# Appendix: YKY14\_Letters of support for our PR24 Business Plan



# Navigating this document



This Appendices document is separate to and supports the main business plan document.

#### Links outside of this report

#### **Read more links**

This icon can be clicked on to link to any further documents or resources outside of this report



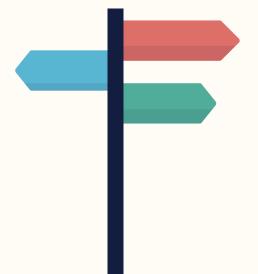
Read more about this at websiteaddress.com or link

#### **Business plan links**

This icon can be clicked on to go to the main Yorkshire Water Business Plan document where more information can be found.



More detail on this subject can be found in Chapter 6: Customer and stakeholder engagement



2

### **Contents**

1.	Letters of support for our PR24 Business Plan	4
1.1	Yorkshire Leaders Board	5
1.2	North York Moors National Park Authority (NYMNPA)	7
1.3	Aire Rivers Trust	9
1.4	Andrew Jones (MP) re: River Nidd	10
1.5	Don Catchment Rivers Trust	11
1.5	Yorkshire Coastal Committee	12

## 1. Letters of support for our PR24 Business Plan

We are pleased to share a number of letters of support for our PR24 business plan from a number of our key stakeholders and stakeholder groups. The letters can be found below.

- 1.1 Yorkshire Leaders Board
- 1.2 North York Moors National Park Authority (NYMNPA)
- 1.3 Aire Rivers Trust
- 1.4 Andrew Jones (MP) re: River Nidd
- 1.5 Don Catchment Rivers Trust
- 1.6 Yorkshire Coastal Committee



Nicola Shaw Chief Executive, Yorkshire Water Via e-mail

12 September 2023

Dear Nicola

Thank you for your engagement with the cross-party Yorkshire and Humber Leaders Board regarding your business plan for 2025-2030. As co-chairs of the Yorkshire Leaders Board, we are writing to provide our final comments on your business plan.

We are pleased that in 2021 Yorkshire Water took the decision to engage with the Yorkshire Leaders Board during your business planning process, and also by your commitment to continue to work with us following submission.

As well as Yorkshire Water reporting to local authority leaders and chief executives at our formal sessions, the use of a regional roundtable group of council officers has allowed in-depth feedback to be provided on a range of issues, from water resource management plans to affordability and vulnerability. This has allowed political and officer feedback on many elements of your plan and has established a successful method of information exchange.

Overall, we are pleased to see that Yorkshire Water has supported our core priorities for the plan, as described in our letter to Ofwat on their Draft Methodology in 2022.

Following our engagement on your draft business plan, please find below additional comment on specific areas within it:

#### Reducing discharges from sewer overflows

The people that we represent want to see swift action to reduce discharges from sewer overflows and so we are supportive of investment to do this, including your ambition to include investment above that required by national guidance.

We would have liked to have seen even further investment across the whole region but would like to place on record our support for investment at the locations which have been selected, which we believe will benefit the region's environment and economy.

#### Investment in schemes under the Living with Water flood mitigation partnership

Partnership working is crucial to reducing flood risk. We are pleased that Yorkshire Water has recognised this in its business plan following our expression of concern last year.

The Living with Water (LWW) partnership in Hull and the East Riding was formed in 2017 and includes Yorkshire Water, Hull City Council, East Riding of Yorkshire Council and the Environment Agency. The partnership has developed detailed plans to improve flood resilience in the region.

We support investment proposals of approximately £25 million within Yorkshire Water's business plan which supports the ambitions of the LWW partnership, including investment in the partnerships' bluegreen plan.

We are also pleased that Yorkshire Water has committed to working in partnership with different councils and partners across the region to continue to take forward flood reduction activity in areas such as Calder Valley, South Yorkshire and the Aire Valley. Over the period between now and 2030 it is important that Yorkshire Water can work flexibly with us to take advantage of joint working wherever possible.



#### **Net Zero**

We understand that enhancement investment in reaching Net Zero may be at risk of removal from your business plan by your regulators. We would strongly oppose the wholesale removal of schemes which help reduce the carbon footprint of Yorkshire Water in our region.

It is in the interest of our residents for the carbon footprint of the Yorkshire region to be reduced, and we would therefore wish to see this investment approved.

#### Bill increases and support for customers in vulnerable circumstances

You have explained that Yorkshire Water will increase support available to customers, both through doubling the number of people receiving your social tariff, Water Support, between 2022 and 2030 and greatly expanding your Priority Services Register in future years. This extra support is critical and welcome given the severe challenges that households are facing.

Nonetheless, we have been consistently clear on our concerns that predicted increases in bill levels, alongside increases in the wider cost of living, are likely to impact the most vulnerable residents in Yorkshire the hardest. We have met with you twice in recent days and discussed those concerns in some detail.

You have explained the evidence that has led to your decision to introduce a single increase; however, we cannot support either:

- the level of overall increase; or
- the decision to implement the full bill increase in the first year of the term of the business plan, followed by flat amounts subject to inflationary increases in future years.

We feel that this would place severe financial pressure on a significant number of our residents who are dealing with many challenging situations at this present time.

#### Conclusion

We look forward to working closely with Yorkshire Water during the final stages of business planning, as well as continuing our wider partnership working to increase benefits to Yorkshire.

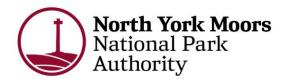
Should you have any questions regarding the content of this letter then please do make contact.

Yours sincerely

Cllr Carl Les and Cllr Sir Stephen Houghton CBE Co-Chairs of the Yorkshire Leaders Board

Email: yhcouncils@wakefield.gov.uk





Your ref:

Our Ref: TH

Date: 28 June 2023

Ms Nicola Shaw CBE Chief Executive Yorkshire Water Western House Western Way Bradford BD6 2SZ

Dear Nicola

#### **Letter of support for Business Plan investment commitments**

Please consider this letter confirmation of support for commitments in your business plan for Asset Management Period 8 (2025-2030), specifically, the proposed project to reduce phosphorus in treated effluent at Danby Wastewater Treatment Works (WwTW).

There is a rare population of Freshwater Pearl Mussels on the River Esk, downstream of Danby WwTW, which we have been working over a number of years to conserve. Unfortunately, our ongoing monitoring of the population has identified Danby WwTW as one of several elements that is likely impacting on the ability of this critically endangered species to thrive.

We recognise that water quality is at Water Framework Directive 'Good ecological status' and therefore would not normally qualify for such investment, but the existing water quality standard is not adequate as pristine water quality is required for Freshwater Pearl Mussels (and their host salmonid fish species) to survive and successfully recruit. Therefore, investment over and above normally accepted standard is essential to allow this population to be sustainable.

The River Esk is the only river in Yorkshire, and one of only a handful nationally, where the Freshwater Pearl Mussel can still be found. The Esk & Coastal Streams Catchment Partnership has produced a strategy to conserve the Freshwater Pearl Mussel, supporting the planned release of captive bred Esk mussels currently housed at the Freshwater Biological Association captive breeding facility in Windermere.

Continued...

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







As defined by the Esk Freshwater Pearl Mussel Strategy, water quality improvements are required before juvenile Esk mussels can be returned to the river, to help restore this under threat and critically endangered population to a sustainable level. Therefore, the phosphorus removal at Danby WwTW (by using metal salts dosing and precipitation), proposed in your business plan would be incredibly beneficial for Freshwater Pearl Mussels by helping to reduce nutrient overload in the watercourse as well as reducing sediment inputs.

We have discussed this case in person, and I was pleased by Yorkshire Water's commitment to supporting our ambitions in this area. Should you require evidence of our support for your proposed works then please do feel free to use a copy of this letter. I would also be pleased to arrange for the provision of additional evidence to your regulators if required.

Yours sincerely

Russ Hind

Tom Hind

**Chief Executive** 



Aire Rivers Trust
Albion Mills Business Centre,
Albion Road,
Greengates,
Bradford BD10 9TQ
05 September 2023

fao Nicola Shaw Yorkshire Water Services Western House Western Way Bradford BD6 2SZ

Dear Nicola,

#### **Support for YWS proposals in AMP8**

Through our ongoing partnership work with Yorkshire Water, I have had the opportunity to review the proposed investment within your draft business plan for 2025-2030. Given the information shared with me, I wanted to confirm our support for your proposals to include additional investment relating to the topics below:

- 1) Achieving Net Zero by 2030.
- 2) Continuing support for the 'Living with Water' partnership, including the delivery of the blue-green plan.
- 3) Combined Sewer Overflow improvements relating to current or potential Bathing Waters, as well as coastal overflows.

We are pleased to have been included in these consultations and to have had the opportunity to look in some detail at your proposals. We also understand that these are, in principle, supported by your customer surveys and we find it encouraging that customers are prepared, in principle, to pay the relatively small amount extra involved in going beyond statutory requirements in these areas.

Your proposals align with our own aims, and indeed those of the wider Rivers Trust movement, which has urged companies to 'do more, sooner' in their efforts to improve the environment. We also note that the additional costs associated with these items is relatively insignificant compared to the overall increase being driven by statutory requirements.

Sef Ruch

**Geoff Roberts** 

Chairman 01274 061902 | 07989 309349 geoff.roberts@aireriverstrust.org.uk

#### **ANDREW JONES MP**

Harrogate & Knaresborough



HOUSE OF COMMONS
LONDON SW1A 0AA

Nicola Shaw CBE Chief Executive Officer Yorkshire Water By email.

8 September 2023

Dear Nicole,

#### Yorkshire Water investment in overflow discharge reduction on the River Nidd

We have spoken previously regarding my campaign for a bathing water to be designated on the River Nidd at Knaresborough Lido. There is considerable support for this proposal amongst local people and businesses many of whom are actively supporting the process of applying for designation.

It was good to meet you at the Nidd earlier in the year and I am grateful that Yorkshire Water have decided to include additional investment on the Nidd in their business plan for 2025 to 2030. I understand the plan is to be submitted in October.

Specifically, I welcome that these proposals include investment in the following Yorkshire Water assets to meet targets for bathing water locations set out in the Storm Overflow Discharge Reduction Plan:

- ABBEY ROAD/NO 2 CSO
- WATERSIDE 47/CSO
- WATERSIDE 48/CSO
- WATERSIDE 49/CSO
- BOROUGHBRIDGE ROAD/CSO
- CRAGG TOP/CSO
- ABBEY MILL/CSO
- SPITAL CROFT/CSO

Yours sincerely,

I understand that as the River Nidd in Knaresborough is not currently a designated bathing water the requirements are non-statutory and subject to customer support as well as review by both the Environment Agency and Ofwat. I am therefore pleased to confirm my support for this additional investment which I know has strong local backing and I am happy to provide evidence to demonstrate this.

Please let me know I can be of any assistance and thank you once again for your ongoing attention to this issue.

Andrew Jones MP

Constituency office: 57 East Parade, Harrogate, HG1 5LQ 01423 529614 andrew.jones.mp@parliament.uk



Don Catchment Rivers Trust Churchill Business Centre Churchill Road Doncaster South Yorkshire DN2 4LP 11<sup>th</sup> September 2023

> fao Nicola Shaw Yorkshire Water Services Western House Western Way Bradford BD6 2SZ

Dear Nicola.

#### **Support for YWS proposals in AMP8**

I am writing to confirm the Don Catchment River Trust's support for the proposals presented within your draft business plan for 2025-2030 on additional investment relating to achieving net zero by 2030, continuing support for the 'Living with Water', and Combined Sewer Overflow improvements.

Not only do these proposals overlap with our own aims as a charity, but we also believe they serve the interests of the people of Yorkshire as a whole. The water sector is one of the most energy-intensive industries in the UK, and given the urgent need to decarbonise the economy then YW's efforts to achieve net zero should be a top priority. Many areas of Yorkshire are at risk of flooding, including large parts of the Don Catchment, and we need all stakeholders that can influence flooding to pitch in to reduce this risk. There is also huge popular demand within our region for improvements to be made to the issue of sewage discharges from CSOs. People in Yorkshire want to feel good about their rivers, and this is important if we are to unlock the huge potential of river corridors as green-blue infrastructure that enhance rather than detract from communities.

The additional costs associated with YW's proposals are trivial compared to the overall cost of a water bill, and the cost of inaction will be greater to us all in the long run.

Yours sincerely

E. Shaw

E Shaw, Managing Director Don Catchment Rivers Trust





Churchill Business Centre, Churchill Road, (off Wheatley Hall Road), Doncaster DN2 4LP

Tel: 01302 439081 Email: info@dcrt.org.uk



#### Yorkshire Regional Flood and Coastal Committee

c/o YRFCC Secretariat Environment Agency Lateral, 8 City Walk, Leeds, LS11 9AT Telephone: 07786 523779

E-mail: <a href="mailto:yrfcc@environment-agency.gov.uk">yrfcc@environment-agency.gov.uk</a> direct: colin.mellors@york.ac.uk

21 September 2023

Nicola Shaw Chief Executive Yorkshire Water

#### via email

#### Dear Nicola

I am writing, as Chair of the Yorkshire Regional Flood and Coastal Committee (YRFCC), to express support for Yorkshire Water's AMP8 submission.

The YRFCC oversees investment in Flood and Coastal Risk management across. Yorkshire region - a task that is highly dependent on collaboration between the Environment Agency, local authorities and other Risk Management Authorities. Yorkshire Water is a crucial partner and the Committee has both encouraged, and been impressed by, the *Living with Water* and, more recently, the *Connected by Water* partnerships in East and South Yorkshire respectively. These partnerships are widely recognised as national exemplars in tackling integrated flood risk. Their work is characterised by a layered and strategic approach - delivering new and innovative infrastructure alongside optimising existing assets. Extensive community engagement has been critical to the work -increasing awareness, enabling the co-creation of schemes with strong local buy-in, and promoting personal flood resilience.

It is pleasing that the AMP8 submission signals a commitment to building further on the work already being delivered through AMP7, whilst also providing a basis for rolling out a similar approach in West and North Yorkshire. The YRFCC strongly endorses such aspirations and representatives of Yorkshire Water are active, and welcome, attendees at YRFCC meetings and its component sub-committees.

A key aspect of the Committee's remit is to encourage all Risk Management Authorities to work in partnership, both to align objectives and to deliver more efficiently. One of the lessons learned through AMP7 delivery is the importance of the closest possible alignment - of policies, processes and schemes – when addressing all sources of flood risk in order to ensure that we make the most effective use of all available funding, not least investment in nature-based solutions that address flood risk, alongside (rather than separate from) water quality and biodiversity.

The latter imperative can be illustrated when water companies do not focus on underground tanks as the means of delivering water quality improvements but also explore the multiple benefit solutions that can be achieved through working closely with other Risk Management Authorities on alternative approaches. Whilst underground storage tanks may address some of the ongoing issues, they are less consistent with Schedule 3 of the Flood and Water Management Act that is seeking to achieve above ground, green sustainable drainage and movement away from exclusively underground infrastructure.

I hope that this letter is helpful and underlines our commitment to working in partnership with Yorkshire Water and other key RMAs on these important issues.

**Professor Colin Mellors** 

Col. Melly

**Chair, Yorkshire Regional Flood and Coastal Committee**