developed collaboratively with the Council, CPCA and local business networks. This should set out how the visitor centre will operate, how complementary commercial and community uses can be phased over time, and how local enterprises and training organisations will be involved as part of the hub's long-term management and development.

#### **ACTIONS:**

- Deliver the visitor centre through the DCO AW to confirm that the visitor centre will be a DCO-delivered element forming the core of the Recreation Hub.
- Enable future commercial and community uses AW to ensure the DCO secures land, servicing and flexible parameters to support future small enterprise units, pop-up spaces, and community facilities such as the RSPCA.
- Provide clearer information on enterprise opportunities AW to set out how the hub will create opportunities for local businesses and start-ups and how these spaces could be phased or managed.
- Develop a Visitor Economy and Enterprise Framework with partners AW to work with FDC, CCC, CPCA and local stakeholders to define how the hub will operate as an economic asset and support local enterprises and tourism.
- Clarify skills and employment pathways AW to outline how construction and operation of the hub will deliver local training, apprenticeships and employment opportunities.

# Masterplanning – Western Zone (including Secondary Visitor Centre)

The Council welcomes AW's ambition to bring the experience of water closer to Chatteris, recognising the importance of strengthening connections between one of Fenland's key market towns and the reservoir. The proposals for the western zone — including a new wetland landscape, active travel loops, opportunities for water-based activities such as canoeing, and a secondary visitor centre — represent positive steps toward achieving this aim. The Council is broadly supportive of these elements and sees clear potential for the western zone to become a distinctive gateway between Chatteris and the wider reservoir environment.

These ambitions are particularly important given the socioeconomic challenges facing communities in and around Chatteris. Fenland remains one of the most disadvantaged districts in Cambridgeshire, with lower life expectancy, higher levels of long-term illness, and greater rates of obesity and inactivity compared with national averages. Educational need is similarly significant, with adult qualification levels among the lowest in the county and limited access to high-value training pathways. Against this backdrop, major developments in the district have a responsibility not only to avoid harm but to actively contribute to healthier environments, improved access to green space, and expanded opportunities for learning,

skills and employment. The western zone therefore has the potential to play a meaningful role in supporting the wellbeing and prospects of local communities.

## **Secondary Visitor Centre**

The Council supports the concept of a secondary visitor centre focused on education, interpretation and culture, with opportunities to explore themes such as the history of the Fens, farming, drainage and water management, and landscape change. Although a detailed programming or interpretation strategy has not yet been developed — and is not necessarily required at this stage — consideration must be given to ensuring that the spaces and facilities being planned can accommodate the types of activities and learning experiences that would support local schools, community groups and visitors from further afield. Ensuring a year-round offer will also be important for the centre's long-term financial sustainability, enabling it to function as a complementary yet distinct destination alongside the main visitor centre.

In addition to these activities, the Secondary Hub could also provide a location for a national research centre (or similar) for Water Voles. Water Voles are a nationally endangered species but are found in many fens drains. Their re-location from the main reservoir site due to construction works into the proposed new wetland areas, including south of the Forty Foot Drain, could provide a focus for research, wider education and visitor interest.

The Council would welcome greater emphasis on incidental play, learning features and public art along pedestrian and active travel routes within the western zone. These elements would enrich everyday journeys, support informal learning and creativity, and provide interest within routes used by residents and visitors. In addition, there is strong justification for a destination play experience close to the secondary visitor centre, helping to broaden the family offer and support children and young people who currently have limited access to high-quality outdoor play.

Improving connectivity remains a priority, particularly in a district where access to services and sustainable travel options are limited. While the proposed active travel loops are supported, the Council believes there is a need for a more direct, legible and attractive walking and cycling route between Chatteris and the secondary visitor centre. This would improve access to green space for residents, encourage healthier lifestyles, and ensure the reservoir becomes a meaningful part of daily life in the town.

The Council also considers that the reservoir edge closest to the secondary visitor centre would benefit from greater variety and interaction opportunities, such as boardwalks, shallow edges, small inlets or viewing points. These enhancements would support biodiversity, enrich the character of the area, and create more opportunities for people — including those with limited travel access — to engage directly with water and nature.

## Marina

A site for a marina and associated activities e.g. a chandlery on the southern side of the Forty Foot Drain would also be complementary to the Secondary Hub. A marina in this location

would allow boaters to most easily access local facilities in Chatteris by walking and cycling. Provision of a marina could form part of the construction program if a rail/water option is used (see the section on Construction Transport of bulk materials elsewhere in this consultation response). If not directly provided, land for a marina should in any event be set aside and safeguarded now.

Taken together, these refinements would help ensure the western zone does more than provide recreational amenity. It can support healthier lifestyles, enable active travel, expand opportunities for learning and skills, and contribute to reducing long-standing inequalities across the Chatteris area. By embedding these outcomes into the masterplan, the western zone can become a welcoming, distinctive and socially purposeful destination closely connected to the life of the town and its communities.

## Road Alignment Within the Western Zone

FDC has significant concerns regarding the proposed internal road alignment eastwards and then north to the Water Treatment Works (WTW) and Secondary Hub. In its current form, the alignment is not supported. The route would cut directly through a large, cohesive wetland area, undermining one of the strongest landscape and ecological opportunities within the western zone. Its justification as a "service corridor" for the pipeline also does not withstand detailed scrutiny, and its length would make it unnecessarily expensive to construct given the engineering challenges of Fenland soils.

A more appropriate and efficient solution would be to align the access road northwards from the A142 roundabout, then curve broadly west and east to arrive at the Secondary Hub on the Forty Foot Drain. This alignment would better reflect AW's stated design principle of concentrating busier and noisier activities to the west, while ensuring quieter, more sensitive landscape and recreation areas to the east remain less disturbed. It would also allow for a larger, uninterrupted expanse of wetland, supporting the ecological, experiential and interpretive objectives for this part of the site.

This alternative alignment would be approximately 0.5 km shorter than the route currently proposed, delivering meaningful cost savings. Road construction costs in the Fens are significantly higher than elsewhere due to ground conditions; a shorter route would therefore generate substantial financial efficiencies while also improving environmental outcomes.

Importantly, this alternative arrangement would avoid conflicts between road traffic and pipeline maintenance activity. The road would be built and operated independently of pipeline service requirements, reducing operational risk. The consultation material notes that three major pipeline corridors will cross the site. If each requires a maintenance corridor, these could be designed to perform a dual function, providing NMU connections across the western and eastern zones. In the event of pipeline maintenance, disruption would be limited to these corridors, avoiding interference with the main access road.

These service corridors could also be integrated into the wetland masterplan, creating clearly defined cells to support water management, habitat creation and long-term maintenance.

It should also be noted that the A142 and New Road already provide a logical vehicular access route to the proposed WTW location. This means the long internal road currently proposed by AW is not required for WTW access. A simple junction and short spur—or safeguarded land for this purpose—could instead be provided to serve the future employment area at this location.

Taken together, these points demonstrate that a revised road alignment offers significant advantages in terms of cost, ecology, visitor experience and operational clarity. They also reinforce the Western Zone's potential to deliver meaningful economic and recreational benefits. Ensuring that the secondary visitor centre is secured through the DCO, and that wider enterprise and employment opportunities are enabled through the masterplan, will be critical to maximising the long-term socioeconomic value of the reservoir for Chatteris and the wider district.

### **ACTIONS:**

- Share further design detail for the secondary visitor centre AW to provide additional information on the proposed functions and spatial arrangements to ensure the building can support educational, cultural and community-focused activities.
- Work with FDC to refine the visitor centre's role and offer AW to collaborate with FDC
  to shape a clear vision for the secondary visitor centre as a facility that serves local
  communities while also providing a distinct, year-round attraction for visitors.
- Improve active travel connectivity with Chatteris AW to explore options for establishing a more direct, legible and attractive walking and cycling route between Chatteris and the secondary visitor centre.
- Enhance water–people–nature interaction opportunities AW to consider additional points of engagement along the reservoir edge near the secondary visitor centre to support varied and inclusive visitor experiences.
- Develop a play and learning vision for the western zone AW to work with FDC to prepare an overarching vision or strategy for play and informal learning across the western zone, including both incidental and destination play opportunities.
- Hold further masterplanning workshops AW to meet with FDC and relevant partners to review design variations, landscape integration and placemaking objectives, ensuring the emerging design aligns with local priorities.
- AW to develop a revised access strategy that: (a) provides direct WTW access from New Road; and (b) uses pipeline maintenance corridors to support NMU movement

and form the framework for wetland creation, avoiding the need for a long intrusive road through the western wetlands.

# Economic Development and Visitor Economy – Western Zone

The Council recognises that the Western Zone offers a valuable opportunity to support local economic activity, strengthen the visitor economy, and create new opportunities for learning, skills and community participation. The proposals for water-based recreation, active travel routes and a secondary visitor hub provide a strong basis for this area to contribute meaningfully to the wider economic impact of the reservoir.

The Council strongly supports the inclusion of a secondary visitor centre in this location and considers it essential that this facility is secured as part of the DCO, alongside the main visitor centre. Its emphasis on education, culture and interpretation has the potential to attract school groups, community organisations and specialist interest visitors, while providing local residents with improved access to informal learning and year-round programming. To maximise economic value and ensure long-term viability, the building will need to be designed with sufficient flexibility to accommodate a mix of activities, events and small-scale cultural and community uses.

The Council also welcomes AW's decision not to use the land off the A142 for wetland creation. While currently identified for agricultural reinstatement, the Council considers this area to hold significant long-term economic development potential due to its scale, accessibility and strategic road frontage. In future, the site could support a high-quality business park, linked leisure uses, or a combination of both, sensitively integrated into the wider reservoir setting and benefiting from improved active travel links to Chatteris and the Western Zone. The Council encourages AW to ensure the DCO does not preclude such opportunities and that the emerging masterplan allows for future employment-generating development.

## **ACTIONS**

- Secure the secondary visitor centre through the DCO AW to confirm that the secondary visitor centre will be delivered as a DCO component, recognising its role in education, community engagement and the visitor economy.
- Work with FDC to refine the visitor centre's role and offer AW to collaborate with FDC to shape a clear vision for the secondary visitor centre as a facility that serves local communities while also providing a distinct, year-round attraction for visitors.
- Safeguard the economic potential of the A142 land AW to ensure that the DCO and emerging masterplan do not preclude future employment or leisure uses on the A142 frontage, and to work with FDC to explore this opportunity further.

# Masterplanning – Eastern Zone

The Council notes AW's aspiration for the Eastern Zone to function as a nature-led area with a quieter, more reflective character than other parts of the reservoir. The proposed approach—including low-key access, landscaped embankments, and foot and cycle paths along the wetland edge—is broadly supported. This area has the potential to become an important space for tranquil recreation, wildlife appreciation and environmental learning, complementing the more activity-focused areas elsewhere on the site.

## **Tertiary Hub**

AW's consultation material notes the potential inclusion of parking, toilets and space for popup cafés within the Eastern Zone; however, these are framed only as possibilities, with no clear commitment to delivery. The Council considers that a firm and explicit commitment to a core level of visitor infrastructure is essential if this part of the reservoir is to function safely and effectively, particularly for families, older residents, and those approaching the site from the east. Basic facilities must be secured through the DCO rather than left to future discretion. In addition to the elements referenced by AW, the Council would also expect to see sheltered picnic areas incorporated to provide weather-resilient resting and gathering spaces that support inclusive use and help visitors engage with the landscape throughout the year.

It is also unclear from the consultation material why the tertiary hub has been moved southwards and away from the Honey Bridge area, which was previously presented as its likely location. A tertiary hub situated closer to Honey Bridge would more naturally align with NMU desire lines from Manea and better support east—west movement across the site. The current proposals provide no explanation for the change in approach, nor is it evident whether the previously suggested provision for horsebox unloading and equestrian access remains part of the design. If this ambition has been removed, the Council would welcome clarification on AW's alternative proposals for equestrian users and for the overall role and function of the tertiary hub.

## Visitor interaction with the wider landscape

The Council also believes that there is more potential within the Eastern Zone to enable meaningful interaction with the wetland environment. Features such as boardwalks, bird hides, quiet viewing points and sensitively designed public art could provide controlled access to nature-rich areas, enhance opportunities for wildlife observation, and strengthen the educational value of the zone. These interventions would need to be carefully designed to respect ecological sensitivities while creating more engaging and immersive experiences for visitors.

In addition, the Council considers that the reservoir edge in the Eastern Zone could be shaped to provide greater variety and visual interest, benefiting not only visitors entering from the eastern access points but also those walking, cycling or horse riding around the reservoir.

Incorporating subtle variations—such as small inlets, textured water edges or resting platforms—would enrich the character of the zone and help create a smoother transition between nature-led areas and the wider recreational network.

Overall, the Council supports AW's intent for the Eastern Zone to be a nature-focused part of the reservoir but believes that clear commitments on visitor facilities, combined with enhanced opportunities for sensitive nature interaction, will be essential to ensuring the area is inclusive, usable and well-integrated into the overall visitor experience.

#### **ACTIONS:**

- AW to provide justification for relocating the tertiary hub southwards and clarify whether equestrian access and horse-related activities will still be accommodated in this area.
- Confirm delivery of core visitor facilities AW to commit to providing parking, toilets and space for pop-up cafés in the Eastern Zone. AW to explore opportunities for sheltered picnic areas in the Eastern Zone area to support year-round visitor use.
- Expand nature-interaction features AW to incorporate additional boardwalks, bird hides and viewing points in this zone to enable controlled engagement with wetland habitats.
- Hold further masterplanning workshops AW to meet with FDC and relevant partners to review design variations, landscape integration and placemaking objectives, ensuring the emerging design aligns with local priorities.

# Masterplanning - Forty Foot Drain

The Forty Foot Drain (Vermuyden's Drain) is one of the most significant landscape and historical features within the reservoir site. As a major component of the Middle Level system, it provides important water-management functions, supports recreational navigation, and accommodates established Public Rights of Way (PRoWs) primarily along its northern bank. The emerging Local Nature Recovery Strategy (LNRS) also identifies the Forty Foot as a key ecological corridor, linking the internationally important Ouse Washes to the east with the Great Fen Project to the west.

In earlier masterplanning comments, the Council highlighted the need for stronger perimeter variation, enhanced activation of the eastern and southern edges, and better opportunities for people and nature to engage with the wider landscape. The Forty Foot Drain represents one of the clearest opportunities to achieve this. It has the potential to become a secondary focal point within the scheme—supporting wildlife, enabling active travel, and celebrating the historic drainage heritage of the Fens.

From a navigation and recreation perspective, there is scope for the reservoir to facilitate enhanced boating facilities, including land for, or provision of, a small marina and additional moorings in the vicinity of the Secondary Hub. Such facilities would diversify recreational use,

create a distinctive destination, and strengthen the relationship between the reservoir and the Middle Level waterways network.

There are also significant opportunities to improve NMU movement along and across the drain. At present, there is a notable gap in safe off-road access between the western side of the Sixteen Foot Drain (near its junction with the Forty Foot) and the B1098 bridge. Addressing this gap through a combination of new NMU bridges and upgraded off-road pathways would create a continuous east—west route, enabling safe and attractive movement to the Ouse Washes in the east and to Leonard's Childs Bridge on Doddington Road in the west. This would reinforce the reservoir's role as a regional green infrastructure connector and directly support the Council's earlier request for a comprehensive, rather than piecemeal, NMU strategy.

Taken together, enhancements to the Forty Foot Drain corridor would support navigation, ecology, heritage interpretation, walking, cycling, horse riding, and landscape distinctiveness—aligning strongly with the project's stated ambition to create a place where water, people and nature come together.

#### **ACTIONS:**

- AW to acknowledge the strategic importance of the Forty Foot Drain within the project brief, including its ecological, recreational, navigational and heritage value.
- AW to develop a network of NMU routes and new bridges, closing existing gaps and improving movement to, from and within the reservoir site in line with earlier masterplanning principles.
- AW to explore enhanced navigational facilities, including land for a marina and new moorings, in collaboration with relevant navigation and drainage authorities.

## Site Access and Movement

FDC has appointed an independent transport and movement masterplanning consultant to support our review of the proposals. Their assessment has informed the Council's position, and the comments set out below reflect FDC's view based on that technical advice. A full copy of the consultant's report is provided as a supporting document.

FDC welcomes AW's ambition to create a well-connected visitor destination, but the transport proposals for the main reservoir site remain insufficiently developed for the Council to understand their full implications or provide confidence that the site can function as a safe, accessible and resilient destination during both construction and operation. Key components of a full Transport Assessment—including traffic modelling, trip generation analysis, parking strategy, public transport access and active travel design—have not yet been provided.

#### Access Strategy and Internal Movement

The Council supports the principle of a multi-hub access strategy, with primary, secondary and tertiary access points helping distribute movement and reduce pressure on any single entrance. However, the consultation material does not yet show how the different access points will operate in practice, how they will interface with local roads, or how internal circulation will be managed.

A clear and coherent hierarchy of routes within the reservoir site is required, distinguishing between:

- Primary vehicle routes
- Shared walking and cycling corridors
- Lower-speed internal access roads
- Service and maintenance routes

More detail is needed on routing, widths, crossing points, gradients, lighting, drainage and potential conflict between user groups. As currently presented, these are only illustrated in high-level conceptual form.

#### Active Travel Network and Circular Reservoir Route

FDC strongly supports the ambition for a continuous walking, cycling and horse-riding loop around the reservoir, complemented by a broader network of routes offering different lengths, rest points and vantage points. This feature has the potential to become one of the site's core attractions.

However, the Consultation 3 material does not yet demonstrate:

- Whether the full circular route is continuous, safe and fully off-road
- Surfacing standards, gradients and year-round accessibility for wheelchairs, mobility scooters and pushchairs
- The alignment, lighting and safety of paths near steep embankments
- How pedestrian, cycling and horse-riding routes interact or are separated
- How the network will connect securely to settlements, schools and transport nodes beyond the reservoir boundary

Crucially, it is not yet clear whether the entire circular route will be secured through the DCO or whether portions remain aspirational. FDC expects this to be a firm, committed element of the scheme.

#### **Public Transport Access to the Main Hub**

The material provided gives almost no detail on bus access, despite public transport being essential for widening access and reducing car dependency. A reservoir of this scale must be readily accessible by bus, particularly for residents without private vehicles.

The Council expects the next round of proposals to demonstrate:

- How buses will enter and circulate within the site
- The location and design of sheltered waiting areas and turning facilities
- Integration with existing and potential CPCA-supported services
- · Realistic estimates of likely patronage
- How people arriving by bus will safely and easily reach key visitor spaces

Without a clear public transport strategy, the reservoir risks becoming a predominantly carbased destination.

#### Highway Access: A141 and A142

AW proposes new junctions on both the A141 and A142 to serve the reservoir. While this approach appears reasonable in principle, the Council has not yet been provided with the technical evidence required to assess the suitability and safety of these proposals. In particular, the following key elements remain outstanding:

- Junction modelling
- Traffic growth assumptions
- Peak visitor day sensitivity testing
- Assessment of construction-period interaction with visitor traffic
- Safe crossing designs for pedestrians, cyclists and equestrians

This information is essential before the Council can consider supporting any new junction arrangements. The design must also demonstrate in detail how vulnerable road users—including pedestrians, cyclists, equestrians and mobility-impaired users—will be able to cross the A141 and A142 safely to reach the reservoir and move between nearby settlements.

The Council welcomes AW's revised position on vehicular access from the A142, which represents an improvement on earlier proposals. In particular, the revised access arrangement:

- Provides a configuration that will support future access to the Fenland Local Plan allocated site to the south of the A142, and
- Enables an at-grade NMU crossing, made possible by the proposed reduction in the speed limit to 40 mph west of the new roundabout.

These are positive steps; however, they must be supported by clear technical justification and detailed design work to ensure the junction operates safely and effectively for all users.

#### Non-Motorised Users (NMU) access to and from nearby settlements

Anglian Water (AW) identifies "connecting nearby communities" as a key design principle for the Fens Reservoir, stating that the project "would seek to enhance connectivity between neighbouring communities such as Chatteris, Doddington, Wimblington and March using the reservoir land as the conduit and as a destination, providing dedicated safe and attractive routes and crossings over busy roads and watercourses."

AW also notes that, "where practicable, the reservoir design could promote active travel, including walking, cycling and horse riding, providing routes that connect into the wider Public Rights of Way network and align with local and regional Green Infrastructure strategies."

FDC strongly supports this ambition. Indeed, the opportunity for the reservoir to deliver transformational improvements in active travel, community health, wellbeing and accessibility was one of the key reasons the Council supported the project at the outset. The site's proximity to multiple settlements—March, Chatteris, Doddington, Wimblington and Manea—creates a unique opportunity to strengthen local connectivity, reduce rural isolation and improve access to green space in an area with significant levels of deprivation, poor health outcomes and lower-than-average levels of physical activity.

However, despite the strength of AW's stated aspirations, the NMU proposals set out in Consultation 3 fall far short of this ambition. Chapter 7 ('Traffic and Transport') of the Design Refinement Report contains minimal information on walking and cycling and provides no meaningful detail on how safe, coherent and attractive NMU access would be delivered. This represents a serious gap, particularly given AW's own narrative and the strategic importance of NMU access to the reservoir's long-term legacy.

The reservoir site is currently severed for NMUs by three major barriers—the A141, the A142, and the Forty Foot Drain. Overcoming these constraints will require a fully developed, sitewide NMU strategy, not piecemeal, reactive interventions at the margins of the scheme. NMU infrastructure must be integral to the design—not an "add-on"—and should shape the spatial layout, hub locations, landscape structure and access hierarchy of the entire masterplan.

FDC remains fully committed to working with AW and CCC to develop a deliverable, ambitious and cost-effective NMU strategy that aligns with the recommendations in the consultant's report (appended) and provides safe and convenient access for all five nearby settlements.

To achieve AW's own design principle of enhanced community connectivity, FDC considers the following components essential:

- A direct NMU route between March and Chatteris Using the disused railway corridor, a parallel lit path along the A141 and an on-site route through the reservoir. Delivers AW's aim of using the reservoir "as a conduit and a destination."
- Re-characterisation of the A141 north of the new access roundabout. Including a 10-mph reduction in speed to facilitate safe, at-grade crossings linking Wimblington and Doddington. Supports AW's commitment to providing "safe and attractive routes and crossings over busy roads."

- An overbridge and underpass on the A141 south of the roundabout. To address the high-speed section between the new access and the Slade End junction. Ensures "safe environments for users" where highway improvements are necessary.
- At least three NMU crossings of the A142 from Chatteris. Located west (Fenton Way), centrally (new roundabout area), and east (New Road). Helps tie the reservoir into the PRoW network and reduces severance.
- A minimum of three NMU bridges over the Forty Foot Drain. Providing western, central and eastern connections into the site and onward routes to Manea and March. Directly supports AW's ambition for crossings over watercourses.
- Safe, managed NMU routes through and around wetlands. Balancing ecological protection with enabling public access.
- Exploring two additional A142 at-grade crossings. At Doddington Road and near the eastern cemetery.
- Clarification on access over third-party land. Particularly between Furrowfields Park and the A142, where no existing PRoW or permissive route exists.
- A direct Manea connection. From Westfield Road to Honey Bridge via existing PRoWs, farm tracks and a small number of new sections.
- Maximise the potential of the Forty Foot Drain as a key east-west movement corridor, providing safe and direct access between the reservoir, the Ouse Washes to the east, and villages to the west such as Benwick and Warboys.
- Investigating extended NMU connections and opportunities. To more distant settlements to the east, west and south, aligning with CPCA's wider Green Infrastructure and active travel networks.

#### **Wider connections to Surrounding Communities**

The reservoir's success as a regional destination will depend on its ability to connect meaningfully with the surrounding towns, villages and public transport hubs. FDC considers that the current design does not yet fully harness the opportunities presented by the site's strategic location, particularly in relation to active travel corridors, rail access, and future mass rapid transit proposals. A more ambitious and clearly defined movement strategy is required.

The two closest rail stations — March to the north and Manea to the east — provide direct connections to Peterborough, Ely, Cambridge and beyond, creating significant potential for the reservoir to be accessed by rail as part of a wider multimodal journey. At present, however, the proposals do not identify how realistic, safe or attractive links between these stations and the reservoir will be created. FDC expects the next stage of design to include dedicated, fully specified walking and cycling links from both March and Manea stations to the reservoir, ensuring that visitors arriving by train can complete their journey confidently and without dependency on the private car.

Manea station presents a particularly important opportunity, being both the closest station and the most directly connected to large parts of the district via the Ely–Peterborough rail corridor. Yet AW's design principles currently make no reference to a Manea–Reservoir route. A direct, well-lit, all-weather active travel connection linking the station, village and eastern reservoir edge must be treated as an essential component of the final design. Similar attention is required for March, where the former March–St Ives railway alignment offers a rare opportunity to create a high-quality greenway, providing a largely traffic-free route between the town and the reservoir.

Beyond rail integration, the Fenland landscape — flat, expansive and ideally suited to longer-distance cycling — presents strong potential for e-bike use. Provision for e-bike charging, secure parking, rental or hire schemes and wayfinding should be embedded within the movement strategy, enabling more residents and visitors to reach the reservoir sustainably. E-bikes also offer a practical solution for linking more remote rural communities to the site, overcoming distance barriers that might otherwise limit active travel.

The reservoir also has an important role in supporting broader regional connectivity. The Council notes emerging discussions around mass rapid transit (MRT) options within the Combined Authority area, including potential routes extending into Huntingdonshire. The reservoir's position between Huntingdonshire and Fenland creates an opportunity to ensure the site is fully aligned with longer-term MRT ambitions. Early safeguarding of potential corridors, interchange points or shuttle connections should be explored so that the reservoir can integrate with future transport technologies and travel patterns over its lifetime.

In addition to rail-linked access, the movement strategy must also deliver high-quality, continuous non-motorised user (NMU) routes between the reservoir and nearby communities including Chatteris, Wimblington, Doddington, March and Manea. These routes must meet appropriate standards for accessibility, width, surfacing, gradients, lighting (where appropriate) and safety. A combination of radial connections from surrounding settlements and a circular perimeter route around the reservoir will help ensure the site functions as an inclusive, district-wide leisure asset rather than an isolated visitor attraction.

Taken together, these enhancements — rail integration, NMU corridors, e-bike infrastructure and alignment with emerging MRT opportunities — would enable the reservoir to operate as a genuinely multimodal destination, broadening access for residents and visitors while significantly reducing reliance on the private car. FDC expects the next iteration of proposals to present a far clearer and more ambitious strategy for linking the reservoir to its wider transport network.

## **River Navigation and Waterway Access**

The reservoir's proximity to the Forty Foot Drain, Sixteen Foot Drain and the wider Middle Level system present an opportunity to strengthen river-based access and enhance the role of Fenland's historic waterways within the project. While AW's consultation material now

places less emphasis on navigation, the Council considers that river access remains an important and under-explored element of the scheme's long-term connectivity and visitor potential.

FDC notes with concern that the previously referenced opportunity to improve Welches Dam Lock—a key gateway between the Middle Level system and the Ouse Washes—no longer appears within the proposals. Enhancing this lock would not only support historic navigation routes but could also form part of a broader blue-green access network, complement walking and cycling connections to the reservoir.

The Council also sees merit in safeguarding the potential for a marina or mooring facility in the vicinity of the Secondary Hub or elsewhere along the Forty Foot Drain. Such a facility could serve multiple functions: supporting small-scale recreational boating, providing an additional gateway into the reservoir, and offering a legacy use for any temporary construction-phase waterways infrastructure (for example, in areas considered for barge delivery of construction materials).

Together, these opportunities would enrich the reservoir's role as a regional destination, strengthen its connection to Fenland's unique waterway heritage, and align with national and local aims to promote sustainable leisure and tourism.

## **Parking Strategy**

The Council has not yet seen sufficient detail on the parking strategy for the main reservoir hub, including:

- Overall parking numbers
- Blue Badge and accessible provision
- Seasonal variation in demand
- Coach parking and pick-up/set-down
- EV charging strategy
- Overflow parking for peak event days

Given AW's projected visitor numbers, the lack of a substantive parking strategy is a significant gap.

From previous discussions FDC understands that car parking charges are likely at the three recreation hubs. Due to the lack of alternatives many people in Fenland are reliant on private cars as their primary means of transport. Considering the relative deprivation in Fenland and the need to encourage health and wellbeing and return visits to the reservoir, the Council would seek to have discounted prices, such as a season ticket pass, for local people.

# Safety, Conflicts and Integration

The current material does not adequately demonstrate that the layout will avoid conflicts between:

- Vehicles and cyclists
- Service vehicles and general visitors
- Construction haul routes and public routes (during phased construction)
- Drainage channels and pedestrian paths
- Areas of steep embankment and public access points

These issues will require careful resolution during the next stage of design.

#### **Overall Position**

FDC supports the direction of travel but considers that the transport and movement proposals for the main reservoir site require substantial further development, including detailed modelling, design refinement and stronger commitments to sustainable access. Significant additional work will be required before these elements can be appropriately assessed as part of a DCO submission.

#### **ACTIONS:**

- Provide a full Transport Assessment AW to submit complete traffic and junction modelling, trip generation analysis, parking strategy, and sensitivity testing for peak visitor and construction periods.
- Define a detailed internal movement framework AW to set out a clear hierarchy for all internal routes (vehicles, walking, cycling, horse-riding and service access), including design standards, widths, gradients, crossings and measures to avoid conflicts between users.
- Commit to a secured, fully designed circular NMU route AW to guarantee that the
  continuous walking, cycling and horse-riding route around the reservoir will be
  secured within the DCO, with detailed alignment, surfacing, accessibility and yearround safety specifications.
- Strengthen public transport access into the site AW to provide detailed proposals showing how buses will enter and serve the main hub, including stop locations, shelters, turning areas and integration with CPCA-supported services.
- Provide full modelling and design for A141 and A142 junctions AW to supply operational modelling for normal, peak and construction scenarios, alongside safe pedestrian, cycling and equestrian crossing arrangements.
- Deliver high-quality active travel links to surrounding communities AW to develop safe, direct NMU routes connecting the reservoir to Chatteris, Wimblington, Doddington, March and Manea, with appropriate standards for accessibility and user comfort.
- Integrate rail access and multimodal connectivity AW to demonstrate realistic walking and cycling routes from March and Manea stations and explore opportunities for rail-to-site shuttle or interchange options to support multimodal travel.

- Incorporate e-bike infrastructure AW to provide secure parking, charging points, and wayfinding for e-bike users, supporting longer-distance, low-carbon access.
- AW to confirm its position on improving Welches Dam Lock and reassess the potential for navigation enhancements as part of a wider blue–green access strategy.
- AW to safeguard land and design flexibility for a future marina or mooring facility linked to the Forty Foot Drain.
- Maximise the potential of the Forty Foot Drain as a key east-west movement corridor, providing safe and direct access between the reservoir, the Ouse Washes to the east, and villages to the west such as Benwick and Warboys.
- Set out a comprehensive parking strategy AW to confirm parking quantum, accessible spaces, coach parking, EV charging, internal circulation and peak-day overflow capacity at the main visitor hub.
- Address key safety and conflict points AW to identify and redesign potential points of conflict between vehicles, pedestrians, cyclists, drainage channels and embankments to ensure safe and inclusive site access.

# Renewable energy

FDC welcomes AW's decision not to pursue wind turbine power as part of the energy strategy. While this marks a notable shift from earlier project stages, the Council is content with the move away from turbines provided the overall energy strategy is clearly articulated and delivers a resilient, low-carbon solution for the reservoir.

The Consultation 3 material sets out the potential for both floating solar and ground-mounted solar. FDC is supportive of the principle of integrating renewable energy generation into the project and notes that floating solar is, in principle, the Council's preferred option, as it typically requires less land, can improve operational efficiency, and aligns more naturally with reservoir-based infrastructure.

However, further clarity is required before a firm position can be adopted. In particular, the Council seeks additional information on:

- The quantum of floating solar required, including how this relates to operational demand.
- Potential ecological impacts, including effects on waterbirds, movement corridors and open-water ecology.
- Visual and landscape considerations, especially in relation to the reservoir's openwater character and long-range views.

Should AW determine that ground-mounted solar is necessary or preferable, FDC would require a clear and robust justification for its scale, location and visual prominence, particularly in the area north of the reservoir.

Further detail is also needed on the battery storage facility—including footprint, appearance, proximity to sensitive receptors and how it will integrate with the wider site design. Given its operational importance, it must be masterplanned in a coordinated and landscape-led way.

Finally, FDC encourages AW to fully explore the potential for water source heat pumps as part of a low-carbon energy strategy. The reservoir offers a rare opportunity for large-scale heat extraction, which could meaningfully support operational efficiency or contribute to local energy networks. Early feasibility testing is recommended.

#### **ACTIONS:**

- AW to provide a clear justification for the proposed solar generation strategy, including the quantum of floating and/or ground-mounted solar required and evidence on ecological and visual impacts.
- AW to supply full details of the proposed battery storage facility, covering footprint, siting, design approach and integration with the wider masterplan.
- AW to undertake an initial feasibility assessment of water source heat pumps (WSHPs) and share findings with FDC, CCC and CPCA.
- AW, FDC, CCC and CPCA to hold a focused technical session to review energy options and jointly shape a coherent, deliverable low-carbon energy strategy for inclusion in the DCO.

# **Pumping stations**

The Council notes that the Consultation 3 material provides only high-level references to the pumping stations required for the extraction, conveyance and operational management of water within the reservoir system. However, no clear information has been provided on the number, size, capacity, precise locations or operational characteristics of these pumping stations, including those proposed within the reservoir site itself. Without this clarity, it is not possible to fully assess the cumulative environmental health impacts of these installations, particularly in relation to noise, vibration, air quality, lighting, and operational hours.

Given the scale and duration of reservoir operations, pumping stations are likely to represent significant and permanent infrastructure components. Their positioning—whether adjacent to settlements, near sensitive ecological habitats, or within quiet rural environments—will have material implications for both local communities and biodiversity. The Council therefore requires detailed information on:

- The full quantum of pumping stations (raw water extraction, transfer, distribution and operational balancing).
- Physical size, height, building design and enclosure requirements.
- Predicted noise levels, both day and night, including cumulative modelling.
- Mitigation measures, including acoustic screening, building orientation, and operational controls.
- Lighting requirements, particularly for sites in dark-sky rural contexts.

• Access requirements, maintenance frequency and associated vehicle movements. This level of information is essential to establish whether impacts can be effectively mitigated, whether alternative siting options should be considered, and whether any components pose unacceptable environmental or residential amenity risks.

#### **ACTIONS:**

- Engage with FDC and CCC at masterplanning level to review siting options, explore
  potential for co-location or consolidation, and ensure appropriate buffers from
  sensitive receptors.
- Provide a complete schedule and spatial plan of all pumping stations associated with the reservoir, pipelines and operational water management system, including those within the reservoir boundary.
- Submit detailed environmental health information (noise, lighting, air quality, vibration, operational hours and traffic movements) for each pumping station to enable full cumulative impact assessment by FDC, CCC and statutory consultees.

# **Emergency Drawdown**

It is noted that the Independent Design Expert Panel is currently content with the operational safety of the reservoir. However, the potential impacts of an emergency drawdown event on the Middle Level system require far more detailed assessment. The Middle Level network is not a simple, free-flowing river system; it behaves as a series of ponded, low-gradient water bodies where flows do not automatically move downstream towards St Germans Pumping Station.

In a rapid drawdown scenario, there is a significant risk that large volumes of water released from the reservoir could:

- Fail to move eastwards and northwards as intended, due to minimal hydraulic gradient
- Be pushed back westwards towards Peterborough and other upstream reaches
- Overwhelm local channels, culverts and control structures
- Create unintended flood risk for communities, farmland and infrastructure across the Middle Level catchment.

Given the scale of the reservoir, this scenario cannot be treated as a routine operational consideration. A robust hydraulic model and emergency management plan will be required to demonstrate how the system would behave under extreme conditions and what safeguards will ensure downstream, upstream and lateral areas of the Middle Level system are not adversely affected.

#### **ACTION:**

 AW to undertake and share detailed hydraulic modelling of an emergency drawdown scenario, demonstrating how water would behave across the entire Middle Level system and identifying any required infrastructure, controls or mitigation to prevent upstream or downstream flood risk.

# WATER TREATMENT WORKS

#### **Location of Water Treatment Works**

FDC previously indicated in-principal support for locating the Water Treatment Works (WTW) close to the reservoir, recognising the operational efficiencies this offers and the benefit of placing key infrastructure on Flood Zone 1 land. However, the more detailed information released at Consultation 3—together with further site visits and recent concerns raised by the Council's Environmental Health team—has introduced new uncertainties about the suitability of the proposed location. AW has recently provided additional technical material, but FDC has not yet had the opportunity to fully review this. A firmer position will be established following the planned meeting with AW and a more detailed assessment of the new information.

In addition to these emerging constraints, the archaeological potential of the site has not yet been fully established. The land sits noticeably higher than its immediate surroundings along the historic fen edge, raising the possibility of significant archaeological features and buried remains. Until proper investigation and assessment are undertaken, the risk to heritage assets remains unclear and must be addressed before the acceptability of the site can be confirmed.

Subject to these concerns being satisfactorily resolved—and only if FDC is able to support this location in principle—the Council considers that there are significant improvements that could be made to the layout and configuration of the WTW to reduce its visual, noise and landscape impacts.

FDC encourages AW to explore a reorientation of the complex, with the main buildings moved further east, away from Chatteris, and the lagoons repositioned to the western side of the site. This reconfiguration would:

- Increase separation distances between WTW structures and residential areas in Chatteris
- Reduce potential visual prominence and better allow the WTW to sit "quietly" in the landscape, as intended by AW
- Respond more positively to concerns raised by FDC's Environmental Health team regarding noise and amenity impacts
- Provide a more sympathetic visual relationship with the proposed wetland area extending northwards towards the Forty Foot Drain
- Improve the ability to integrate structural landscaping and screening in key directions. AW has acknowledged that both security and minimising visual impact are important considerations for the scheme. FDC believes the above reconfiguration would support these aims while also delivering a more landscape-led design.

Should the site be demonstrated acceptable in principle, FDC considers that both the main access and an emergency access could be provided from New Road, subject to full assessment through the Transport Assessment and supporting evidence.

#### **ACTIONS:**

- Undertake archaeological assessment as a priority AW to commission detailed archaeological evaluation of the WTW site, reflecting its elevated position on the historic fen edge and high potential for significant buried remains.
- Provide essential supporting evidence to confirm site suitability AW to supply the further information requested by FDC—including site-selection justification—to enable the Council to determine whether the location remains appropriate.
- Hold a dedicated masterplanning and technical review meeting AW to meet with FDC (Planning, Environmental Health, Heritage and Transport officers) to review the suitability of the proposed WTW location, assess alternative layout configurations, and jointly consider options for reducing visual, noise, archaeological and landscape impacts.
- Review access arrangements from New Road AW to assess the feasibility and safety
  of providing both main and emergency access from New Road, supported by detailed
  transport and highway design work.

# **Building Height, Design Quality and Integration**

FDC wishes to emphasise that the following comments on building height, design and integration are provided *without prejudice* to the Council's outstanding concerns regarding the overall suitability of the proposed WTW location, which remains subject to further evidence and assessment.

FDC wishes to ensure that any WTW buildings are designed to be as low-key and unobtrusive as possible within the surrounding landscape. While it is acknowledged that some of the main process buildings are likely to reach heights of 10–12 metres, it remains unclear whether these heights represent an absolute minimum or whether further design optimisation could reduce their scale. Comparable WTW facilities elsewhere appear to operate successfully with lower, more compact structures, and this should be investigated as part of the next design stage.

To help the WTW sit more quietly and sensitively within the landscape, the following measures would greatly assist:

- Relocate and reconfigure the complex, as described above, to improve separation from Chatteris, reduce visual prominence and create a more landscape-led footprint.
- Ensure high-quality architectural design and materials, recognising that the slightly elevated nature of the site will make the buildings more visible than those set within lower-lying fenland terrain.
- Adopt a consistent design language and materials palette across the WTW and the
  wider reservoir site. As discussed at the AW workshop on 9 June 2025, a coherent
  design approach will be essential to achieving a unified and visually harmonious
  development.

- Incorporate substantial structural landscaping and screening, drawing on good practice examples such as the Morcott and Wing WTW complexes, where major tree belts and landform adjustments effectively soften the visual impact of operational buildings.
- Locate visually intrusive plant elements within the interior of the complex, rather than on the perimeter as shown in current plans. Items such as substations, storage containers, kiosks and ancillary equipment should be integrated within the core of the site to minimise views from the wider landscape.

Together, these measures would help ensure that the WTW appears more recessive, less industrial and more sympathetic to the surrounding fenland context, while supporting AW's own stated intention to reduce its visibility and landscape impact

#### **ACTION:**

 Hold a dedicated masterplanning and technical review meeting - AW to meet with FDC (Planning, Environmental Health, Heritage and Transport officers) to review the suitability of the proposed WTW location, assess alternative layout configurations, and jointly consider options for reducing visual, noise, archaeological and landscape impacts.

# **Access and Movement**

The Council recognises the importance of ensuring that the WTW is served by safe, efficient and resilient access. However, based on the information presented in the Consultation 3 materials, the Council does not yet consider the proposed transport strategy for the WTW to be sufficiently developed or appropriately aligned with the wider masterplanning approach for the western zone.

AW currently propose that vehicular access to the WTW is taken from the new A142 roundabout, with an internal road running east and then north through the western part of the site. The Council has concerns about this alignment. It would cut directly through one of the most significant wetland areas proposed within the western zone, undermining the intention to maintain quieter, nature-focused spaces towards the east. It would also introduce general traffic into an area that should remain largely free from vehicular activity and result in a longer, more complex and more expensive route to construct and maintain.

For these reasons, the Council maintains that New Road offers a more appropriate and efficient primary access route for the WTW. This existing corridor already provides a logical point of entry to the proposed WTW location. With proportionate upgrades, it could accommodate both operational and emergency access requirements while avoiding unnecessary intrusion into sensitive landscape areas. This approach would also reduce road length, simplify construction sequencing and help ensure that WTW traffic does not compromise the visitor experience elsewhere within the western zone.

The Council also notes that three pipeline corridors are expected to cross this part of the site. These corridors provide an opportunity to separate pipeline maintenance activity from general access routes and could be used to support NMU movement across the western landscape. Integrating these maintenance corridors coherently into the wider access strategy would help reduce conflicts between operational traffic, construction activity and public access.

Further clarity is still required on the transport-related impacts associated with WTW construction and operation, including expected HGV volumes, abnormal load movements and long-term operational traffic. Given the proximity of the WTW to Chatteris, the Council will also expect transport considerations to be assessed in conjunction with noise, air quality and visual impacts.

Overall, the Council considers that a revised access strategy—centred on New Road and avoiding the need for a long, intrusive internal road—would result in a more coherent, cost-effective and environmentally sensitive approach, better aligned with the wider masterplanning vision for the western zone.

#### **ACTION:**

 AW to work with FDC and CCC to re-evaluate WTW access options, giving full and early consideration to a primary access route from New Road and providing evidencebased justification for any alternative.

# Community orchard adjacent to the WTW

FDC is supportive in principle of incorporating community-focused green infrastructure within the reservoir project, and a community orchard could deliver valuable social, educational and environmental benefits. However, FDC cannot support the orchard in the currently proposed location—between the A142 and the WTW—unless major concerns around access, amenity, environmental quality and design can be fully resolved.

In its present form the location is problematic:

- It is severed from Chatteris by the A142, with no safe or direct NMU route for people to reach the site.
- Proximity to fast-moving traffic compromises the quiet, contemplative qualities normally associated with orchard spaces.
- Vehicle emissions raise concerns about air quality and food safety for fruit grown immediately adjacent to the carriageway.

Notwithstanding this, the land does have the potential to become an attractive and multifunctional green infrastructure (GI) corridor if re-designed and supported by safe access. Should AW be able to provide a safe, at-grade NMU crossing at the A142 / New Road

junction, there are opportunities to create a far more meaningful, community-led and environmentally rich landscape.

#### This could include:

- Ground-scaping and landform sculpting to set community spaces—such as a future orchard, community garden or "secret garden"—further back from the road, providing greater separation, reduced noise intrusion, improved air quality and a more sheltered microclimate.
- Structural planting, including native tree belts and dense mixed hedgerows along the roadside edge, to create a visual and acoustic buffer between the A142 and community-focused areas.
- Establishment of a broad GI zone, combining planting, habitat creation, informal seating areas, shaded spaces and opportunities for outdoor learning.
- A community "secret garden", incorporating sensory planting, small growing plots, quiet recreation spaces and nature-themed interpretation.
- A strategic NMU corridor connecting Chatteris to the eastern reservoir edge, the Forty Foot Drain and wider recreational routes.
- Scope for community-led growing projects or small-scale meanwhile uses, designed and managed in partnership with local groups.

Approached in this way—supported by enhanced planting and safe NMU access—the land could offer significantly greater long-term benefit as a more welcoming, accessible and tranquil landscape capable of supporting health, wellbeing, biodiversity and meaningful community use.

#### **ACTIONS:**

- Reconsider the orchard's positioning, unless safe access and environmental conditions can be fully addressed through NMU crossings, ground-scaping and screening.
- Deliver a safe, at-grade NMU crossing at the A142/New Road junction to unlock wider community and GI potential.
- Work with FDC to develop a comprehensive GI concept, incorporating landform design, structural planting, and options such as a community orchard/secret garden and strategic NMU route.

# ASSOCIATED INFRASTRUCTURE

# River Abstraction and Treatment Facility near Dog-in-a-Doublet Sluice

AW proposes to locate the river abstraction and treatment facility, together with the associated pumping station, on the southern part of the site adjacent to the Counter Drain (Nene) near Dog-in-a-Doublet Sluice. The consultation material indicates that this location has been selected to align the new infrastructure with existing water management assets and to keep operations away from nearby homes, farms and Levitt's Drove to minimise disturbance. While the Council recognises the logic of consolidating infrastructure in this area, several issues remain insufficiently addressed.

## Landscape and Visual Considerations

The site lies within an expansive, open fenland landscape characterised by long, uninterrupted views. In such a setting, even modest structures can have a far-reaching visual presence. AW's material provides only limited information on the proposed scale and form of the buildings, meaning the Council is unable to assess the full extent of the visual impact.

To understand how the facility will sit within this sensitive landscape, the Council requires:

- Cross-sections and indicative building heights to assess visibility in long-distance views.
- Massing studies or a simple 3D model to illustrate the relationship between built elements, embankments, and the wider landscape.
- A robust soft landscaping strategy, including bunding and structural planting, to help mitigate the effects of large operational structures within a flat, open setting.

Without this information, FDC cannot determine whether the proposed location offers an acceptable balance between operational need and landscape protection.

## Heritage Setting and the Scheduled Monument

The facility sits close to the Scheduled Monument at Bank Farm, located just to the north within the Peterborough City Council (PCC) administrative area. Given the sensitivity of the asset and the openness of the landscape, careful assessment of potential impacts on its setting is essential. This assessment should be undertaken in close liaison with PCC's archaeological advisors and must demonstrate how any effects can be avoided or mitigated.

# Noise and Operational Disturbance

FDC recognises that an operational pumping facility already exists at Dog-in-a-Doublet, and that the surrounding area has an established baseline of activity associated with water management infrastructure. However, the introduction of a new abstraction and treatment facility, has clear potential to increase noise levels above those currently experienced. It is therefore essential that AW demonstrates how any additional noise—whether from pumps, mechanical equipment, water treatment operations, vehicle movements or maintenance

activities—will be minimised to avoid adverse impacts on nearby residents, recreational users of the area, and sensitive ecological receptors. A comprehensive assessment of cumulative noise effects, taking account of existing operations as well as the proposed new infrastructure, will be required.

#### **ACTIONS:**

- AW to provide a detailed Landscape and Visual Impact Assessment (LVIA) for the abstraction and pumping facility, including verified viewpoints, massing studies and proposed screening measures.
- AW to undertake full baseline and predictive noise modelling for the facility and pumping operations, and to develop a mitigation package in partnership with FDC's Environmental Health team.
- AW to clarify operational and spatial relationships with Dog-in-a-Doublet Lock, including any implications for navigation, heritage setting and public access.

# River Abstraction and Filtration Facility near Welches Dam

The proposed Welches Dam Pumping Station is set within an extremely open, flat landscape characteristic of the wider Ouse Washes. While the logic of collocating new infrastructure alongside existing water management assets is noted, several aspects require further detail and assessment before the Council can be confident that the proposals represent an appropriate and well-integrated solution.

## Landscape and Visual Considerations

The Welches Dam area offers long, uninterrupted views across the Ouse Washes and surrounding fenland. In such a landscape, new above-ground structures—such as intake equipment, filtration units, pumping buildings, access tracks, compounds and security fencing—can have a pronounced and far-reaching visual influence. The consultation material currently provides only limited information on the scale, massing and appearance of the proposed structures.

AW's material refers to a flood bund with some tree planting in this location. While this could help to soften views in the medium to long term, the Council requires clearer evidence of:

- The height, profile and extent of the bund.
- The proposed planting strategy, including species, density and anticipated maturity.
- How the bund would integrate with the broader landscape character of the Ouse Washes.
- Whether alternative or additional screening options have been considered.

To assess the proposals effectively, cross-sections, massing studies or a simple 3D model will be essential. These should illustrate how the facility sits within the existing landform,

what the viewer experiences from key public viewpoints, and what level of mitigation is realistically achievable.

## Heritage and Local Character

Although there are no designated heritage assets in the immediate vicinity, there is a draft locally listed cottage and a draft locally listed sluice gate close to the proposed facility. Both have been assessed as meeting the criteria for inclusion on the district's Local List and are therefore recognised as non-designated heritage assets of local importance.

Given their proximity, AW will need to demonstrate:

- How the design and siting of the facility avoid harm to their setting, character or appreciation.
- How landscaping and the arrangement of built elements can help maintain the historic fen-edge character of this location.
- Whether any heritage-led enhancements or interpretation opportunities could be integrated.

## Noise and Operational Disturbance

FDC recognises that the existing Welches Dam pumps already create a baseline level of activity. However, the introduction of new pumping equipment and filtration processes may increase overall noise levels. The Council therefore requires AW to:

- Establish a clear baseline noise profile for the area.
- Model predicted operational noise levels from all new infrastructure.
- Set out proposed acoustic mitigation measures, including building design, enclosure specification, operational controls and equipment selection.
- Consider effects on nearby residents, visitors, recreational users and sensitive ecological receptors.

## **Ecological Considerations and Water Management**

AW notes that removing excess water from the Ouse Washes could provide ecological benefits—for example, by creating more suitable conditions for breeding birds in summer and foraging birds in winter. The Council acknowledges that this may present an opportunity to support conservation objectives, but emphasises that:

- The ecological effects must be fully evidenced, including hydrological implications for the SSSI, SPA and Ramsar designations.
- Any benefits must be balanced against potential risks associated with altered water regimes, disturbance, or construction impacts.
- A clear ecological justification must be provided to demonstrate that the abstraction and transfer process will support, rather than inadvertently undermine, the ecological function of the Ouse Washes.

The Council expects a thorough assessment of these interactions within the Environmental Statement, supported by robust modelling and stakeholder engagement with Natural England and the Middle Level Commissioners.

#### **ACTIONS:**

- AW to provide detailed landscape information, including cross-sections, massing studies or 3D modelling, and a comprehensive planting and screening strategy for the Welches Dam facility
- AW to undertake and share full noise modelling, including cumulative effects with existing pumps, and agree mitigation measures with FDC's Environmental Health team
- AW to assess and address impacts on nearby non-designated heritage assets (draft locally listed cottage and sluice gate) and demonstrate how their setting will be protected
- AW to evidence the ecological implications of water abstraction from the Ouse Washes, including hydrological modelling and justification of claimed benefits
- AW to present any alternative siting or layout options within the Welches Dam area that could further reduce landscape, noise or heritage impacts

# Open water transfer vs. Piped network

The consultation material indicates a shift from earlier commitments to prioritise open-water transfer routes into the reservoir wherever practicable. The new proposal to pump water from the Ouse Washes to the main reservoir site represents a notable departure from that stated ambition, yet no clear explanation is provided for this change in approach. Several plans refer to "environmental mitigation" along the Forty Foot Drain, but it is not clear what this entails or how piped transfer infrastructure would interact with existing or proposed habitats, access routes, or drainage functions. Further clarity is required.

## **ACTION:**

 AW to provide clear explanation of the rationale for moving from open-water transfer to pumped transfer, including full details of proposed mitigation along the Forty Foot Drain.

# Raw Water Supply - Long-Term Reliability and Strategic Options

FDC encourages AW and Cambridge Water to revisit the full range of raw water supply options considered to date and to provide a clearer justification for the preferred approach. One option that merits further examination is abstraction from the River Great Ouse in the vicinity of Denver Sluice. This location receives flows from several major tributaries—including the Cam, Soham Lode, Lark, Little Ouse and Wissey—resulting in one of the most consistently high-yield supply points in the region.

Given the strategic importance of securing a reliable and robust long-term water source for a scheme of this scale, the Denver Sluice option may provide notable advantages. The proposed downstream pipeline connection to the Bexwell service reservoir would pass close to this location, potentially offering a practical alignment for conveying raw water back to the reservoir. If viable, this could reduce or eliminate the need for the raw water infrastructure currently proposed from Earith.

#### **ACTION:**

 AW and CW to provide evidence of the raw water supply options assessed to date, including hydrological analysis, and to set out their position on the feasibility of a Denver Sluice abstraction option.

## Use of Raw Water for Local Farmers and Landowners

In line with the aim of delivering wider community and economic benefits, FDC encourages AW to explore opportunities for local agricultural users to access raw water supplies from the reservoir. Along the pipeline corridors, there may be practical scope to install take-off points to supply nearby on-farm reservoirs or support irrigated agriculture.

Similarly, access to raw water could support landowners seeking to transition to rewetted farming systems, including paludiculture, which aligns with emerging climate, biodiversity and land-use agendas in the Fens. Providing these opportunities could help unlock innovation in land management, build stronger support for the reservoir among local landowners, and create a step-change in the resilience of Fenland farming.

#### **ACTION:**

 AW to work with FDC, local landowners and agricultural stakeholders to assess the feasibility of providing raw-water take-off points along the pipeline corridors, including options to supply on-farm reservoirs and support rewetted or alternative farming systems.

# CONSTRUCTION

## **Ecology Considerations During the Construction Stage**

The construction of the reservoir, associated pipelines and supporting infrastructure will extend over several years, creating a prolonged period of ecological disturbance. During this time, habitats will be lost or modified, species will be displaced, and sensitive ecological corridors may be temporarily fragmented. FDC therefore considers it essential that ecology is embedded into all phases of construction planning, sequencing and site management, ensuring that harm is minimised and that opportunities for early habitat creation are maximised.

#### Early and Concurrent Habitat Creation

Given the multiyear construction period, ecological disturbance cannot be regarded as temporary in the usual sense. Without early mitigation, there is a risk of long-term or irreversible displacement of species.

## For this reason:

- Habitat creation and enhancement should begin early, ideally in advance of major construction works, and continue concurrently throughout the construction programme.
- Early habitat delivery can provide immediate refuges and foraging opportunities for displaced species, particularly bats, wintering birds, amphibians, reptiles and ditchassociated fauna.
- Advance planting, including wetland margins, woodland blocks and grassland areas, should be prioritised where possible to reduce landscape impacts and accelerate the ecological establishment of the site.

Well-planned advanced works will also help soften future visual effects and improve site integration during the most intensive phases of construction.

Managing Ecological Impacts from Pipeline and Water Infrastructure Construction

The installation of pipeline corridors, pumping stations and other water-delivery infrastructure poses a particular risk of habitat fragmentation, species disturbance, and impacts on peat and sensitive wetland soils.

# To minimise these impacts:

- Trenching should be phased wherever possible, allowing wildlife to relocate in stages rather than facing large-scale, simultaneous habitat loss.
- Where phasing is not feasible, dedicated species crossing points should be incorporated into temporary working areas to maintain ecological connectivity.

• AW should assess whether tunnelling methods could be used in the most ecologically sensitive sections, as this would significantly reduce disturbance to terrestrial habitats, ditch systems and peat soils.

Where open-trench approaches are unavoidable, the design and reinstatement of working areas must be undertaken in full understanding of peat hydrology, soil moisture and species needs.

Protecting Water Sources and Preventing Environmental Harm

As construction works progress, the project will interact with existing watercourses, drainage infrastructure, and excavated water bodies. These features often support important species, including water voles, aquatic invertebrates, bats, and numerous bird species.

To safeguard ecological interests:

- Any proposals involving water abstraction or movement during construction must be subject to comprehensive environmental assessment, ensuring no deterioration in water quality or harm to existing ecological interests.
- Water used for construction, dust suppression or wetland establishment must be filtered, screened and monitored to prevent the spread of invasive species, pathogens or pollutants.
- Areas with high biodiversity value—such as ditch networks and stretches supporting notable wintering birds—should be avoided during sensitive periods, including overwintering and breeding seasons. Night-time working in these areas should be restricted.

Where habitat loss is unavoidable, alternative habitat should already be in place to support displaced species.

Temporary Construction Compounds and Haul Roads

The location, footprint and duration of temporary construction compounds can have significant ecological implications if not carefully planned.

## FDC expects AW to:

- Identify compound locations early and avoid areas of known ecological value, high peat content or key wildlife corridors.
- Incorporate temporary SuDS features, habitat buffers and ecological fencing where appropriate.
- Set out clear plans for full ecological reinstatement of compound areas, recognising that some sites may require long-term habitat management or off-site compensation if reinstatement cannot be achieved within the BNG framework.

Long linear haul roads also risk fragmenting wildlife corridors; these must be designed to include wildlife permeable crossings or be located to minimise severance.

Ditch Network Replacement and Aquatic Habitat Design

The existing ditch systems across the site support a high diversity of aquatic invertebrates, plants, amphibians and water voles. Much of this network will be lost or significantly modified as part of reservoir construction, meaning that replacement ditch habitats must form a core element of the ecological strategy.

Replacement ditch networks should:

- Include varied depths, widths and bank profiles to create diverse microhabitats
- Support a mosaic of slow-flowing, shaded and open-water sections
- Be located to maintain or enhance connectivity to the Forty Foot and Sixteen Foot Drains
- Be designed with appropriate water-level management features to prevent stagnation or eutrophication
- Provide suitable refuges and foraging habitat for species displaced during construction

New ditches should be established early in the construction programme to support species translocation and minimise population losses.

#### **ACTIONS:**

- AW to prepare a Construction Ecological Management Plan (CEMP) detailing construction sequencing, species safeguards, timing restrictions, and early habitat delivery
- AW to bring forward early or concurrent habitat creation, including advance planting and the establishment of refuge habitats, ahead of major construction works
- AW to assess construction methodologies for pipeline routes, prioritising tunnelling where ecologically justified and incorporating phasing or crossing points where trenching is unavoidable
- AW to undertake full environmental assessment of any proposed water movement or abstraction during construction, ensuring invasive species control, water-quality protection and ecological safeguarding
- AW to identify temporary compound and haul-road locations early, avoiding sensitive habitats and incorporating measures to maintain ecological connectivity
- AW to design and deliver a replacement ditch network, providing hydrological variation and strong ecological connectivity, and to coordinate its establishment with species translocation needs

# Air Quality and Noise During Construction

Given the scale and duration of the construction programme, careful management of air quality, noise and lighting impacts will be essential to protect the health, wellbeing and amenity of Fenland's communities. The rural and generally quiet character of the surrounding

environment means that dust, noise and night-time activity have the potential to be particularly intrusive if not proactively controlled.

FDC notes that AW has undertaken baseline monitoring for  $NO_2$ , but no particulate  $(PM_{10}/PM_{2\cdot 5})$  monitoring has been carried out to establish a full baseline, nor is there currently a commitment to monitor construction dust throughout the works. This is a significant omission. With national guidance on particulates evolving and with construction expected to last several years, the Council expects a comprehensive particulate monitoring programme to be in place before construction begins and maintained for the duration of the project. Clear intervention thresholds and mitigation triggers will also be required.

Air quality issues have already been identified at Guyhirn and Peas Hill (March) roundabouts, raising concerns about the use of transport routes that already experience elevated pollutant levels. These issues are compounded by the cumulative impact of multiple major developments and NSIPs potentially using the same network. A detailed cumulative air quality assessment will therefore be essential, particularly for the A141, A142, A47 and other strategic corridors.

Noise impacts will also require careful consideration. In a rural environment with low ambient noise, construction activity—including piling, heavy vehicle movements and general site operations—will be highly perceptible. FDC strongly advises that night-time working should be avoided wherever possible. Only in exceptional circumstances should night work be considered, and this must be supported by clear evidence, community consultation and appropriate ecological safeguards.

Construction lighting will require careful control to avoid unnecessary disturbance to residents and wildlife, particularly in dark-sky rural areas and around sensitive ecological receptors. Lighting design, timing, direction and intensity must therefore be addressed thoroughly within the Construction Environmental Management Plan (CEMP), ensuring that light spill and glare are minimised and that sensitive areas are protected.

Effective and transparent community liaison will be essential throughout the construction period. Residents and businesses must receive timely, accessible information about upcoming works, changes to construction traffic routes, noisy activities, night-time operations and environmental mitigation. The Council expects AW to maintain clear, user-friendly communication channels—both digital and direct—to enable residents to raise concerns and receive prompt responses.

Overall, the Council will require a robust CEMP, supported by detailed sub-plans covering dust and air quality, noise, lighting and community liaison, to demonstrate how impacts will be minimised, monitored and managed throughout the construction period.

#### **ACTIONS:**

- AW to establish full baseline air quality monitoring, including particulates (PM<sub>10</sub> and PM<sub>2·5</sub>), prior to construction and maintain comprehensive dust and particulate monitoring throughout the construction period.
- AW to prepare a detailed cumulative air quality assessment for construction traffic routes, taking account of existing issues at Guyhirn and Peas Hill roundabouts and the cumulative effects of other major developments using the same network.
- AW to develop and maintain clear, accessible communication channels for residents and businesses, ensuring timely updates on construction activity, noisy works, nighttime operations and environmental mitigation.
- AW to work with FDC and CCC to prepare a comprehensive CEMP, including detailed sub-plans for dust and air quality, noise, lighting and community liaison.

# Transporting material to and from the site

Construction of the reservoir will require the movement of very substantial quantities of material, both onto and off the site. While AW intends to reuse as much excavated material as possible within the project boundary, significant volumes of stone, equipment and specialist materials will still need to be imported, and some material will need to be removed. It is therefore critical that the strategy for transporting materials is efficient, sustainable and minimises impacts on local communities.

AW has identified four potential A-road-based transport routes for HGV movements:

- Route 1: west of March via the A141 to the southwest corner of the site.
- Route 2: along the A141 southwards towards Huntingdon.
- Route 3: the A142 east from the southwest corner of the site towards Newmarket.
- Route 4: initially following Route 3, then turning south at Ely along the A10.

FDC welcomes AW's intention to keep construction traffic on A-roads where possible, avoiding smaller local roads. However, the Council's strong preference is to minimise the use of the Strategic Road Network, given current pressures from other major schemes, known congestion constraints, and the need to avoid unnecessary disturbance to local communities.

AW also indicates that alternative modes—rail, barges and coastal shipping—have been considered. AW's initial assessment suggests that local inland waterways are not feasible for barge transport, though marine delivery to the Port of King's Lynn may be possible. Two rail options have been identified, each involving a new railhead with onward transfer to the site either via the A141 or via a newly constructed haul road.

The Council considers that this analysis remains incomplete. Based on earlier technical advice, a third multimodal option should be explored: establishing a rail siding northwest of Stonea (between the Sixteen Foot Drain and Ballast Hole Pond, subject to heritage safeguards), with materials transferred by barge along the Sixteen Foot and Forty Foot Drains to temporary marinas near the Secondary and Tertiary Hubs.

This approach has the potential to be the lowest-carbon and least road-dependent construction method, significantly reducing HGV movements on the A141/A142 and the wider Strategic Road Network. It could also create a post-construction legacy, with temporary marinas repurposed for recreation or moorings.

Should detailed assessment conclude that this multi-modal rail-and-barge option is not feasible, the Council would, in principle, support a rail-and-road solution as the next best alternative. However, FDC cannot yet express a preference between the Whitemoor Yard option and the new haul-road option, as critical information is still missing, including environmental impacts, local traffic implications, operational efficiency, cost, and long-term infrastructure benefits. Further detail will therefore be required before the Council can determine which rail-supported option would be acceptable.

In parallel, clarity is needed on the volume, routing, timing and destinations of materials removed from the site. This information is essential to understand the implications for the A47, A141, A142 and cumulative impacts with other regional infrastructure projects.

FDC will expect AW to develop a comprehensive multimodal construction logistics strategy, prioritising rail and waterborne options wherever feasible, and minimising reliance on the Strategic Road Network.

#### **ACTIONS:**

- AW to undertake and share a full feasibility assessment of the proposed multimodal rail-and-barge option (Stonea siding + Sixteen Foot/Forty Foot barge transfer), including environmental, heritage, engineering and operational considerations, and discuss findings with FDC, CCC and relevant partners.
- If the multimodal option proves unworkable, AW to provide detailed comparative analysis of the two rail-supported alternatives, including traffic impacts, environmental effects, cost, deliverability and long-term legacy benefits, to enable FDC and CCC to identify a preferred solution.
- AW to supply clear information on material movements, including expected volumes, routing, destinations, peak flows and timing, to allow assessment of impacts on the A47, A141, A142 and other strategic and local routes.
- AW to work with FDC and CCC to develop a comprehensive multimodal construction logistics strategy that prioritises rail and waterborne transport, minimises reliance on the Strategic Road Network, and aligns with national policy on carbon reduction and freight efficiency.

## Local Employment, Skills and Business Impacts

FDC welcomes AW's intention to produce a Socio-Economic Strategy as explained in the Approach to Social and Economic Value document but asks that this should be made available for review and comment prior to the DCO application.

The construction of the Fens Reservoir—anticipated to run for six to eight years, with further activity continuing beyond the initial supply date—presents both significant opportunities

and notable risks for Fenland's local economy. Given the scale, duration and complexity of the works, it is essential that AW adopts a construction strategy that maximises local benefit while mitigating the pressures that major infrastructure projects can place on existing businesses and labour markets.

There is strong potential for the project to support local employment, skills development and supply-chain participation. With coordinated planning, the reservoir could help create new routes into construction, engineering, environmental management and associated technical roles. The Council encourages AW to work closely with local colleges, training providers, employment agencies, schools and business support organisations, including the CPCA, to ensure that:

- Clear and accessible training and employment pathways are developed for residents, including young people, career changers and those with lower qualification levels.
- Opportunities for apprenticeships, upskilling and lifelong learning are embedded throughout the construction period.
- Procurement processes are designed to be open and accessible to local small and medium sized enterprises (SME), with early information on contract packages and supplier engagement activity.

Early engagement with local schools and further education (FE) institutions is strongly encouraged—not only to support recruitment but also to inspire young people, raise awareness of career opportunities linked to the reservoir, and help strengthen the local skills base over the long term.

At the same time, the Council recognises that a project of this scale could create labour market pressures, particularly in a district where many small and growing businesses already report challenges in recruiting and retaining staff. A prolonged period of high labour demand has the potential to draw skilled workers away from existing employers, affecting business stability and growth. The Council therefore expects AW to work with FDC and local business networks to:

- Monitor labour market impacts throughout construction and identify emerging pressures early.
- Explore targeted measures to support existing businesses, including staff retention or training initiatives where appropriate.
- Consider opportunities to attract new complementary businesses into the area, supported by FDC's ability to identify suitable sites, premises and local networks.

By taking a balanced and collaborative approach—one that combines strong commitments to local employment and supply-chain participation with proactive management of economic risks—the construction phase can leave a positive, long-term legacy for Fenland's communities while minimising disruption to existing businesses.

#### **ACTIONS**

- AW to produce a socio-economic strategy for review prior to DCO submission.
- Prepare a local employment and skills plan AW to work with FDC, CPCA and local education/training providers to define clear pathways into construction, apprenticeships and upskilling opportunities.
- Engage early with schools, colleges and training centres AW to establish early
  partnerships with local education institutions to support recruitment and inspire
  future entrants into construction and environmental careers.
- Maximise local procurement opportunities AW to provide early notice of contract packages and deliver supplier engagement activity to support SME participation across Fenland and the wider CPCA area.
- Monitor and mitigate labour market pressures AW to work with FDC and CPCA to identify risks to existing businesses from increased labour demand and agree appropriate mitigation measures.
- Support business resilience during construction AW to collaborate with FDC and CPCA to explore targeted initiatives that help local businesses retain staff, access training or respond to recruitment challenges.

# Construction worker housing

The consultation material indicates that during the peak construction period—anticipated to last five to six years—up to 2,000 workers may be on site at any one time. At this stage it is unclear how many will be drawn from the local workforce and how many will need or wish to relocate, including workers accompanied by families. This scale of inward migration has important implications for housing, place-shaping, service provision and community wellbeing.

Fenland's housing market is already under pressure, with affordability challenges, high rental demand, limited supply and a heightened risk of displacement or homelessness if demand spikes suddenly. Without a robust accommodation strategy, the construction workforce could unintentionally intensify these pressures, affecting local residents, businesses and essential workers.

The Council would therefore strongly support the provision of purpose-built construction worker accommodation, located close to Chatteris and designed to minimise pressure on the local housing market. There may be scope to include land south of the A142 within the DCO boundary to enable such provision—potentially as a mix of budget or mid-range hotel accommodation, modular living units and higher-quality temporary or semi-permanent housing.

To be acceptable, this accommodation must be supported by:

- Well-designed layouts that embed Secured by Design principles, ensuring that natural surveillance, lighting, clear pedestrian and cycling routes and active frontages help to reduce the potential for antisocial behaviour.
- Robust management and security arrangements, including on-site staff, clear codes of conduct, and effective reporting systems to minimise impacts on surrounding communities.
- Amenity and social spaces that support positive wellbeing and reduce risks of unmanaged congregation or disorder.
- Safe NMU routes to surrounding areas

These measures are essential to maintain community safety and cohesion, particularly given the scale and duration of the construction workforce.

Where accommodation is built to a permanent or high-quality semi-permanent standard, there is significant potential for a positive long-term legacy. Following construction, such buildings could transition into:

- Affordable homes
- Community or youth facilities
- Health and wellbeing spaces
- Education or training centres
- Flexible community rooms or small business/start-up units
- Meanwhile uses during construction (e.g. pop-up learning or outreach hubs)

The Council expects AW to work proactively with FDC, CCC, CPCA, health providers and education partners to explore these legacy options from the outset. Local service providers should be offered first refusal on occupying or repurposing any suitable assets, ensuring that the benefits of the reservoir development extend well beyond the construction period.

#### **ACTIONS:**

- AW to prepare a comprehensive Construction Workforce Accommodation Strategy, setting out expected worker numbers, duration of stays, local versus non-local workforce profiles, and associated accommodation needs.
- AW to work with FDC, CCC and CPCA to assess the potential impacts of the construction workforce on the local housing market, including affordability, availability, displacement risk and pressures on public services.
- AW to explore the inclusion of land south of the A142 within the DCO boundary to deliver purpose-built construction worker accommodation close to Chatteris.
- AW to develop and share options for mixed-model accommodation solutions (e.g. modular housing, budget/mid-range hotel provision) that minimise pressure on the private rented sector.

• AW to work with FDC to identify opportunities for temporary worker accommodation to have a long-term legacy use—such as affordable housing, community space, small business units or meanwhile uses—post-construction.

# Construction worker housing - Linked Social Infrastructure

Alongside accommodation needs, the influx of a large construction workforce will generate additional demand for health, education and community services across Chatteris, March and the wider area. Fenland already experiences significant pressures on GP capacity, NHS dentistry, early years provision, social care, and community facilities. These pressures relate not only to physical space but also to workforce shortages, with challenges in recruiting and retaining qualified staff across health, care, early years and education sectors. Without proactive planning, the presence of up to 2,000 construction workers—some potentially relocating with families—could intensify both the physical and staffing constraints already experienced locally.

The Council therefore expects AW to work collaboratively with FDC, CCC, CPCA, local health partners, social care providers, early years settings and education providers to assess the likely impacts of the construction programme on primary care, childcare and school capacity, youth services, mental health and wellbeing support, and wider community provision. This assessment must consider both the spatial implications and the staffing implications—including the local system's ability to recruit additional professionals and the need for AW to contribute towards measures that strengthen local workforce capacity. This includes temporary workers and any accompanying family members who may choose to live locally or within purpose-built accommodation.

There is also an opportunity to integrate temporary or semi-permanent community spaces into construction worker accommodation sites—such as flexible meeting rooms, mobile or periodic GP/nurse-led clinics, early years spaces, wellbeing facilities or multi-use community rooms. These facilities could help to alleviate pressure on existing local services throughout the construction period and provide meaningful outreach opportunities. To be effective, such facilities must be complemented by adequate staffing provision; AW should therefore consider how it can support the recruitment or deployment of additional personnel to ensure these services can operate sustainably.

Given the anticipated longevity and scale of the project, the Council considers it essential that construction-related facilities are designed with legacy potential in mind. Where buildings or community spaces are constructed to an appropriate permanent or semi-permanent standard, they could transition—post-construction—into:

- Community hubs or meeting spaces
- Early years or childcare provision
- Health and wellbeing facilities

- Training centres or adult education spaces
- Youth provision or flexible activity venues

To maximise this legacy value, there should be ongoing dialogue between AW and local service providers throughout the construction period. Health, education and community organisations should be given first refusal on occupying or repurposing any suitable buildings or spaces, and discussions should include not only the physical assets but also strategies for supporting the long-term workforce required to operate them. This includes consideration of training pathways, recruitment initiatives, and broader measures to attract professionals to the area.

A coordinated and forward-looking approach to social infrastructure planning will be essential to ensure the reservoir development supports—rather than strains—local services, workforce capacity and community wellbeing, both during the construction phase and in the decades that follow.

#### **ACTIONS:**

- Develop a Social Infrastructure Impact Assessment to quantify potential pressures on local health, education and community services arising from the construction workforce, and share this with FDC, CCC, CPCA and relevant service providers at the earliest stage.
- Work with FDC, CCC, CPCA and local service commissioners (e.g. NHS, education and community providers) to identify required on-site or near-site social infrastructure to support the construction workforce and minimise pressure on existing facilities.

# Community Benefits and Legacy

Given the scale and duration of the construction period, the Council considers it essential that the project delivers tangible and lasting community benefits to help offset the unavoidable disturbance that residents, businesses and communities will experience. A construction programme of six to eight years represents a significant presence in the daily lives of those living and working near the reservoir site and along the pipeline corridors. It is therefore important that AW commits to a package of measures that provides direct community value, supports wellbeing and strengthens local resilience throughout the construction phase and beyond.

The Council would welcome exploration of a community benefits and legacy fund to support local initiatives, small-scale infrastructure, environmental improvements, and community-led projects within the areas most affected by construction. Such a fund could help address project impacts, create visible local improvements and leave a meaningful legacy after construction has concluded.

There is also significant scope for meanwhile uses in and around the construction footprint, particularly within areas not actively being worked on during certain phases. These could

include temporary learning, interpretation or viewing areas, community spaces, or small-scale activities linked to environment, heritage or engineering. Meanwhile uses can help maintain a positive relationship between the project and local communities, offering points of engagement and opportunities for education, recreation or creativity throughout the construction period.

The Council also sees strong value in a clear commitment to learning, education and public understanding during construction. Given the unique engineering, environmental and landscape processes involved, the project offers an important opportunity to create curriculum-linked materials, talks, site-based learning experiences, and partnerships with local schools and FE providers. These activities would help raise awareness of the project, demystify construction processes, and support local education outcomes.

In addition, the Council encourages AW to establish a robust and accessible digital engagement platform, enabling residents, businesses and stakeholders to stay informed about construction progress, road or access changes, environmental monitoring, and upcoming works. This platform should include:

- Clear, regularly updated information on construction activity
- Easy ways for affected individuals to get in touch, raise concerns or report issues
- Educational and interpretive content explaining the project, its purpose and its progress
- Accessible formats for different audiences, including residents, schools and community groups

Such digital tools would help maintain transparency, support timely communication and ensure that residents feel connected and informed throughout the construction period.

Together, these measures – community benefits funding, meanwhile uses, strong educational opportunities and effective digital engagement – would help ensure that the construction phase delivers positive community value, strengthens local understanding of the project, and leaves a legacy that extends well beyond the completion of the reservoir.

#### **ACTIONS**

- Establish a community benefits and legacy fund AW to work with FDC and CPCA to develop a fund that supports local projects, environmental improvements and community initiatives in areas most affected by construction.
- Identify opportunities for meanwhile uses AW to explore temporary learning, interpretation or community spaces on parts of the site not under active construction, in partnership with FDC and local groups.
- Develop construction-phase learning and education programmes AW to collaborate with local schools, FE providers and community organisations to create curriculum-linked resources, talks and site-based learning activities.

•	Create a comprehensive digital engagement platform - AW to deliver an accessible online hub providing up-to-date construction information, educational content and clear channels for residents to raise issues or seek support.

## SUPPORTING DOCUMENTS

FDC has reviewed the Design Refinement Report (DRR) and the Supporting Environmental Information Report (SEIR) in detail. However, we have chosen not to provide line-by-line comments at this stage, as both documents will need to be updated to reflect the substantial design changes that are likely to arise from feedback provided by FDC and other stakeholders. Many of the issues raised throughout our wider response have implications for the overall design, masterplanning approach, access strategy, environmental mitigation and supporting assessments. Detailed comments on the current DRR and SEIR would therefore risk becoming outdated or misaligned with the next iteration of the proposals.

Nevertheless, FDC wishes to highlight several overarching points that should be addressed as these documents are updated:

- Access and movement: Supporting documents should explicitly recognise the
  importance of connecting the reservoir to the surrounding network of local footpaths
  and Public Rights of Way. Safe, direct and attractive routes for walking, cycling and
  horse riding are essential to realising the community, health and wellbeing benefits of
  the scheme.
- Health impact conclusions: FDC does not agree with the conclusion that the
  beneficial health impacts of the reservoir will outweigh adverse effects. Numerous
  desire-line crossings of the A141 and A142 have not been adequately considered.
  Without safe NMU crossings, there is a serious risk of avoidable injury or loss of life. A
  development of this scale and public draw must not be delivered without secure and
  inclusive access routes for nearby communities.
- Opportunities along the piped network: The current approach of excluding upgrades to the wider supply network is too narrow. The piped corridors offer a major opportunity to support agricultural resilience by enabling raw water transfer to local farm reservoirs—a point the Council expects to see explored in future iterations.
- Construction logistics and carbon reduction: Options for combining rail freight with waterborne transfer of bulk materials—for example, via Stonea sidings and the Sixteen Foot Drain—should be revisited as part of the carbon reduction hierarchy. These multimodal options may offer lower-impact construction routes compared with extensive HGV transport.
- Road condition and maintenance responsibilities: The SEIR acknowledges the
  challenges of Fenland's underlying geology during dry periods, but it does not set out
  how construction impacts—particularly on local roads serving associated
  infrastructure—will be managed or compensated. FDC expects financial or in-kind
  provision for necessary repairs to be incorporated into the project.

- Raw water availability: Availability of raw water is one of the most significant risks to
  the project's long-term operation and should be treated as a primary design
  consideration. FDC encourages AW and CW to revisit the option of sourcing raw water
  from the vicinity of Denver Sluices, where supply reliability is expected to remain
  comparatively strong.
- Bulk materials movement: Assessments should now incorporate the potential for rail-to-water movement of bulk materials and more detailed analysis of HGV impacts on the A47 between the A1 and A141, which has not yet been fully explored.
- Active travel: Active travel from the north, particularly from March, requires fuller assessment and integration into revised masterplanning and movement strategies.

FDC also reiterates the need for a comprehensive Transport Vision and Strategy, as set out in the Latcham Report. This should act as a unifying framework for NMU access, public transport opportunities, active travel networks, junction design, and multimodal construction logistics.

Finally, we welcome the statement in Appendix B.4 recognising that "the Fens Reservoir Project is about more than just securing a long-term water supply – it's also a unique opportunity to deliver broader environmental and community benefits." This principle should underpin all future revisions of the DRR and SEIR, including the approach to landscape design, movement, habitats, recreation, and community infrastructure.

#### OTHER FEEDBACK

# Impacts on Affected Businesses and Residents Within the Proposed DCO Boundary

FDC recognises that the construction and operation of the reservoir will directly affect several homes, businesses and community assets located within the proposed DCO boundary. These impacts are significant for those affected, and it is essential that AW maintains a transparent, proactive and continuous dialogue with all affected parties throughout the development of the scheme.

The Council expects AW to ensure that any residents or businesses displaced by the project are fully supported and compensated at least to the statutory minimum, and ideally in a manner that reflects the scale of disruption, the length of the construction period, and the importance of sustaining community cohesion. Early engagement, clear timelines, and accessible communication channels will be critical in helping households and businesses make informed decisions about their future.

#### Two assets merit specific attention:

- Chatteris Airfield: Chatteris Airfield is a recognised sporting, recreational and tourism
  asset, drawing visitors from within Fenland and further afield. Its operation
  contributes positively to the local economy and to the area's cultural and leisure offer.
  FDC understands that AW is undertaking a needs assessment to consider the
  implications of the airfield no longer being able to operate on its current site. The
  Council stresses the importance of this work and encourages AW to engage closely
  with the airfield operators to understand their operational requirements, economic
  role, and preferred relocation options.
- RSPCA Animal Welfare Centre: The RSPCA centre at Block Fen provides valuable
  community benefit and is an important component of Fenland's wider charitable and
  social infrastructure. Its loss would leave a gap in local provision. FDC therefore
  recommends that AW works collaboratively with the RSPCA to identify a suitable
  alternative site within the local area and to ensure that any relocation is viable,
  properly supported, and capable of delivering an equivalent or improved level of
  service.

In line with good practice for major infrastructure projects, the Council expects AW to:

- Maintain direct, ongoing engagement with all affected residents and businesses.
- Provide clear information on timescales, acquisition processes, and compensation pathways.

- Ensure that compensation meets at least the statutory minimum and reflects the specific circumstances of those affected.
- Proactively explore relocation opportunities for key community and economic assets, including Chatteris Airfield and the RSPCA centre, within the local area.
- Work with FDC to understand the wider economic and community implications of any displacement and identify appropriate mitigation or legacy opportunities.
- By approaching this aspect of the project with care, openness and a commitment to minimising harm, AW can help ensure that affected organisations and households are not disadvantaged and that valued local assets continue to serve the Fenland community.

## Consultation Events and Presentation of Information

FDC wishes to acknowledge the positive steps taken by AW in the design and delivery of the Consultation 3 engagement programme. The number of events, the spread of venues across the district, and the use of both staffed and drop-in formats demonstrated a clear commitment to broad community outreach. The physical model, interactive mapping, and visual materials were particularly effective in helping residents grasp the overall layout and scale of the project, and these tools were widely appreciated.

However, despite these strengths, several aspects of the consultation materials limited the public's ability to fully understand the proposals.

A key issue was that the material did not sufficiently convey the scheme at a human or experiential scale. Many residents—despite repeated engagement—continue to struggle to visualise what the embankments will look and feel like when experienced up close within the flat Fenland landscape. This limited clarity risks undermining meaningful understanding of the visual and landscape implications of the scheme.

Similarly, much of the imagery depicted a mature, 25-year post-construction landscape, which does not reflect how the site will appear in the early years or during the lengthy establishment period. For a project of this size and duration, it is essential that communities are shown phased visual scenarios, including:

- construction
- immediate post-construction
- early establishment
- long-term maturity

This is necessary for residents to make an informed judgement about impacts on views, amenity and local character over time.

FDC also considers that future engagement should place greater emphasis on involving young people and harder-to-reach groups. While the programme successfully reached many residents, there is still opportunity to improve by doing things like:

- Work more proactively with local schools, colleges and youth groups, using tailored materials and curriculum-linked content.
- Make greater use of digital tools, animations and short explanatory videos to make complex design concepts accessible to a wider audience.

#### **ACTION:**

To support clearer public communication at the next stage, FDC recommends that AW include:

- Accurate, eye-level human-scale visualisations from meaningful viewpoints.
- Phased landscape imagery showing years 1, 5, 10 and 25+.
- Clearer, more intuitive explanation of embankment heights, gradients and massing.
- Visual material illustrating how the design responds to Fenland landscape character.
- A strengthened engagement strategy, explicitly addressing younger audiences and harder-to-reach groups.

These improvements will enable residents—and key stakeholders—to form a more accurate and informed view of the proposals ahead of the DCO submission.

# Long-term Monitoring and Adaptive Management

Given the complexity of the habitats proposed—including fens, bog cells, wet woodland, grassland and large wetland mosaics—successful outcomes will depend on long-term monitoring and adaptive management, not one-off implementation.

FDC expects AW to commit to:

- A long-term ecological monitoring programme, with regular reporting on habitat development, species responses and ecological condition
- Clear triggers for adaptive management, allowing interventions where habitats fail to establish as planned or where species targets are not being met
- Ongoing specialist ecological oversight, supported by the proposed Ecology Technical Group, which should meet regularly (e.g., bi-annually) for at least the first decade

Provision of adequate resources—financial and technical—to maintain habitat quality for the long term, recognising the long establishment timescales for fen and peatland habitats.

Such a framework will ensure that the reservoir delivers its full nature recovery potential and avoids future habitat degradation.

# ACTION:

