



STATEMENT OF COMMON GROUND BETWEEN HUNTINGDONSHIRE DISTRICT COUNCIL AND ANGLIAN WATER

UPDATED AUGUST 2026

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Document Revisions

- July 2026 – Publication of Statement of Common Ground Between HDC and Anglian Water
- August 2026 – Update to Strategic Matter 3

STATEMENT OF COMMON GROUND BETWEEN HUNTINGDONSHIRE DISTRICT COUNCIL AND ANGLIAN WATER

1. INTRODUCTION

This document presents a Statement of Common Ground (SoCG) between the Huntingdonshire District Council (HDC) and Anglian Water (AW) in relation to the developing Huntingdonshire Local Plan to 2046 (HLP).

It has been prepared jointly by HDC and AW in accordance with Paragraph 28 of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) to collaborate and identify strategic matters, documenting cross-boundary matters and progress in cooperating to address these matters.

The statutory provisions relating to the duty to cooperate were introduced by the Localism Act 2011 and are set out in section 33A of the [Planning and Compulsory Purchase Act 2004](#). It places a legal duty on local planning authorities such as HDC to engage constructively, actively and on an ongoing basis with prescribed bodies as identified in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on strategic cross boundary matters to maximise the effectiveness of the local plan preparation.

Although AW is not a prescribed body under the Duty to Cooperate, HDC have established positive working relationships and will continue to engage with Sewerage Undertakers and Water Supply providers.

HDC serves as the Local Planning Authority for the Huntingdonshire administrative area. In this capacity, HDC is responsible for overseeing planning matters and ensuring that development within the district aligns with established policies and statutory requirements. AW is the statutory undertaker for Water Supply and Water Recycling Services for the East of England, South of the River Humber to the River Thames. Figure 1 illustrates the Water Service and Water Recycling Service Areas covered by AW.

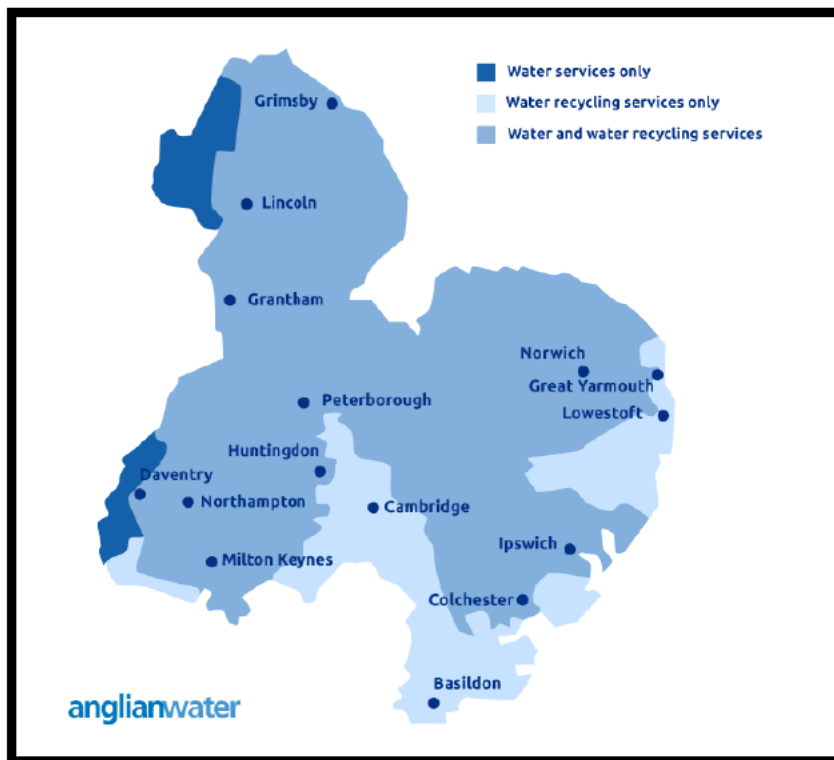


Figure 1 – Anglian Water service areas

AW, is one of the statutory undertakers for the administrative area of Cambridgeshire of which Huntingdonshire form's part and is charged with supplying water for domestic purposes within the majority of the district, as defined by Section 218 of the Water Industry Act 1991. In addition, AW is the statutory sewerage undertaker provider for Cambridgeshire, ensuring the delivery of essential wastewater services in accordance with legislative obligations.

HDC has engaged extensively with AW on the development of the HLP from the outset and AW has been formally consulted and responded at the Regulation 18 consultations in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

This SoCG set outs the basis on which the parties have actively and constructively worked together to meet the requirements of the Duty to Cooperate. The statement sets out the agreement, outstanding matters between parties and where necessary areas of disagreement as appropriate and covers matters relating to Water Recycling Centre (WRC) Capacity and approach to growth, the Fens Reservoir infrastructure and water efficiency.

The SoCG demonstrates how HDC and AW will plan development in alignment for the upgrade of WRCs to accommodate planned growth and which demonstrates that "no deterioration" and "no adverse impacts" can be achieved to the satisfaction of EA and NE.

2. PARTIES INVOLVED

The parties involved in this Statement of Common Ground are:

- Huntingdonshire District Council
- Anglian Water

3. SIGNATORIES

The signatories on behalf of Huntingdonshire District Council are:

Clara Kerr - Head of Planning Infrastructure and Public Protection



13/08/2026

Name

Date

The signatories on behalf of Anglian Water are:

Hannah Wilson –Growth Planning & Policy Manager



13 August 2026

Name

Date

4. ADMINISTRATIVE AREAS COVERED/ STRATEGIC GEOGRAPHY

The SoCG specifically addresses the approach that Huntingdonshire District Council (the district) will adopt with Anglian Water (the statutory water and sewerage undertaker) when approaching strategic policies and development.

Huntingdonshire is one of six districts comprising the county of Cambridgeshire, also sharing borders with Bedfordshire and Northamptonshire. The district is traversed by several Water Resource Zones, which play a significant role in the district's water management. Huntingdonshire forms part of the wider Anglian River Basin with a number of Water Resource Zones originating outside of the district. Development within and outside Huntingdonshire, all have the potential to impact AW's ability to provide and manage waste water within the district.

HDC recognise the cumulative impacts on water provision and management that transcend district boundaries, and that growth occurring both within Huntingdonshire and in neighbouring Local Planning Authorities may have ongoing effects elsewhere. This consideration has been integrated into the districts approach to strategic water management policies and preferred option site allocations.

This SoCG sets out Huntingdonshire's approach to strategic water and wastewater management through its policies and development plan. While specifically focused on HDC as demonstrated in figure 2, the signatory organisations acknowledge that its approach to water/wastewater management discussed apply to a wider spatial area rather than simply to Huntingdonshire alone, and include water recycling centres (WRC's) that sit outside the district but serve communities within it.

**FIGURE 2 – ADMINISTRATIVE AREA COVERED BY STATEMENT OF
COMMON GROUND**



5. STRATEGIC MATTERS TO BE ADDRESSED

As part of HDC's emerging Local Plan, a Stage 1 Water Cycle Study, Interim Stage 2 Water Cycle Study and a Final Stage 2 Water Cycle Study have been undertaken. The WCS's have been aligned with current government flood risk guidance, policy and water industry plans and programmes.

The Final Stage 2 Water Cycle Study outlines that:

- Several WRCs currently do not have dry weather flow capacity (based on a 3 year average Q80 from the period 2022-2024) to accommodate growth, including Huntingdon (Godmanchester), Brampton (WRC), Elton (WRC) and Somersham (Cambs) (as at February 2026) where growth is planned during the plan period¹.
- Alconbury (WRC), Needingworth (WRC), Wyton (RAF) WRC, alongside St. Neots (WRC) have some capacity, but would not have capacity to serve all of the growth planned in their catchments to 2046 (as at February 2026).
- St Neots WRC is identified for a growth scheme in AMP8. AW is currently evaluating growth forecasts for all the 2025-2030 WRC growth schemes to understand the current delivery need and capacity required, and prioritising them based on associated risks at each site.
- Modelling work indicates that the WRCs named above, do not have dry weather flow capacity to serve all of the growth planned in their catchments without future investment.
- AW state that currently depending on the type of business proposed, development may be constrained by their non-domestic water supply position where any request for more than 20m³ /day will be declined.
- The Fens Reservoir Infrastructure corridor currently coincides with part of draft mixed-use allocation Needingworth 2 – South of A1123 / North of Bluntisham Road
- Huntingdonshire District Council is located in an area of serious water stress as defined in the [Environment Agency's Water Stressed Areas – Final Classification 2021](#)

Anglian Water has updated Dry Weather Flow data for 2025 that can be used to inform future assessment of WRC capacity to support local plan preparation and is being used to inform AW responses to planning applications.

HDC conducted its Regulation 18 Preferred Options draft Local Plan to 2046 consultation in Winter 2025, in response AW provided feedback which highlighted several areas for discussion.

¹ No growth is planned through site allocations for the area of Elton, however the local plan policies do allow for windfall development if they meet specific criteria.

Further discussion was held between HDC and AW that identified several strategic matters and opportunities focused on four key areas that warrant further attention and cooperation. These are summarised below:

Strategic Matter 1. Approach to wastewater infrastructure and water quality – site phasing and infrastructure improvements

Strategic Matter 2. Hemingford Abbots 1: The Lattenburys (land to the South of the A1307 and North of A14, and East of A1198, Godmanchester 3: Former A14 Compound, North of A1198 Roundabout and North Huntingdon 4: Wyton Airfield

Strategic Matter 3. Mixed use allocation Needingworth 2 – South of A1123 / North of Bluntisham Road and the Fens reservoir associated infrastructure

Strategic Matter 4. Water Efficiency

6. STRATEGIC MATTER 1: Approach to Wastewater Infrastructure And Water Quality – Site Phasing and Infrastructure Improvements

Background

Huntingdonshire's Preferred Options draft Local Plan to 2046 plans for approximately 32,200 new homes between 2021 to 2046, over half of these homes (17,288) are already completed or committed². Employment floorspace need from 2025 to 2046 is identified as 922,000sqm³ (this factors in completions from 2021 to 2025) split as follows:

Employment Use	Floorspace (sqm)
Office	113,000
Research and Development	45,900
Light Industrial	106,000
General Industrial	224,000
Storage and Distribution	433,000
Total	922,000

The Final Stage 2 Water Cycle Study identified that several Water Recycling Centres (WRCs) currently do not have dry weather flow (DWF) capacity to accommodate growth including Huntingdon (Godmanchester), Brampton (WRC), Elton (WRC) and Somersham (Cambs) (as at February 2026) and therefore will require infrastructure improvements.

In addition, Alconbury (WRC), Needingworth (WRC), and Wyton (RAF) WRC, alongside St. Neots (WRC) have some capacity, but would not have capacity to serve all of the growth planned in their catchments to 2046 (as at February 2026) without the inclusion of infrastructure improvements.

These infrastructure improvements will need to be identified through the next DWMP which will be used to inform the PR29 Business Plan to seek investment for what is needed to support growth without deterioration to water quality.

Anglian Water AMP8 Investments (between 2025 and 2030) include:

- St Neots WRC – which has a planned growth scheme to increase dry weather flow capacity
- Peterborough (Flag Fen) WRC – which has a planned growth scheme for process capacity
- Grafham to Cambridge interconnector pipeline - This water main will be capable of transferring up to 50ML/day of water and is proposed to cross the south of the district.

² Huntingdonshire District Council Annual Monitoring Report Part 1 2025

³ [Economic and Employment Needs Assessment 2025](#)

The Water Cycle Studies were informed by data provided by AW and drafts were shared with AW for comment before publication. This has enabled Anglian Water to have early sight of any strategic matters affecting Huntingdonshire District allowing them to plan appropriately and pragmatically for the growth needs within the district to 2046.

AW has also indicated that resolving the impact of environmental pressures, including WRCs that will need to meet technically achievable limits (TAL) for phosphorus, and the approach required to enable future sustainable growth is a matter Anglian Water will continue to discuss with the Environment Agency and key stakeholders to assess future options for growth. This includes alternative options to accommodate flows from additional growth at WRCs that are already required to meet technically achievable limits (TAL) for phosphorus but will also need to accommodate additional growth through increasing dry weather flow capacity. Potential solutions being explored include catchment approaches and investments in removing phosphorus from wastewater discharges at upstream WRCs. These solutions will need to be identified through DWMP28 and PR29 Business Plan to seek investment for what is needed to support growth without deterioration to water quality.

Areas of Agreement

All parties agree that HDC Final Stage 2 WCS identifies that a number of Water Recycling Centres (WRC) catchments do not have immediate capacity or have limited capacity for the future residential growth proposed in the HLP. To prevent these WRC from continuing to exceed their limits, or being pushed beyond them, they will require upgrades throughout the plan period, unless alternative solutions are identified through the preparation of the next Drainage and Wastewater Management Plan (DWMP28).

The WRC's identified are;

- Huntingdon (Godmanchester) WRC
- Somersham (Cambs) WRC
- Wyton (RAF) WRC
- St. Neots WRC (however, a growth scheme is identified for AMP8)
- Brampton WRC
- Alconbury WRC,
- Needingworth WRC,

It should be noted that for St Neots WRC a Dry Weather Flow growth scheme is planned for delivery in AMP8 (2025-2030) which will improve the capacity for flow and allow further development in the St Neots WRC. St Neots WRC is identified for investment to reduce phosphorus to TAL by 31st March 2030.

All parties agree that ensuring that these WRC's have sufficient capacity, to serve the proposed growth in the Local Plan is essential to support the district's development needs during the Plan Period. Therefore, a collaborative approach is required to balance infrastructure requirements with the growth requirements of the district.

All parties agree that there is no planned growth investment in AW's Asset Management Period (AMP8) covering 2025 – 2030, beyond St Neots WRC, Peterborough (Flag Fen) WRC and the Grafham to Cambridge interconnector pipeline. Therefore, funding for growth schemes at the remaining identified sites will need to be included in subsequent Price Review processes.

AW and HDC agree that AW will assess infrastructure improvements for Huntingdon (Godmanchester), Brampton (WRC), Elton (WRC) and Somersham (Cambs) for AMP9 covering the period 2030 – 2035, through the next Drainage and Wastewater Management Plan (DWMP28), to inform the PR29 Business Plan investments; meaning sites within these catchments should be deliverable (or be able to be occupied) by 2035 at the latest, dependent on funding being secured for these investments and deliverability of the scheme. This would be subject to approval by water industry regulators.

HDC and AW agree that in order to allow growth to continue, within the catchments of the remaining identified sites not included in AMP9 AW's WRC growth schemes will need to align with the delivery trajectories of the relevant proposed allocations to ensure that waste water flows are available at the point of occupation. A guidance note circulated in June 2026 to local planning authorities on Anglian Water's approach to strategic sites (500+ dwellings identified in an emerging or adopted local plan) also outlines how AW will support the delivery of strategic development sites including temporary foul drainage connections to facilitate early phases of development (see Appendix 2).

AW and HDC agree that there is dry weather flow capacity at Wyton (RAF) WRC to facilitate planned growth for North Huntingdon 4: Wyton Airfield for initial phases.

AW agrees to assess Alconbury (WRC), Needingworth (WRC) and Wyton (RAF) WRC through the preparation of the DWMP28 which will identify short, medium and long-term strategies to address growth, which will inform investments in the Price Review process (PR29). All parties agree that in order to align with planned growth, infrastructure improvements to Alconbury (WRC), Needingworth (WRC), St. Neots (WRC) and Wyton (RAF) WRC will be required in AMPs 9 (2030 - 2035), 10 (2035 – 2040) or 11 (2040-2045) – unless alternative strategies are identified through the DWMP28 process.

AW and HDC agree that proposed site allocations within a WRC catchment that is identified in the Final Stage 2 WCS as having no capacity for growth, would be assessed for investment in AW's PR29 Business Plan (informed by DWMP28).

Actions

AW has indicated that as part of their five-year cycles for infrastructure assessment and investment, they will include water recycling centre infrastructure upgrades in AMP9, covering Huntingdon (Godmanchester), Brampton (WRC), Elton (WRC), and Somersham (Cams) WRCs – subject to the strategies identified in the emerging DWMP28 and securing future funding in agreement with water industry regulators. HDC and AW agree that work for sites served by Huntingdon (Godmanchester) and Somersham WRCs won't start before 2030.

HDC and AW agree that the sites below will be feasible once investment has been confirmed and the price control deliverable requirements provided (i.e. completion dates) – this will also be subject to an agreed pre-planning assessment between the developer and Anglian Water being issued within 12 months of the planning application to ensure network, treatment capacity, and drainage strategy are addressed.

- Somersham 1: College Farm, West of Parkhall Road – 120 homes
- Somersham 2: Dews Bus and Coach Depot, Chatteris Road – 50 homes
- Somersham 3: College Farm, West of Newlands Industrial Estate – 45 homes
- Bluntisham 1: Land off 18 Holliday's Road – 35 homes
- Bluntisham 2: West of Colne Road – 85 homes
- Huntingdon 1: Hinchingsbrooke Hospital site, Hinchingsbrooke Park Road, Huntingdon
- Godmanchester 2: South of Godmanchester, off the A1198 - about 550 homes, and associated infrastructure
- North Huntingdon 2: North of A141, between Huntingdon Racecourse and A1307 - 240,000 sqm of employment floorspace
- North Huntingdon 3: Lodge Farm, North of A141 – about 4,900 homes and associated infrastructure
- Fenstanton 1: Galley Hill, Fenstanton - 100,000sqm of employment floorspace.

HDC will agree to provide annual updates on estimated delivery trajectory to assist in AW's future delivery of infrastructure improvements, to Alconbury (WRC), Needingworth (WRC), St. Neots (WRC) and Wyton (RAF) WRC, in AMPs 10 (2035 - 2040) and AMP 11 (2040-2045)

Anglian Water will provide updates on Dry Weather Flow data WRC capacity as part of their response to the Regulation 19 Local Plan consultation.

Next steps

There were no unresolved issues within the discussion in relation to assessment WRC capacity and timing of site delivery therefore there are no further resolutions required. The matter of nutrient removal at our WRCs, addressing current and future TAL requirements, and WRC growth schemes, will need to be kept under review with relevant stakeholders.

AW and HDC will continue to work together and regularly revisit discussions in terms of AW's future Asset Management Plans and the sharing of housing trajectories for Huntingdonshire.

7. STRATEGIC MATTER 2: Hemingford Abbots 1: The Lattenburys (Land to The South of The A1307 and North of A14, and East of A1198 , Godmanchester 3: Former A14 Compound, North of A1198 Roundabout and North Huntingdon 4: Wyton Airfield

Background

Huntingdonshire's Preferred Options draft Local Plan to 2046 plan includes the allocation of Hemingford Abbots 1: The Lattenburys (land to the South of the A1307 and North of A14, and East of A1198 and Godmanchester 3: Former A14 Compound, North of A1198 Roundabout, that do not currently fall within a WRC catchment. The closest, Huntingdon (Godmanchester) WRC is currently exceeding capacity and therefore unable to serve any newly proposed growth.

In addition, HDC have noted that sites within the catchment of the Wyton (RAF) WRC have some capacity for immediate growth for North Huntingdon 4: Wyton Airfield but will require careful phasing of development to ensure that Wyton (RAF) WRC does not exceed its permit.

Therefore, it is necessary to reach an agreement on how Hemingford Abbots 1 and Godmanchester 3 will be served in term of water supply and services, as well as to establish a strategy for the phasing of development within the catchments of WRC facilities with limited capacity.

AW has also indicated that resolving the impact of environmental pressures, including WRCs that will need to meet technically achievable limits (TAL) for phosphorus, and the approach required to enable future sustainable growth is a matter Anglian Water will continue to discuss with the Environment Agency and key stakeholders to assess future options for growth. This includes alternative options to accommodate additional growth at WRCs that are already required to meet technically achievable limits (TAL) for phosphorus but will also need to accommodate additional growth through increasing dry weather flow capacity. Potential solutions being explored include catchment approaches and investments in removing phosphorus from wastewater discharges at upstream WRCs. These solutions will need to be identified through DWMP28 and PR29 Business Plan to seek investment for what is needed to support growth without deterioration to water quality.

Areas of Agreement

All parties agree a solution is required on how Hemingford Abbots 1 and Godmanchester 3 will be served in term of water supply and services to facilitate growth.

HDC and AW agree that Hemingford Abbots 1: The Lattenburys (land to the South of the A1307 and North of A14, and East of A1198 and Godmanchester 3: Former A14 Compound, North of A1198 Roundabout are not close to any WRC catchments. The closest WRC that would process the quantum of flows from these sites would be Huntingdon (Godmanchester) WRC, as the catchment extends to Godmanchester and the Hemingfords.

AW and HDC agree that the developers for both sites would be required to fund their conveyance to the nearest sustainable connection point to the WRC and this may result in phased connections. There is currently no capacity to accommodate flows until a growth scheme at the WRC is confirmed and there is no growth scheme identified for AMP8 (2025-30).

AW has advised that they have recently identified an approach to strategic sites (500+ homes), such as The Lattenburys and Godmanchester 3. This approach is to prioritise development in locations where sufficient infrastructure capacity is already in place to support growth from the outset. However, AW also recognise that certain sites, while having more limited existing capacity at water recycling centres and within the wastewater networks, remain sustainable in wider planning terms and important contributors to housing need. Therefore, these strategic sites may appropriately come forward over a longer time horizon as infrastructure investment is identified and delivered over subsequent asset management periods (AMPs).

In such cases, a phased approach will be taken for strategic sites that will be allocated in a Local Plan. This enables AW to plan and deliver any required infrastructure investment in a timely and coordinated manner, ensuring existing customers and the environment are protected. Given the scale of these sites, the build-out of strategic sites will occur over an extended period, with phased connections to the wastewater network. It is recognised that delivery of strategic sites could span several asset management periods (AMPs), allowing the development trajectory to inform future business planning and investment strategies. Anglian Water is, therefore, supportive of the principle of development at sustainable locations. However, to ensure that connections are appropriately phased and environmentally robust, it is recommended that appropriate planning conditions are imposed, so development is phased in step with delivery of the required sewerage/drainage infrastructure. This approach will help inform AW strategies but will also be dependent on funding being secured for these investments and deliverability of the scheme. This would be subject to approval by water industry regulators.

All parties agree that in order to overcome the issue of no existing WRC to serve the allocations, onsite solutions could be a solution to be taken forward. For Hemingford Abbots 1, the developer has an option to expedite delivery by providing an onsite WRC with potential to recover treated wastewater for non-potable reuse to supply onsite industrial uses, subject to the necessary discharge consents, to be agreed by the Environment Agency.

For larger strategic sites such as the Lattenburys options for a standalone WRC are as follows:

1. Developer delivers onsite WRC - designed to AW specifications - AW would adopt WRC and operate following a defects liability period.
2. Developer uses a NAV (New Appointments and Variations) to deliver the new infrastructure on site including WRC.
3. Anglian Water delivers the infrastructure onsite (or invests in existing WRC) - this option would be subject to the DWMP informing future investment schemes, and funding being agreed by the regulator.

All parties agree, if Godmanchester 3 was to come forward following a similar trajectory to Hemingford Abbots 1, there could be an opportunity to connect into the wastewater network infrastructure proposed for Hemingford Abbots 1 delivered by the developer.

All parties agree that Wyton (RAF) WRC has capacity to facilitate the initial phases of growth at the strategic residential-led mixed use allocation of North Huntingdon 4: Wyton Airfield and that that upgrades to Wyton (RAF) WRC facilities will be required and included in subsequent price review processes to enable continued delivery of these sites post 2035 – this is dependent on the strategies identified in the emerging DWMP28 and subsequent iterations (i.e. DWMP33).

HDC and AW agree that careful phasing of the site is required so as not to cause any exceedance of permit parameters at Wyton WRC, including dry weather flow, which could result in environmental harm.

Actions

AW have agreed to review the findings of the final Stage 2 Water Cycle Study to ensure that infrastructure improvements are factored into the next AMP9 cycle. These will include Huntingdon (Godmanchester), Brampton (WRC), Elton (WRC) and Somersham (Cambs) WRCs.

Funding for growth schemes at some of these WRCs would need to be included in the next Price Review process (PR29) covering the period 2030-2035 - subject to the strategies identified in the emerging DWMP28 and securing future funding in agreement with water industry regulators. These will include Huntingdon (Godmanchester) WRC.

HDC and AW will agree to work with developers on sites that are not currently served by existing WRC in terms of potential onsite solutions.

HDC will agree to provide annual updates on estimated delivery trajectory to assist in AW's future delivery of infrastructure improvements, to Wyton (RAF) WRC, in AMPs 10 (2035 - 2040) and AMP 11 (2040-2045)

Next Steps

There were no unresolved issues within the discussion in relation to assessment WRC capacity and timing of site delivery therefore there are no further resolutions required. The matter of nutrient removal at our WRCs, addressing current and future TAL requirements, and WRC growth schemes, will need to be kept under review with relevant stakeholders.

AW and HDC will continue to work together and regularly revisit discussions in terms of AW's future Business Plans for five-year Asset Management Periods (AMPs) and the sharing of housing trajectories for Huntingdonshire to ensure that infrastructure is appropriately forward planned. AW has and continues to engage with HDC through the preparation of the emerging Drainage and Wastewater Management Plan for 2030-2055 (DWMP28) and developing the most appropriate growth scenario to ensure that future infrastructure needs are aligned. This will be used to inform investment schemes in future Business Plans. The draft DWMP will be consulted on in 2027, with a final version published in 2028.

8. STRATEGIC MATTER 3: Mixed Use Allocation Needingworth 2 – South of A1123/ North Of Bluntisham Road and The Fens Reservoir Associated Infrastructure

Background

HDC is located in an area of serious water stress as defined in the [Environment Agency's Water Stressed Areas – Final Classification 2021](#).

Two new storage reservoirs are proposed, The Fen Reservoir in Cambridgeshire and the Lincolnshire reservoir. The reservoirs were identified as two of several nationally strategic resource options required to address future deficits in public water supply and are being progressed through the Regulators' Alliance for Progressing Infrastructure Development (RAPID) as projects of national significance via Development Consent Orders. The Fens reservoir is planned to be situated adjacent to Huntingdonshire, within the administrative area of Fenland District Council, and its associated infrastructure will intersect parts of Huntingdonshire. The Lincolnshire reservoir is planned for construction north of Huntingdonshire to the southeast of Sleaford. Associated water infrastructure will be located in the northern part of Huntingdonshire.

AW (and Cambridge Water for the Fens Reservoir) has been undertaking evidence gathering, site selection and public consultation to facilitate the development of both Reservoirs. Submission, examination and decision of the Development Consent Order is currently expected in Autumn 2028.

HDC have been involved at various stages as part of the project's stakeholder consultations, with HDC providing updates on the Local Plan Call for Sites and location of sites put forward for consideration as proposed site allocations including Needingworth 2: South of A1123 / North of Bluntisham Road.

Phase 3 of the Fens Reservoir consultation on behalf of AW and Cambridge Water ran from the 15 October to the 10 December 2025. The consultation was centred around the location and type of water infrastructure required to support the Fens reservoir ([Phase 3 Brochure](#)). The preferred route for the Fens Reservoir pipeline was proposed to run through eastern Huntingdonshire and the site allocation Needingworth 2.



Figure 4: Preferred route for associated infrastructure (pipeline) for The Fens Reservoir at Phase 3 Consultation

HDC submitted a response to the phase 3 consultation (Appendix 1), outlining disagreement with the location of the pipeline which has been rerouted from AW's and CW's Phase 2 consultation (30 May- 9 August 2024) to run along the northern and western boundary of proposed allocation Needingworth 2. The proposed allocation took into account the location of the infrastructure pipeline corridor which at the time was located along the western boundary of the site by reserving land for the infrastructure relating to the Fens Reservoir.

In response to the regulation 18 consultation for HDC local plan, AW raised objections regarding the Needingworth 2 site, specifically concerning the pipeline route. The primary concern related to the fact that the final placement of the pipeline for the Fens Reservoir within the identified corridor is not yet known and that further refinement of the corridor is

expected ahead of DCO submission. This is reflective of the interactive nature of the DCO process, the scale/complexity of the Project, and the need to retain flexibility into the construction phase. AW indicated that should the site be developed before the pipeline route is confirmed, there is a significant risk that housing development could constrain the delivery of infrastructure associated with the Fens Reservoir. This could potentially hinder the successful implementation of the Reservoir project.

HDC included Needingworth 2 – South of A1123 / North of Bluntisham Road as a residential-led mixed use allocation within its preferred options local plan to 2046. The site was 35ha of land South of A1123 to comprise of about 290 homes, community retail facilities to meet any needs arising from the development and land to safeguard against flooding and infrastructure relating to the Fens Reservoir. This allowed for the accommodation of land for Fens Reservoir infrastructure.

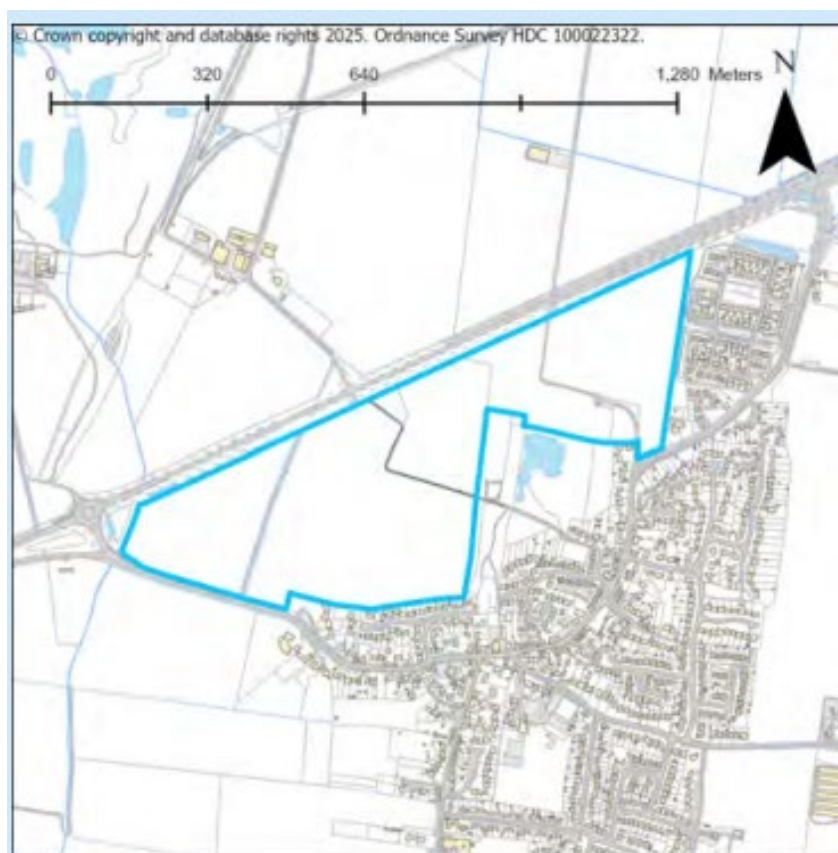


Figure 3 – Boundary of Preferred allocation Needingworth 2: South of A1123 / North of Bluntisham Road

Following the Preferred Options Draft Local Plan consultation (held between 5 November and 17 December 2025) consultation responses to the proposed allocation were reviewed. Key concerns included:

- Flooding concerns, the need for strong mitigation, and uncertainty over drainage effectiveness.
- Potential constraints linked to the Fens Reservoir pipeline.

- Traffic impacts on the A1123, Morrisons roundabout, and surrounding network especially at peak times.
- Coalescence with St Ives, eroding the distinct identity of both settlements.
- Need for noise attenuation from the A1123 bypass
- Worries about poor air quality and the site's sensitivity to traffic-related disturbance.
- Loss of farmland, alongside wider sustainability concerns about large-scale growth north of the Great Ouse.
- Infrastructure concerns ranging from education, sewage, utilities, emergency services, and local facilities to support major expansion
- Some sought deletion of allocation and instead seek smaller/medium sites.

As a result of the consultation responses, especially in relation to traffic impacts, flood risk, coalescence with neighbouring settlements, landscape concerns and the size of the site the Council have concluded that the scale of the proposed allocation should be reduced from 290 homes to 100. This results in the removal of the western parcel of land.

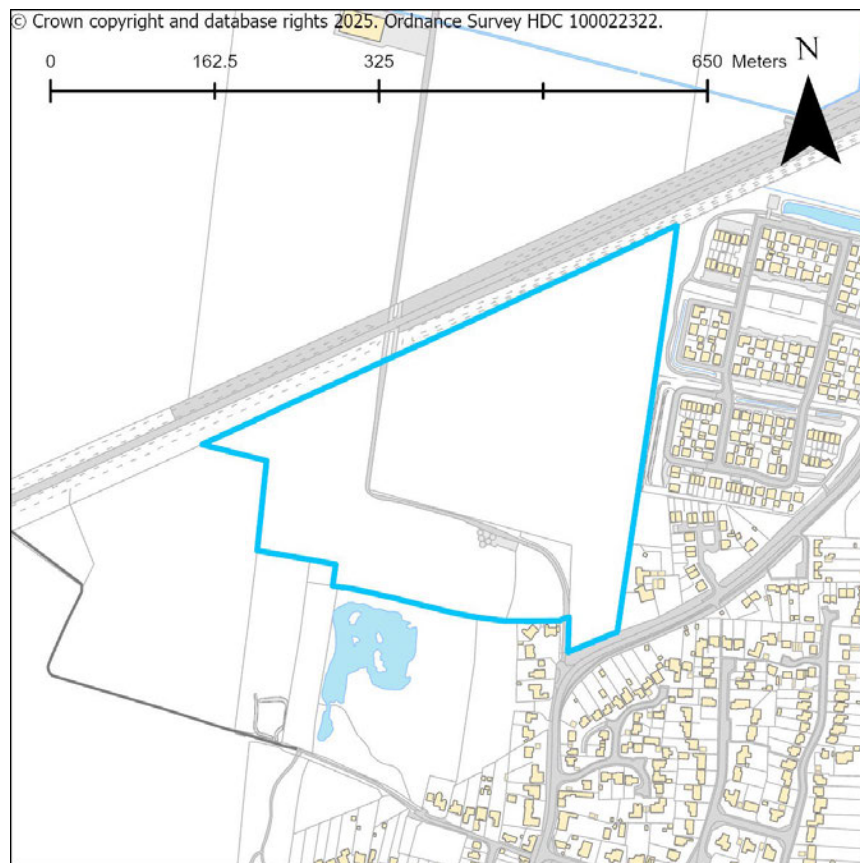


Figure 4: Revised allocation: Needingworth 2

Areas of Agreement/Disagreement

HDC and AW agree that the Fens Reservoir is required to contribute to the wider water supply and management for the eastern region.

HDC and AW have agreed to the inclusion of criterion within the revised allocation policy as follows: “Successful development of the site will require..... accommodation of infrastructure relating to the Fens Reservoir including agreement of easements and access for maintenance”

Actions

No further action required.

Next steps

AW and HDC will continue to work together through the development of the Fens Reservoir to in relation to the location of Fens Reservoir infrastructure.

9. STRATEGIC MATTER 4: Water Efficiency

Background

HDC is located in an area of serious water stress as defined in the [Environment Agency's Water Stressed Areas – Final Classification 2021](#).

Huntingdonshire Integrated Water Management Strategy: Water Cycle Strategy Stage 1, Interim Stage 2 and Final Stage 2 studies undertook an options appraisal to support integrated water management. The Final Stage 2 report concluded that “Water efficient fixtures and fittings could benefit most types of development site. A water efficiency policy requiring 85l/p/d (subject to viability assessment) and the equivalent BREEAM standard for non-household development would drive adoption of this measure.”

This is supported by The Written Ministerial Statement (WMS) by the former Secretary of State for Levelling Up, Housing and Communities (DLUHC) states that: *“...in areas of serious water stress, where water scarcity is inhibiting the adoption of Local Plans or the granting of planning permission for homes, I encourage local planning authorities to work with the Environment Agency and delivery partners to agree standards tighter than the 110 litres per day that is set out in current guidance.”*

HDC and AW agree that Huntingdonshire is identified as an area of serious Water Stress and have included more stringent Water efficiency targets, which will not only ease the pressure on water abstraction but also contribute to less capacity requirements at WRC.

HDC has undertaken a Stage 1 and 2 Whole Plan Viability Assessment that notes that 90 litres per person per day (l/p/d) is viable and achievable in balance with other policy priorities within the local plan.

The current Local Plan policy requires a water efficiency target of 110 l/p/d and the preferred options plan to 2046 proposed a target of 90l/p/d. If the water efficiency target of 90l/p/d is adopted this would result in a **saving of 1.9Ml/d**, this equates to a **14% reduction** in

demand from the current efficiency targets by the end of the plan period. This provides additional resilience in the water resources system and potentially reduces the volume of water that would need to be abstracted in WRZs and will consequently require less capacity from WRC.

Scenario	Residential demand (Ml/d)	Employment demand (Ml/d)	Total demand (Ml/d)	Demand saving by 2050 (Ml/d)	Percentage reduction (baseline to 2050)
Business as usual - 110l/p/d	9.33	3.89	13.22	-	-
100l/p/d and BREEAM WAT01 (3 credits)	8.82	3.01	11.83	1.39	10%
90l/p/d and BREEAM WAT01 (3 credits)	8.30	3.01	11.31	1.90	14%

The [shared-standards-in-water-efficiency-for-local-plans.pdf](#) (Shared Standards) was released in June 2025 and developed in collaboration with Natural England, Environment Agency, Water Resources East, Cambridge Water, Essex and Suffolk Water, Affinity Water and AW. The Shared Standards provide guidance and local evidence to assist LPAs in justifying the case for more stringent water efficiency policies. The Shared Standards recommend policy requirements that aim to achieve 85l/p/d for residential developments, and full credits in the BREEAM water calculator for non-household development, where feasible and viable. The Shared Standards recommendations are more stringent than Building Regulations and provide flexibility such as a range between 85 - 95l/p/d and a minimum of 3 credits in BREEAM water calculator WAT01 – where this can be justified through water cycle studies and viability assessments.

HDC's Preferred Options draft Local Plan to 2046 provides a planning policy on enabling water efficiency (draft policy LP 16) set out as follows:

Draft Policy LP 16

Water Efficiency

A proposal for new residential development will be supported where it can demonstrate that it is designed to utilise no more than 90 litres per person per day of mains supplied/ potable water.

A proposal for new or redevelopment of non-household development (excluding public buildings such as schools and hospitals) will be supported where it can demonstrate:

- a. It can achieve full credits in the BREEAM water calculator, with a minimum of 3 credits in WAT01 water consumption issue category, or an equivalent standard set out in any future update to BREEAM; and
- b. it has contacted Anglian Water or Cambridge Water, to ascertain if a water resource assessment for non domestic supplies is required.

A proposal must be accompanied by a statement to demonstrate how policy requirements have been met.

Should government policy or legislation relating to water efficiency and integrated water management be of a more stringent or significant departure from the above, after the adoption of this plan, the more stringent standard will be applied.

In addition, Anglian Water also provide Environmental Incentives⁴ whereby developers can reduce the cost of connections if they meet Tier 1 or Tier 2 requirements for water efficiency and/or reuse.

Areas of Agreement

HDC and AW agree that water efficiency measures should be more stringent than Building Regulations. AW support HDC's approach to water efficiency set at 90l/p/d.

Actions

No further action is required.

Next steps

No next steps are required with regard to water efficiency.

10. Governance Arrangements

HDC and AW have been cooperating closely and engaging on an ongoing basis through meetings, document reviews and collaboration, as well as through written consultation representations. A record of discussions and outcomes from consultation comments can be found as below in table 1.

HDC and AW agree to the following governance arrangements:

- Ongoing engagement and cooperation through meetings and discussions on matters relating to capacity at WRCs serving existing communities and proposed

⁴ <https://www.anglianwater.co.uk/developing/help-and-advice/services-and-charges/environmental-incentive-scheme>

future growth in HDC's administrative area, between AW's Spatial and Strategic Planning Leads and HDC's Principal Planning Policy Officer.

- Continued discussion on the location and routing of Fens Reservoir Infrastructure and proposed site allocation Needingworth 2 to agree a shared approach between AW's Spatial and Strategic Planning Leads and HDC's Principal Planning Policy Officer.
- Continued provision of housing and business commitments to AW to inform Pricing review process (PR29).
- Agree to review this SoCG and update as relevant
- Continued input and discussion relating to Reservoir consultations
- Maintain positive principles of cooperation.

Main points of Contact

The main points of contact for day-to-day collaboration are established as:

- Huntingdonshire District Council: [REDACTED] (Principal Planning Policy Officer)
- Anglian Water: [REDACTED] (Spatial and Strategic Planning Lead)

The key areas of collaboration to date have been identified below (these exclude on the most part email exchanges). The parties have worked collaboratively within a close working relationship to recognise, raise and remedy arising issues.

TABLE 1: Record of Meetings and Correspondence with Anglian Water

Date	Format	Remit	Attendees/ recipients / contacts	Discussion	Outcomes
28.01.2020	Data Provision	Water Cycle Studies and Strategic Flood Risk Assessments	- Anglian Water - Environment Agency	Data provision table	
		Ongoing participation as a stakeholder in the Fens Reservoir project	Huntingdonshire District Council Officers Fens Water Partnership project team and experts and Multi agency meetings	Including but not limited to: 11/03/2021, 03/04/2021, 15/04/2021, 28/04/2021 – Coarse screening, systems mapping 20/07/2021 - Fine screening workshop 29/09/2021, 15/11/2021, 17/11/2021, 08/12/21 – Multicriteria decision analysis, fine screening 3/3/22 – Fens Water Partnership update 7/4/22 - Fens Water Partnership update 18/10/23 – Project brief 24/01/2024 – Fine screening results 9/4/24 – update on Fens and Lincs Reservoir infrastructure and sharing of Call for sites locations 15/5/24 – Local Authority Associated infrastructure forum 23/5/24 – Reservoir site and associated infrastructure 18/9/24 – Reservoir catchup 15/5/24 – Local Authority Associated infrastructure forum 09/08/24 – Response to Phase 2 consultation 1/3/10 - Local Authority Associated infrastructure forum 29/1/25 – drainage and flood risk 6/3/25 – fens water partnership 08/12/25 - Response to phase 3 consultation	
01.02.2023	Consultation	Notification of Consultation	Sent to: Anglian Water	Opportunity to respond to consultation documents: Consultation on a Statement of Community Involvement and Sustainability Appraisal Scoping Report, ran from 1 February to 15 March 2023.	Response received from: Anglian Water

Date	Format	Remit	Attendees/ recipients / contacts	Discussion	Outcomes
14.03.2023	Data Sharing Agreement	Sharing of data for WCS and SFRA	Signed by: Anglian Water Huntingdonshire District Council	The data to be shared will include: - WRC catchments for Huntingdonshire – partly or wholly within the HDC boundary. - Dry Weather Flow data for the last three years for the WRCs in Huntingdonshire. - Areas where sewer capacity may be causing drainage issues and contributing to local flood risk i.e. network pinch points, critical points in drainage network - Historical sewer flood incident data - Modelling performance data flood outlines - Proposed / ongoing drainage / FRM schemes	Agreement to share data
29.03.2023	Consultation	Notification of Consultation	Sent to: Anglian Water	Opportunity to respond to consultation documents: Land Availability Assessment Methodology and Settlement Hierarchy Methodology which ran from 29 March to 10 May 2023. - Call for Sites which ran from 29 March to 7 June 2023. Further details can be found on the Call for Sites webpage. - Issues Engagement Papers consultations which ran from 26 April to 5 July 2023: The Issues Engagement Paper, The Issues Summary Paper and The Issues Easy Read Version	Response received from: 05/07/23: Anglian Water
18.09.2024	Consultation	Notification of Consultation	Sent to: Anglian Water	Opportunity to respond to consultation documents Consultation on the following between 18 September 2024 and 27 November 2024: Further Issues and Options and Land Availability Assessments/ Sustainability Appraisal	Response received from: 27/11/24: Anglian Water
23.04.2025	Consultation	Notification of Consultation	Sent to: Anglian Water	Opportunity to respond to consultation documents. Consultation on the following between 23 April 2025 for 6 weeks until Wednesday 4 June 2025: Additional Sites Land Availability Assessments and Additional Sites Sustainability Appraisals	Response received from: 4/6/25: Anglian Water
16.05.2025	Anglian Water WRC and Planning Response List	Communication received from AW	Parties involved: Anglian Water Huntingdonshire District Council	List of WRC and likely planning response that would be given by AW should a planning application be submitted.	
18.06.2025	Meeting	Stage 1 Infrastructure Delivery Study initial meetings	Spatial and Strategic Planning Lead, Anglian Water Planner Manager, Anglian Water)Principal Planning Policy Officer, HDC Planning Policy Officer, HDC DAC Planning DAC Planning	Local Plan update Baseline Report Feedback	

Date	Format	Remit	Attendees/ recipients / contacts	Discussion	Outcomes
10.07.2025	IDS questionnaire response	Stage 1 Infrastructure Delivery Study response to IDS questionnaire	Spatial and Strategic Planning Lead, Anglian Water	Comments on initial baseline infrastructure and local plan growth options	
21.10.2025	Consultation	Level 2 SFRA Main Report/ Scoping Report / Site assessment reports, including nominal risk report / Data and model logs for data used / Water Cycle Study	Involved Parties: Anglian Water Huntingdonshire District Council	- Anglian Water notes the Water Cycle Study requires updates to information and integration of updated strategic plans (e.g., WRMP29/DWMP timelines). - Several Water Recycling Centres including Huntingdon, Brampton, Needingworth, Elton, Somersham, and others are already at or near capacity, with many requiring upgrades not yet funded in AMP8 and dependent on future funding rounds (PR29/AMP9). - AW highlights regulatory obligations in AMP8 to reduce storm overflow spills and stresses that new development must <i>require</i> SuDS, avoid surface-to-foul connections, and use sustainable points of connection to ease pressure on networks. - WRMP24 updates (including major projects like the Fens Reservoir and Lincolnshire Reservoir) should be accurately reflected in the WCS, noting that some options listed in the WCS like new River Cam abstraction are not supported by AW. - AW urges early developer engagement, stronger policy requirements for demonstrating capacity at WRCs, updated assumptions on water efficiency standards, and clarification that several WRCs should be RAG-rated RED due to no current capacity or planned upgrades.	Feedback provided to consultants for inclusion in WCS.
22.10.2025	Local Plan Update and Growth Strategies	Meeting	Spatial and Strategic Planning Lead, Anglian Water Fens Reservoir Planning Lead Anglian Water Principal Planning Policy Officer, HDC	- HDC and Anglian Water have collaborated throughout the Local Plan process, engaging via Regulation 18 consultation, Duty to Cooperate meetings and ongoing dialogue to address water-related strategic matters - Three key strategic issues were identified: the need for phasing development due to limited wastewater capacity; AW's objection to the Needingworth 2 allocation because of uncertainty around the Fens Reservoir pipeline route; and the requirement to safeguard infrastructure corridors for the Fens and Lincolnshire reservoirs - Phasing is required because several Water Recycling Centres lack immediate capacity, and no upgrades are funded in AMP8 (2025–2030), meaning development must align with future asset management plans - HDC has agreed to explore a safeguarding policy to protect proposed reservoir-related infrastructure routes and to incorporate these into the Local Plan policies map, with AW supplying updated mapping as the project progresses	Finalise the Stage 2 Water Cycle Study and update the SoCG as necessary, both parties commit to maintaining ongoing cooperation as the local plan process moves forward
05.11.2025	Consultation response	Comments	Involved Parties: Anglian Water Huntingdonshire District Council	Formal Regulation 18 consultation for preferred options draft local plan to 2046	Comments received from Anglian Water

Date	Format	Remit	Attendees/ recipients / contacts	Discussion	Outcomes
09.01.2026	Water Infrastructure and Consultation response discussion	Meeting	Principal Planning Policy Officer, HDC Planning Policy Officer, HDC Spatial and Strategic Planning Lead, Anglian Water Fens Reservoir Planning Lead, Anglian Water	• Consultation comments from AW discussed and agreements made on some suggested changes to policies and allocations • Disagreement recorded over the preferred pipeline route for the Fens Reservoir and allocation Needingworth 2. AW have objections to this site allocation as the final placement of the pipeline is still not yet confirmed. If the site was to come forward prior to this, housing development would be very constraining and potentially cause issues with the development of the Fens Reservoir infrastructure delivery. Would anticipate pipeline would be in by 38 / 39. AW have confirmed they are spending next couple of months investigation and by March should have a bit more clarity about route which will enable a corridor for flexibility.	• Continued discussions over local policies and sites within catchments of WRCSA exceeding or likely to exceed. • Continued discussion over Needingworth 2 allocation, HDC ask for information from the March work by AW by spring to discuss further. AW agreed to come back to us after Feb March workshops.
13.07.2026	Water Infrastructure and Local Plan discussion	Meeting	Principal Planning Policy Officer, HDC Planning Policy Officer, HDC Spatial and Strategic Planning Lead, Anglian Water Fens Reservoir Planning Lead, Anglian Water	• Fens Reservoir progress • Water infrastructure discussion • Discussion on DWMP • Local Plan update	• Agreement to publish Statement of Common Ground
12.08.2026	Local Plan discussion	Meeting	Principal Planning Policy Officer, HDC Planning Policy Officer, HDC Spatial and Strategic Planning Lead, Anglian Water Fens Reservoir Planning Lead, Anglian Water DCO Planning Lead, Anglian Water	• Local Plan update • Discussion on strategic policy 'Supporting and enabling strategic infrastructure' • Update on Fens Reservoir infrastructure • Discussion on wording of site allocation Needingworth 2 in relation to Fens Reservoir infrastructure • Agreement to update Statement of Common Ground in relation to site allocation Needingworth 2.	• Agreement to update Statement of Common Ground in relation to site allocation Needingworth 2.



Pathfinder House, St Mary's Street Huntingdon.
PE29 3TN

www.huntingdonshire.gov.uk

Stakeholder Lead – Fens Reservoir Project
Sent by email only to:

Our reference: 25/02054/COA

8th December 2025

Dear

FENS RESERVOIR PHASE 3 NON-STATUTORY CONSULTATION

I am writing on behalf of Huntingdonshire District Council (HDC) in relation to the above Phase 3 non-statutory consultation on the Fens Reservoir and associated water infrastructure proposals project.

The Council's response is provided at Appendix 1 to this letter. The Council acknowledges that the project remains at the early stages of development and welcomes continued engagement and collaboration which will enable the provision of more detailed advice as the scheme progresses and the Development Consent Order (DCO) process advances.

I trust that this information is of assistance to you. Should you wish to discuss this matter further then please contact by email:

Yours Sincerely,

Chief Planning Officer

Head of Planning, Infrastructure and Public Protection

Huntingdonshire District Council

Appendix 1: Fens Reservoir Phase 3 Non-Statutory Consultation Comments

- 1.1 The Cabinet of Huntingdonshire District Council formally considered the Fens Reservoir project in its role as a statutory consultee and host authority at its meeting held on 16th July 2024. The Cabinet delegated authority to the Chief Planning Officer to take all associated action necessary in the interests of the efficient and timely conduct of the Council's compliance with the Fens Reservoir and the Lincs Reservoir DCO procedures.
- 1.2 These comments primarily relate to the associated water infrastructure proposals within the Huntingdonshire District Council administrative boundary, rather than the overall scheme.
- 1.3 It is considered that the Fens Reservoir and associated water infrastructure proposals project is a key opportunity to support the water needs of our communities and meet the ambitious growth agenda set out in Huntingdonshire's Local Plan to 2036. In addition, it is important to HDC that future provision takes account of the ambitious growth opportunities identified as part of the Cambridgeshire and Peterborough Combined Authority's Local Growth Plan, including the North Huntingdon Opportunity Zone, and longer-term aspirations identified in the Huntingdonshire Futures Place Strategy 2050.
- 1.4 The Council reserve the right to comment further on the proposal through future consultation.
- 1.5 The Council has liaised with its specialist officers, and the responses are set out in the table below.

Topic	Proposal aspect referred to (e.g. document name, paragraph, page number or general comment)	Comments
Socio-economics	‘Our approach to driving social and economic value’ Supporting Environmental Information Report, Section 7.5 Strategic socio-economic impacts	In its Phase 2 consultation response, the Council indicated that collaboration with Anglian Water would be welcomed to identify opportunities for enhancing wider infrastructure to support residents, businesses, and the visitor economy of Huntingdonshire. This approach aligns with the ambitions of Huntingdonshire District Council as set out in the Huntingdonshire Futures Place Strategy. It is noted that a socio-economic strategy document would be included in the DCO application which may include commitments to cultural and community benefits, employment and skills, recreation and amenity, supply chain and procurement and transport and connectivity. These commitments should be aligned to help realise the goals of the Huntingdonshire Futures Strategy. Paragraph 7.6.10 of the SIER notes that mitigation measures would consider active travel connectivity to maximise opportunities for walking, wheeling, cycling, and horse-riding from the surrounding area. HDC recognises that the scheme presents significant potential to enhance the health and wellbeing of residents through improved active travel options. Continued engagement between HDC, The Cambridge and Peterborough Combined Authority (CPCA), Cambridgeshire County Council, and Anglian Water on the development of active travel routes is encouraged to ensure visitors can access the reservoir via sustainable means, supporting the health and well-being of our district. Further, the provision of safe, accessible active travel routes will significantly contribute to the leisure visitor economy of Huntingdonshire and neighbouring authorities. In addition, consideration should be given to potential impacts on Grafham Water, a valued asset within Huntingdonshire that attracts substantial recreational visitor numbers. This should include consideration of the proximity of the existing reservoir and facilities at Grafham Water in relation to the proposed new reservoir and associated recreational proposals, to ensure complementary provision and avoid duplication or adverse impacts on existing amenities.

		HDC is keen to work collaboratively with Anglian Water to ensure that meaningful employment and skills development opportunities are made available to local residents, working in partnership with local businesses. It is acknowledged that the project will generate temporary jobs, so the inclusion of apprenticeships and training initiatives that offer long-term career benefits is welcomed. The commitment to involving local businesses in the delivery of the project is an important aspect that aligns with HDC's objectives for local economic growth. Further details on how these commitments could be implemented as the strategy develops and early discussion with HDC's Economic Development Team is encouraged.
Planning Policy	Interactive Map - Water infrastructure – Best engineering route for raw and treated water pipelines Associated water infrastructure Proposals document – pages 24 to 29	The Council issued its Preferred Options consultation on the emerging Local Plan in October 2025. At the time of writing, the emerging Local Plan remains at such an early stage in its preparation that little if any weight can be attributed to the Preferred Options document. However, that position may evolve once responses to the Preferred Options consultation have been received, collated and published, or at such a time that this project is progressed through the DCO process. The 'Best engineering route for raw and treated water pipelines' as shown on the Interactive Map passes through the Eastern half of proposed allocation Needingworth 2 which is set out in Preferred Options Draft Local Plan to 2046 - Huntingdonshire.gov.uk. The proposed allocation is for 35ha of land for mixed use development comprising about 290 homes, community retail facilities to meet any needs arising from the development and land to safeguard against flooding. Importantly, criterion (c) of the proposed allocation requires safeguarding land for infrastructure relating to the Fens Reservoir. However, the pipeline route as currently shown cuts through the top third of the site. In the interest of collaboration and efficient land use, it is strongly recommended that the pipeline route be adjusted to run closer to the site boundary or, preferably, along the northern side of the A1123 and then along the western boundary of the site. This would enable the Local Planning Authority to deliver the allocation effectively while accommodating essential infrastructure. The pipeline corridor identified—within which the pipeline could be located—is up to 500 metres wide, creating significant uncertainty regarding its final position. While the consultation document notes that “We’ve narrowed our original pipeline corridor south of Needingworth and Dry Drayton to work with existing planning applications”, this approach does not appear to have been applied within

		Huntingdonshire, despite early sharing of Local Plan call-for-sites maps and the identification specifically of this site (Needingworth 2). This allocation plays an important role in contributing to the Government’s national housing targets. It is therefore essential that the pipeline route is planned in a way that does not compromise the delivery of these homes or the wider objectives of the Local Plan. Proposed pipeline route:  Proposed allocation Needingworth 2: 
Noise	General	There is no longer a proposal for an above-ground reservoir in Bluntisham, which reduces concerns about long-term construction noise in the area. A microfiltration plant and pumping station are now proposed to the south-west of Bluntisham, adjoining the eastern side of the A1123 (Station Road), north of Barleycroft Lake. This location is over 100 metres from the nearest noise-sensitive receptor (Priors Field Farm to the north) and benefits from a higher background noise level due to its proximity to the road. Baseline noise measurements have already been taken and agreed, and the use of BS5228 to minimise construction noise and BS4142 to reduce operational noise has also been previously agreed.

Land Contamination	General	Having compared the new pipeline alignment with HDC's database of potential contamination sources, the only noteworthy feature is the former railway line, which the pipeline will cross multiple times. A plan for investigating and remediating any contamination has already been agreed.
Air Quality	General	No additional comments.
Built Heritage (excl archaeology)	General	Heritage advice was provided as part of the Council's Phase 2 Consultation response dated 9 th August 2024. Heritage comments raised are summarised as • Early stage consultation, insufficient information currently available to assess impact on heritage. • Methodology should also apply to time limited transfer works • Heritage Value Criteria inconsistent • Insufficient justification for either route WsoA or Route WsoB – no recognition of assets in Holywell It is not clear if these comments raised at Phase 2 have been considered in the development of the Phase 3 proposals.
Built Heritage (excl archaeology)	General	The proposed pipeline measuring 0.8 -1.2 metres wide would pass through a 500-metre corridor between Somersham and Pidley, passing to the west of Bluntisham and Needingworth and then to the North and East of Holywell. In addition, a spur for water intake from the Great Ouse would be positioned to the South and East of Bluntisham. An area south of Bluntisham is identified for a river intake/ pumping station / filtration/administration building. Indicative proposals are identified in the south western corner of the site adjacent to Station Road. This site is part of Gull Field one of the four original fields to the village. This field is shown in the Jeffries Map 1768 and the pre enclosure map of 1814 and noted in the 1932 Victoria history of Huntingdonshire.

		Without details of the proposed building, it is not possible to assess its impact on heritage assets at this stage. The mitigation hierarchy indicates that where impact occurs then measures will be taken to avoid/prevent/reduce/offset. The construction of the pipeline and the presence of the new pumping station (including proposals for lighting and increased traffic movement) could result in permanent change to the setting of a number of heritage assets. There is no evidence that consideration has been given to the avoidance of this impact, only that measures will be taken to reduce the impact through planting and design. Evidence should be provided to explain why avoidance is not possible. There is currently no evidence that the significance of these assets or the contribution that setting makes to significance has been considered at this stage.
Built Heritage (excl archaeology)	General	At this stage, detailed information regarding the potential impacts of the proposed development on heritage assets within Huntingdonshire is not yet available. It is understood that some baseline work is currently being undertaken; however, as this does not form part of the present consultation, it is not possible to provide substantive comments at this time. The authority will continue to engage actively through the Heritage Technical Working Group and at subsequent stages of the DCO process.
Landscape and Biodiversity	General	The proposal indicates that the project's indicative footprint intersects the 23.66 ha Heath Fruit Farm County Wildlife Site (CWS) in Bluntisham. This site comprises semi-natural habitat managed using traditional practices that support biodiversity objectives and reflect local cultural heritage. Approximately 15.5 ha of the CWS falls within the indicative footprint. The construction working area, shown as a 75 m wide corridor, includes the proposed optimal engineering route for water pipelines. This alignment would sever the orchard and fragment this ecologically valuable habitat. The site lies within the Central Claylands Landscape Character Area (LCA), historically dominated by extensive apple and plum orchards, particularly around Somersham and Bluntisham. Although many have been lost, the remaining orchards retain considerable historical and cultural significance, reflecting the identity and heritage of these settlements. The Landscape and Townscape SPD 2022 identifies the retention, revitalisation, and protection of orchards as key to preserving the area's character. Orchards around Bluntisham and Colne make an important contribution to this landscape.

		Fragmentation of the Heath Fruit Farm CWS would fundamentally erode this historic character and diminish the settlement's identity. Orchards play a vital role in maintaining habitat connectivity within fragmented landscapes, where habitat loss and fragmentation pose major threats to wildlife. Together with hedgerows and woodlands, orchards act as ecological corridors or stepping stones, enabling species to disperse, interact, and avoid isolation that can lead to local extinction. At a landscape scale, this network is essential for sustaining scarce species that depend on continuous habitat over time. Recognising this importance, the Cambridgeshire Habitat Action Plan includes traditional orchards as a priority habitat for wildlife conservation. Traditional orchards are a long-established and widely distributed habitat, recognised as biodiversity hotspots that support a wide range of wildlife. They include UK BAP priority habitats and species, as well as numerous nationally rare and scarce species. Orchards contribute significantly to biodiversity, landscape character, and local distinctiveness across the UK. We strongly recommend implementing mitigation measures to minimise disturbance to the Heath Fruit Farm County Wildlife Site (CWS) in Bluntisham, with a clear objective to avoid fragmentation of this Habitat of Principal Importance and key feature of the landscape character area. As the previously proposed treated water storage facility is no longer required in this location, we recommend that the pipeline corridor be further refined to avoid adverse impacts on this environmentally sensitive area. The above comments highlight the need for extensive habitat and species surveys, alongside a detailed landscape assessment, to evaluate the effects of the proposed pipeline route on the landscape, associated habitats, and the species they support. These studies should inform the refinement of the final route as the proposal develops and guide the implementation of appropriate mitigation measures where impacts cannot be avoided. The proposed construction compound south of Bluntisham is located within the Great Ouse Valley Landscape Character Area (LCA) and would include a river intake, filtration system, and pumping
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		station. The potential visual impact of this infrastructure must be assessed through a Zone of Theoretical Visibility (ZTV) analysis, supported by a series of agreed viewpoints to inform the final siting as the proposal develops. A comprehensive Landscape and Visual Impact Assessment (LVIA) should be carried out, and appropriate landscape mitigation measures identified to minimise adverse effects. A detailed assessment of Biodiversity Net Gain will be required, as well as information and details on the conducted ecological surveys mentioned in the Scoping Report. We propose a 20% uplift of BNG is achievable across the Huntingdonshire District.
Ecology	Supporting Environmental Information Report/General	Regarding impacts on statutory and non-statutory designated sites, terrestrial and aquatic habitats, and flora and fauna, the current approach to the Environmental Impact Assessment, raw and treated water transfers, Habitats Regulations Assessment and Water Framework Directive assessment, habitat design and Biodiversity Net Gain outlined in the Supporting Environmental Information Report are acceptable. Raw water source abstraction level proposals must prioritise avoidance of impacts. The proposed treated water connection into Cambridge water Supply at Bluntisham would bisect Heath Fruit Farm CWS. Landscape & Biodiversity comments above regarding damage to a priority habitat are supported from an ecological perspective. All efforts should be made to avoid clearance of a minimum 75m wide construction working area and subsequent easement zone that would see the habitat permanently degraded. Routing the pipe around the site to the north would be preferable. Both bisect Heath Fruit Farm CWS and historic field boundaries may contain veteran trees, irreplaceable habitat whose loss should be avoided. Mitigation planting and replanting for the route should prioritise UK native species of UK stock.



Guidance note: Strategic Sites

Our approach to supporting strategic development sites, explaining the expectations we have of developers and landowners to make sure wastewater infrastructure is planned and delivered in a sustainable, coordinated, and environmentally responsible manner.

Overview

We're always working hard to strike a balance between environmental compliance and supporting growth. But in order to meet the urgent needs of the region and unlock large scale developments, we need innovative approaches and a more collaborative way of working.

We must all manage growth responsibly, balancing statutory duties, environmental compliance and government ambitions.

Purpose of this guidance

This guidance note sets out our approach to supporting strategic development sites, explaining the expectations we have of developers and landowners to make sure wastewater infrastructure is planned and delivered in a sustainable, coordinated, and environmentally responsible manner.

It's also intended to support early engagement, make our processes clear and align development delivery and infrastructure investment.

I. What are strategic sites?

We define strategic sites as **large-scale developments of 500 dwellings or more** that are:

- supported by the Local Planning Authority (LPA) through allocation in an adopted Development Plan
- or
- identified in an emerging Local Plan at the preferred options stage.

These sites are typically built out over a long timeframe and their delivery often spans multiple Asset Management Periods (AMPs) – our five-year regulatory investment cycles.

Due to their scale and duration, strategic sites need a different approach to infrastructure planning than smaller developments.

We'll engage with local planning authorities and neighbourhood plan groups early in the plan-making process to make sure:

- they include appropriate measures in strategic site allocation policies
- that the measures reflect the appropriate processes and stages needed to support the delivery of these sites.

2. Why strategic sites need a dedicated process

Strategic sites present both opportunities and challenges:

- existing wastewater infrastructure may not have sufficient capacity from the outset;
- infrastructure solutions will take several years to design, fund, and deliver

Our strategic sites process allows for a coordinated, long-term approach, aligning infrastructure planning with agreed development trajectories all while protecting our customers and the environment.

Early engagement is critical for everyone involved to reach sustainable outcomes.

3. Early engagement expectations

We expect developers and landowners to engage with us as early as possible, ideally during the plan-making process, masterplanning phase, or pre-application. We should then discuss:

- development scale and phasing;
- anticipated build trajectories; and
- wastewater infrastructure requirements.

Early engagement allows us to assess risks, identify sustainable solutions, and consider how future investment can be planned in line with the site's delivery programme.

4. Site-wide Sustainable Point of Connection (SPOC)

For strategic sites, we'll always need agreement for a site-wide strategic Sustainable Point of Connection (SPOC) for foul drainage.

The key principles of this are:

- A single strategic SPOC will serve the whole development.
- The development will need to connect solely to this point at a certain point in time.
- All on-site foul drainage infrastructure and any off-site conveyance needed to connect to the SPOC must be designed and funded by the developer(s)/landowners(s).

This approach makes sure that there's:

- consistency across the development;
- reduced risk of flooding and pollution; and
- effective long-term management of network and water recycling centre capacity.

5. Temporary foul drainage connections for early phases

We recognise how complex it is to deliver strategic infrastructure upfront. That's why we may, where appropriate, support temporary foul drainage connections to help facilitate early phases of development.

These key principles apply to temporary connections:

- They'll be strictly limited and subject to an agreed cap (e.g. number of dwellings and/or flows).
- They're only intended to enable early development phases.
- They mustn't prejudice the delivery of the permanent strategic solution.

At an agreed point in the build (typically linked to a specific number of dwellings being occupied, the following needs to happen:

- all temporary connections must be decommissioned, and
- foul flows must be redirected into the permanent strategic foul drainage infrastructure.

Temporary arrangements will always be secured and controlled through appropriately worded planning conditions. Where any risks are identified in relation to temporary connections, they may – where appropriate - be mitigated on-site through the provision of additional storage and the use of real-time control measures.

Anglian Water will not adopt any temporary assets associated with Strategic sites. This position reflects the fact that such assets are time-bound and would require subsequent decommissioning, making them unsuitable for long-term adoption and ownership.

6. Use of the planning system

We'll use the planning system as the primary way to manage the growth and delivery of drainage infrastructure at strategic sites. That's because it provides a transparent and enforceable framework to make sure that development always proceeds in a way that's environmentally robust and

deliverable.

Our support for strategic sites is conditional on the appropriate planning conditions being imposed, which may include:

- phasing of occupation in line with infrastructure delivery;
- controls on build rates;
- delivery of site-wide drainage strategies;
- limits and removal of temporary connections; and
- alignment with Water Recycling Centre capacity.

Where suitable and enforceable planning conditions can't be secured, we might not be able to support development proposals.

7. Aligning development with long-term investment

Strategic sites play an important role in shaping our future business plans and investment strategies.

By engaging early and agreeing clear build trajectories, strategic sites allow us to:

- plan investment across multiple Asset Management Periods;
- coordinate infrastructure delivery with development needs; and
- support sustainable growth while protecting existing customers and the environment.

8. Opportunities

As part of the Strategic Sites process, we'll always actively look for opportunities to support the delivery of long-term wastewater infrastructure solutions that align with the scale and build-out of strategic developments. This includes early consideration of the cumulative impacts of proposed sites within a catchment and whether land can be made available within or alongside strategic sites for the construction of new Water Recycling Centres (WRCs) or the extension or enhancement of existing WRCs, where it represents a sustainable and deliverable solution.

We'll also consider collaborative opportunities with developers, Local Planning Authorities and regulators. These will be assessed on a site-specific basis. Our objective is to identify sustainable, future-proofed infrastructure solutions that support growth over multiple Asset Management Periods while protecting our existing customer and the environment.

9. Water re-use

We'd always strongly encourage proposals that incorporate non-potable water reuse, including rainwater and stormwater harvesting, greywater recycling and/or the reuse of appropriately treated final effluent from the local WRC. These measures can materially reduce potable water demand and, in some cases, wastewater loading, supporting water resilience, environmental protection and the efficient use of infrastructure.

This is an approach that's in line with the evidence and good practice developed through Enabling Water Smart Communities (www.ewsc.org.uk) which has demonstrated the technical feasibility, public acceptability and strategic benefits of water reuse in new developments, and provides a robust framework for delivering water-smart, climate-resilient communities.

10. Summary

Our Strategic Sites process:

- supports sustainable delivery of large developments;
- relies on early and ongoing engagement with all stakeholders;
- secures site-wide drainage solutions through planning; and
- enables coordinated, long-term infrastructure investment.

We encourage developers to work with us and Local Planning Authorities collaboratively to make sure that strategic sites can be delivered efficiently, responsibly, and so they comply with regulatory and environmental requirements.

11. Get in touch

If you'd like to get in contact with us to discuss any element of a project in our region, you can call us on **03450 263 912** any time between 8am and 5pm, Monday to Friday (not including Bank Holidays) or email [**planningliaison@anglianwater.co.uk**](mailto:planningliaison@anglianwater.co.uk).