# Appendix: Supporting evidence for Biodiversity enhancement

YKY-PR24-DDR-29-CE-Supporting-evidence-for-biodiversity-enhancement-appendix - redacted

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# 1. WINEP Biodiversity enhancement supporting evidence

This document is designed to provide relevant and detailed supporting information to the arguments presented in Expenditure Allowance – Part 2, Clean Water Enhancement – section 15 (<u>YKY-PR24-DDR-03</u>). Each section is therefore to some extent self-contained in the provision of supporting evidence.

# 1.1 Key stakeholders

Optioneering against our NERC programme was predominately completed in collaboration with our external Biodiversity Advisory Group (BAG). This comprises of representatives of the Rivers Trusts, Wildlife Trusts and CaBA partnerships within our operational area.

Additional consultation took place with other key stakeholders such as the four lead authorities for Local Nature Recovery Strategies in the Yorkshire area, representatives of the National Parks and national NGO groups such as the RSPB and Freshwater Habitats Trusts.

The programme was co-developed in iteration with Yorkshire Water specialists, the BAG and technical specialists from the Environment Agency and Natural England through a pre-existing YW/EA/NE Biodiversity Steering Group (BSG).

A large list of stakeholder suggestions was received either through direct discussion, email or through working groups of the BAG or others (e.g., the North Yorkshire Crayfish Forum or the Yorkshire Invasive Species Forum). One key theme running through the majority of suggestions, as well as aligning with YW's corporate aspirations, was recognising that in our role as a water company, we have a disproportionate ability to impact on certain key habitats and species, particularly wetland and aquatic ones. The Environment Agency amongst others note that as well as over 90% already being lost, over 10% of our freshwater and wetland species are threatened with extinction, with two thirds of our existing wetland species being in decline and note that wetlands make up only 3 percent of the UK but are home to at least 10 percent of our species.

The selected preferred option effectively tackles the challenges outlined above and is designed to stop the decline of biodiversity in our operational area.

# 1.2 Our optioneering process

We implemented a robust optioneering process, consistent with the WINEP and WISER guidance encouraging co-design, as follows;

# Stage 1, setting the framework

In October 2021, the BAG was briefed on the WISER and WINEP consultations, PR24 timeline and the likely ask of the group to help collaboratively design the YW Biodiversity Programme. In October and November, the BSG met to review the developing guidance through the WISER and WINEP documentation and draft Options Development Report guidance as well as discussing initial expectations around likely content under the NERC driver.

# Stage 2, collaboratively identifying risks and issues

In January 2022, the BAG was updated on the new WINEP guidance and options development information was shared to enable the groups to consult with internal staff and key partners, leading to a workshop in February 2022 where there was a general discussion of 'risks' and 'issues' relating to biodiversity.

This workshop produced a longlist of potential solutions for inclusion in the AMP8 programme (detailed below) and YW encouraged additional thoughts during a consultation phase that also included external partners like Local Authorities and national NGO groups.

In February 2022, the BSG met to produce a similar longlist of risks and issues based on prior investigations, policy changes and professional judgement.

The BSG met again in March to refine the longlist into a likely shortlist for presentation to the BAG. This BAG meeting took place in March where YW summarised the feedback received and reflected what elements aligned with policy drivers and YW's corporate aspirations for biodiversity, to be clear what elements were not likely to be taken forward at this stage and explain why.

# Stage 3, proposing solutions

In May the BSG met to discuss learning from AMP7 that could feed into the AMP8 programme, updated each other on the expected PR24 timeline and compared feedback received from other national and industry colleagues.

In June 2022, the BAG met to discuss the shortlist that had been created from the longlist which pinned down the risks and issues being met by the programme. A second meeting in June discussed the potential solutions to meet these 'risks' and a further meeting in July then defined the solutions and the scale of the solution required

A BSG meeting in July allowed YW to update on the recommendations of the BAG to ensure regulator acceptance in principle. To help define the solution, the content of draft Action Specification Forms was discussed and YW undertook the action of drafting these in advance of deadlines for the NERC programme to allow the regulatory outcomes of the programme to be defined to give sense to the ODR and OAR.

The programme as a whole, the ASFs and ODRs were then iterated at meetings of the BSG between July and October as well as general discussions to share intelligence on good practice across the water industry, and guidance from regulators (for example the outcomes of a Water UK Conservation Network meeting or the Natural England Nature Recovery List).

The options that were taken forwards were then progressed with the Environment Agency via the Action Specification Forms. As a specific example, the workshop process identified the need for further action on native crayfish due to the exponential spread of signal crayfish, the impacts of our operations and the conservation benefits offered by our assets. Further collaboration with the North Yorkshire Crayfish forum helped us to refine the actions against this option, before discussions with the Environment Agency led to the specific activity set out in the Action Specification Form (WINEP ID08YW103012):

Crayfish surveys to understand the baseline within and around YW assets – A short list of sites that are suitable for crayfish will be drawn up, these will be visited for initial habitat suitability surveys and will record potential barriers for crayfish movement with further manual searching and trapping being undertaken to understand the distribution of native and invasive non-native crayfish in and around our assets. This will include reservoirs and proportionate upstream and downstream reaches where access can be sought. Any white-clawed crayfish populations can be monitored in the future and any negative impacts recorded with potential enhancements. It will also allow us to target areas for biosecurity and know if any populations are at high threat from INNS crayfish.

- Yorkshire wide forum to support the existing North Yorkshire Crayfish Forum to expand to a Yorkshire wide Crayfish Forum and assist the project officer role in delivering the existing strategy. To help develop a sustainable funding model for the Forum.
- Barriers to non-native crayfish to assist the EA with investigating how existing barriers on East Morton Beck could be adapted to stop American signal crayfish impacting the white-clawed crayfish population in Sunnydale Reservoir. This would likely involve adapting three barriers with follow up monitoring YW baseline abundance
- Headwater stream ark sites investigation To investigate where headwater streams above YW reservoirs could be suitable for potential ark sites for white-clawed crayfish, and if so, to publicise their availability for future crayfish rescues.
- AMP7 ark site monitoring to determine whether populations have established and learn lessons for future interventions.

The above activity was then costed based on:

- Crayfish surveys to be delivered at £20k AMP reflecting a mix of in-house resource through our own licensed surveyors, supported by consultancy resource in the first year of the AMP for suitability surveys (based on costs of c.£10k from our three Environmental Framework Partners to undertake an Ark site assessment of 5 sites in 2020).
- £41k p.a to run the Yorkshire Crayfish Forum and employ a project officer, based on a quote from an NGO partner and expected match funding from the Environment Agency and other forum partners (to cover the forum secretariat role, managing data, manage external outreach, maintain the Yorkshire Crayfish Strategy, managing volunteer groups, managing incident response and undertaking licence applications).
- £60k to investigate and deliver a barrier to passage for American signal crayfish based on indicative costs provided by the Environment Agency and our own fish pass programme.
- £20k to cover eDNA costs associated with ark site and headwater stream monitoring based on quotes from two commercial providers (c. £370 per test kit and analysis.).

# 1.3 An example of external workshop outputs to produce a longlist of measures that YW could align with to delivery biodiversity duties under the WINEP:

- Core funding for catchment partnerships as well as funding for projects on the ground is crucial for us to be able to prioritise and deliver our common objectives (and work out what these are, more below).
- Producing and implementing YW specific species and habitats recovery plans. Should be a definite priority.
- A partnership-based Yorkshire wide ecological monitoring programme.
- Funding equipment required for citizen science monitoring.
- Wetland restoration on a landscape scale Swale & Ure Washlands.
- Reconnection of floodplain and wetland creation in Wensleydale.
- Yorkshire Water help Catchment Partners (CPs) across Yorkshire become more resilient by attracting further private/public sector investment into both CPs and projects they/their partners deliver on the ground by helping them become more investment ready.
- Map the catchment in terms of Natural Capital and the Ecosystem services that they provide.
- Riparian tree planting. We currently have a strategic riparian tree planting programme on the Ure which we would like to extend across all of our catchments in due course.

This could be further extended to include riparian habitat creation via creation of buffer strips in areas where tree planting is not a priority.

- There are no examples of a Stage 0 river restoration project in our catchment, which isn't surprising given the population density and the constraints posed by human infrastructure. However, here and there there's enough space and absence of human concerns that there appears to be the potential to deliver a Stage 0 restoration project. It's worth pursuing as such projects result in a much more complete restoration of natural river processes, and the resultant heterogeneity of river and floodplain habitat leads to increased biodiversity gain.
- Our rivers are often celebrated as ecological corridors, providing connectivity for wildlife, particularly important in urban or intensely farmed areas. Despite this there has to-date little effort to systematically push the creation of continuous riparian habitat to ensure that the river network functions as an effective river network as is possible.
- To have a large positive impact on biodiversity it is necessary to work with large numbers of landowners. One way of going about this is to provide grants to landowners for measures that result in desired outcomes. By all accounts, Severn Trent's Environmental Protection Scheme has been a successful and well-regarded grant-making programme, and it might be something that YW might consider copying.
- The biodiversity and climate emergencies ideally require us to make wide-scale changes across our landscape. However, project delivery is time-consuming and difficult, and often it feels we are scratching the surface of what can be done. Creating more delivery capacity within organisations is one way of boosting the rate of project delivery but perhaps there are other ways of doing it more cost effectively. Reverse auctions seem to offer a way to facilitate large scale delivery as landowners make the interventions themselves. Also, I understand that a number of organisations are looking to initiate a green investment project in our region, and perhaps that's a way of bringing in large amounts of funding.
- Implement and complete all 403 issues noted of site walking the Middle Aire Catchment (72km) as well as Silsden Beck. Not all of the becks have friends of groups. The project would insure all of the Becks have a friends of group, championing their local beck. The project would also seek to have monitoring and educational aspects (Figures below).
- A variety of wetlands connected floodplain and re-meandering the river from Malham to East Riddlesden. The project would build upon Leeds FAS 2 NFM, on aspects upstream of Apperley Bridge which is the current projects extent. With the ACN on board, the project will also connect communities together addressing more of the 6 Yorkshire Water Capita than this would if this were an EA project in isolation.
- Lower Ouse and Wharfe: purchasing and securing floodplain meadows SSSI south of York plus purchasing and restoring poorer quality floodplain meadows potentially as part of BNG near Wharfe Ouse confluence as part of the Lower Derwent and Lower Ouse Valley landscape scheme.
- YDCP/YWT Lowland wader (especially curlew) Continue expansion of the lowlands waders project to create more stepping-stone and breeding habitat.
- Fish: Brook/river lamprey, eels, brown trout, and maybe burbot reintroduction).
- Mammals: water vole.
- Invertebrates: white clawed-crayfish, tansy beetle, Electrogena affinis (Scarce yellowstreak).
- Plants: tubular water dropwort, fine-leaved waterdropwort, greater water parsnip.
- Birds: lowland waders, willow tit, corncrake, SPA/SSSI wildfowl species.
- Start delivering river reconnection projects if cost effective, currently have a short list that need either refreshing partners investigations or investigating feasibility/costings from scratch to become spade ready.

- Project to improve people's access and knowledge of their rivers through waymarked permissive paths, interpretation boards about the river at sites throughout the catchment, working with schools and stakeholders to do an art/engagement project about what the river means to them.
- Would like to see core funding on a par with EA CaBA catchment hosting funding and as longer-term commitment (say the 5 years) for stability of partnerships and ability to match funding with other streams. Could discuss and agree with YWS what part of the funding would deliver, such as help fund staff time to produce delivery plans/funding bids delivering joint ambitions and targets).
- Re-visit the lowland peat project in Cayton & Flixton Carrs on the Derwent, agricultural land change/habitat restoration.
- Further NFM expansion and targeting in upper headwaters (currently some RFCC funding building on Derwent Villages pilot project).
- Sediment reduction programme extending and building on our current work with EA on Upland Streams and the SSSI doing walkovers, identifying agreeing and costing works up with farmers and then organising contractors to install the interventions working alongside CSF and EA agricultural officers.
- Strategic programme of works to look at floodplain reconnection and creation of new floodplain habitats in middle to lower Derwent and at confluence of the Derwent and Ouse at Barmby, (potential removal/realignment of floodbanks).
- Continue expansion of the lowlands waders project to create more stepping-stone and breeding habitat.
- Start delivering river reconnection projects primarily on the Mid-Derwent, currently have a short list that need either refreshing partners investigations or investigating feasibility/costings from scratch to become spade ready.

# 1.4 Cost efficiency Example 1: River Resilience WINEP action - £3.2m

Previous quotes from our countryside management supply chain, and Tier 1 partners working on habitat creation for BNG, have resulted in the order of £50,000 - £100,000 per ha (e.g Swinsty reservoir Biodiversity Enhancement Management Plan creation and implementation, or Rodley wastewater treatment works, Duck Marsh wetland creation scheme).

Through this WINEP measure we have a regulatory commitment to deliver 130 ha of priority habitat conservation, 100 km of river habitat restoration, to unlock £2m in match funding and to facilitate 15,000 volunteer hours.

Delivering this through our existing supply chain would therefore lead to costs in the order of £5-10m.

Instead, the programme is costed (£3.2m) to be delivered via our Yorkshire CaBA partnerships, with funding being provided to employ project officers to work across partners to help us deliver these regulatory targets. Providing £40k per annum to a partnership host allows the facilitation not just of our required outcomes, but encourages cross organisational working, brings in significant external funding, and allows delivery of greater environmental, financial and social outcomes for customers. The cost is based on quotes received from 2 of the main 8 Yorkshire CaBA partnerships and sense checked with the Environment Agency who also provide core CaBA funding.

A case study providing more detail is given below.

Case Study; S.41 habitats and species WINEP conservation programme – Calder and Colne Rivers Trust and Calder Catchment Partnership

Whilst there is often strong overlap between Rivers Trusts and Catchment Partnerships, these are separate, with the Partnerships being a collaboration of organisations working as a network to improve a specific catchment (<u>https://catchmentbasedapproach.org/</u>). In this case, the Calder and Colne Rivers Trust (CCRT) is the host of the Calder Catchment Partnership (CCP) and to do this role, receives £7500 from Defra via the Environment Agency on an annual basis. Full catchments receive an annual payment of £15,000, but due to scale, the Aire and Calder run two separate Catchment Partnerships and therefore the two hosts split the Defra funding in half. Yorkshire Water is a steering group member of the Calder Catchment Partnership.

## Impact of YW funding 2020 - 2025

Prior to 2020, the CCRT had no permanent staff, and the organisation was managed on a light touch basis by trustees and a staff member employed for a single day a week to host the CCP. As such, whilst collaborative action did occur and a Catchment Plan was produced (part of the RBMP process requires this document to enable public participation in the process), joint action was limited.

A clear message from our general biodiversity WINEP partner consultations during PR19 was that it is relatively straightforward to access capital funding for environmental improvements, but exceedingly hard to find core staff time to identify where improvements are needed, gather evidence and develop strategies to achieve long term improvements and write funding bids focused on quality outcomes.

As such, our Partnership agreement with the CCRT and EA was structured to identify outcomes to work towards but with flexibility in how this would be achieved. The CCRT in consultation with the EA and ourselves identified the most effective approach would be to use our funding to bolster EA funding to employ a permanent staff member rather than to spend it directly through trustees commissioning contractors to do habitat improvement works.

Due to the nature of the AMP cycle, we were able to commit to 5 years of funding, which enabled CCRT to identify and recruit well against their expectations. Yorkshire Water and the Environment Agency were both able to support the CCRT in this recruitment process.

Since our funding began in 2020, the initial staff member has been able to identify significant alternative funding sources and grow the Trust to 7 FTE. In addition, the CCP has continued, expanded and thrived as a network, with well attended quarterly meetings of regulator, charity, private business and local authority partners, and multiple partnership projects underway and in development.

Outcomes to date against YW's WINEP regulatory commitments and our investment of £40k p.a.

Example ongoing activity

- £1.16m invested in ecological outcomes through external funding bids led directly by the CP (against £3.17 bid for).
- C.15ha of priority habitat improved.
- 1200 volunteer hours committed.
- 35 km of waterway surveyed, and pressures mapped for later action.
- Replenish water stewardship 7-year programme with multiple benefits for biodiversity, reducing flood risk and water quality.
- Black Brook Restoration and BNG Project river restoration, floodplain reconnection and habitat enhancement project due to complete in 2023/ 24 with ongoing maintenance under a BNG agreement.
- Calderdale NFM Grant delivery programme of NFM projects due to be completed in partnership with landowners in 2024, working with natural processes for natural flood management.
- Establishment of Farm and Rural Liaison and South Pennines Farmers Group.
- Connecting the Calder Weir removal and river restoration programme.
- River Health Project development; A paid member of staff is now supporting volunteers, extending training, recruitment and delivery of quality citizen science in the catchment through the Riverfly programme.
- Local Nature Recovery Strategy; Steering group lead for Water.
- 'Eyes on the ground' increased identification of impacts.
- A communication route to stakeholders through the Catchment Partnership and other sector networks.
- Developing BNG evidence base on rivers,
- Identifying BNG opportunities through catchment knowledge and understanding.
- Support in identifying suitable catchment-based solutions for the WINEP and engaging with YW's design consultants.

# 1.5 Cost efficiency Example 2: Water and wetland WINEP action - £3.5m

This programme includes our work to restore Yorkshire's chalk streams (additional to the DEFRA Flagship Chalk Stream which is a separate WINEP line) as well as work including river restoration of priority habitat headwaters and lowland wetland creation.

Our regulatory WINEP targets are to deliver 200 ha of wetland habitat improvements, 85 km of river habitat restoration and to facilitate 12,000 volunteer hours.

During AMPs 4-6, Yorkshire Water had interpreted our WINEP duties in line with our wider capital programme, namely through utilising our framework partner supply chain to undertake interventions to benefit natural habitats or species. For example, delivery of river restoration projects at Swinsty and Ingbirchworth reservoirs and Cudworth Dyke wastewater site during AMP5 at a cost of approximately £15m via our Tier 1 frameworks.

From AMP6 Yorkshire Water took an alternative approach to begin to deliver these duties in collaboration with environmental NGO groups rather than Tier 1 frameworks. This led to a significant cost reductions, in the order of 70-90% for similar scale projects such as Driffield Trout Stream (£50k for 500m chalk stream re-meandering with the Yorkshire Wildlife Trust), Black Brook (£48k for 400m of river restoration with the Calder Rivers Trust) and Lindley Wood (£10k for 600m of river restoration with the Wild Trout Trust) as well as generating additional 6 capitals value, for example through community participation in projects. Working with partners with a long-term attachment to a project ensures sustainability, multi benefits and longevity of project outcomes. This is the model we have followed for the cost build-up of this action.

Unit costs were provided by a number of groups working on river restoration in the area (e.g. The Wild Trout Trust and Yorkshire Wildlife Trust) and from existing pipeline project outlines (e.g. from EA WFD MTP costs for the Hull Headwaters SSSI restoration strategy). Using these led to the build-up of £800k being required to deliver 150 ha of lowland wetland habitat enhancement, £600k being required to restore 40km of headwater stream and £200k being required to deliver around 12km of river restoration and 15 ha of habitat creation associated with our Yorkshire chalk streams.

If required, we can request permission from our partners to share the detail behind these unit costs. The reasons these efficient costs can be achieved is through the specialist knowledge brought by local NGO groups who provide landowner and recreational group relationships, site specific technical expertise and access to trained volunteers. The programme includes facilitation costs to allow us to deliver our regulatory outputs, such as the breeding of wetland plants at our own Tophill low nursery and with the Lower Ure Conservation Trust, to allow us to provide local provenance priority plant species for our restoration work, rather than relying on under pressure supply chains focused on batch producing plants for SuDS and similar schemes.

# 1.6 Cost efficiency example 3: species conservation WINEP action - £2.1m

Whilst there remain specific species targets aligning with this WINEP action, at a programme level additional regulatory targets have been set to deliver works benefiting 30 ha of habitat associated with priority species, 30km of river, to work with at least 20 external stakeholder groups and to have facilitated 850 volunteer hours.

Our species conservation obligations set out in the WINEP cover a number of species, but our costs assume we will be delivering all of them in partnership with local or regional NGO groups. For example, our Freshwater Pearl Mussel conservation is costed on the basis of supporting the Freshwater Biological Association's licensed pearl mussel hatchery, at a cost of £45k p.a. to cover the breeding and running costs supporting the Esk pearl mussel population before catchment interventions can be completed and the mussels returned.

Our work on Tansy beetle is based on costs provided by St Nicks Environment Group in York, who take a lead on delivering the York Tansy Beetle strategy and already manage adjacent land for York Council and Natural England.

Our white-clawed crayfish conservation work is focused through delivery alongside the Yorkshire Crayfish Forum, an organisation bringing together government, local authority, private and NGO partners with a shared desire to conserve crayfish.

By working through the forum, we have been able to share expertise, data and licenses, for example in facilitating multi agency responses to crayfish plague outbreaks, providing our assets for use as Ark sites, and using NGO volunteer teams to engage the public and deliver social value.

Employing an officer to run and coordinate this forum is budgeted to cost £40k p.a., however this is significantly cheaper than unilaterally progressing our conservation work using consultant resource (e.g. from consultant quotes in AMP6 and 7, £2k to attend an angling event to talk about biosecurity, £11k to undertake crayfish surveys at a reservoir, all of which have been done repeatedly per year by the forum partnership at no cost).

1.7 Stakeholder letters of support



#### Sheffield & Rotherham Wildlife Trust

37 Stafford Road Sheffield, S2 2SF 0114 263 4335 mail@wildsheffield.com wildsheffield.com ☞@WildSheffield.com

For nature, for everyone

Yorkshire Water
Western House
Halifax Road
Bradford
BD6 2SZ

Dear

# Re: Letter of support for YW's draft determination response to OFWAT

I am writing to offer the support of Sheffield and Rotherham Wildlife in relation to biodiversity elements of your representation to OFWAT in the face of potential allowance reductions. Given the nature crisis we're in, we strongly believe now isn't the time to be cutting biodiversity budgets, especially given the strength, capacity and capability of CaBA partnerships in the area. In our view these partnerships offer both efficient, high quality delivery and excellent value for money.

Yours sincerely,



Head of Nature Recovery

Registered charity no. 700638 Company no. 2287928



Tom Hind Chief Executive

Date: 12 August 2024

Dear

### Yorkshire Water biodiversity enhancement allocation – North York Moors National Park

The support from the Yorkshire Water biodiversity enhancement scheme has played a crucial role in delivering priority river restoration works across the River Esk & Coastal Streams catchment and River Rye (Derwent) catchment, within the North York Moors National Park and surrounding landscape.

A key priority of the North York Moors Management Plan, adopted by all partners including Yorkshire Water, is to restore the River Esk & Coastal Steams catchment including conserving the critically endangered freshwater pearl mussel, and to continue the success of the work already underway in the River Rye catchment.

It is disappointing to hear that the biodiversity enhancement allocation may reduce for 2025-2030. We would like to seek clarification as to how the reduction of the Yorkshire Water biodiversity enhancement allocation demonstrates OFWAT's duty, as a relevant authority under Section 11A of the National Parks and Countryside Act 1949, to seek to further the purposes of National Parks?

If this decision is part of a larger strategy being proposed by OFWAT, perhaps there are alternative solutions OFWAT will be proposing for Yorkshire Water to increase support for biodiversity, water quality and partnership working to ensure greater success in our restoration efforts across Yorkshire's rivers, and specifically within our protected landscapes?

We would welcome an update on the above.

With regards to biodiversity enhancement funded projects to date, we are keen to summarise that North York Moors National Park projects undergo a thorough options appraisal, feasibility and constraints check process before works proceed, to ensure we are delivering good value for money. All our local projects are then assessed at a programme level by Yorkshire Water across other Rivers Trusts and Catchment Partnership projects.

As well as being part of the Yorkshire Derwent Catchment Partnership, the North York Moors National Park Authority is the lead partner for the Esk & Coastal Streams Catchment Partnership. Since 2014 CaBA partnerships have demonstrated excellent value for money for habitat creation, biodiversity and species conservation targets.

It had been proposed that Yorkshire Water biodiversity enhancement funding for 2025-2030 would match the EA's annual Esk & Coastal Streams CaBA contribution. This, alongside previous investment for staff, is incredibly beneficial from our perspective. Only a fraction of what we have achieved would be possible if delivery was solely undertaken by external consultants.

Working together to sustain the landscape and life of the North York Moors for both present and future generations to enjoy

The Old Vicarage, Bondgate, Helmsley, York YO62 5BP 01439 772700 general@northyorkmoors.org.uk planning@northyorkmoors.org.uk northyorkmoors.org.uk



Your ref:

Our Ref: 33AC01

Date: 12 August 2024

Rather than reduce the allocation we would question why contributions to support Catchment Partnerships are not even higher?

Investment from Yorkshire Water has also enabled us as a partnership to unlock substantial amounts of match funding such as the Blue Corridors project (2020 – 2023) which delivered outputs across both the Esk and Rye catchments, restoring natural river processes, controlling invasive non-native species, enhancing accessibility to the local area and monitoring water quality and ecological indicators. Levering in external funding as a result of partner match funding demonstrates efficient and good use of Yorkshire Water funds.

Partnership approach is fundamental to successful delivery, from local knowledge and in-kind support to funding investment. We would very much welcome an update as to how OFWAT's proposals will ensure continued and increased support from Yorkshire Water for 2025-2030 to support the restoration works across the North York Moors National Park's river catchments.

Yours sincerely



Chief Executive

Email from the Chair of Trustees, Aire Rivers Trust:

"Regarding Ofwat's comments suggesting that CaBA is, in your words, inefficient, I'd like to make some comments on what CaBA achieves.

Firstly, that CaBA is managed by not-for-profit organisations which provides a greater efficiency than were it companies that top-slice profit from the funding.

Next, that through CaBA, those not-for-profits are able to develop and manage community volunteer guardianship of watercourses with detailed local knowledge.

Volunteers and not-for-profit organisations are uniquely able to use our democratic systems to continue to press for change and to hold business to account. Without this pressure, change would be much slower if it happened at all. It might be uncomfortable for officials and politicians but they drink the water, eat and breathe the air too: we all need the improvements to green and blue environments. CaBA works in everyone's interests by enabling voluntary organisations to drive momentum for change.

Volunteer guardianship - volunteers include academic experts, retired industrial experts and trained citizen scientists observing the streams and rivers that they know well achieves data that feeds into strategic decision making and alerts to incidents on a watercourse, enabling early intervention. A consultancy or government department would not be positioned to attain what CaBA provides: the thousands of hours of free expert generated data and leadership.

Our politicians seem to have woken up to that we might be in the early stages of a crisis with crashing insect populations which threatens food security, a biodiversity problem further up the food chain, poor water quality, flooding and extreme weather patterns to list the ones that come to mind while writing a quick email. As Chair of the Aire Rivers Trust, I receive government and local government offers of grants and calls for projects that provide improved biodiversity. In each of those calls, there is a growing emphasis on 'co-benefits' including specified mental health, engagement, flood mitigation, biodiversity uplift, sediment control, INNS control and education. CaBA achieves these co-benefits by reaching more widely than specific government departments: it joins up the issues to create holistic multi partner solutions. To achieve those same co-benefits, a private enterprise would have to outsource to the not-for-profits and CaBA or a system like it".

Kind regards,

**Chair of Trustees** 



Manager of Environmental Planning and Governance Yorkshire Water



#### OFWAT reduction in Biodiversity Enhancement Allocation allowance

As a member of the Yorkshire Water Advisory Group, we would like to provide a letter of support to Yorkshire Water for their draft determination response to OFWAT relating to biodiversity enhancement allocation.

Yorkshire Dales Rivers Trust is a local Rivers Trust and charitable organisation, working hard to improve rivers in the catchments of the Swale, Ure, Nidd, Ouse and Wharfe. We are disappointed by the OFWAT response – which risks reducing positive outcomes for biodiversity recovery in our region – and support Yorkshire Water in challenging this decision. Our concern is that there is both significant risk, loss of momentum, and loss of scale of opportunity for improvement to the riverine, riparian and wider environment by the proposed reductions in investment.

We have noted the concerns raised by OFWAT but challenge these. OFWAT concerns:

- 20% reduction due to: Some concerns: We have some concerns whether the investment is the best option for customers. Evidence of alternative options being considered was provided for only a limited number of schemes and the company does not provide sufficient optioneering to demonstrate that the chosen option is the right solution.
- a further 20% reduction due to: Some concerns: We have some concerns whether the investment is efficient. The company does not provide sufficient and convincing evidence that the proposed costs are efficient.

Yorkshire Dales Rivers Trust was part of the extensive process supporting the development of options and the Biodiversity Lead has worked closely with us and other partners to develop the best outcome as well as meeting the guidance. We attended workshops as part of the Biodiversity Advisory Group and discussions took place at the Dales to Vale Rivers Network (DVRN), the Catchment Partnership for the SUNOW catchments (part of the Catchment Based Approach network), with YW.

We are therefore confident that sufficient alternative options were considered at a programme level, through engagement of knowledge and expertise of the Catchment Partnerships and Regulators. A long list of options was refined with partners against catchment priorities as well as other strategic drivers and overall benefits.

We believe that the proposed investment is extremely efficient and cost effective and represents very good value for customers. Over the last ten years, each £1 of funding for the DVRN has leveraged a further £55 from other funding sources for project work on the ground. The YW model for supporting Catchment Partnerships through direct investment and partnership delivery has a proven track record of success. Catchment Partnerships bring together the people who care for their rivers with those who can effect change and improvements to their condition. We believe that with the relatively small investment to CaBA partnerships, YW will achieve more in terms of habitat creation, biodiversity mitigation and species conservation than working through framework contractors and consultants. The inclusive partnership structures and the opportunities they bring cannot be replicated successfully through a framework contract model.

Yours sincerely



Chair of Trustees, Yorkshire Dales Rivers Trust

8 Kings Court, Pateley Bridge, North Yorkshire, HG3 5JW Registered charity 1107918 Registered company 05220147







Don Catchment Rivers Trust Churchill Business Centre Churchill Road Doncaster DN2 4LP

13th August 2024

# Letter of concern regarding OFWAT draft determination.

To whom it may concern,

We are writing to you from the **Don Catchment Rivers Trust**. We are the rivers trust for the Don & Rother catchment area, and we are the host organisation of our Catchment Partnership, known as the **Don**, **Dearne & Rother Network**.

As a Trust and host of the Network, we bring together organisations who work in the catchment to improve our water environment and rivers. Taking a **Catchment Based Approach** (CaBA) is critically important as it builds cross-sector partnerships that result in better and more efficient outcomes for the water environment. Furthermore, catchment partnerships have been highly effective at leveraging significant additional funding and provide excellent value for money. Water companies are integral to CaBA and **Yorkshire Water** has been key to the approach in our region – not just through funding, but by engaging with the Don Dearne and Rother Network to find solutions to the problems facing our rivers. The existence of the catchment partnerships is essential to Yorkshire Water achieving good outcomes to its AMP 8 initiatives, including the Great Yorkshire Rivers programme, the Nature First commitment to use nature-based solutions as the preferred way to deliver YW services, and the newly formed YW River Health Team.

During AMP 7, the Trust received £448,000 from Yorkshire Water, made up of £320,000 from the Catchment Resilience Fund, and £128,000 in other grants available to the Trust. This funding has enabled us to directly employ three members of staff, each of which have worked in partnership with Yorkshire Water and dozens of organisations to improve our catchment. The reduction in funds proposed in the Draft Determination means we cannot continue this partnership working to the same extent. Through working in partnership with Yorkshire Water we have provided excellent value for money, and we do not see how this can be improved upon by cutting funds for biodiversity – we feel that we ourselves are being punished, when organisations like ours are best placed to find solutions and make improvements.

The funding provided by Yorkshire Water to our Trust has not only employed staff and delivered projects – the Trust, along with our fellow Yorkshire rivers trusts have been

working hard to improve and strengthen our relationship with Yorkshire Water in a genuine effort to work collaboratively in solving problems. Less funding available to the Trust means less staff time and therefore less capacity as a Trust to continue our working relationship with our water company. This couldn't come at a worse time as in 2024 the Rivers Trust movement has entered into a Strategic Partnership with YW to collaborate on areas of shared interest, including sewage pollution, Nature-based Solutions, biodiversity, and land-management.

## During AMP 7 the funding received from Yorkshire Water has enabled:

### <u>A strengthened Catchment Partnership – the Don Dearne & Rother Network:</u>

CaBA partnerships are a Defra initiative that are partly funded through the Environment Agency and have been annually for the last 10 years. Seeing the importance of catchment partnerships, Yorkshire Water have match funded our catchment partnership with £75,000 over three years, enabling us to create a full role for a dedicated Catchment Partnership Officer.

These partnerships deliver a collaborative, cross-partner approach to improving the health and condition of rivers at a catchment scale for both people and wildlife. We have over 50 organisations in our catchment partnership. Over the last decade catchment partnerships have proved themselves to be unique in the way they build cross-sector partnerships among environmental organisations, Government agencies, water companies, local authorities, businesses, and civil society. This enables the sharing of resources and intelligence, joined up (rather than siloed) thinking, and the building of social capital and consensus, resulting in better and more efficient outcomes for the water environment. Furthermore, because of the variety of stakeholders and interests represented, such partnerships have been highly effective in attracting a range of non-governmental funding, multiplying water company investment. As they are hosted by not-for-profit eNGOs like ours they also provide excellent value for money. To achieve this, catchment partnerships have been highly effective at leveraging significant additional funding.

The DDRN is reliant on the additional funding from Yorkshire Water to help maintain the excellent work carried out by partnership, and with the combination of the DEFRA WEIF funding along with the funding we have received from **Yorkshire Water**, this has increased the resource and capacity available to the Catchment Partnership Officer to host and develop the catchment partnership. We are therefore concerned about the recent OFWAT draft determination of the Yorkshire Water business plan, and the potential for this to impact on the important work being undertaken in our catchment.

As part of our catchment plan, we have formed a steering group of key partners from across the catchment. The DDRN Steering Group has been created with the purpose

of representing the interests of the wider partnership, and to be a forum for discussion of issues and coordination of activity to develop the Catchment Partnership. Yorkshire Water are a key member of the steering group, and through their involvement excellent working relationships have been established with several departments within the business – if organisations understand how Yorkshire Water operates, then we can all contribute to solutions to issues in our catchment.

Over the past few years, numerous projects to improve our river and waterway spaces for people and wildlife have been developed, funded, and delivered by partners of the Don, Dearne & Rother Network. We have recently undertaken an evaluation of the 23/24 CaBA year for our annual reporting, and this demonstrated the excellent work being undertaken by catchment partners, including:

- 9.27 hectares of habitat created, such as hedgerows and trees planted, wetlands (including wetlands and scrapes), and wildflower areas
- 334 volunteers and/or citizen scientists engaged
- 4.63 km of waterways protected or enhanced, such as habitat enhancement works, nature-based solutions, soil health, floodplain reconnection and fish passage works.

There is huge interest in the Don Dearne and Rother Network, as demonstrated by the attendance at this year's Network Conference, which was oversubscribed.

# Improvement in fish habitats:

The Trust has a long-established partnership working arrangement with Yorkshire Water in terms of improving our rivers for migrating fish. We have collaborated on several fish passage projects, and over the past decade have had a shared vision of returning 'Salmon to Sheffield' - reversing hundreds of years of damage to the connectivity of the river.

This AMP, building on that momentum, Yorkshire Waters Catchment Resilience Fund has fully funded a Fishery Habitat Officer. They work closely with Yorkshire Water colleagues to identify priority areas for improvement and find match funding to deliver works. During AMP 7, we have leveraged additional funding to remove Stocksbridge Weir (a barrier for fish passage) and to carry out associated habitat works. We have delivered river habitat improvements in the middle of Sheffield city Centre and on important tributaries of the Rother in Chesterfield. We are currently working with Yorkshire Water funding to further improve the Don in Sheffield, and the Moss Valley. The officer has also established a fish pass maintenance group to ensure the various owners of fish passes keep them in working order and has also begun a programme of salmon monitoring.

# Improvements in agricultural land management:

The Catchment Resilience funding from Yorkshire Water has allowed the Trust to employ a 32 hour p/w Agricultural Officer for three years – match funding a significant grant from Highways England. During the three years, our Agricultural Officer has provided advice and support for dozens of farms in the catchment, encouraging them to use catchment sensitive farming techniques. The funding from Yorkshire Water for agriculture (£23k of the total resilience fund allocation), has leveraged:

- Dearne Valley Farm cluster: £29,935 from the Yorkshire Water biodiversity fund. Formation of the Dearne Valley Farm cluster – at least 102\_ha of land into new stewardship schemes. The value of the stewardship schemes are £216k of revenue and £283k of capital.
- Hedges & Edges: £9127 from Natural England to provide training and advice on hedgerow restoration in the Dearne Valley Farm cluster
- Tyres Hall Scrapes: £9980 from a local wind farm fund to create a 0.1 hectare wader scrape; Design and install a metal interpretation board; Install a stone bench; Host a farmer cluster training event and run a community event.
- Aerator machinery sharing pilot scheme: £25,880 from Yorkshire Regional Flood & Coastal Committee

# All Hands on the Don project:

An allocation of £100,000 (split between development and delivery) from the Catchment Resilience Fund was given to the Trust's All Hands on the Don project, which leveraged c.£1m in funding for delivery of a major three-year project. This project employs 6 people in the Doncaster area and is delivering an imaginative programme of volunteering, events, access improvements, work placements and habitat improvements. These will look to:

- · enhance fish populations and floodplain habitat
- · increase health and wellbeing
- · foster community action, inclusion, and community cohesion
- increase skills and employability
- improve access to the river, celebrate river heritage and foster understanding of the river and river issues

Projects like this are achieved through partnership working and collaboration, and without the additional funding support for River Trusts CaBA partnerships, this type of project is

#### not possible.

To conclude, funding from Yorkshire Water has enabled our Trust to grow and play an important part in the environmental and ecological recovery of our catchment. We do this in partnership with Yorkshire Water. Through the Don, Deame & Rother Network, together we enable dozens of organisations to work towards a shared mission – Healthy, Resilient Rivers for Nature and People. We see no better value for money than the ability to bring together organisations - millions in funding has been levered for important projects because of the funding Yorkshire Water has invested in us. As a charity, we strive to provide excellent value for money, but the reduction of available funds for biodiversity suggested by OWFAT will mean we have to scale back our efforts, lose skilled and talented staff, hamper future collaboration with YW, and risk decades of hard work. We urge OFWAT to reconsider.



Operations Director Don Catchment Rivers Trust



Catchment Partnership Officer Don, Dearne & Rother Network



Calder Rivers Trust The Elsie Whiteley Innovation Centre Hopwood Lane Halifax HX1 5ER

Manager of Environmental Planning and Governance Yorkshire Water

Dear

#### OFWAT reduction in Biodiversity Enhancement Allocation allowance

As a member of the Yorkshire Water Biodiversity Advisory Group, we would like to provide a letter of support to Yorkshire Water's response to the OFWAT draft determination relating to Biodiversity Enhancement Allocation.

Calder Rivers Trust is a local Rivers Trust and charitable organisation, working to improve rivers in Calderdale, Kirlees and Wakefield. We are disappointed by the OFWAT response and support Yorkshire Water in challenging this decision. Our concern is that there is both significant risk to loss of momentum, and loss of scale of opportunity for improvement to the riverine, riparian and wider environment by the proposed reductions in investment.

We have noted the concerns raised by OFWAT but challenge these. OFWAT concerns:

- 20% reduction due to: Some concerns: We have some concerns whether the investment is the best option for customers. Evidence of alternative options being considered was provided for only a limited number of schemes and the company does not provide sufficient optioneering to demonstrate that the chosen option is the right solution.
- a further 20% reduction due to: Some concerns: We have some concerns whether the investment is efficient. The company does not provide sufficient and convincing evidence that the proposed costs are efficient.

Calder Rivers Trust has actively contributed to the development and refining of options to improve biodiversity and wider environmental benefit. Yorkshire Water's Biodiversity lead has worked closely with us and other partners to develop the best outcome as well as meeting the guidance. We attended workshops as part of the Biodiversity Advisory Group and facilitate discussions within the Calder Catchment Partnership to feed into Yorkshire Water's plans.

We are comfortable that alternative options were considered at a programme level, through engagement of knowledge and expertise of the Catchment Partnerships and Regulators. A

The Calder & Colne Rivers Trust is a registered charity and company limited by guarantee Operating as: Calder Rivers Trust. Registered Office: The Elsie Whiteley Innovation Centre, Hopwood Lane, Halifax, HX1 5ER. Company No. 06822083/ Charity No. 1134377 long list of options was refined with partners, and reviewed against catchment priorities as well as other strategic drivers and overall benefits.

We challenge the concerns over whether the investment is efficient and can evidence that YW can achieve more through the relatively small investment to CaBA partners in terms of habitat creation, biodiversity mitigation and species conservation than working through framework contractors and consultants. The partnership structures and the opportunities that working with CaBA partners brings cannot be replicated successfully through a framework contract model.

Our reporting to YW shows that an investment of £200,000 over 5 years will have unlocked over £1,900,000 (up to end FY 23/24) of funding from other sources to deliver environmental improvements to the Calder Catchment. We know that reporting from other CaBA catchment hosts demonstrates a similar pattern.

This clear financial benefit is testament to working with catchment partners through the catchment base approach (CaBA), and YW have used this data to highlight the contrast in these costs to working with YW's large contractor partners. The YW model for supporting Catchment Partnerships through direct investment and partnership delivery has proven successful over the last few years and is not only lower in cost than working with framework contractors and consultants, but brings with it extensive local knowledge, support for CaBA partnership networks, development of strategies, and results in collaborative working and unlocking of external funding to match YW investment.

We hope you take into consideration the challenges to your concerns and reconsider this determination.

Sincerely

General Manager - Calder Rivers Trust

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Yorkshire Wildlife Trust

yorkshirewildlifetrust

Yorkshire Wildlife Trust is a company limited by guarantee. Registered in England No. 409650 and is a registered charity No. 210807

To whom it may concern,

I am writing to you in support of Yorkshire Water's formal challenge to OFWAT's proposed 40% reduction of biodiversity enhancement funding for the AMP8 (2025 – 2030).

Clean, pollutant-free river catchments and water courses are the lifeblood of Yorkshire, crucial for both people and wildlife. However, the systems once designed to manage our watercourses and water supplies are no longer delivering the outcomes needed and urgent remedial action is required. As such, the UK is ranked as one of the worst countries in Europe for water quality. Most of our rivers no longer provide suitable wildlife habitat or refuge for species with only limited opportunities for safe public recreational activity, due to pollution, human designed <u>modifications</u> and the changing climate.

As such, Yorkshire Wildlife Trust very much welcomes Yorkshire Water's plans to recover and enhance biodiversity throughout the County through a comprehensive set of river catchment-based actions that have been identified via a series of effective and inclusive stakeholder engagement events and meetings. Our work with Yorkshire Water on restoring upland peat, managing invasive non-native species and recovering nature at former water treatment works, along with more focused meetings held throughout the year have all enabled the Trust to inform the options for biodiversity enhancement across a range of habitats and areas of Yorkshire via work supported by Yorkshire Water. In addition, our work, carried out over the past 2 years on the production of the 'State of Yorkshire's Nature' report has both aligned with and further substantiated aspects of the optioneering undertaken by Yorkshire Water.

Given the ongoing risks to, and the alarming rate of decline in Yorkshire's biodiversity, we are disappointed to learn of the reported reduction of 40% by OFWAT to the funding of proposed biodiversity enhancement schemes that have the potential to contribute to the halting of species and habitat loss and therefore greatly assist with nature's recovery across Yorkshire.

Our work for nature and local communities alongside Yorkshire Water is founded upon established partnership working, enabling much added value both financially and socially. As the delivery of projects usually includes volunteering opportunities and organised citizen science and educational sessions, schemes that seek to recover nature also provide significant health & wellbeing and learning benefits for local communities, whilst ensuring that expenditure on actual outcomes and outputs is maximised, delivering real value for money.

Given the value and importance of effective partnership working, we agree with Yorkshire Water's commitment to bolster and support the existing Cable networks across Yorkshire through their proposals for AMP8 as the potential impact of well-resourced and motivated partner-based networks, operating at scale across landscapes and working with farmers and landowners offers much hope for improved water quality and recovered nature.



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As Yorkshire's varied and extensive network of rivers support internationally important populations of nationally scarce or recovering species, including Otter, White-clawed crayfish, Freshwater pearl mussel, Water vole and River lamprey we have a responsibility to work together with partners to prevent further loss and damage to such sensitive and vital ecosystems.

Yorkshire Water's submission to OFWAT has been fully costed and includes proposals based upon a wealth of evidence and stakeholder expertise for biodiversity enhancement and we would therefore request that the decision to reduce the requested funding by Yorkshire Water to support this essential and valuable work in Yorkshire be reconsidered and reinstated in order to support the urgent recovery of nature.

Yours sincerely,

Regional Manager (South & West Yorkshire) Yorkshire Wildlife trust



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c/o Yorkshire Wildlife Trust 1 St. George's Place York YO24 1GN Tel: 01904 659570

14<sup>th</sup> August 2024

Dear Sir/Madam,

#### Proposed OFWAT efficiency cuts

I am writing to express concern over the proposed cuts to the next round of AMP biodiversity funding and some of the points raised in coming to that decision. A number of points were raised that we fundamentally disagree with.

#### Catchment Partnerships as value for money:

YDCP have been successful a number of times applying for YWS Biodiversity Enhancement Programme funded through the AMP process. It has enabled us to use the funding as leverage to draw in other funding by showing that if YWS are willing to invest then other parties are safe to do so also.

To give an example the £15k spent on restoring the SSSI at <u>Barmby</u> has levered in £60k from the Environment Agency (EA) plus delivered engagement with local people volunteering their time to help with the projects and gain a sense of pride and ownership of their river and the wetlands next to it.

That added value in volunteering, community and bringing in additional funding through the relationships the catchment partnership officer maintains would not be achieved, nor the outcomes delivered at such a low cost if YWS merely used a contractor.

Another example is a current Natural Flood Management project on the river Dove tributary of the Derwent, we are delivering using money from the EA and RFCC.

The considerable groundwork, working up the business case was funded effectively by the £25k core funding support from YWS. It then brought in £249k of EA/RFCC funding and since the project started last year the officer who set up a delivery group of YDCP partner organisations working with farmers, the National Park, and Natural England among others has levered in a further £100k from the £19L aggi-environment scheme, and £137k from the National Park (£87k for restoring 4km of hedgerows on slopes to slow sediment and surface water <u>run off</u> and £50k for woodland planting for the same reason).

Without £25k core funding support to pay for staff time to work on developing projects and bids we would not have created a project that reduces flood risk, reduces pollution in the river and benefits biodiversity worth £486k, using our local contacts and long standing relationships with YDCP partner organisation staff. Yorkshire Water could not deliver that through contractors since it requires considerable effort to build those long term relationships with estates, tenants and other landowners and has led to the additionality of us developing a further project to reduce sediment with the same stakeholders.







c/o Yorkshire Wildlife Trust 1 St. George's Place York YO24 1GN Tel: 01904 659570

14<sup>th</sup> August 2024

#### Derwent lack of defined options.

One of the ongoing challenges with making good progress on identifying options has been the lack of core funding available for the staff who are then needed to develop projects, <u>costs</u> and applications to then bring in the further funds for feasibility, detailed design and delivery.

The increased support for catchment partnerships is one way of achieving this. We currently receive £5k a year over 5 years. While it is valuable, it is not enough to progress our aspirations to restore the catchment nor our YDCP partners including Yorkshire Water.

Fortunately, the recent receipt of some enforcement undertaking money has enabled us to arrange for several feasibility studies for restoring a Derwent chalk stream and addressing fish migration. It has also contributed to writing a bid to the new Water Restoration Fund for feasibility studies for river channel and floodplain reconnection of 4 further sites on the Derwent SSSI.

These would then put us in a position to bid for delivery funding from Yorkshire Water and other funders, but not if there is such a significant cut to proposals to support catchment partnerships or help provide match or startup funding for restoration projects.

At the very time our water resources are in need of critical investment to help reverse the decline in biodiversity the decision to carry out such swinging cuts to a well thought out programme of work that we have all put a lot of time costing up and planning sends exactly the wrong message.

We hope you reconsider your decision and reinstate the proposals for the Derwent so we can meet our targets for river restoration and biodiversity recovery in addition to continuing our existing essential sediment reduction and NFM work.

Yours sincerely,







# 1.8 Cost breakdown for the SSSI Moorland Management programme (08YW100316a)

As the largest single action against the biodiversity outcome, we have provided additional specific information in relation to our SSSI Moorland management programme (08YW100316a). This is in response to Ofwat's comment that "Options Development Reports (ODRs) and OARs present detailed cost breakdowns for preferred options for most schemes, including the 'Chalk Streams Restoration' flagship project and the wider 'Yorkshire Water Biodiversity Programme'. However, for the most material scheme (08YW100316a), no additional cost breakdown has been provided in the submission."

Moors for the Future (M4tF) in the South Pennines and Dark Peak and Yorkshire Peat Partnership (YPP) in the North are used as our preferred suppliers for moorland restoration rather than setting up numerous contracts with other companies able to carry out the works but not provide the added benefits.

Between them, they were pioneers of moorland restoration at scale and have many years of experience. They are also part of a wider network of moorland specialists (i.e. the Great North Bog) understanding the scale of restoration over a wider area outside their remit. Within their areas, they work with other water companies, some of which have neighbouring land to YWS and therefore manage peatland restoration and the limited number of contractors to cover a large area more efficiently and helping us to achieve economies of scale.

Many moorland contractors are procured by these companies and every job undertaken across our estate is tendered for, thereby securing the best price and availability. These not-for-profit organisations can also attract a large amount of funding that we and therefore our customers benefit from. For example, by using match funding, in AMP 7 YPP generated an extra £4m to invest in our catchment in the north, and M4tF using our match funding (25%) generated an extra £880k to spend at Snailsden.

We have included within the appendices the detailed breakdown of costs showing the scale of works needed in the South Pennines and the Dark Peak. We believe that currently, this is the most efficient way to run this programme of works due to the economies of scale, visibility of wider contractor availability, ability to attract external funding, liaison with major stakeholders (including tenants and third-party rights owners and expertise in the moorland restoration sector.

If the efficiency cuts are not reversed, we are putting off the early intervention of restoration. The earlier intervention is carried out, the sooner we can see the effects and, the less degraded these landscapes are, the more resilient and biodiverse they become exponentially. The moors may improve naturally over time, but they need to be able to withstand future extreme events and climate change and this can only be done by helping to speed up this healing process.

# Table 1-1: Sum of total cost per site

Site	Sum of Total Cost £ (ex.VAT)
Bodkin Farm	£375.00
Butterly	£1,876.40
Deanhead	£2,670.00
Haworth	£37,839.63
Heptonstall	£251,886.50
Higher Moor	£55,539.81
Keighley Moor	£50,880.00
Keighley Moor non catchment	£68,065.00
Nab Water	£4,905.00
Rishworth	£1,017,978.47
Snailsden	£987,722.00
Soyland	£668,583.35
Soyland Building Blocks	£56,209.00
Stanbury	£109,409.28
Thornton	£1,624.00
Thurlstone	£94,828.00
Turley Holes	£670,836.03
Twizle Head	£127,474.38
Twizle Head SSSI non catchment	£10,498.90
Walshaw Dean Reservoir	£4,000.38
Warley Moor Reservoir	£19,095.60
Wessenden Head SSSI	£1,269,165.50
Wessenden Head SSSI non catchment	£515,105.00
White Moss	£32,530.19
Widdop	£335,054.20
Wrigley's Piece Midhope	£50,434.75
Grand Total	£6,444,586.35
YW overheads	£1,446,413.65
Inflation	£391,393.60
Total	£8,282,393.60

Detailed cost build up for SSSI implementation:

Table 1-2: Example cost build	up behind the above table	(in this case the £55k s	pend at Higher Moor SSSI Unit
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Site	"T	Works	No. Units 🖵	Unit Cost £ (ex. VAT)	Total Cost £ (ex.VAT) 📮
Higher Moor		Bunding (ha)	0.76	1110	843.6
Higher Moor		Dense sphagnum clump translocation (@2000	0.03	1524.4	45.732
Higher Moor		Footpath works (m)	53	190	10070
Higher Moor		Grip/Gully Blocking: Heather/coir (Bale/log)	76	96	7296
Higher Moor		Grip/Gully Blocking: Peat (Dam)	5	28	140
Higher Moor		Grip/Gully Blocking: Stone (Dam)	6	175	1050
Higher Moor		Heather Brash (Bags)	9	70	630
Higher Moor		Molinia Cutting (ha)	4.31	1030	4439.3
Higher Moor		Re-profiling (m)	470	7	3290
Higher Moor		Sedge/dwarf shrub Plug plants (@2,500 per ha	) 6.51	2832.5	18439.575
Higher Moor		Sphagnum planting (@1250 plugs per ha) (ha)	9.58	812.5	7783.75
Higher Moor		Sphagnum planting (@4000 plugs per ha) (ha)	0.39	2636.8	1028.352
Higher Moor		Year 1 Lime, Seed & Fertiliser (total) ha	0.05	3670	183.5
Higher Moor		Year 2 Lime and Fertiliser (total) ha	0.05	3000	150
Higher Moor		Year 3 Lime and Fertiliser (total) ha	0.05	3000	150

# 1.9 Example of customer willingness to pay survey

In our Independent Acceptability and Affordability testing, where we engaged with 1,791 household, non-household and future customers, PC targets relating to a healthy natural environment, including biodiversity, were particularly well supported with 85% of household and non-household customers supporting these PCs, and with support from 78% of future bill payers.

In research on our long-term delivery strategy, when asked if they are supportive of Yorkshire Water's long-term target on looking after our natural environment and targets to increase biodiversity and biodiversity net-gain, over two-thirds of customers (69%) are supportive and just 7% are unsupportive (we spoke to a representative sample of 793 customers).

In our qualitative Water Resources North engagement research, there was widespread approval of the environmental ambition, and most customers said they want to see water companies to be ambitious and deliver enhanced protection for the environment, to support nature recovery and achieve sustainable abstraction (44 YW customers). Non-household customers and stakeholders in this research felt that they want water companies to protect what they have in terms of the environment, and once that protection was in place to improve what there is through Biodiversity Net Gain.

In our Land Strategy research, speaking with 108 customers quantitatively there were high levels of support for both the objectives and initiatives in the strategy although, the protection of wildlife and community involvement are two areas raised by customers where they would like to see further action from Yorkshire Water. Objectives tackling environmental issues such as water quality and climate change, as well as initiatives involving trees received the most support and were seen as the most important to customers.

Customers view river and sea health as being important, primarily to support wildlife and so that they look clean. Just under 3 in 4 (of 202 customers consulted in our storm overflows consultation research) feel it's important for river/sea health to be improved to provide healthy habitats.

Earlier this year, we also conducted an extensive programme of research (engaging with 1967 household, future and non-household customers) to gauge levels of support and perceived value for money for all of our proposed enhancement cases. One of which, was a biodiversity non-statutory scheme of local significance under WINEP, our case to further protect the Freshwater Pearl Mussels in the River Esk by improving the river water quality beyond the 'good' status it is currently. Both current and future customers were highly supportive of this enhancement case, with support levels of 87% from household customers and 96% support from future customers and non-households respectively. The majority of all customer groups also agreed that the case represented good value for money, with agreement ranging from 56%

from household customers to 81% from future customers, around three-quarters (74%) of non-household customers agree the case represents value for money.

Customers support the case largely because they feel it's important to help protect rare and endangered species and particularly those that are historically significant to the region. They also feel the amount of investment results in a negligible impact on bills and some customers also believe that the water quality improvements may help benefit other species and wildlife in the Esk too.



# Partnership working

Customers have told us that they want to see us working with and supporting the communities we serve and that partnerships are great way for us to achieve that. In our recent brand campaign research, we held focus groups with our customers examining messages they would like to hear from us. A key theme to emerge was that customers would like to see us engaging in community initiatives that use both our expertise and the support or resources of partner organisations to tackle big issues at a local level such as supporting flood resilience or working with wildlife charities to support environmental projects. 'Direct link' projects that utilise our inhouse expertise were the most popular out of all other community initiatives. This approach was particularly popular as it included partnerships that had an environmental element, such as partnering with the Yorkshire Wildlife trust.

In our 2020 Land Strategy research (where we spoke to 108 customers quantitatively), customers showed very high levels of support for our objective around partnership working, with 86% of customers supporting efforts to try and 'unleash the power of partnerships' and with 83% believing this to be an important aspect of our strategy.

In addition, our previous research shows that customers and stakeholders back partnerships, believing they lead to efficiencies, faster delivery, and innovative solutions. This was evident in the support for the optional Living with Water investment in Hull within our PR24 business plan - our Affordability & Acceptability testing, in this, 78% of customers approved the plan with this investment included. Moreover, the Yorkshire Leaders Board highlighted this collaborative project as a major factor for supporting our plan.

# 1.10 Example of the historical unit-cost benchmarking applied to WINEP categories

Table 1-3: Example unit costs for common biodiversity activities based on quotes provided as part of the PR24 build up

Works	Unit Cost from quotes £ (ex. VAT)
Bracken management (ha)	1236
Tree planting (ha)	8000
Lime and Fertiliser (bags)	15

Stock Fencing (m)	11.58
Tree Planting (ha)	8000
Grip/Gully Blocking: Peat (Dam)	28
Grip/Gully Blocking: Stone (Dam)	175
Heather Cutting (ha)	1030
Rush management (ha)	1030
Sphagnum planting (@1250 plugs per ha) (ha)	812.5
Bunding (ha)	839
Molinia Cutting (ha)	1030
Rhododendron control	200
Sedge/dwarf shrub Plug plants (@2,500 per ha) (ha)	2832.5
Officer time pa FTE	40000
1 km bankside river restoration	10000
1 km in channel river restoration (no machines)	17000
1 km re-meandering	95000
1 ha meadow management	5000

Example outputs from AMP6/7 projects relating to similar outputs that were used to develop costs submitted within the ODR/OAR/ASF process. Please note the partner organisation details have been removed but these can be supplied out of the public domain if required. All projects on the below list were delivered in collaboration with NGO or Local Authority groups rather than consultants and/or Tier 1 partners. Given the complexity of biodiversity projects, please note the outcome for each project is specific to that project and not directly comparable (e.g 170 ha of improved wetland habitat was delivered for £27k YW investment due to the SSSI site requirements being related to tree removal and improved grazing regimes whereas the £21k for 8 ha project was botanically focused and required the collection and then breeding of rare plant seed to facilitate species reintroductions).

#### Table 1-4: Example outputs from AMP6/7 projects

Project	Cost (£)	Habitat (Ha)	Length of river (km)	External match raised (£)
Tophill Reedbed management	33000	8		
Lundwood wetland scrape creation	30000	15		150000
Wombwell wetland scrape creation	10000	3		
Darton Wet woodland management	7000	1		
Otter habitat creation - Sheffield	7000	7		
Hay meadow management - Humberstone	39000	15		
Lea Valley Pond creation	48000	2		

# Yorkshire Water PR24 / Draft Determination Representation

Moss Brook river restoration	5500		3	
Wet Beck river restoration	30000		5	15000
River Severn restoration	8000		0.5	
Rotherham Rivers restoration	35000	27		45000
Wet scrape and NFM creation - Wharfedale	50000	5		
River restoration with angling groups	28000		14	33000
Woodland management	9000	1		
Meadow management	30000	5		44000
Wetland habitat creation	47000	16		10000
River Lune river restoration	19000	5	7	8000
Wader habitat and floodplain management	27000	170		15000
Wetland creation	2000	1		2000
Pond creation	28000	1		
Urban beck restoration	31000		10	17000
River restoration - Dearne	16000		1	8000
Urban wetland creation	48000	1	1	90000
Pond creation	37000		1	
River restoration in channel	50000		9	100000
Wetland habitat creation	39000	2		72000
Meadow management	40000	60		
Driffield Trout Stream restoration	37000	1	1	35000
Reedbed creation	3000	1		
Pond creation	39000	5		
Meadow management	46000	150		
River restoration (Wharfe)	48000		2	
Floodplain habitat management	21000	8		
River restoration	8850		1	117004
Meadow management	2547.2	0.165		
River restoration	36000		7.5	
Moorland restoration	4900	4		
Reed Bed and Reed Fen Creation	5000	5		3800
Wetland creation	9732	6		
Urban beck restoration	4800	5.1		6237

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Pond creation	22000	10		2500
Meadow management	4000	2		
Floodplain habitat management	5700	1	1	14650
River restoration	45605	2	1	72185
Pond creation	49690	0.08	0.5	
Wetland habitat creation	47800	1.78		
Urban river restoration	49940	0.05	0.1	5000
Floodplain habitat management	18040	75		6975
Pond creation	16193.6	2		2000