

NORTH HUNTINGDON & ST IVES CUMULATIVE IMPACTS GROUP

Flooding, Water Supply and Wastewater (Review of the Local Plan Evidence Base)

The flooding and water evidence has improved significantly since the Preferred Options consultation. HDC has now undertaken much more detailed work on water supply, wastewater treatment, water quality and flood risk, supported by engagement with Anglian Water, the Environment Agency and the Lead Local Flood Authority.

The evidence is considerably better at identifying where the constraints are. However, it remains less certain about when and how the infrastructure needed to overcome those constraints will actually be delivered.

Where the Evidence Base Has Improved

One of the biggest improvements is that water supply, wastewater, water quality and flooding are being considered as interconnected issues rather than separately.

The evidence now:

- recognises that Huntingdonshire is in a seriously water-stressed area;
- identifies which Water Recycling Centres (WRCs) would serve proposed growth;
- identifies where wastewater treatment capacity is already constrained;
- assesses potential effects of additional wastewater on rivers and protected habitats;
- considers river, surface-water, groundwater and other sources of flooding;
- provides more detailed flood-risk assessments for individual strategic sites;
- considers the cumulative effects of development across whole river catchments;
- promotes stronger water-efficiency standards and Sustainable Drainage Systems;
- includes formal engagement with Anglian Water, the Environment Agency and the Lead Local Flood Authority.

These are important improvements in the quality and extent of the evidence, but they are principally improvements in identifying and understanding the problems. They do not mean that additional water or wastewater capacity has been provided, or that the infrastructure required to support the proposed growth has been funded or secured.

The evidence no longer assumes that water can simply be supplied, sewage treated and surface water drained regardless of the scale or location of growth. It also recognises that necessary infrastructure may need to be in place before new connections or occupation can take place where treatment capacity, environmental permits or flood risk would otherwise be compromised.

The evidence base is therefore much clearer about where the water, wastewater and flooding constraints exist. The remaining question is whether the solutions needed to overcome them are actually deliverable.

Where the Evidence Base Remains Weak

1. Identifying the problem does not demonstrate the solution

The evidence identifies significant wastewater constraints at several treatment works serving growth areas, including Huntingdon (Godmanchester). However, many of the necessary solutions still lack certainty over:

- what infrastructure will actually be required;
- how much it will cost;
- who will fund it;
- when it will be constructed;
- whether environmental permits can be obtained;
- what happens if investment is delayed.

Some growth-related wastewater investment will depend upon Anglian Water's future regulatory investment programme, including AMP9 covering 2030-2035. Funding through that process is not guaranteed.

The evidence is increasingly clear about where capacity is lacking, but much less clear about when the necessary infrastructure will actually be operational.

2. Huntingdon (Godmanchester) WRC demonstrates the problem

Huntingdon (Godmanchester) Water Recycling Centre provides particularly important example. The updated July 2026 Water Cycle Study assesses it as **RED**. Current dry-weather flow is recorded at 11.40 million litres per day, compared with the 10.7 million litres per day benchmark used in the study. It concludes there is "*no capacity for growth and no named WRC growth scheme in AMP8.*"

The study cautions that this should not be interpreted as a formal finding that Anglian Water is breaching its environmental permit. However, Anglian Water separately confirms that there is currently no capacity for further growth beyond developments which already have planning consent and the right to connect. It also identifies no sustainable connection point for further development in the Huntingdon network without reinforcement.

This is important because the same Water Cycle Study models 14,419 dwellings and 628,148m² of employment floorspace within the Huntingdon (Godmanchester) catchment over the plan period. These figures include existing commitments and other growth assumptions used in the study; they are not simply new allocations in the emerging Local Plan.

HDC and Anglian Water expect the necessary improvements to be considered through future water-industry investment, including AMP9 (2030–2035), with an expectation that affected sites could be delivered or occupied by 2035. However, the improvements still depend upon future planning, regulatory approval and funding being secured.

In simple terms, substantial additional growth is being planned within a catchment where Anglian Water says there is currently no capacity for that further growth. A route towards providing additional capacity has been identified, but the necessary improvements are not yet secured or funded.

This illustrates the wider weakness in the evidence base: identifying what infrastructure will be needed is not the same as having it funded, built and operational when development requires it.

3. Infrastructure must keep ahead of development

The evidence recognises that development may need to be phased until wastewater infrastructure is available. The Water Cycle Study refers to the possible use of Grampian or pre-occupation conditions where development comes forward ahead of the infrastructure required to serve it. Anglian Water also identifies circumstances where network reinforcement will be required before new connections can be agreed. The Local Plan will therefore need effective mechanisms such as:

- development phasing;
- infrastructure triggers;
- planning conditions and legal agreements;
- restrictions preventing occupation until essential infrastructure is operational.

This is particularly important where there is currently no capacity and the required infrastructure is dependent upon a future investment programme.

Whilst the evidence recognises that infrastructure must keep pace with growth, the emerging Local Plan still needs to turn that principle into effective and enforceable development, connection and occupation controls.

4. Water quality may restrict the ability simply to expand treatment works

Wastewater capacity is not simply a question of making treatment works bigger.

More development means more treated wastewater being discharged into rivers. Where rivers are already environmentally sensitive, the Environment Agency may require tighter pollution limits.

The Water Cycle Study assesses whether deterioration could be prevented through tighter treatment standards and considers the **Technically Achievable Limit** – effectively the level to which wastewater can realistically be treated using available technology. In some circumstances, therefore, the required treatment may approach the practical limits of what current technology can reliably achieve.

Increasing wastewater capacity may depend not only upon funding new infrastructure, but also upon whether additional wastewater can be treated and discharged without causing unacceptable environmental harm.

5. Major commercial growth creates additional uncertainty

Future water demand from housing can be estimated reasonably consistently. Commercial development is more difficult because water consumption can vary considerably depending upon the eventual use.

The Water Cycle Study itself identifies uncertainty around some forms of commercial development, including research and development uses. This is relevant when considering employment growth including Alconbury Weald, RAF Wyton and the developing Project Fairfax proposals, Newlands and potentially Brampton Cross.

Brampton Cross remains an unallocated commercial proposal but continues to be actively progressed by its developers through engagement with stakeholders. Its eventual uses and water requirements are not yet known.

Neither Brampton Cross nor Project Fairfax appears to be expressly assessed under those names within the final Water Cycle Study. The study does assess Wyton Airfield, but this does not in itself demonstrate that the latest Project Fairfax proposals have been modelled.

The evidence cannot yet demonstrate the full water demand arising from major commercial growth where the eventual type, scale and intensity of development remain uncertain.

6. Flood-risk evidence has improved, but detailed local risks remain

The Strategic Flood Risk Assessments provide a much stronger district-wide picture and now include both site-specific assessments and consideration of cumulative impacts across catchments.

However, strategic modelling cannot replace detailed assessment of:

- ordinary watercourses and drainage ditches;
- culverts and local drainage systems;
- historic flooding known to communities;
- site-specific surface-water behaviour;
- safe access during flooding;
- the effect of development upon neighbouring communities.

Sustainable Drainage Systems can help manage runoff, but their effectiveness depends upon sufficient land, appropriate design and reliable long-term maintenance.

A strategic assessment showing that development may be possible does not prove that an individual site can be developed safely without increasing flood risk elsewhere.

7. The latest cumulative growth assumptions need to remain under review

The water evidence has been updated as the Local Plan has evolved, including publication of the updated Final Water Cycle Study in July 2026. However, the scale and location of growth continue to change. HDC therefore needs to demonstrate that its final evidence reflects the latest assumptions for major proposals including:

- Sapley Park;
- Newlands;
- Project Fairfax and RAF Wyton;
- Alconbury Weald;
- strategic growth around Huntingdon and the proposed A141 realignment;
- significant commercial proposals such as Brampton Cross where they could reasonably affect the same infrastructure.

This is particularly important because different developments may ultimately rely upon the same treatment works, water resources, rivers and drainage catchments.

The cumulative assessment needs to reflect the development actually being planned and promoted, rather than assessing major sites in isolation.

Conclusion

The flooding and water evidence base has improved considerably. HDC now has a much clearer understanding of water scarcity, wastewater capacity, water quality and flood risk. It also recognises that cumulative growth can place pressure upon the same treatment works, rivers and drainage catchments.

However, the improvement is principally in recognising and assessing the infrastructure problems rather than demonstrating that the solutions have been secured.

Huntingdon (Godmanchester) WRC illustrates the issue particularly clearly. The updated Final Water Cycle Study assesses it as **RED**, with no capacity for growth and no named WRC growth scheme in AMP8. Anglian Water separately identifies no current capacity for future growth beyond sites already having planning consent and the right to connect.

Against this position, the Water Cycle Study models 14,419 dwellings and 628,148m² of employment floorspace over the plan period within the Huntingdon (Godmanchester) WRC catchment.

There is now an identified route for considering the necessary improvements through future water-industry planning and AMP9, with an expectation that affected sites should be deliverable/occupiable by 2035. However, this remains subject to future investment decisions, regulatory approval and secured funding.

Similar uncertainty remains around future water resources, environmental capacity, major commercial demand and the timing and maintenance of flood and drainage infrastructure.

The question is therefore will that infrastructure be funded, permitted, built and operational before the development that depends upon it is allowed to connect or be occupied?

At present, the evidence identifies a route towards addressing these constraints, but does not provide certainty that all of the necessary infrastructure is secured and funded.

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