

From: EIR Compliance

To:

Subject: 20260625 – EIR – Response

Date: 25 June 2026 16:00:00

Reference Number: EIR

Dear

We refer to your request for information submitted to Yorkshire Water dated 28 April 2026:

"I am writing to request information regarding your involvement in the Hebden Bridge Flood Alleviation Scheme (FAS), particularly in relation to surface water management and drainage infrastructure.

Publicly available documentation indicates that earlier iterations of the scheme (2017–2022) included surface water mitigation measures, including drainage infrastructure and a proposed pumping station. However, the scheme that has progressed through planning approval in 2025 appears to have removed or deferred these elements, with the scheme now described as predominantly fluvial in nature.

Given Yorkshire Water's role as the statutory undertaker responsible for wastewater and drainage infrastructure, I request clarification on the following:

1. Involvement in Scheme Design

Please confirm whether Yorkshire Water was consulted or involved in the design or assessment of surface water mitigation measures within the Hebden Bridge Flood Alleviation Scheme, including any proposed pumping stations, drainage systems, or discharge arrangements.

2. Technical Constraints and Advice

Please provide details of any technical advice, constraints, or concerns raised by Yorkshire Water in relation to:

- Sewer capacity;*
- Network connections;*

- Discharge limitations;
- Infrastructure conflicts;
- Requirements for upgrades or diversions;

in connection with the proposed surface water elements of the scheme.

3. Influence on Scheme Scope

Please confirm whether any advice, requirements, or constraints provided by Yorkshire Water contributed to the removal, modification, or deferral of surface water mitigation measures from the scheme.

4. Records and Correspondence

Please provide copies of:

- Correspondence between Yorkshire Water and the Environment Agency;
 - Meeting notes or technical discussions;
 - Consultation responses;
- Modelling outputs or technical assessments;

from January 2020 to December 2024 relating to the Hebden Bridge Flood Alleviation Scheme.

5. Current Position

Please confirm Yorkshire Water's current position on surface water management within Hebden Bridge, including whether existing infrastructure is considered sufficient to accommodate flood mitigation measures, or whether further works would be required.

Given the importance of integrated flood risk management and the interaction between fluvial and surface water systems, clarity on the role of utility infrastructure in shaping the scheme is essential.

Included with this email are the response to your questions:

Question 1:

Yes, we have been in close consultation with EA and there has been significant assessment of impacts on our asset base.

Question 2:

Please refer to FAS planning application in the public domain.

Question 3:

This information is readily available in the public domain via the Eye on Calderdale FAQs 'Why was the surface water scope descoped?'

Question 4:

- **Correspondence between Yorkshire Water and the Environment Agency;**

We have carefully considered this request and recognises that it relates to a legitimate public interest issue concerning surface water management and drainage infrastructure. However, we consider that complying with the request would be manifestly unreasonable under regulation 12(4)(b) of the Environmental Information Regulations 2004. Although the request is defined, responding in full would require extensive searches across multiple systems and teams for external correspondence over the period. As a result, we would be required to engage multiple departments across the business to establish whether any relevant information is held, and to undertake a manual, document-by-document review to determine the relevance of any material identified. In applying the public interest test, we recognise the strong public interest in transparency, flood resilience and understanding how risks to infrastructure are identified and managed. However, this must be balanced against the public interest in ensuring that the company can continue to carry out its core functions effectively. On balance, we consider that the public interest in maintaining the exception outweighs the public interest in disclosure in this instance.

Meeting notes or technical discussions

We have been advised that we do not record meeting minutes. As such for the purposes of paragraph 12(4)(a), a public authority may refuse to disclose information to the extent that it does not hold that information when an applicant's request is received.

- **Consultation responses;**

Please refer to FAS planning application in the public domain.

- **Modelling outputs or technical assessments;**

We are writing to inform you that your request for environmental information has been partially refused in accordance with the Environmental Information Regulations (EIR) 2004. Under Regulation 12(3), this refusal is based on the grounds that the requested information constitutes personal data relating to an individual other than the applicant within the modelling data. Protecting the privacy and personal data of individuals is a fundamental principle, and as such, the provision of this information would contravene the data protection principles set out in Regulation 13. Regulation 13 stipulates that personal data shall not be disclosed if the release of such information would contravene any of the data protection principles in the UK GDPR or the Data Protection Act 2018.

Question 5:

For your information, the definition of environmental information we have used, given as Regulation 2(1), is reproduced below:

- (a) The state of the elements of the environment, such as air and atmosphere, water, soil, land, landscape and natural sites including wetlands, coastal and marine areas, biological diversity and its components, including genetically modified organisms, and the interaction among these elements;
- (b) Factors, such as substances, energy, noise, radiation or waste, including radioactive waste, emissions, discharges and other releases into the environment, affecting or likely to affect the elements of the environment referred to in (a);
- (c) Measures (including administrative measures), such as policies, legislation, plans, programmes, environmental agreements, and activities affecting or likely to affect the elements and factors referred to in (a) and (b) as well as measures or activities designed to protect those elements;
- (d) Reports on the implementation of environmental legislation;
- (e) Cost-benefit and other economic analyses and assumptions used within the framework of the measures and activities referred to in (c); and

- (f) The state of human health and safety, including the contamination of the food chain, where relevant, conditions of human life, cultural sites and built structures inasmuch as they are or may be affected by the state of the elements of the environment referred to in (a) or, through those elements, by any of the matters referred to in (b) and (c).

We trust that the provision of this data satisfies your request. In accordance with the Environmental Information Regulations 2004, if you are not satisfied with this reply to your request you can ask for an internal review. A request for an internal review must be submitted within 40 working days by contacting the Data Protection Team.

Thank you for contacting Yorkshire Water.

Yours sincerely,

Data Protection Team

Email: EIR@Yorkshirewater.co.uk