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Consultation Response on the Fenland Reservoir: A response from the Cam Valley Forum

INTRODUCTION

This is a consultation response from the Cam Valley Forum to the **Anglian Water & Cambridge Water Fenland Reservoir Proposal**.

As a major River group in the Cam valley we are both your customers and stakeholders. In that spirit, as collaborative stake-holders, **we heartily welcome this proposal but with some provisos!**

About us. *The Cam Valley Forum*, a voluntary charitable organisation, works with many other bodies to protect and improve the river Cam and its riversides, including its many tributaries and its sustaining aquifers. We recognise fully that this project is actually outside our river's catchment, but we did call for such a project some time ago. As an association of local individuals with diverse environmental, recreational, academic and business interests, we are concerned mostly with the rivers in our catchment, but this is pertinent to us as we are largely in the Cambridge Water Company area which it will possibly benefit. This response focuses mainly, therefore, on our group's concerns for the future of the rivers and their environments as a knock-on from this plan. We have contributed to many previous such planning discussions.

About our main concern. The Chalk streams in the UK are internationally important in the conservation of biodiversity. The UK has about three-quarters of the world total. This includes our Cam, Rhee and Granta and many of their tributaries. Our local Chalk streams have declined over recent decades for three principal reasons; channel modifications, water quality pollution and loss of Chalk aquifer flow. Our Chalk streams, as you recognise, **have suffered hugely from public water supply over demand due to ground water abstraction**. It is intolerable to us that the Cam should continue therefore to suffer a loss of over 100 megalitres per day from its Chalk aquifer (to Affinity, Cambridge Water and Anglian Water combined). That water could also support much needed summer flow. In recent years the depth and degree of aquifer depletion has grown and this has of course been accompanied by growing wetland biodiversity loss. Low flows also exacerbate the polluting eutrophication harm to biodiversity that is due principally to our catchment's high river phosphate levels - often classed as 'Poor'.

We welcome the reservoir as this is a meaningful consideration of Chalk stream welfare by Anglian Water and Cambridge Water in their planning. This need for environmental improvement requires a much bigger investment to ensure that the current loss is reversible. Thanks largely to our lobbying and the campaigning of many other river supporters something is at last now happening. We are determined to see that our River flow really does markedly improve.

Some specific Cam Valley Forum concerns with this consultation exercise.

Given the many aspects of this proposal, like the recent Anglian Water DWMP consultative process, you do not present an open enough request for public involvement. Indeed if consultation means anything at all it means that, for example, the capacity of the reservoir should be very open to public comment! As a result of that you will have to allow for this sort of fuller response commentary. We therefore give below some of our key points, in summary, for you to take on board also.

The Need for the Reservoir.

We assert that there is already a great need for this Reservoir to relieve pressure on the Chalk aquifer. That this relief is being requested now by government through Natural England and the Environment Agency, to the tune of a 60% reduction in present levels of abstraction, is indicative of the perceived need. We hope that NE and EA will hold you to that. The *status quo* is already unsatisfactory and our duty to conserve our Chalk streams better is already failing. We, therefore, feel that the ‘**no deterioration in flows**’, that you seem to consider a gesture of merit, is actually **a totally insufficient ambition** for this project. This will certainly be the result if all the gains that the reservoir may well produce (by 2035) are to be swallowed up completely through your meeting that increased demand for supply. We shall therefore be watching WRE, etc. closely on this count. They, likewise, seem also to have not yet got that message.

Capacity.

The capacity of this reservoir to meet that 60% reduction is patently insufficient already. We will surely need more water. WRE can do the sums and have doubtless already done them. We, in Cam Valley Forum, have little confidence yet in your ability to reduce the level of present demand. The 2022 summer drought saw a great increase in demand in our area despite pleas from you, and others such as ourselves, for water use restraint. Without **Temporary Use Bans** you will just not get that message across to the public. Cambridge Water do not publically acknowledge the urgency that the EA and Natural England both express. Without much greater investment by all the water companies in the reduction of leakage the gains you are expecting to make are unrealistic. We are, needless to say, totally supportive of compulsory metering and all possible measures for greater water efficiency.

Growth.

That you see the reservoir as **principally to supply growth** is evident from the Cambridge Water Company’s own words in the preconsultation Q and A... *“In the short and medium term, we believe we can meet the proposed growth in our area through the delivery of our proposed demand management options e.g. leakage, metering and water efficiency. This means we will not be increasing our abstractions from the chalk aquifers in order to meet this growth. However, in the longer term, we are unable to meet the growth through demand management options alone, and this is where new supply options, particularly the Fens Reservoir, will play a major role in ensuring we can deliver the additional demand due to growth, as well as achieve the reductions required to restore and protect the environment.”* It is clear to us that you still do not acknowledge the unsustainability of your present operations. Cam Valley Forum made it very clear in May 2020, in our ‘*Let it Flow!*’ publication that we would want to see a ‘Chalk streams first’ policy and an accelerated reduction in the enduring abuse of our Chalk streams.

Encouraging a more holistic view of sustainable development.

We do recognise the need for some growth, but the present Government focus on population expansion and rapid building development in this region is widely questioned in the Cambridge community in terms of its long term ecological sustainability. At present development highlights continually the unsustainability of contemporary UK life styles. This is most true of all with fresh water resources. Britain imports a huge amount of its food from other countries which themselves are already running their own water resources down to feed us. A bigger focus is needed on water footprint. Growth beyond ecological limits is a folly that will be regretted in times to come. Climate change, with all that it may bring, is very pertinent indeed here and planning without recognition of the Precautionary Principle is a Government folly. Water Companies and WRE need to listen and speak out on this as well if they are to be trusted.

The Dangers of Greenwashing.

Doubtless there will be likely gains in people's open air recreation and in Biodiversity Net Gain from what is proposed. These are fully possible and achievable aims. But you need to be more open about this aspect and not pretending that re-wilding wonders are easily gained! Anglian Water and Cambridge Water are not alone in such exercises and you too easily fall into the trap of 'greenwashing'. The latter has been defined as '*a deceitful and unethical practice aiming to mislead investors and consumers genuinely seeking environmentally friendly companies or product*'. Where it is practised it should be pointed out. You may well think this does not matter, but, in your Reservoir brochure on page 17, you clearly thought you needed a pretty picture of a butterfly to advertise Biodiversity Net Gain. If you had only asked a good naturalist - on your Anglian Water staff (like Chris Gerrard) - for a suitable fen example, to put alongside the native otter and kingfisher they would have suggested something much more appropriate than the heliconid Tiger Longwing, *Heliconius hecale*, that you pictured. That butterfly species comes from tropical Amazonia and Central America! It is laughable at one level, for you to put it in but is also pretty insulting to those of us who care realistically about the future of wildlife in Cambridgeshire.

Biodiversity Net Gain

This is achievable (though many ecologists doubt the metric) and it is welcomed. Cam Valley Forum would like to beg you to consider this aspect with considerable ambition. Several local county wildlife conservancies:- like the Kingfishers Bridge Reserve, Wicken Fen NT, the Wildfowl and Wetlands Trust at Welney and RSPB at several sites have all been regional pioneers in wetland regeneration. Their expertise should be fully called for and their advice and their involvement will be an essential for you to employ.

Social and Environmental Impact

We do not know the feelings in the Chatteris area about what is proposed. British history is replete with historical examples of communities deeply scarred, for generations sometimes, on account of a more central government's imposition of such infrastructure projects. The County will need to provide adequate social support and environmental impact support for the people whose livelihoods will be affected. There may be gains in local employment but there will be losses too and these are often endured by the most vulnerable in our society. This must be a well funded County concern with the costs fully met by those profiting from it all.

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In response to your own specific response requests :-

1. Do you have any comments about the pink area we have identified or the effects of us using it?

We heartily support the principle of creating a fenland reservoir, however, this site (Level 3 Flood risk) adjacent to **Chatteris is inevitably at risk from major river flooding** and quite possibly in the future from marine inundation also. The banks of the reservoir may be high enough to counter this risk, but the salination of the site is not a remote possibility with sea level rise. We would like to know the degree of risk that you have perceived.

There will be huge **carbon emissions** in the construction and running of the reservoir (see your site selection report). These will totally outweigh any reductions arising from it not contributing to present fenland emissions. We know that Carbon Neutral Cambridge are very concerned here.

There will be **major landscape changes with the high banks**. It will not therefore look anything like Grafham or Rutland water. Native tree planting may help, with this landscape change, but wetland wildfowl, if they are wanted, will avoid such treed areas. We would rather see a great expansion of fen carr woodland, than any other extensive lowland woodland planting.

2. Are there ways you think we can improve or reduce any of these effects?

With respect to carbon emissions we would want the engineers to minimise the use of concrete in favour bank building entirely with heavy clay and other softer subsoil mineral materials.

3. Do you have any comments about the grey area we have identified or the effects of us using it?

We can see that this initial wider area of land will be needed for supporting infrastructure during construction. We are very supportive of this including wildlife and environmental areas, leisure and recreation facilities, etc. Bringing the additional developments that will bring social and environmental benefits are welcome.

Zonation is key to the planning of this.

(1) Wildlife areas should be varied (drier woodland, wet alder carr woodland, willow scrub, reedbeds, rank long herbage cattle grazing areas, as well as short turf Konik grazed wader meadows for lapwing etc.

(2) Open water will attract water fowl and from that may come unwelcome eutrophication of the water. The RSPB and Wildfowl and Wetlands Trust should be engaged as consultants. There is only a small opportunity here for carbon sequestration.

(3) Recreational areas (with dogs and people) and the prime wildlife areas do not mix well. If you want to encourage some rarer bird species - like European cranes - the last thing you want is people. If social recreation is what you want it will deter many such wetland bird species.

Management and upkeep is not often costed sufficiently into green spaces planning. This needs careful budgeting. Good management requires great skills and will be key to the area's success.

6. As part of this consultation we have provided a very early concept design for the reservoir to help stimulate thought and discussion. This will be developed further as the project progresses taking into account your feedback, so we are keen to understand your initial views. Do you have any comments on the early concept design at this stage?

The main reservoir surface water should be open for sailing. There may be smaller areas open water areas that could be given over to floating photovoltaics. This would incidentally reduce evaporation. The edges of the reservoir will be much more attractive to landscape, people and wildlife if not rectilinear. This requires greater skill in design than anything geometric.

7. Below are some of the features we could potentially include as we develop the proposals for the reservoir. Are there any you have a preference for?

These we are in favour of

Wildlife enhancement and conservation (such as for birds and other species)
Ecological enhancements (such as wetland areas)
Recreational water sports (such as quiet sailing, angling and wind surfing)
Education facilities (such as nature trails, visitor centres)
Social and recreational facilities (such as picnic areas)
Local enterprise and economic opportunities will be welcomed.

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