



Department  
for Environment  
Food & Rural Affairs

T: 03459 335577  
helpline@defra.gov.uk  
[www.gov.uk/defra](http://www.gov.uk/defra)

Granville Davies  
Yorkshire Water

**Date:** 8 February 2019

By email only: [granville.davies@yorkshirewater.co.uk](mailto:granville.davies@yorkshirewater.co.uk)

Dear Granville,

**Yorkshire Water draft WRMP19: further information in support of your statement of response**

Thank you for submitting the statement of response (SoR) to Yorkshire Water consultation on its water resources management plan. We have been reviewing the revised draft plan, SoR and advice from the Environment Agency prior to submitting the documents to the Secretary of State for a decision on next steps. However, before we can refer your plan to the Secretary of State for a decision we would like you to provide some further information in support of your plan. The information requested is enclosed.

The additional information should be sent to: [water.resources@defra.gov.uk](mailto:water.resources@defra.gov.uk); [water-company-plan@environment-agency.gov.uk](mailto:water-company-plan@environment-agency.gov.uk); [wrm@ofwat.gsi.gov.uk](mailto:wrm@ofwat.gsi.gov.uk)

Any further information will form part of your statement of response prepared under Regulation 4 of the Water Resources Management Plan Regulations 2007 and as such it should be published on the water company's website and a copy sent to those that made representations on the draft Plan. This is to enable stakeholders to understand, fully, the company's proposals and to ensure that all information informing the Secretary of State's decisions is in the public domain.

I would be grateful if you could let me have this further information as quickly as possible, but in any case no later than 5 April 2019.

I am copying this letter to Richard Flint, Paul Hickey at the Environment Agency and Colin Green at Ofwat.

Yours sincerely

**Margaret Read**  
Deputy Director – Water Services  
T: 020 8026 3611  
E: [margaret.read@defra.gov.uk](mailto:margaret.read@defra.gov.uk)



## **Annex A – further information required from Yorkshire Water to support a decision on the Water Resources Management Plan**

### **Customer views on leakage reduction**

While reducing leakage is clearly supported by, and aligned with, Ofwat and Government ambition, the company should justify the level of its leakage reduction. The narrative presented in the company's statement of response and revised draft plan did not clearly demonstrate that its customers support the leakage reduction programme proposed beyond general support for the ambition to reduce leakage and improving the company's performance relative to the rest of the industry.

The company should provide evidence to show clear customer support for its preferred programme in its final plan, or commit to further customer research to support its level of leakage in its next annual review. The company should also address Ofwat's concerns as to why cheaper metering options were discounted.

### **Limits on transfers from Severn Trent Water**

The Environment Agency's representation requested that the company provides further explanation regarding its transfers with neighbouring companies in varying drought conditions. The company stated that it would operate these transfers in accordance with its contractual arrangements and in a way that would not adversely affect its customers. This is not sufficient information to satisfy us that the company's transfers are secure in a range of drought events. Experience from this year has shown that the company's plan may suggest an assumed dry year yield larger than is available based on the contractual arrangements.

The company should fully address the individual transfers and bulk supplies to inset companies the Environment Agency highlighted in its representation and describe how they will operate. The company should also consider whether the values are appropriate given its experience in the dry hot summer of 2018.

### **Update the SEA non-technical summary to make it compliant**

There are a number of changes needed to the non-technical summary to make the Strategic Environmental Assessment (SEA) compliant. This includes updating the environmental baseline section, stating whether any significant effects (adverse or beneficial) are expected as a result of the preferred plan and including a summary of mitigation measures. The non-technical summary should be a standalone document and allow the reader to understand the mitigation measures envisaged.