

A Proposed Reservoir in the Fens and Its Associated Water Infrastructure: Phase Three Consultation Feedback Form

About Us:

This feedback is on behalf of the Inland Waterways Association & is submitted by:

Stephen Heywood, Whitehouse Farm, Nordelph, Downham Market, PE38 0BG

sgheywood@btinternet.com

This feedback addresses each of the questions in the Form published in hard copy and online in sequential order. Our comments are shown in bold

Emerging Design for the Main Reservoir Site (Page 3)

- Q1. We are continuing to explore opportunities for different types of recreational activities at the reservoir as IWA progress our plans. Which of the following recreational activities would be most important to you? (Very important / Important / Not important)
Inland Waterways Association (IWA) welcomes the inclusion in the Phase Three Consultation Proposals (Con3) all of the facilities listed. The IWA views all the activities listed in the Form as being "Important".
- Q2. If you were to visit the reservoir site, please indicate, for each of the following ways of travelling to the reservoir, approximately how often you would visit.
Very much dependent on the facilities available at the site which would attract the boating community.
- Q3. Do you have any comments on the overall design approach to the reservoir, including its shape and embankments? (Please note, you can provide specific comments on the zones of the reservoir in the following pages.)
IWA welcomes the landscaping plans included in the Con3 proposals and the zoning of the site for various purposes. We welcome any footpaths and areas which give greater access to the 16 Foot and 40 Foot rivers alongside two sides of the Reservoir. We feel this would be of benefit to the wider community as well as boaters.

The Different Zones of the Reservoir (Pages 4 to 9)

Recreational Hub: NW of Reservoir site nearest to Doddington & Wimblington

Our proposals for this area position it as the main access point to the reservoir, with a focus on recreation and leisure opportunities. The proposals include a main visitor centre and improved access for both local communities and visitors.

- Q4. Do you have any overall comments about our proposals for this area of the reservoir, particularly regarding its focus as the main recreational hub?
The plans and mock-up model for the Reservoir include various leisure amenities, notably water sports within the reservoir complex. These activities are welcomed, especially if facilities such as pontoons and moorings for small craft are provided, alongside training and introductory sessions for a range of water activities. To support these amenities associated land-based facilities will be required. Con3 proposals envisage these facilities being provided & constructed by third parties following the completion of the Reservoir itself.
Such new leisure amenities will necessitate the development of access roadways and pathways, connecting the site entrance and car parks to both the facilities and the waterfront. There will also be a need for essential utilities, including electricity, water supply, effluent removal, heating, and potentially cooling. Constructing these supporting services after the initial Reservoir build may lead to a higher construction costs and site disruption. To mitigate this, we would recommend that outline plans for these amenities be prepared in advance, with basic infrastructure incorporated into the main construction plans for the Reservoir.

- Q7. Do you have any comments on our proposals for access to this area for non-motorised users, including a proposed footbridge across the A141 to provide safe access and connect Wimblington and Doddington to the reservoir?
None
- Q8. Our proposals for this area include the main visitor centre. Which features would you most like to see included? (Please tick all that apply.)
IWA welcomes provision of all the facilities listed, in addition please see our response to Q4 above
- Q9. Do you have any other comments about this area that you have not included above?
None

Western Zone: West and south area of the reservoir site nearest to Chatteris

This area includes access to the southern edge of the reservoir from Chatteris and is designed with both visitors and the local community in mind. It aims to be a place for learning, exploration, and connection with nature and one another.

- Q10. Do you have any overall comments about our proposals for this area, especially its focus as an area for wetland, and a combination of nature and recreation?
This area of the proposed Reservoir site is bordered by two existing navigable waterways: the 40 Foot River and the 16 Foot River. Currently, there is no provision for Middle Level boaters to stop, moor up, and enjoy the proposed amenities, which could also generate additional revenue. IWA recommends adding purpose-built mooring areas along both the 40 Foot and 16 Foot Rivers, with sufficient space for multiple boats to moor overnight, as well as the provision of waterpoints and waste disposal facilities. The design should ensure access from these mooring areas to the planned network of tracks and pathways encircling the site, enabling boaters to fully enjoy the new reservoir.
To connect Chatteris residents with the leisure activities at the Reservoir, two link bridges are proposed over the 40 Foot River: one footbridge and one road bridge (referred to as an all-user bridge). These structures must allow adequate air draft to permit navigation and pleasure boating beneath them. It is expected that navigation along the 40 Foot River will be restricted during construction of these bridges, but this disruption should be minimised to avoid significant impacts on boat traffic. Similar considerations apply to the planned footbridges over the 16 Foot River.
We would also suggest consideration be given to linking this area with footpaths and cycle ways leading to the Ouse Washes at Welches Dam, where additional facilities for the Reservoir are planned. See also our answer to Q29 re “Horseway Channel & Welches Dam”
- Q11. Do you have any comments on our proposed access route from the A142 for vehicles to this area of the reservoir?
None
- Q12. Do you have any comments on our proposals for parking in this area?
None
- Q13. Do you have any comments on our proposals for access to this area for non-motorised users, including a signalised crossing across the A142 and a bridge across the Forty Foot River to improve connections with Chatteris for those travelling by foot, bike, or horse?
None
- Q14. Our proposals for this area include a secondary visitor hub to provide amenities for people arriving from Chatteris. Which features would you most like to see included? (Please tick all that apply.)
All facilities list plus moorings as detailed in our response to Q10
- Q15. Do you have any other comments about this area that you have not included above?
None

Eastern Zone: Eastern Area (Nearest to Manea)

This area is intended to provide access to the eastern side of the reservoir near Manea and may include a small visitor hub and parking. Nature will be at the heart of this area, offering visitors the chance to unwind and enjoy peaceful wetland landscapes.

- Q16. Do you have any overall comments about our proposals for this area, particularly its focus on nature and quieter recreation?
IWA welcomes the concept of designating this area as one focusing on nature.
- Q17. Do you have any comments on our proposed access routes, via the B1098, for vehicles?
None
- Q18. Do you have any comments on our proposals for parking in this area?
None
- Q19. Do you have any comments on access to this area for non-motorised users (for example, walking, cycling, horse-riding)?
IWA recommends the inclusion of access paths to the 16 Foot River plus moorings. This would allow the public and boaters alike greater access to stop and enjoy this area. Our comments on this point are similar to those for the Western Zone (Q10)

- Q20. Our proposals for this area include a smaller visitor hub to fit with the quieter nature-focused character of the zone. Which features would you most like to see included?
IWA welcomes the provision of all these facilities and would recommend the addition of moorings as mentioned above.
- Q21. Do you have any other comments about this area that you have not included above?
None

Water Treatment Works (Page 10)

- Q22. Do you have any comments on our plans for the water treatment works, which would treat water from the reservoir for supply to people's homes, particularly regarding our proposed landscaping and visual screening to reduce visual effects?
None, other than IWA welcomes any screening that is incorporated into the design to reduce visual impact to the area

Constructing the Reservoir (Page 11)

Transport by Waterways

IWA is disappointed that delivery of materials via waterways for this project has been discounted. However, IWA accepts that the routes considered so far are unsuitable for the volumes of material required in the Project's projected construction timescale. Only one route could have met the volume requirements, namely delivery via Kings Lynn, the River Great Ouse & the Old Bedford River/ 40 Foot River. However, IWA accepts that this would have involved considerable construction and dredging work. The expense for such work probably could not be justified solely to meet the needs and timescale of the project.

However, IWA proposes a means of mitigating some of the impact of HGV's on local roads and residents from one of the Road & Rail options. Namely adopting a hybrid rail and waterways route involving using local waterways to transport materials from Whitemoor Sidings. This option is detailed in the attached Appendix 1

The benefits of this hybrid option would be to

- Reduce risk to the project by providing an alternative means of delivery.
- Meet the National Policy Statement for Water Resources Infrastructure which encourages a shift from road to more sustainable modes such as rail and inland waterways (section 3.2.7 of the DRR)
- Reduce impact on local residents and traffic.
- Reduce carbon emissions per tonne of material delivered.
- Be cost effective.

Transport by Road

We have identified four possible A-road routes for construction traffic, each connecting to one of three different access points. Using A-roads should reduce the need for heavy vehicles on smaller local roads. The routes under consideration are:

- Route 1 – A141 from Ring's End, past March, to the entry point near Doddington
- Route 2 – A141 from near Huntingdon (A1 junction) to entry point near Chatteris
- Route 3 – A142 from Newmarket, past Ely, to entry point near Chatteris
- Route 4 – A10/A142 from near Cambridge, past Ely, to entry point near Chatteris

Q23. Do you have any comments on these routes? Please specify which route(s) your comments refer to.

IWA has concerns about the volume of traffic and the impact it will have on the local area, roads, and residents, particularly Route1. Our concerns are addressed in more detail in a paper prepared for this project submitted to the Project's Traffic and Transport Working Group in October 2025, following previous discussions in July.

IWA proposes a means of mitigating this impact by using a hybrid route utilising an unused branch line (Bramley Line) to move materials from Whitemoor Sidings and tranship to the Reservoir site using barges and local waterways. (See Appendix 1)

Transport by Rail

IWA are also considering rail options to reduce road transport, congestion, and carbon emissions. Two options have been identified: Whitemoor Yard and Manea Sidings. These would involve creating a railhead for materials delivery by freight train, with onward transport to the site by road. Discussions are ongoing with Network Rail to assess viability.

- Q24. Do you have any comments on the proposed rail options you would like us to consider? Please specify which option your comments refer to.
Please see our comments above & details in Appendix 1 regarding the option to deliver via Whitemoor Sidings & HGVs. The option to deliver via new sidings at Manea (Stonea) and local haul roads is welcomed even though it would make our suggested option for delivery by waterways redundant. However, we would also suggest considering investigating the use of conveyors as well or as an alternative to haul roads, which if enclosed by both soundproofing and weather protection could operate 24/7 to site.

Construction Working Areas (Pages 12 and 13)

Areas of land have been identified for construction compounds, IWA/life facilities, material storage, and worker access.

- Q25. Do you have any comments on the areas of land identified, or suggestions for improvements?
None

At peak construction, expected to last around five to six years, up to 2,000 workers may be required, offering a range of employment opportunities for local businesses.

Opportunities for employment in this area are to be welcomed.

- Q26. Is there anything you would like us to consider when developing our construction plans?
Installation of enabling facilities and utilities to support the development of recreation facilities in the planned “Hubs” as part of the construction plans, as mentioned in our response to Q4.
- Q27. Do you have any comments on our proposals for managing the construction workforce, including outline options for worker accommodation?
If suitable access, moorings & facilities were provided on the 16 and 40 Foot rivers adjacent to the site, residential boats could be used to accommodate the additional workforce. This would suit the temporary and transitional nature of the workforce.

Power Supply (Page 13)

IWA are committed to the reservoir being operationally net-zero when open, and renewable energy on-site will support this. Options being explored include ground-mounted solar panels and floating solar technologies.

- Q28. Do you have comments on current proposals for using solar technology?
IWA encourages development and use of such technology. This is providing floating solar panels do not interfere with water focused recreational activities in the top lagoon of the Reservoir.

Associated Water Infrastructure (Pages 14 & 15)

This section covers our proposals for the raw and treated water infrastructure required to transfer water from sources to the reservoir, treat it, and supply it to Anglian Water and Cambridge Water customers. Before responding, you may find it helpful to read the Phase Three Consultation Associated Water Infrastructure Brochure, chapters six, seven, and eight of the Design Refinement Report, and the Supporting Environmental Information Report.

Our proposals are grouped into five sections, each outlining the necessary infrastructure, working areas, and construction road routes. Please indicate which section your comments relate to. If you are commenting on more than one section, please specify.

Area of Our Proposals	Overview	Tick
Manea to Downham Market	Corridor and best engineering route for a pipeline transferring treated water from the reservoir to Bexwell in Downham Market, including a new service reservoir at Bexwell and proposed working areas and road routes for construction.	No
Peterborough, Stanground and Whittlesey	Infrastructure to draw raw water from the River Nene and its Counter River, with a bypass pipeline around Stanground Lock to transfer water to the Middle Level System, plus working areas and road routes for construction.	Yes – see below
Between Chatteris, March and Manea (Ouse Washes)	Infrastructure to draw raw water from the Ouse Washes and pipelines transferring raw water to the reservoir, including proposed working areas and construction routes.	Yes – see below
Chatteris to Bluntisham, near Earith	Infrastructure to draw raw water from the River Great Ouse near Earith, plus a pipeline corridor transferring raw water to the reservoir and treated water to Cambridge Water supply at Bluntisham, on to Madingley, including working areas and construction routes.	Yes, for raw water transferred to the Reservoir from the River Great Ouse at Bluntisham – see below
Bluntisham to Madingley via Swavesey	Corridor and best engineering route for a pipeline transferring treated water from the reservoir to Madingley, including a new service reservoir near Madingley and related working areas and construction routes.	None

- Q29. Do you have any comments on our proposed plans for the required infrastructure, including suggestions for improvement?

Scheme Integration

IWA feels that the current raw water scheme, as outlined in Con3, is unlikely to deliver water to the reservoir efficiently without incurring excessive costs. This outcome appears to stem from a restrictive interpretation of the Water Framework Directive (WFD), particularly its requirements to prevent cross contamination between neighbouring waterways. The proposed scheme focuses on individual water sources instead of the entire water basin. This conflicts with what is very much an existing network of interconnected waterways.

A recommended solution is to designate the catchment area for the Reservoir as a single, integrated water basin, permitting free transfer between waterways within the basin. Implementing this strategy would require political will and potentially legislative changes.

Without such reforms, substantial elements of the Fens Reservoir Project (FRP) risk becoming expensive missteps, comparable to the bat tunnel on HS2. Failure to adopt an integrated approach could result in anomalies, inconsistencies, and legal challenges to any proposed scheme, which may delay or even halt the project—an undesirable scenario given the urgent regional demand for potable water.

In the absence of a unified management strategy, significant difficulties are expected in balancing the extraction and supply of raw water for both drinking purposes and agricultural irrigation. Additionally, flood control measures may become increasingly complex. The lack of integration could give rise to unpredictable and fluctuating water levels across the system.

Such variability in water levels has the potential to negatively affect local residents, disrupt navigation along waterways, and impact wildlife habitats. Ensuring consistency in water management is therefore crucial to safeguarding community interests, maintaining navigational routes, and supporting the ecological needs of the region.

Water Framework Directive (WFD)

The WFD underpins legal requirements for the prevention of cross contamination between watercourses.

The proposals in Con3 lacks evidence or data indicating significant differences in water quality among the identified sources that would necessitate extensive treatment. Existing water transfers within the Anglian Basin, such as from the River Great Ouse (RGO) to Grafham Reservoir and the Great Ouse Cut-off Channel to Abberton and Hanningfield Reservoirs in Essex, occur without substantial treatment.

There is no evidence in Con3 to support the assumption that treating water will prevent the spread of invasive species; at best, it may slow their eventual spread. Given the interconnected nature of Fens watercourses, concerns over invasive species seem speculative rather than factual. There is minimal observable difference in species between waterways connected to the RGO and those linked to the Middle Level and Nene. Common invasive species—including Chinese Mitten Crab, Himalayan Balsam, American Mink, Zebra Mussels, and American Crayfish—are present throughout. Floating pennywort being the only exception, which the Environment Agency is currently managing on the River Great Ouse and its tributaries.

While the Ouse Washes and the RGO are separated from the Middle Level by the barrier bank, this does not significantly hinder mammals and birds. Plant seeds or aquatic creatures have numerous alternative means of transfer—such as wind, birds, human activity, equipment, boats, land run-off, discharges, or the accidental or deliberate introduction of imported species.

Given the proposed water transfer scheme in Con3, the Reservoir could be populated by invasive species introduced from sources where only limited water treatment is proposed. Particularly via pipeline from the RGO at Bluntisham and the Ouse Washes, or from the Nene via the Middle Level. It is inevitable that, during the reservoir's operation, periods of heavy rainfall will necessitate use of the spillway, discharging into the Middle Level Waterways and thereby negating the investments made to keep watercourses separate.

Abstraction from the River Great Ouse at Bluntisham & the Ouse Washes

- 1) IWA has no corporate opinion on the supply of water, by pipeline, from the River Great Ouse or Ouse Washes to the reservoir other than to the extent that abstractions may adversely affect navigation on or the environment of navigable waterways.
- 2) That said, it is apparent to IWA that a comprehensive water management study, supported by water resource modelling and hydraulic modelling, is needed:
 - a) To demonstrate what sources, have the capacity to supply the Fens Reservoir under various circumstances,
 - b) To demonstrate that the various pump stations, pipelines, rivers, canals and drains have adequate capacity to carry such flows without adverse effects on navigation or the environment while also taking into account existing water management regimes and water flows for agriculture, flood control, water supply and navigation ; and
 - c) To take due account of water velocities, water levels, scour, bank raising, headroom and air-room at bridges, and similar matters.
- 3) The IWA is of the opinion that such a study should be placed in the public domain, when completed, so that interested parties can understand the details of what is being proposed, and why.
- 4) Specific comments relating to the current consultation documents are:
 - a) Water abstracted from the River Great Ouse upstream of Brownhill Stauch is likely to be of better quality than that from the Ouse Washes or from the tidal River Great Ouse at Bluntisham.
 - b) IWA suggests that the FR Project team should examine whether water can be carried, mainly by gravity, from Earith to Horseway via a re-development of the Middle Level Transfer Scheme (Earith to 40 Foot: 1985 -2000)
- 5) Direct transfer from the Counter Drain via Horseway Channel (Welches Dam to Horseway) would avoid water being pumped into the Washes & then back again to the Reservoir.
- 6) If cross contamination concerns can be resolved, reverting to the Con2 recommendation to use a refurbished Horseway Channel for water transfer is more logical and likely to be more cost effective than the current Con3 approach.

Horseway Channel and Welches Dam Lock

It is recognised that restoring and upgrading the channel for both navigation and water transfer would entail significant investment, including lock and sluice upgrades, re-lining, and bank raising to increase water depth. The latter would facilitate water transfer and minimise the need for major upgrades to Welches Dam Lock, except as a stop lock for emergencies or maintenance.

Restoration of Horseway's Channel could also provide wider benefits to the public beyond boaters. Subject to landowner consent, walkways & cycle paths could be added alongside the water channel. This would significantly improve access for walkers & cyclists to the Ouse Washes & RSPB reserve at Welches Dam. Guests at the proposed visitors centre at the Western Zone of the Reservoir would have another area to explore and enjoy as well as the Reservoir.

IWA recommends re-examining the Con2 proposals for restoration and use of this channel.

Abstraction from the River Nene and Nene Washes

The River Nene and Nene Washes are proposed as the third main non-rainfall water source for the reservoir. Water would be abstracted from the Nene Counterdrain north of the Nene and transferred into the Middle Level waterways via a culvert at Stanground, travelling through the Middle Level System before abstraction, treatment, and pumping into the reservoir from the 16 Foot River.

- 1) Mitigation measures are needed to ensure safe navigation at Stanground Lock, where water is introduced downstream of the existing lock. The culvert design should accommodate continued safe passage and mooring for boats.
- 2) There is no reference to funding for use of the Middle Level System as a water supply route to the reservoir. The approach needs to address funding for this new function alongside existing purposes—irrigation, flood protection, and navigation.
- 3) It is unclear whether an assessment has been conducted regarding the impact of reservoir supply plans on boat users along the 160 kilometres of navigable Middle Level waters. Specific concerns include necessary mitigation and improvements to protect waterways, structures, and riverbanks from increased flows, especially near Briggate, Whittlesey, Ashline Lock, March, and Benwick. Funding for such measures should be clarified.
- 4) Con3 includes provision for a water treatment and pumping station to return purified water to the Nene above the Dog & Doublet Lock. Most of this treated water would pass through the lock and associated sluices and be discharged to sea via the tidal River Nene. This appears to be a waste of capital and operational resources. Clarification of this scheme is suggested.
- 5) Outlets, including the one for purified water mentioned above, should be sited so they do not impede boats navigating or mooring nearby, particularly at locks.
- 6) The Middle Level system is currently configured to discharge excess water to the sea through Wiggshall St German pumping station, with automated controls based on water level rises. A mechanism is needed to distinguish between water requiring discharge and water introduced from the Nene for reservoir filling; otherwise, water from the Nene may never reach the reservoir.

Additional details of our concerns and suggestions are included in the attached Appendix 2

- Q30. Do you have any comments on the working areas identified for constructing this infrastructure?
None
- Q31. Do you have any comments on the proposed road routes for use during construction?
None other those contained in our answer to Q23 and Q24

Consultation Materials and Experience (Page 16)

- Q32. Do you have any comments on the consultation materials provided?
Inability to save work in progress when completing the online form has led to this hybrid response.
- Q33. Do you have any feedback on your experience of the consultation overall, such as what you found helpful or suggestions for future consultations?
Suggest it would be more beneficial if such feedback is provided once IWA has received responses to our concerns and suggestions.