Statement of Response

January 2023

Statement of Response

Introduction

We published our draft Drainage and Wastewater Management Plan 2024 (dDWMP24) and our Strategic Environmental Assessment (SEA) for consultation on 30 June 2022. This, which can be found via this link: https://www.yorkshirewater.com/about-us/drainage-and-wastewater-management-plan/
The consultation closed on 23 September 2023. This document sets out how we have taken account of our consultation responses and the changes we will be looking to incorporate into our plan before the final document is published on 31 May 2023.

Statutory consultees and interested parties most likely to be affected by our plan were notified of the consultation directly by email. We produced technical and non-technical summaries alongside a customer summary of our plan. We also included a range of storyboards and offered access to our interactive GIS Hub to help our stakeholders and customers navigate and visualise the information within the plan.

In response to this consultation, we received a number of responses on our dDWMP24 and Strategic Environmental Assessment. Responses were received from our regulators Ofwat and the Environment Agency and a number of other stakeholders including the Consumer Council for Water (CCW), Natural England and Historic England, a number of Rivers Trusts, five local councils, a catchment-based partnership, a National Park and eleven customers. Ofwat and the Environment Agency provided full written responses to our dDWMP24, with a number of recommendations for improvements in their response. This was also followed up by a multi-agency feedback session facilitated by Defra, which CCW also attended.

Following the consultation, we are working to produce our final DWMP24. We will complete our Habitats Risk Assessment (HRA) alongside the Strategic Environment Assessment, incorporating any consultation feedback relevant to these ahead of publication alongside the final DWMP in May 2023.

There are a number of key themes included in the responses received. These are:

- Importance of partnership working.

- Support for a Best Value Plan (BVP) approach.
- Requirement to demonstrate compliance with all aspects of the Storm Overflows Discharge Reduction Plan (SODRP[1]).
- Provide increased clarity on the short, medium, and long-term elements of our plan.
- Support for reducing the levels of flood risk at properties.

Figure 1, Figure 2 and Figure 3 show some of the outcomes from our consultation survey.

Figure 1 - Consultation Responses Summary

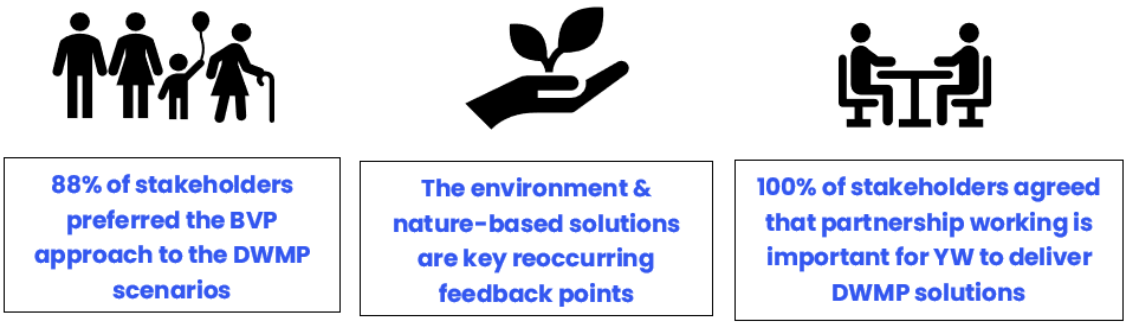
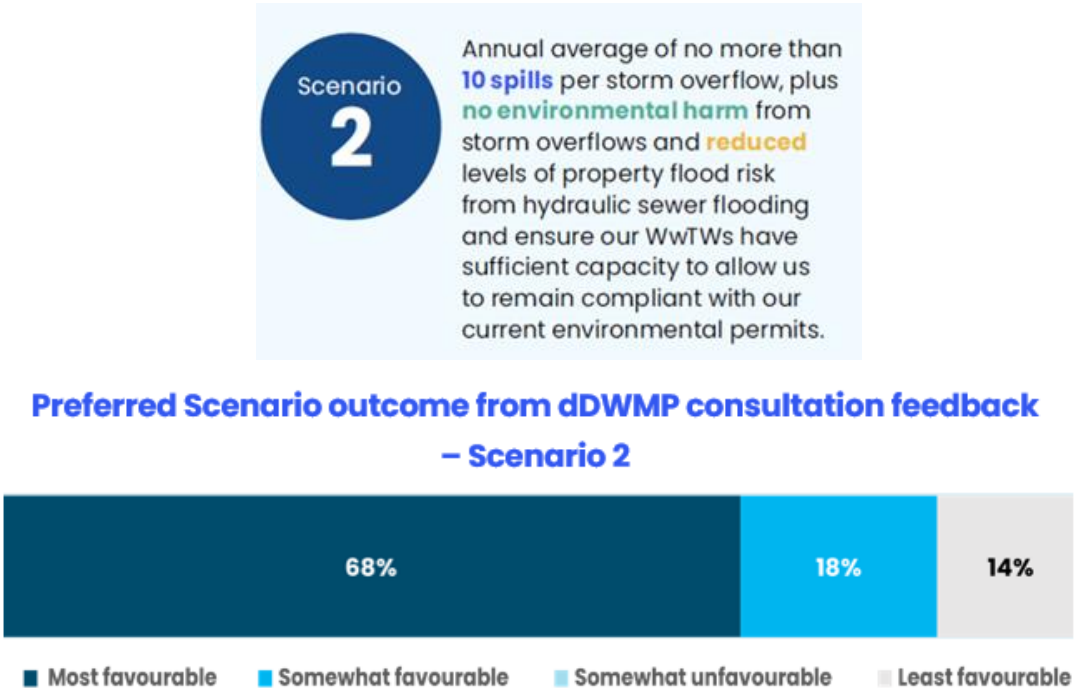
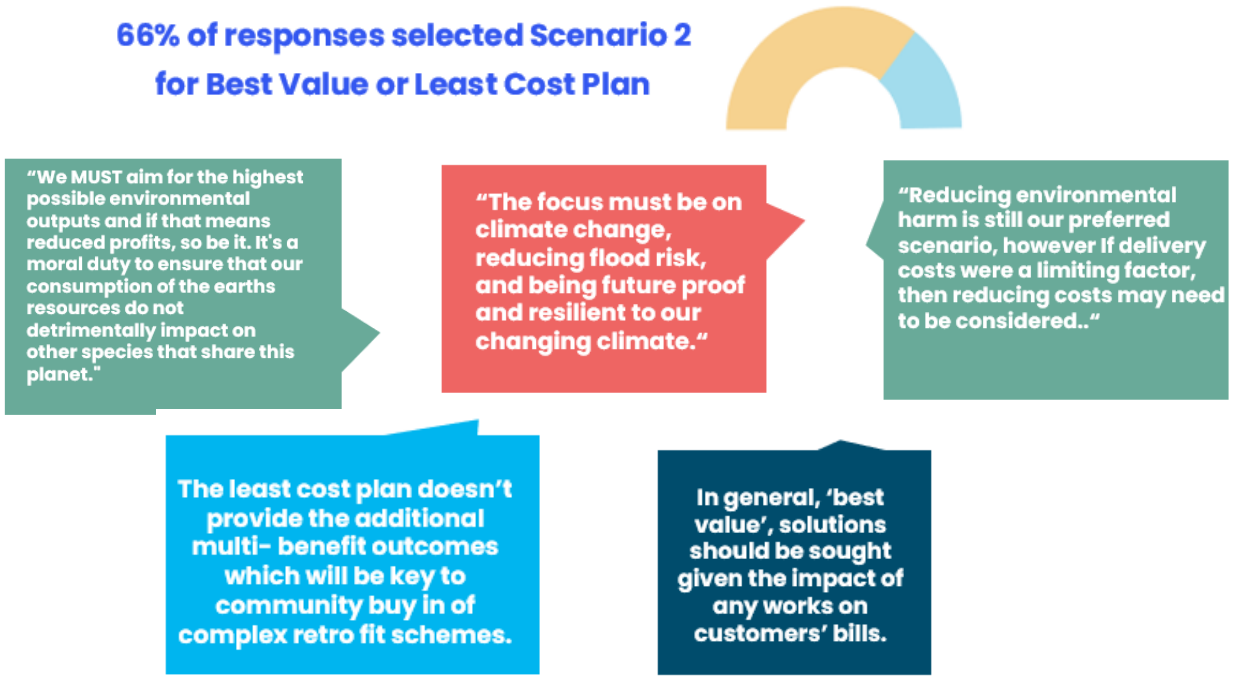


Figure 2 - Preferred Scenario Feedback



[1] https://www.gov.uk/government/publications/storm-overflows-discharge-reduction-plan

Figure 3 - Support for Scenario 2 Best Value Plan (BVP) or Least Cost Plan



We have considered each of the comments made in the responses and how we should address them. Table 1, Table 2, Table 3 and Table 4 provide our response to each individual comment and how this will be addressed in the final plan as appropriate.

In addition to the individual response to our draft DWMP consultation received from Ofwat, a letter to all water companies was issued on 11 October 2022 providing Ofwat's industry overview of draft Drainage and Wastewater Management Plans[2]. A high-level summary of the comments and feedback themes within this industry overview are summarised below:

Ofwat Industry DWMP Comments

- Company plans on storm overflows are lacking. All or part of the UK government's storm overflow targets have not been included in the DWMPs for English water companies.
- There is insufficient evidence to support the investment needs and inadequate development of costs and benefits of solutions, particularly for schemes with multiple benefits.

[2] https://www.ofwat.gov.uk/publication/letter-to-water-companies-ofwats-industry-overview-of-draft-drainage-and-wastewater-management-plans-2022/

- There is a lack of ambition in prioritising improvements from base expenditure, and prioritising nature-based solutions or surface water separation options.
- There is a lack of focus and maturity in partnership solutions.

We have taken the comments from the industry overview into consideration in the development of our final DWMP. These are broadly aligned with the individual feedback points we received from Ofwat, outlined below, and we have provided responses to these within our Statement of Response. We have not provided further individual responses to the comments within the industry overview.

Ofwat YW DWMP Bespoke Feedback Themes

- Overall Plan Quality – planning objectives and risk assessment
- Decision Making and Option Appraisal
- Storm overflow reduction plan
- Costs, funding and affordability considerations
- Stakeholder engagement
- Assurance and Governance

This feedback requires us to include all aspects of the storm overflow discharge reduction plan within our DWMP for all storm overflow assets. It also asks us to provide more granular detail on costing and bill impacts of our final plan alongside provided a fully assured plan.

Within their response to our consultation the Environment Agency (EA) provided a covering letter, executive summary and supporting document entitled Annex 1. We have responded to the detailed comments included within Annex 1 below as this provided the greatest level of detail. The EA feedback themes were broadly consistent with Ofwat's feedback. There were a few differences within the EA feedback, and this included feedback on groundwater, climate change and enhancing our stakeholder engagement. The EA wanted us to ensure we were including all aspects of impacts to groundwater in our plan, that we considered carbon impacts in our solutions and that we work with the EA closer in cycle 2 to embed a more joined up stakeholder engagement plan.

Tables of Responses

Table 1 - Ofwat

Topic/Area	Ofwat Feedback	YW Response
Overall DWMP plan quality: planning objectives and risk assessment	We consider that your dDWMP is generally well structured and technically well developed. It broadly follows the technical framework and includes the expected documentation. Helpfully, it included relevant information in the L2 and L3 storyboards, which provides useful background to your RBCS principles and BRAVA outcomes.	We welcome this feedback and will continue this approach into the final document and enhance where necessary.
Overall DWMP plan quality: planning objectives and risk assessment	We consider that your plan demonstrates a good understanding of the purpose and application of adaptive planning, and adaptive considerations appear to be driving the prioritisation of low-regret interventions. We note that you specify two planned alternative pathways where triggers are based on costs and technologies. However, it is unclear how the assessment of external uncertainties such as climate change and growth has been reviewed as part of this process. In your final DWMP, you should use a range of scenarios to optimise investment needs against a range of likely futures; this should also include the common reference scenarios	As part of our final DWMP, we will undertake sensitivity analysis on the impact of different climate change and growth scenarios aligned with the common reference scenarios, on our plan.

Topic/Area	Ofwat Feedback	YW Response
Overall DWMP plan quality: planning objectives and risk assessment	We note that you have reviewed your asset optimisation and maintenance requirements and described them in your dDWMP as "business as usual". However, it is unclear from your plan how these maintenance elements will be implemented and monitored for the short-medium-long term in your region, or how they might contribute to reducing risks you have identified. You should clearly set out how asset management and optimisation (base expenditure activities) can address some risks, such as providing additional hydraulic capacity headroom in the system, as part of a hierarchy of options, before recommending enhancement schemes. You should ensure that you continue to be able to meet all legal obligations, both now and in the future	Our plan was focused on the hydraulic elements of the sewer network and assets. We will work to incorporate asset health, system optimisation and maintenance into our final DWMP.

Topic/Area	Ofwat Feedback	YW Response
Decision making and option appraisal	In determining options to manage current or future uncertainties, our pre-consultation feedback to companies recommended that evidence for their preferred best value solutions is presented alongside alternative options, such as least cost. This was to demonstrate the incremental benefits and associated costs that a range of solutions could deliver and to understand the basis for pursuing certain solutions while rejecting others. We note that you have provided a cost estimate for both approaches (best value and least cost approach) for all four scenarios, but in most cases, you have not clearly explained the detail on how you have determined these costs. This should be included in your final DWMP.	We will seek to add further detail on how our costs have been built up within our final DWMP. The costs for both the best value plan and least cost plan will change between draft and final due to the incorporation of all elements of the SODRP, amongst other changes.
Decision making and option appraisal	As DWMPs look holistically at a range of risks and mitigations at catchment levels, we expected companies to provide sufficient evidence in respect of costs and benefits of solutions, particularly schemes that will deliver multiple benefits. We note that you have used an SEA framework to assess the benefits of generic options and that you have attempted to define the benefits associated with best value on a qualitative basis, but you should develop your approach further in your final plan to quantify the multiple benefits of solutions.	We are working to provide more detail around the multiple benefits delivered by our plan within the final publication.

Topic/Area	Ofwat Feedback	YW Response
Decision making and option appraisal	We consider that there is insufficient convincing evidence on why alternative options were discounted, although we note that you state that your decisions are informed by customer preferences and research. Your final DWMP should provide evidence why preferred solutions were chosen over others in order to clearly demonstrate that the right, long-term options have been selected.	We have evaluated 2 options for this strategic plan - one detailing surface water removal in combination with traditional storage solutions and the other focused on traditional storage solutions only. Programme Appraisal via our Decision-Making Framework (DMF) selects the preferred solution linked to benefits for our Best Value Plan. During capital delivery, optioneering will be revisited with improved data resolution to enable selection of the best solution. This may differ from that promoted at the strategic stage.

Topic/Area	Ofwat Feedback	YW Response
Decision making and option appraisal	In our pre-consultation feedback, we stated the importance of considering where nature-based or green solutions could address the risks identified. This is a key consideration in the DWMP Guiding Principles and the Defra storm overflow discharge reduction plan. We asked that companies clearly explain why green solutions would not be feasible. In your dDWMP, you primarily refer to SuDS and a variety of nature-based solutions which slow the flow and create more effective space for water. You explain that the requirements to deliver priority storm overflow solutions, while considering affordability and deliverability, may mean that you start on a core pathway of least cost investment and there is a risk that your plan is likely to prioritise grey over green solutions in the short term. You also explain how your plan can adapt to deliver the most efficient and beneficial outputs for all, and that once some of your defined uncertainties become clearer, the gap between your best value plan and the least cost plans should start to converge. We are concerned that your approach will drive mainly grey solution options and fail to consider longer-term, best value nature-based opportunities. In your final DWMP you should provide clear evidence and rationale for discounting nature-based options.	There are some situations where physical constraints, delivery timescales and uncertainty associated with solution outcomes that mean blue-green solutions would not be appropriate. We will endeavour to detail in our final DWMP where this may apply. As part of our adaptive planning approach, we recognise the challenge of moving from the least cost plan that drives mainly grey infrastructure solutions to a best value plan with a higher proportion of green solutions. In our final DWMP, we will set out our commitment to delivering blue-green solutions more clearly, for example, our AMP8 SODRP has 20% of its solutions with an element of blue-green contained within it and we will work to increase this percentage over time.

Topic/Area	Ofwat Feedback	YW Response
Decision making and option appraisal	The DWMP technical guidance and the DWMP Guiding Principles state that companies cannot develop plans which deliver their full potential without the input of other stakeholders. Some risks and solutions identified in the DWMP planning process, such as surface water removal or separation, rely heavily on joint working with local authorities and other risk management authorities (RMAs). We note your approach of engagement and collaboration with RMAs and other stakeholders. We also note that you have the experience of working in collaborative partnership schemes, such as your Living with Water partnership to manage different aspects of flood risk in the Hull area, which should provide you with the experience to help you to develop future opportunities. However, it is unclear to us at this stage whether some of your proposed opportunities will materialise. In your final DWMP you should provide further detail on the likelihood of your partnership schemes going ahead, including timelines for delivery and the split in funding contributions, and be clear on the rationale for not progressing such schemes, where applicable.	Whilst we will always strive to work in partnership, funding opportunities and appropriate schemes are not always readily available, or timescales not suitably aligned to allow for partnership working. Planning of smaller partnership schemes is much more short term and opportunistic in nature. Longer term strategic partnerships including Living with Water and Connected by Water provide frameworks for longer terms plans and investment. We will be considering other opportunities in our region to develop these types of strategic partnerships. We have a number of established partnership schemes already in delivery. We will work to use the learnings from these partnerships to incorporate reactive partnership opportunities and streamline our processes to allow more opportunistic partnership investment. Where we have identified partnership schemes, we will be including these within our data tables.

Topic/Area	Ofwat Feedback	YW Response
Storm Overflow Discharge Reduction Plan (SODRP)	We expect companies in England to make rapid progress in addressing storm overflow spills and meet the targets in Defra's storm overflow discharge reduction plan. Companies must ensure that they are complying with their obligations under section 94 of the Water Industry Act 1991 as supplemented by the Urban Waste Water (England and Wales) Regulations 1994. With regards to Defra's storm overflow discharge reduction plan, we acknowledge that storm overflow targets are a dominant feature of your dDWMP. We note that you have developed four scenarios based on the less than 10 spills target in your region. However, it is not clear how you plan to deliver against these commitments. We expect to see a more detailed and robust timeline (showing milestones and prioritisation) and evidence on the costs for these storm overflow schemes in your final DWMP.	We intend to meet the requirements of the SODRP and have included within our WINEP24 proposals, an AMP8 plan for storm overflow reductions which is aligned to these requirements. Our final plan will set out our medium and longer-term plans to meet all the SODRP requirements over the next 25-years. We will endeavour to provide more detail on costing of these options and any multi-benefit opportunities within our final plan. We acknowledge our wider duties in respect of management of the wastewater network and its contents and will reflect this in our final DWMP.

Topic/Area	Ofwat Feedback	YW Response
Storm Overflow Discharge Reduction Plan (SODRP)	The DWMP Guiding Principles and the Defra's storm overflow discharge reduction plan state that companies are expected to consider green infrastructure, nature-based and low-carbon solutions to mitigating risks, where possible. In your plan you consider nature-based options for storm overflow reductions and use a six capitals approach to form a holistic view when optioneering. However, we are unclear how your optioneering and decision-making supports this ambition. You should provide clarity on this in your final DWMP, along with the rationale as to why green options have been discounted.	As per our hierarchy of solutions we have prioritised green infrastructure and inclusion of impermeable area reduction within our option development and optimisation stages. During capital delivery, optioneering will be revisited with improved data resolution to enable selection of the best solution. We will provide additional clarity on this in our final plan.
Storm Overflow Discharge Reduction Plan (SODRP)	Your scenarios did not include details for the requirements to screen discharges and monitor water quality, but we note that you plan to review these elements further in your final DWMP. Also, we could not find sufficient and convincing evidence on how you have assessed the bathing water target. As your dDWMP does not include evidence on how these will be achieved, we are unclear on the scale of the investment required and your ambitions around delivery. Therefore, you should provide detailed evidence on your approach, costings and milestones to achieve these requirements as part of your final plan.	The full SODRP will be incorporated in the final DWMP, alongside costings, phasing, and ambitions for delivery. This will include screening, monitoring, and inland and coastal bathing water requirements.

Topic/Area	Ofwat Feedback	YW Response
Costs, funding and affordability considerations	In line with the DWMP Guiding Principles, and the UK Government's strategic policy statement for Ofwat we expect your plan to be affordable and take account of customers' priorities. Costs should indicate the impact on affordability of bills. It is not clear from your dDWMP what the potential future bill impacts could be for your region. We did not see sufficient and convincing evidence that transparently sets out the costs required to address customers' priorities and other necessary elements of your plan. We expect you to set out a range of scenarios and the likely impact on affordability and bills for customers and stakeholders so that they understand how you are considering their best interests when proposing your DWMP options. For your final plan you should explain the range of costs and bill impacts associated with addressing customers' priorities for your overall preferred best value plan	We will consider bill impacts of our range of costs and scenarios within the final DWMP and set this out transparently.

Topic/Area	Ofwat Feedback	YW Response
Costs, funding and affordability considerations	We expected by this stage in the planning process that companies would have set out information on affordability and bill impacts so that we have a clearer understanding of how future risks would be addressed through base expenditure allowances and what would require enhancement funding. We note that your plan refers to a number of activities under 'business-as-usual' and you are considering installing intelligent systems for a more proactive operation and maintenance regime. However, it is not clear in your dDWMP how you differentiate between what are base maintenance or enhancement requirements and the improvements that you are expecting through base expenditure.	Further information will be provided on this within the data tables, associated narrative and final DWMP.
Costs, funding and affordability considerations	We asked companies to provide details of significant, material investment requirements, such as tackling storm overflows, in draft and final DWMPs and PR24 business plans. We note that in your dDWMP you have provided your provisional view and set out your ambition around storm overflows as part of your four different scenarios. In your final plan you should provide further clarity around the timeline and costs required to deliver against this target, and any other significant and material investment needs.	We will seek to demonstrate and provide clarity on our plan, costs, and timescales to deliver against targets within our final DWMP. The requirements will be reflected in our Long-Term Delivery Strategies.

Topic/Area	Ofwat Feedback	YW Response
Stakeholder engagement	We acknowledge the work that you have done to seek the endorsement from different strategic partners and stakeholders	We will continue to work with our customers and stakeholders ahead of the publication of our final DWMP to ensure levels of engagement are appropriate.
Stakeholder engagement	In our pre-consultation feedback, we recommended that companies considered following up with stakeholders to ensure they understood the information being presented to them, and that companies continued to engage effectively with stakeholders throughout the remainder of the planning process. We note that your stakeholder engagement has shaped some elements of your plan and influenced some of your planning objectives. However, it is not clear whether the feedback that you have received to date, represents a wide range of stakeholders necessary for a more meaningful outcome. You should consider the responses to your dDWMP consultation and explain how these have influenced your final DWMP	We will seek to incorporate where applicable the feedback received during the consultation on our draft DWMP within our final DWMP. This statement of response outlines the feedback received from all parties and how we are utilising this feedback to develop and shape our final plan.

Topic/Area	Ofwat Feedback	YW Response
Assurance and governance	As set out in a joint letter to companies, we requested an assurance statement from companies' Boards that the dDWMPs published for consultation followed the DWMP Guiding Principles (https://www.gov.uk/government/publications/drainage-and-wastewater-management-plans-guiding-principles-for-the-water-industry/guiding-principles-for-drainage-and-wastewater-management-plans) and the DWMP technical framework (which amongst other things says that companies must take account of legal requirements), met all defined planning objectives, linked to partnership opportunities that will be put forward in PR24, addressed the storm overflow reduction plan, and gave best value options based on robust evidence. We could not find a full Board assurance statement for your dDWMP, but we note that you refer to your continuous liaison with your Board to consult on your dDWMP and you have also appointed an external provider to assure the development of your dDWMP. You should ensure that a full Board Assurance statement is provided as part of your final DWMP submission, and we would welcome confirmation of any additional assurance provided on your final plan.	We will be providing a fully assured plan accompanied by a Board Assurance statement for our final DWMP. We appointed a third-party to provide independent assurance of our draft DWMP. Independent third-party assurance of our final plan will also be completed to support the Board in provision of the Board Assurance Statement for the final DWMP.

Table 2 - Environment Agency

Topic/Area	Environment Agency Feedback	YW Response
Stakeholder engagement	The Water UK framework and Defra's guiding principles place significant emphasis on engaging and collaborating with stakeholders during the development of the DWMP, with the additional expectation of co-created solutions. We were disappointed that Yorkshire Water's stakeholder engagement did not follow the framework or guidance. Yorkshire Water's main engagement method has been their ArcGIS hub, that over 100 individual users representing around 30 organisations had access to. However, we call into question the quality and nature of this engagement. It is difficult to determine the extent to which these users have been actively engaged or whether they have merely just created accounts. The rollout of this platform felt passive, with only a few sessions, predominantly with local authorities, to help navigate the hub. There were two active 'roundtables' to discuss risks, but Yorkshire Water only engaged local authorities on this. We would have liked to have seen the ArcGIS hub supported through more of these active engagement sessions, particularly Level 2 Strategic Planning Area focused workshops. Multi-stakeholder workshops at the defined stages of DWMP development (e.g., RBCS, BRAVA, ODA) are essential to the production of a good DWMP with stakeholders feeling at least some sense of ownership of the plan	In January 2023, we held a DWMP Engagement Event to update on progress with our DWMP, to share Partnership learnings and to share our AMP8 plans for storm overflow reduction, with a particular focus on identifying any synergies and opportunities to tackle localised issues in Partnership. This was based on regional grouping of Level 2 Strategic Planning Areas. The workshop was attended by over 20 stakeholders including the EA, local councils, National Park and Rivers Trust representatives. The output of this workshop is being processed. In our final DWMP, we will indicate how this has shaped our plans. We note the feedback about more active involvement of stakeholders earlier in the process and we will seek to build on this feedback for Cycle 2 by holding similar workshops throughout the DWMP cycle.

Topic/Area	Environment Agency Feedback	YW Response
Stakeholder engagement	We also note that Yorkshire Water did not set up Strategic Planning Groups (SPGs) for each Strategic Planning Area (SPA), as recommended by the framework, and subsequently there was a lack of meaningful engagement at the L2 scale. There was a lack of multi-stakeholder gatherings, with the company not taking an 'engage, deliberate, decide' approach in spirit with the approach set out in the framework and guidance. There was little evidence within the plan of specific examples of where Yorkshire Water have incorporated stakeholder feedback. We were also disappointed that Yorkshire Water did not fully recognise or utilise the opportunity to engage with the catchment partnerships.	We acknowledge that we did not set up SPGs or fully engage with the catchment partnerships as recommended and will as above take this feedback on board for Cycle 2. We currently work with catchment partnerships and have been actively involved of co-delivery of schemes. We will do more to highlight this engagement in our final plan.

Topic/Area	Environment Agency Feedback	YW Response
Stakeholder engagement	While there was some evidence of active engagement with local authorities around risk, it does not appear that Yorkshire Water actively engaged all key stakeholders at any specific stage of the DWMP development (RBCS, BRAVA and ODA). There is a lack of detail on how other stakeholders, excluding local authorities and the Environment Agency, have been actively engaged. It is therefore unclear to us how stakeholders were genuinely engaged on important matters such as the additional bespoke objectives, the risk categorisations (for BRAVA) and options development in specific Level 2 or 3 catchments. Whilst we appreciated the ArcGIS portal and the sessions on alignment with the FRMP in the Humber region, we were disappointed that too often, 'DWMP progress' existing meetings, and was an agenda item in we did not feel like we had the opportunity to fully engage across the DWMP development.	We acknowledge this feedback. We will provide additional clarity on the engagement that has been undertaken within our final DWMP. We acknowledge that further engagement may have been beneficial and will look to build upon this for Cycle 2.

Topic/Area	Environment Agency Feedback	YW Response
Stakeholder engagement	Looking forward, all companies need to consider the maintenance of the stakeholder relationships that have been formed in the development of this DWMP. Stakeholders, including the Environment Agency, will be interested in understanding how Yorkshire Water will track identification of risks and delivery of solutions within DWMPS and their success at mitigating risks. We would encourage all companies to treat DWMPs as a "living document", to enable more solutions to be taken on board over time.	We will work to keep our DWMP as a continually evolving plan, reviewing different risks and solutions over time, and monitoring their effectiveness, at risk mitigation and resolution.
Planning objectives	Yorkshire Water adhered to the six national common planning objectives and proposed seven additional bespoke planning objectives. Yorkshire Water's bespoke planning objectives are built on the national planning objectives. Whilst we liked the additional planning objectives focussing on the environmental and asset resilience, it is unclear to what extent local expertise and input informed these planning objectives. It was also helpful to see separate methodologies and guidelines adopted, including a more granular 0 to 5 scoring band utilised for risks threshold for bespoke planning objectives.	We acknowledge this feedback and will incorporate any additional information for final where applicable to fully enhance our methodology.

Topic/Area	Environment Agency Feedback	YW Response
Planning objectives	Yorkshire Water did provide the detail of the threshold values used for each BRAVA criteria within the technical summary to inform the risk assessment. It is too early for us to comment on the setting of the BRAVA risk thresholds for the bespoke planning objectives and given their environmental focus we would expect them to sufficiently reflect the value of the water environment. This is an area where we would welcome further dialogue with Yorkshire Water.	We would welcome further dialogue at a national level regarding thresholds for cycle 2 and will work closely with the EA and other partners in Yorkshire on identification of catchment specific, appropriate planning objectives and risk thresholds.
Programme appraisal and investment needs	The Programme appraisal compares best value with least cost, exploring the utilisation of natural capital as part of the solution for the benefit for the environment, society and public health. While we support the inclusion of natural capital in this way, there is a lack of detail regarding the benefit delivered from this investment. Yorkshire Water adopted the six capitals (Natural, Social, Human, Financial, Intellectual and Manufactured) approach to investment for balanced and informed decision making	We will endeavour to expand upon our benefit evaluation narrative within the final DWMP.

Topic/Area	Environment Agency Feedback	YW Response
Programme appraisal and investment needs	With regards to options, long-term investment needs are discussed based on the four scenarios presented (scenario 2 most ambitious, scenario 3 least ambitious) subjected to least cost and best value approaches, yet there is a lack of detail for short to medium term investments. There is some consideration of how asset health can reduce risks, but the primary focus is on the hydraulic capacity and not a wider consideration of managing all drainage and wastewater management risks. There are indicative commitments to partnership for nature-based solutions and ongoing programmes, but there is a considerable lack of detail which could be addressed with stronger engagement to co-identify and co-fund solutions.	Our final plan will contain a more detailed short-, medium- and long-term plan. Increased certainty over WINEP and PR24 facilitates greater clarity over planned AMP8 investment. We are working hard to identify and build additional partnership opportunities, beyond those already highlighted, to include within our final plan.

Topic/Area	Environment Agency Feedback	YW Response
Programme appraisal and investment needs	Although the plan presents four scenarios, the scenarios are very limited in their scope. All four scenarios include an identical objective of maintaining sufficient capacity to allow compliance with current environmental permits. The focus seems to be on storm overflows and sewer flooding from hydraulic capacity. While storm overflows are important, the DWMP should underpin and support all of Yorkshire Water's future investment in drainage and wastewater infrastructure. It is not just a stormwater overflow plan. The scenarios need to cover more of the planning objectives, for example, different levels of reduction in pollution incidents.	Our DWMP focused on the hydraulic elements of the wastewater environment for draft. Whilst we recognise the importance of pollution reduction, this element is covered in greater detail by our relevant performance commitments, which will be detailed in our plan for PR24. Narrative will be expanded to include pollution reduction and links to asset health metrics in the final DWMP. These are also included within the data tables. We have recently published our Pollution Incident Reduction Plan (PIRP), and this highlights the key areas we will be focusing on as a business. Our PIRP is made up of two key elements; Projects targeted at specific asset types and projects that support enabling themes that cut across all asset types and teams. There are five enabling themes in total: 1. Process improvement & governance 2. Training, competence & culture 3. Data & Technology 4. Maintenance & investment 5. Risk & assurance https://www.yorkshirewater.com/media/4boj2gek/yw_pollution-incident-reduction-plan.pdf

Topic/Area	Environment Agency Feedback	YW Response
Water Quality and Storm Overflows	Yorkshire Water has provided two planning objectives related to storm overflows, PO-2 as the national common planning objective and PO-9 as a bespoke planning objective for more a granular assessment of risk with more rainfall inputs into the modelling. Whilst a more detailed score helps with refined prioritisation (1 – 20, rather than 0 – 3), it was unclear why more modelling was conducted for the bespoke objective (PO-9) instead of the national common planning objective (PO-2).	The national planning objective deadline for publication precluded some data availability. No changes to models were made but some additional work was undertaken for the bespoke planning objectives, utilising 10-year time series rainfall data not previously available for a limited number of catchments.

Topic/Area	Environment Agency Feedback	YW Response
Water Quality and Storm Overflows	Regarding Yorkshire Water's aims for storm overflows, two targets have been considered by 2050: (i) applying annual average spill frequency of no more than 10 spills per year, and (ii) applying annual average spill frequency of no more than 10 spills per year, plus eliminating ecological harm from storm overflows. The latter is the only one that partially adheres to Defra's Storm Overflow Discharge Reduction Plan. These were incorporated into four different scenarios that focus on the three common planning objectives, varying in levels of ambition. Scenarios 1 and 3 do not adhere to the SODRP targets of preventing local adverse ecological impact. Furthermore, all scenarios have failed to account for high priority sites and detail how Environment Agency spill standards for bathing waters will be met by 2035. With 62% of total overflows spilling more than 10 times per year (according to 2021 EDM data), detail of how, when and where this will be achieved with a sustainable investment trajectory is needed.	As referred to within the dDWMP, without the fully confirmed SODRP it was impossible to incorporate the full suite of measures and targets until they had been finalised, detailed, and confirmed. The initial consultation paper was issued by Defra on 30 March 2022 and the final details were published on 26 August 2022. This did not align with our 30 June 2022 draft submission deadline. We intend to meet the requirements of the SODRP and have included within our WINEP24 proposals, an AMP8 plan for storm overflow reductions which is aligned to these requirements. Our final plan will set out our medium and longer-term plans to meet all the SODRP requirements over the next 25-years.

Topic/Area	Environment Agency Feedback	YW Response
Water Quality and Storm Overflows	All expected targets detailed in Defra's Storm Overflow Discharge Reduction Plan (SODRP) must be assessed. To meet the 10 spills target referenced, different delivery scenarios have been developed for implementing improvements, including: (i) least cost: grey infrastructure to increase network capacity, and (ii) best-value plan: a hybrid of grey and nature-based solutions (NBS) utilising sustainable drainage solutions (SuDS) to reduce the amount of rainfall entering the network. Whilst the attenuation of surface water before it enters the network is welcome, there seems to be a lack of evidence for how existing and ongoing partnerships, including the Living with Water (LWW) Blue-Green Plan and aim to provide (in most places) a reduction in impermeable area of 50%, will be used to meet the targets and where, including providing multiple benefits. The use of NBS has an average +£8 billion capital cost uplift across all scenarios, without transparently detailing the appraisal method. Whilst Yorkshire Water's 'core pathway' includes NBS and grey infrastructure, these are to be finalised on the publication of the final SODRP. Furthermore, it is unclear how the prioritised 'promote catchments' relate to high priority sites for overflow spills standards, it seems all overflows should be considered within this plan, not just those within these catchments	As above we will work to incorporate the targets of the SODRP in our final DWMP. We will work to illustrate how we will use surface water removal, including blue-green infrastructure, to meet the targets of the SODRP, looking to provide multiple benefits wherever possible. We will look to provide further detail on the appraisal of costs and benefits in our final DWMP. We will include all the priority storm overflows within the final DWMP, 91% of which are within our promote catchments. Our plans will deliver the priority storm overflow requirement and at the point of draft publication the SODRP had not been confirmed so we were unable to include all elements in our draft plan.

Topic/Area	Environment Agency Feedback	YW Response
Water Quality and Storm Overflows	It is also unclear how continuous water quality requirements to ensure no local ecological harm are embedded in the plan. 97% of overflows already have Event Duration Monitoring (EDM) and seems on track for the 2023 deadline but there has been no detail of publishing near-real time EDM which will substantially change Yorkshire Water's approach to identifying issues and associated public awareness. This should be acknowledged in adaptive planning	We will include reference to this within our final DWMP, in line with the following feedback previously provided to Ofwat – 1 April 2022. This was in response to the letter from David Black, Ofwat dated 1 March 2022. "We already publish our EDM data on our website every year, but we're going to start publishing our wastewater treatment works compliance data publicly too. In addition, we're going one step further by creating an interactive map with near real time updates. This means customers can be better informed about what's happening with their rivers and beaches and they can check the last time there were spills in the area before they enter the water. We'll start by getting our designated bathing waters on the map first, followed by all our other overflows by 2025. To help customers and stakeholders keep track on what we're doing, we'll be reporting back on all our river health initiatives every year." For the no harm element of the SODRP more investigations will need to be undertaken to understand where this component will apply, and we are working to incorporate this into our adaptive plan.

Topic/Area	Environment Agency Feedback	YW Response
Water Quality and Storm Overflows	Water companies that contain 'nutrient advice areas' are expected to assess potential nutrient neutrality risks because of present and future pressures and co-develop appropriate mitigation options with stakeholders. Natural England have provided local planning authorities tools and guidance on 'nutrient neutrality' to mitigate the impact of nutrient pollution so that development can proceed without detrimental downstream effects, especially to designated sites. There is also expected to be a statutory duty for water companies to upgrade wastewater treatment works to the highest technically achievable limits (TAL) by 2030 in nutrient neutrality areas. As part of the Levelling Up and Regeneration Bill, water companies will be required to undertake these upgrades in a way that tackles the dominant nutrient(s) causing pollution at designated sites. The plan is expected to detail the options needed to address areas of highest risk.	There is currently one designated 'nutrient advice area' within the Yorkshire Water region, the Hornsea Mere. We do not have any impact to Hornsea Mere. We will continue to work to the latest designations in respect of potential nutrient neutrality risks.

Flood and Coastal Erosion Risk Management	We welcome the reference to National Flood Coastal Erosion Risk Management (FCERM) Strategy 2020, within Yorkshire Water's DWMP. However, we would expect greater reference and alignment with local strategies, e.g., 'Connected by Water' for South Yorkshire and the Humber Estuary 2100 Tidal Flood Risk Management Strategy. Yorkshire Water identify how DWMP will support delivery of the strategies main themes of climate resilient places by managing sewerage networks to address current and future risk and deliver resilient infrastructure and growth, by managing flood risk through a mix of solutions with a focus on nature-based measures to deliver environmental net gain. Also, Yorkshire Water recognise the importance of a partnership approach between Risk Management Authorities (RMA) and communities, particularly with reference to surface water flooding and the spread of roles and responsibilities across these groups. Strengthening Yorkshire Water alignment with formal risk management authorities would help establish the whole systems approach required as part of DWMPs, including greater attendance on LLFA partnership meetings and Regional Flood and Coastal Committee (RFCC) meetings, for co-developing and co-funding schemes, along with incident management.	We will build upon and continue our position with our stakeholders for cycle 2 and beyond. We will work to ensure we have the correct representation and engagement to ensure maximum collaborative working.

Topic/Area	Environment Agency Feedback	YW Response
Flood and Coastal Erosion Risk Management	We like that bespoke Planning Objectives were built around national planning objectives and expanded on asset performance assessments beyond the requirements. For example, Yorkshire Water run storm scenarios for 1 in 30 years, additional to the 1 in 50 years asked for by the national guidance and Yorkshire Water have also considered flow and quality. The bespoke planning objectives developed in the plan enhance the existing national planning objective, providing greater sensitivity for the risk banding scoring and expand on asset performance by looking at different storm return periods. This can help support an adaptive planning approach.	We acknowledge this feedback.

Flood and Coastal Erosion Risk Management	Adaptive planning is a critical tool to manage uncertainty. Yorkshire Water has shown an understanding of the value added by following adaptive planning approach and applied this thinking around short term, medium term and long-term uncertainty, based on strategic risk appetite. We observe that adaptive planning on flood and drainage is reliant on sewerage model projections. The results predicted by the model simulation are good, as they are calibrated to the natural environment. Both blue-green infrastructure (e.g., SuDS) and grey solutions (e.g. concrete storage tanks) were proposed in the planning of the DWMP. We understand that Yorkshire Water are still to update the plan in response to the challenges of reducing the agreed spills of sewer overflows and reducing the risks of flooding and pollutions. The proposed plan presents four scenarios for a best value plan, focussing mostly on grey solutions and we note that where possible a mix of blue-green and grey solutions may be applied. We consider the overall resiliency of the plan to be good, demonstrated by the modelling and applying bespoke planning objectives. Focus is still needed on how to prevent sewer flooding now and for future flooding incidents to minimize pollution, with no harm or near to zero harm, to environment and society.	Our best value plans were made up of predominately blue-green solutions to the scenarios and demonstrated enhanced benefits. Our least costs plans contained mainly grey/traditional solutions. We will work to find the most cost beneficial solution as part of any scheme that proceeds to delivery regardless of its initial resolution pathway. Our AMP8 SODRP has 20% of its solutions with an element of blue-green contained within it and we will work to increase this percentage over time. Our DWMP focused on the hydraulic elements of the wastewater environment for draft. Whilst we recognise the importance of pollution reduction, this element is covered in greater detail by our relevant performance commitments, which will be detailed in our plan for PR24. Narrative will be expanded to include pollution reduction and links to asset health metrics in the final DWMP. These are also included within the data tables. We have recently published our Pollution Incident Reduction Plan (PIRP), and this highlights the key areas we will be focusing on as a business. Our PIRP is made up of two key elements; Projects targeted at specific asset types and projects that support enabling themes that cut across all asset types and teams. There are five enabling themes in total:

Topic/Area	Environment Agency Feedback	YW Response
		1. Process improvement & governance 2. Training, competence & culture 3. Data & Technology 4. Maintenance & investment 5. Risk & assurance https://www.yorkshirewater.com/media/4boj2gek/yw_pollution-incident-reduction-plan.pdf

Topic/Area	Environment Agency Feedback	YW Response
Flood and Coastal Erosion Risk Management	In addition to understanding the risk of flooding from Yorkshire Water infrastructure the DWMP framework in Appendix C requires companies to assess wider resilience risk to their wastewater infrastructure, including specifically the risk from fluvial and coastal flooding. Yorkshire Water's 'Flood Resilience Dashboard' focuses on flooding from multiple sources, outages from power and telemetry and response and recovery planning. This assessment is used to provide a risk status for each STW catchment at level 3. However, we do not see how this assessment is linked further to the DWMP. It would be useful to understand what resilience measures have been used to protect critical infrastructure. We welcome Yorkshire Water contacting the Environment Agency area team regarding specific sewage treatment works and pumping stations that face flood risk issues and aligned with Environment Agency and LLFA FCERM schemes based upon Section 19 (post-event) reports and local resilience forum meetings. We are happy to share this detail to ensure we can fully collaborate for maximum outcome. Yorkshire Water's resilience assessment appears to look at current risks and fails to consider Climate Change impacts. However, it is positive to see that response and recovery is considered in the draft plan and that Yorkshire Water incident response planning follows Cabinet Office guidance of the 4 R's Keeping the country running: natural hazards and infrastructure.	We have used a variety of measures to protect some of our critical and vulnerable infrastructure by raising control panels and kiosks on plinths, increasing the height of instrumentation and actuated valves above flood levels and sealing cable ducts and installing watertight access covers where equipment cannot be relocated. We also have 1.5km of demountable defences and a stock of high-capacity pumps we can deploy during incidents. We have also relocated a number of assets on the coast to further protect them from coastal erosion. Our resilience assessment was based on the best available data at the time. We look forward to working nationally and with the Environment Agency to better understand the changes in flood risk driven by climate change to ensure we are resilient to future risks.

Topic/Area	Environment Agency Feedback	YW Response
Flood and Coastal Erosion Risk Management	Yorkshire Water's investment profiles for 'maintaining flood risk' appears to decrease over the duration of the plan, despite recognition that external factors increase risk with time, e.g. climate change and 'urban creep'. We would like to explore this further with Yorkshire Water to understand how Yorkshire Water will realise schemes that deliver multiple benefits for customers and the environment, as we could not determine a systematic approach to assessing partnership opportunities within the draft plan and how the externalities Yorkshire Water identify will impact them.	We will be reviewing investment profiles ahead of publication of our final DWMP and the attribution of benefits to our solutions. We work alongside our partners and Lead Local Flood Authorities (LLFA) to establish opportunities and review the EA Medium-Term Plan (MTP) to further identify viable future schemes.
Climate Change	We welcome some dedicated sections on climate change in Yorkshire Water's plan. The DWMP explanations on adaptation and possible climate impacts are clear, including the use of appropriate allowances. Embodied and operational carbon does seem to be considered during optioneering, but the 'in-house assessment' conducted needs to be shared with stakeholders. We conclude that Yorkshire Water has shown a willingness to be a resilient company from the angle of climate change and adapt with uncertainties that may arise in the future. However, there is a lack of transparency for how the 'in-house' method for accounting for operational and embodied carbon was conducted and applied to inform scenarios and options.	As the solutions developed for our final DWMP have changed to accommodate the entirety of the SODRP, the carbon assessment will also be revised and we will, where possible, incorporate further narrative in the final DWMP.

Strategic Environmental Assessment	The Strategic Environmental Assessment (SEA) is a high-level consideration of the potential effects of the plan and the options in the plan at Level 1: The outcome of the assessment of the options at the level of the whole study area (Level 1) is provided, with supporting narrative; however, the list of options assessed do not clearly match with the list of hierarchy of options (in Table 5.2.1) i.e. the first three options (observe, monitor, investigate) are not accounted for in the assessment tables (i.e Table 5.3.1 and 5.3.2). There are a greater number of options relating to 'enhance' in the assessment tables than that listed in the options table (Table 5.2.1). Therefore, it is unclear if all reasonable alternatives been considered	The naming and arrangement of some options were amended during the development of the draft DWMP. Within Table 5.2.1, the options relating to 'enhance' are grouped together into broad categories, such as 'additional network capacity; storage; separate flows'. As these may have differing environmental effects, these options are considered separately within Table 5.3.1 and Table 5.3.2 (where additional sewer network capacity, increased storage capacity, and separate flows are each considered). As such is it thought that all reasonable alternatives have been considered. However, the SEA is currently being reviewed to confirm this and to increase clarity and consistency between the SEA and the final DWMP. The second row in Table 5.3.2 states 'Observe, monitor and investigate options are not included in this table as they will not be assessed through SEA.' They were looked at in an earlier stage of the DWMP24 process, with only applicable Level 3 catchments moving forward in the process.

Topic/Area	Environment Agency Feedback	YW Response
Strategic Environmental Assessment	Considerations of the options are also stated as being assessed at Level 2 (SPA) although these are also at quite high level and generic across the SPA being assessed. It is stated that Level 3 assessments were not undertaken as this would be 'unmanageable'. However, the report does note that the draft DWMP has identified 160 high priority L3 catchments where storm overflow and/or flood risk reduction measures are required; along with WwTWs where improvements are required, which could have been assessed; this shows inconsistencies between level of detail that is included in the draft DWMP and those options assessed in the SEA, highlighting the potentially limiting influence of the SEA on plan development. There is mention throughout to more detailed assessment being undertaken 'post SEA'; however, it is not clearly stated what this would comprise, when it would be carried out and who would be consulted (as a more detailed assessment of the baseline will be needed and a wider review of relevant plans, programmes and policies) and what influence this would have on plan finalisation to reduce environmental impact. Limited information is also included in relation to monitoring for SEA topics.	According to "Appendix F - Example contents of a drainage and wastewater management plan" of the DWMP Framework report, the SEA should be undertaken at a programme (L1) level only. Nonetheless, the SEA report has also included L2 SPA assessment, in which the L2 SPA is an aggregation of L3 units. In addition, as set out in Table 5.1.1 of the SEA, more detailed consideration of key environmental issues within each catchment has been undertaken as an integral part of the DWMP development to prioritise catchments for action. As part of this, the optimiser tool considers the natural capital approach when determining the option to be taken forward for each catchment. We have established environmental control procedures for the design and construction of our assets which will be in place when the measures identified in the DWMP are implemented. This includes more detailed consideration of the baseline environment and requirements. A section will be added to the final SEA to expand on this and provide greater clarity.

Groundwater	Groundwater's intrinsic role within the water cycle contributes significantly to drinking water sources, streams, rivers and wetlands but it is often out of sight and mind. All groundwater is legally protected under the Environmental Permitting Regulations 2016. Water companies' wastewater can cause substantial impacts on groundwater quality particularly where it is vulnerable to pollution. Water companies who are developing Drainage and Wastewater Management Plans will need to include the impacts of their wastewater management on groundwater to ensure they do not cause polluting impacts on groundwater resources, habitats and the wider environment. Scenarios particularly vulnerable and that are high priority in terms of groundwater protection for maintenance and improvements include: • sewers, sewerage infrastructure and related activities near a public water supply especially those within Source Protection Zone 1, within a groundwater Safeguard Zone, near a groundwater dependant terrestrial ecosystem, SAC, SPA, SSSI. • discharges/sewerage infrastructure near ephemeral streams such as those in limestone and chalk streams • storm overflow to ground or dry ditches • Sewerage infrastructure below groundwater level (i.e. water table)	We continue to work to meet our obligations with regards to groundwater protection. Additional details on this will be provided within our final DWMP.

Topic/Area	Environment Agency Feedback	YW Response
	• frequent spills at wastewater pumping station discharging to ground in Source Protection Zone 2 of public water supply The location of groundwater source protection zones and safeguard zones can be found at Source Protection Zones [Merged] - data.gov.uk & Drinking Water Safeguard Zones (Groundwater) - data.gov.uk. The Environment Agency's approach to groundwater protection (publishing.service.gov.uk) contains further details on groundwater protection principles.	

Table 3 - Natural England & Historic England

Consultee	Feedback	YW Response
Natural England	Only a screening Habitats Regulations Assessment (HRA) has been provided, a full HRA is required.	A full HRA report will inform and be published with the final DWMP.
Natural England	A Strategic Environmental Assessment (SEA) has not yet been undertaken.	Please note that the draft SEA was conducted and submitted with the draft DWMP plan (the HRA was appended within the SEA). Please refer to the link below: https://www.yorkshirewater.com/strategic-environmental-assessment The SEA report will be finalised and published with the final DWMP.
Natural England	At present, it is not sufficiently clear if the draft plan and plan options will impact any designated sites.	Please note that the DWMP is a high-level strategic plan. The impact on any designated sites will be assessed in detail in detailed design. Nevertheless, strategic mitigation measures will be proposed in the HRA to prevent any potential impacts.

Consultee	Feedback	YW Response
Natural England	The draft DWMP has not yet been assessed for the potential for net gain in biodiversity. At this stage, the draft DWMP cannot clearly show a result in a net gain in biodiversity.	As identified in section 9.2.3 of the SEA, the DWMP is a high-level strategic plan and as such the options are strategic in nature. At a strategic level, when considering options, we have incorporated biodiversity within our decision making through our 6 capitals investment models, which provide positive natural capital values for the change in outcomes provided by nature-based solutions. Whilst gathering a baseline over entire catchments is not proportionate or effective at this stage, Biodiversity Net Gain will be calculated at project level within the subsequent design stage and becomes a material factor in our option design cost benefit assessments. Biodiversity Net Gain is also considered within Table 6.3.2 where it is noted that the two principal options provide the potential for biodiversity net gain during reinstatement (grey infrastructure), and the potential for long-term positive effects on biodiversity within blue-green infrastructure.
Natural England	Both Natural Capital and Carbon Offsetting of the DWMP and plan options have not been assessed at this stage. Therefore, at this stage the draft DWMP cannot assess its potential to enhance natural capital.	The themes of natural capital and carbon reduction are integral through the SEA objectives and have been considered for this plan. The YW DMF (decision making framework) tool accounts for both natural capital and carbon within the option selection. The blue-green infrastructure approach is a nature-based solution which supports both these principles and is supported through the SEA.

Consultee	Feedback	YW Response
Natural England	Natural England Area Team's invite Yorkshire Water to further conversations regarding the identified deficiencies in the draft plan and further environmental assessment before the final plan is published.	We are working with Natural England's area team to further discuss our SEA and HRA and links to our final plan.

Consultee	Feedback	YW Response
Natural England	The plan should include references to the Diffuse Water Pollution Plans, including the River Derwent, Hornsea Mere and Malham Tarn which have been particularly impacted by high Phosphate levels from STW and agricultural sources. Options for improvement should include multi benefit approaches. Please see case study example below: Cromhall wetlands trial (wessexwater.co.uk)	When considering the conclusions of the referenced reports it is not apparent that YW owned assets are the cause, nor do they contribute to the issues identified at Malham or Hornsea. Work that was carried out has reduced the risk on the river Derwent as identified within the report. We are happy to support multi-benefit approaches however this may not be a suitable option for these examples, but we will continue to support diffuse water pollution plans where actions are applicable to YW. We support the use of nature-based solutions, providing multiple benefits. Outcomes of the Cromhall wetlands trial: • Overall, it demonstrated the benefits of nature-based solutions • It demonstrated that lower flows into the wetlands in summer provide for increased phosphorus reduction (i.e., supporting removal of surface water flows into constructed wetlands to improve water quality) • A recommendation for flexible permitting – an approach which could be of benefit to the DWMP. These themes are being discussed within the SEA project team and will be referenced where appropriate within the report.

Consultee	Feedback	YW Response
Natural England	Nature-based Solutions should be incorporated to ensure the best possible outcome for the terrestrial and freshwater environment.	We note this feedback. Nature-based solutions have been considered in our options such as SuDS, blue-green corridors and working in partnership to deliver these types of solution.
Natural England	Natural England understand the reasons why an HRA has not been completed at this stage. However, we want a clear plan for when, where and how an HRA and SEA will be completed for the DWMP.	The full HRA is now underway to inform the DWMP and will be submitted together with the final SEA and DWMP.
Natural England	We note some habitats, sites and environmental receptors have been recognised within Section 5 and 7 (SEA) and Section 2 in HRA. Programme outputs of the draft plan raised during stakeholder engagement. However, it is unclear if all relevant habitat sites and their interest features have been identified and/or acknowledged during this high-level strategic phase and how they have influenced the plan options, any appropriate mitigation, and required monitoring at the design stage.	The HRA screening report contains a full list of relevant sites and maps to show their locations in relation to the DWMP Level 3 sites. Mitigation measures have been listed for any potential impacts identified on sites.

Consultee	Feedback	YW Response
Natural England	During assessment, we would like to refer Yorkshire Water to all relevant sites' Conservation Objectives, Supplementary Advice to the Conservation Objectives (SACO's) and Monitoring Specifications. Furthermore, NE Area teams have updated water-related threats data in late 2021 and would encourage the latest data available are referenced during environmental assessment.	The majority of this data is referred to in the HRA, which was written in 2022 using the updated data. The full data available in SACO's has not been used as this is an unsuitable level of detail for the DWMP. Further clarity has been sought on this matter from Natural England.
Natural England	To assist the Habitats Regulation Assessment, we refer Yorkshire Water to Annex 2 - Section 2.1 Habitats Regulations Assessment and Duties to Habitats Sites, which can be found below.	This information will be considered where appropriate. Please note that the full HRA will be a separate standalone report published alongside the final DWMP.

Consultee	Feedback	YW Response
Natural England	Habitats Regulations Assessment and Duties to Habitats Sites: Regulation 9 of the Conservation of Habitats and Species Regulations 2017 (S.I. 2017/1012) as amended (referred to as the Habitats Regulations) requires every competent authority, in the exercise of any of its functions, to have regard to the requirements of the Habitats Directive. This requirement includes restoring favourable conservation status.	We acknowledge this feedback and will incorporate where required.
Natural England	Regulation 10 places a duty on a competent authority, in exercising any function, to use all reasonable endeavours to avoid any pollution or deterioration of habitats of wild birds.	We acknowledge this feedback and will incorporate where required.

Consultee	Feedback	YW Response
Natural England	In addition, regulation 63 places obligations on competent authorities in respect of plans or projects likely to have a significant effect on a protected site. The Government guidance now refers to sites covered by the provisions of the Habitats Regulations as 'Habitats sites' in line with the wording in the National Planning Policy Framework and we have followed that nomenclature throughout this letter. Note that for Marine Protected Areas that are also Habitats sites and Ramsar sites the legal tests are the same as terrestrial/freshwater Habitats sites. In England, as a matter of policy, sites listed or proposed under the "Ramsar Convention on Wetlands of International Importance" receive the same level of protection as Habitats sites. The HRA should be clearly distinguishable document or section of the DWMP.	We acknowledge this feedback and will incorporate where required.

Consultee	Feedback	YW Response
Natural England	The HRA should include: • A list and/or map of all relevant Habitats sites. • An appropriate assessment of the plan options unless, on the basis of objective information, a likely significant effect can be excluded by the screening of relevant Habitats sites. • The appropriate assessment must identify all relevant adverse effects on integrity and uncertainties. • All mitigation aimed at addressing likely significant effects or/and removing adverse effects must be covered within the appropriate assessment. • Any options with residual adverse effects identified or where adverse effects are uncertain must have assessments under Regulation 64 (to determine that there are no alternatives with less or no adverse effects and demonstrate Imperative Reasons of Overriding Public Interest). • All options with adverse effects must have secured compensatory habitat such that the coherence of the Habitats sites series is maintained.	These comments will be considered where appropriate. 1. Already included in screening 2. Appropriate assessment is being written currently 3. We believe all relevant effects have been identified. 4. Mitigation is detailed in the screening and will also be included in the full HRA 5. TBD depending on appropriate assessment. Unlikely that any will have residual adverse effects after mitigation. 6. As above.

Consultee	Feedback	YW Response
Natural England	The HRA of the plan should include an assessment of the in combination and cumulative impacts of the plan with other plans and projects. The HRA should have regards to relevant caselaw and should take account of whether the site is meeting its conservation objectives for relevant features and attributes to the dDWMP options.	Given that the DWMP is a high-level strategic plan, the cumulative impact will be assessed in a high-level descriptive manner.
Historic England	A.1.2 Stages of the SEA and consultation. The second paragraph refers to English Heritage, not Historic England.	This typographical error has now been corrected.

Consultee	Feedback	YW Response
Historic England	Appendix B – Review of relevant plans, programmes and environmental protection objectives. Under the 'National' sub-heading it would be prudent to add the following guidance: 1) 'Managing Significance in Decision-taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2' (https://historicengland.org.uk/imagesbooks/publications/gpa2-managing-significance-in-decision-taking/). 2) 'Preserving Archaeological Remains: Decision-taking for Sites under Development' (https://historicengland.org.uk/images-books/publications/preserving-archaeologicalremains/).	We will include this point within the final SEA report.

Consultee	Feedback	YW Response
Historic England	Appendix C – Environmental baseline, 1.7 Heritage The final paragraph states that 'Other historical sites may be designated under categories not set out above and heritage advise should be sought (local authorities, county archaeologists, etc.) for future specific optioneering and any subsequent planning requirements.' This statement conflates things like conservation areas, non-designated assets (including those identified on local lists where they exist) and other local designations. It would be helpful if these 'other' types of designation were separated out and elaborated upon.	We will update the final SEA report and include greater clarity of the types of 'other' sites mentioned.
Historic England	Various locations In a couple of places (e.g. Table 3.2.1 – Issues and opportunities summary table & Appendix C – Environmental baseline: 1.7 Heritage) reference is made to setting in relation to historic buildings or structures, but it is important to acknowledge that the need to consider setting also applies to below-ground archaeological remains.	Reference will be made, where appropriate, to archaeological setting both above and below ground.

Consultee	Feedback	YW Response
Historic England	General comment Organic-rich deposits, both archaeological and 'natural' (alluvium, peat, etc.), can include organic artefacts (wood, leather, etc.) and paleoenvironmental indicators / proxies (macroscopic plant remains, pollen, etc.), generally resulting from waterlogged anoxic conditions, which are particularly sensitive to any hydrological and geochemical changes to their burial environments.	We will include this text in the final SEA report.
Historic England	The Drainage and Wastewater Management Plan is of particular interest to Historic England for the following reasons: 1. The vulnerability of most heritage assets (designated and non-designated) to flooding, including occasional flooding, and the potential harm to, or loss of, significance as a result of changes to water catchment areas;	The text in the final SEA plan will be checked to ensure coverage of these issues where applicable to the DWMP.
Historic England	2. The potential impact of water catchment and abstraction measures on heritage assets and their settings, including impacts on water-related or water dependent heritage assets;	The text in the final SEA plan will be checked to ensure coverage of these issues where applicable to the DWMP.

Consultee	Feedback	YW Response
Historic England	3. The potential impact of changes in groundwater flows and chemistry on preserved organic and paleoenvironmental remains: where ground water levels are lowered as a result of measures to reduce flood risk, this may result in the possible degradation of remains through de-watering, whilst increasing groundwater levels and the effects of re-wetting/ changes in salinity brought about by coastline modification could also be harmful;	The text in the final SEA plan will be checked to ensure coverage of these issues where applicable to the DWMP.
Historic England	4. The potential impact of hydro-morphological adaptations on heritage assets: this can include the modification/removal of historic in-channel structures, such as weirs / coastal and estuarine features such as historic sea defences; as well as physical changes to rivers/the coastline with the potential to impact on archaeological and paleoenvironmental remains;	The text in the final SEA plan will be checked to ensure coverage of these issues where applicable to the DWMP.
Historic England	5. The potential for unrecorded deeply buried and waterlogged archaeology within the 'natural' floodplain/estuarine / coastal deposit sequence;	The text in the final SEA plan will be checked to ensure coverage of these issues where applicable to the DWMP.

Consultee	Feedback	YW Response
Historic England	6. The potential implications of flood risk on securing a sustainable use for heritage assets, including their repair and maintenance;	The text in the final SEA plan will be checked to ensure coverage of these issues where applicable to the DWMP.
Historic England	7. The opportunities for conserving and enhancing heritage assets as part of an integrated approach to flood risk management and catchment-based initiatives, this includes sustaining and enhancing the local character and distinctiveness of historic townscapes and landscapes;	The text in the final SEA plan will be checked to ensure coverage of these issues where applicable to the DWMP.
Historic England	8. The opportunity for increasing public awareness and understanding of appropriate responses for heritage assets in dealing with the effects of flooding as well as the design of measures for managing flood risk and improving resilience;	The text in the final SEA plan will be checked to ensure coverage of these issues where applicable to the DWMP.
Historic England	9. The opportunities for improving access, understanding or enjoyment of the historic environment and heritage assets as part of the design and implementation of flood risk management measures.	The text in the final SEA plan will be checked to ensure coverage of these issues where applicable to the DWMP.

Consultee	Feedback	YW Response
Historic England	Historic England advises Yorkshire Water to consider each of the above when drawing up plans, and during the detailed design stage for specific interventions, to inform an appropriate and positive response to the historic environment.	Your concerns will be considered in the further development of the DWMP and in drawing up plans in detailed design stage for any schemes promoted through into our capital delivery teams.

Table 4 - Stakeholders & Customers

Consultee	Feedback	YW Response
Consumer Council for Water (CCW)	The draft DWMP is, by its nature, a technical and complex document that is not very accessible to a wider audience. It is important that customers and non-technical stakeholders can understand and contribute to the company's plans. We are therefore encouraged that the company provided an easy-to-understand summary of the draft plan and of the priority areas for this wider audience. The company has a comprehensive suite of webpages about the DWMP. This sets out what a DWMP is and the process of its development. The site is broken down into its river catchment areas catchments, with storyboards for each. These will help focus attention of local interest groups. We also like the design of the Hub, which has over 100 individuals signed up from 30 organisations. We think it would be useful for the company to detail those organisations to demonstrate the range of those it has engaged.	We note CCW's comments and will continue to make the DWMP as accessible to all our customers as is possible with a range of documents, summaries and visual aids published for our final DWMP. Organisations who have signed up for the Hub include the majority of local authorities within our region, rivers trusts, wildlife trust, National Parks, ICASP (Leeds University) and also representatives from Ofwat, Environment Agency, National Farmers Union, Natural England & Historic England.

Consultee	Feedback	YW Response
Consumer Council for Water (CCW)	We are particularly pleased to note that "Internally, the outcomes of the regional roundtables and other stakeholder engagement are captured and fed into our PR24 governance processes. This ensures that stakeholder feedback is provided directly to practitioners who are developing our plans, through to our PR24 Steering Group. This is made up of senior managers and Directors, then through to the YW Leadership Team and ultimately the Board".	We will continue to ensure our internal communications and governance processes are followed through to the publication of our final DWMP.
Consumer Council for Water (CCW)	Company customer research indicates levels of bill increases that customers were prepared to pay at between 1% and 5%. Will this generate the required income against the 4 scenarios set out? Was the research asking customers questions about bill increases in isolation of the other bill increases that they could see as a result of required improvements?	The research carried out for the DWMP was in isolation of the wider PR and AMP bill impacts and we will work to gather more data on potential bill impacts including willingness to pay, for our final DWMP.
Consumer Council for Water (CCW)	Outputs from the workshop on risk prioritisation clearly indicate a desire to focus on minimising sewer flooding with monitoring storm overflows coming towards the bottom of the list. We would like to see how this is reflected in the overall bill impacts for customers.	We will provide more detail on potential bill impacts in our final DWMP. It will be challenging to balance the preferences of our customers for reductions in sewer flooding, with the mandated requirements of the SODRP. We will strive to get the balance right in our short and long-term plans.

Consultee	Feedback	YW Response
Consumer Council for Water (CCW)	We would like to see the company develop their engagement plan further in the final plan to demonstrate in detail who they have engaged with and the company's response to the feedback received. There is also an opportunity to use other engagement tools such as videos and clips to make the plan easy to access and understand.	This statement of response will form part of our response to feedback from our customers and stakeholders and we will aim to work with our stakeholders to effect any changes required. We are also considering the use of additional tools to make the DWMP more accessible within the publication of our final DWMP.
Consumer Council for Water (CCW)	The company holds a vital place within the community in effectively providing both water and wastewater services. It must work in collaboration with other organisations and stakeholders to ensure that it can benefit from advice and guidance from relevant experts and regulators as well as working with consumers and local communities to understand their priorities and to gain and maintain the trust of the people they serve. While the company operates in a discrete area, it does not work in isolation and so must collaborate with others to ensure any national wastewater strategies are reflected in its plans.	As a DWMP team and as part of Yorkshire Water we continue to work with other water companies, steering groups and task and finish groups relating to wastewater to ensure we are aware of and incorporate any national plans into our Yorkshire based plans. Currently we work in partnership with a large number of organisations to deliver a wide range of outcomes. We will continue to build on the learning from this as we develop further partnerships in the future.

Consultee	Feedback	YW Response
East Riding of Yorkshire Council	East Riding has a complex flood risk interaction with drainage and groundwater. With large parts of the region being interconnected through artificial channels and channels and drains which are also managed by several different authorities. With the DWMP being the first iteration of a new strategic plan for drainage and wastewater not only across East Riding but within Yorkshire as a whole we support its implementation and aim in sustainable long-term management of all aspects of wastewater and drainage.	We acknowledge these comments and will continue to engage and work with East Riding of Yorkshire Council and other key stakeholders throughout future cycles of the DWMP. We have completed the UK's first urban blue-green master plan to create a collaborative 25-year strategy managing the impacts of climate change through the Living with Water partnership. We will consider the applicability of this approach for other areas of our region with complex multi-stakeholder flood risk.
East Riding of Yorkshire Council	We also support the long-term planning approach set out by the DWMP in keeping the drainage/wastewater system to appropriate standards and improving resilience to future pressures to 2050 and beyond. Factors such as climate change and population growth will place increasing demands on supply and the network and we support work to reduce the impact to customers and businesses. We will aim to work with Yorkshire Water to ensure we deliver long-term solutions with the best value and benefits for the East Riding	We acknowledge these comments and will continue to engage and work with East Riding of Yorkshire Council and other key stakeholders to deliver the best value long term beneficial solutions.

Consultee	Feedback	YW Response
East Riding of Yorkshire Council	We support the draft scenarios 1 and 2 set out in the DWMP in investment opportunities in East Riding catchment areas moving forward as they aim to reduce levels of sewer flooding to properties. We would have an overall preference for scenario 2, which includes no environment harm from storm overflow spills, though we are aware of the challenges to this would cause to complex local systems and are mindful of customer cost impact. We believe these scenarios are the most sustainable way forward to continue to improve resilience to properties and businesses in line with our own Draft local flood risk management strategy. Furthermore, we also support optimisation of the scenarios to deliver more additional multi benefits through blue-green solutions, which aligns well to our Living With Water partnership work in Hull and Haltemprice.	We acknowledge this feedback on our scenarios and have incorporated the feedback into our Best Value Plan (BVP) and scenario choice for our core pathway for the DWMP including the feedback from other respondents.

Consultee	Feedback	YW Response
East Riding of Yorkshire Council	In total, 51 catchment areas within East Riding have been designated within the BRAVA classification of the DMWP, of which 23 are in “Promote”, 16 in “Investigate” and 12 in “Monitor”. The Council are keen to support Yorkshire Water in the delivery of measures/solutions in areas moving forward, working on partnership studies where are outcomes align. One example of this is within “Promote” catchments identified in the DWMP, such as Bridlington, we have plans to review surface water issues and would be keen to work together on further investigations. We have put together a separate document of technical information and data regarding further partnership opportunities that we will provide to the DWMP team.	We welcome East Riding of Yorkshire Council proactive engagement and information sharing. We are working with East Riding of Yorkshire Council (ERYC) on the specific opportunities in Bridlington and are looking to include these potential partnerships interventions within our final DWMP and business plan and to work together with ERYC to start to tackle the issue of surface water flooding whilst supporting our SDORP targets and priorities.
East Riding of Yorkshire Council	Take the success of Living with Water Partnership and implement across East Riding	Our partnerships team are keen to expand the Living with Water project and implement the successes seen in Living with Water in the wider Yorkshire region and will work with East Riding of Yorkshire Council on a plan to progress this.

Consultee	Feedback	YW Response
East Riding of Yorkshire Council	Include narrative around partnership opportunities within the plan, having reviewed partner RMA programmes and data.	We held a dedicated stakeholder workshop in January to review RMA programmes and plans and links with our AMP8 plan. This has provided us with many opportunities to embrace partnership working and co-sharing of information and opportunities. We will share where we can additional narrative within the final DWMP.
Peak District National Park	The effects of climate change on severe weather events is difficult to predict. Severe weather events including those resulting in flooding have increased over the last 20 years with areas of the Yorkshire Water network affected on a regular basis. The uncertainty around predicting such events and the likelihood that they may worsen in frequency and severity over time (based on recent years) makes it difficult to plan for all eventualities.	We welcome these comments and agree that predicting future risk is challenging, particularly with regards to the impact of climate change. We have endeavoured to utilise the latest available data and modelling techniques to quantify this risk within our DWMP and will continue to do so as new data becomes available. Additional sensitivity testing in line with the Ofwat common reference scenarios will enable us to consider a range of different future scenarios for our final DWMP.

Consultee	Feedback	YW Response
Don Catchment Rivers Trust	We are supportive of the value you place on the importance of partnership working. We welcome your approach to prioritise nature-based, and sustainable drainage solutions, where these can be delivered as 'best value'. We would welcome a commitment to move away from a grey-only approach (as quickly as possible) to investing in more blue/green solutions if the 'least cost' plan is pursued initially. We believe that there is an opportunity for partnership working to develop nature-based solutions in existing surface water drainage systems, for example daylighting culverts and making space to provide a biodiversity benefit and also to provide additional space during flood conditions.	Our aspiration is to move towards greater opportunities for blue-green/nature-based solutions as we work through each AMP cycle and develop more partnership opportunities to deliver these. Our AMP8 SODRP has 20% of its solutions with an element of blue-green contained within it and we will work to increase this percentage over time. Following on from the engagement session in January we will be in touch to discuss your opportunities further.

Consultee	Feedback	YW Response
Hull City Council	It was very encouraging to see the Living with Water Partnership used as a case study highlighting the work and projects in Hull and East Riding. It was also interesting to note the challenges particularly around funding and the alignment of FDGiA. Given that both the DWMP, and the strategic objectives that the Environment Agency have in the National FCERM Strategy and River Basin Management Plans, are ultimately the same goals it is frustrating that the DWMP cannot highlight this issue more clearly so policy makers take note.	We will seek to strengthen the message around funding alignment within our final DWMP and continue to feed into national steering groups and workshops for this and future cycles of the DWMP. This includes learnings and opportunities to improve the alignment of plans, funding and partnership opportunities.

Consultee	Feedback	YW Response
Hull City Council	We also feel that there was a lack of consideration around Biodiversity Net Gain and how this could be linked to the delivery of the blue-green infrastructure required to deliver the scenarios. We feel that this should be included in the next iteration of the plan as we should have further clarity on the requirements under the Environment Act and the piece of work YW and HCC are doing jointly funded by the Natural Environment Investment Readiness Fund to explore the opportunities to link SuDs and BNG.	We will work to include more detail and consideration of Biodiversity Net Gain as we progress into cycle 2, with biodiversity value being integrated within our 6 capitals CBA tools which provide positive natural capital values for the change in outcomes provided by nature-based solutions. As identified in section 9.2.3 of the SEA, the DWMP is a high-level strategic plan and as such the options are strategic in nature. Nevertheless, Biodiversity Net Gain will be calculated at project level within the subsequent design stage and becomes a material factor in our option design cost benefit assessments. Biodiversity Net Gain is also considered within Table 6.3.2 where it is noted that the two principal options provide the potential for biodiversity net gain during reinstatement (grey infrastructure), and the potential for long-term positive effects on biodiversity within blue-green infrastructure.

Consultee	Feedback	YW Response
Hull City Council	The last point is around the linkages of the DWMP with planning policy and development management. There are links to population growth and urban creep in the document and planned residential development was included as a trigger in the Risk Based Catchment Screening. However, as you progressed through the document, there is little information or detail that provides an evidence base or clarity for setting planning policy. We would like to see more joint working of YW with the Local Authorities and Environment Agency on stronger planning policy around drainage and wastewater management to help offset the decades of development where this was not considered.	Our DWMP was focused on long-term strategic responses to modelled hydraulic risks. The data we are providing and sharing through our hub goes some way to demonstrate where areas are under stress and at high risk of issues. We will continue to work with the wider business and externally to influence where possible planning policy. We welcome the recent publication and commitment to implement Schedule 3 of the Flood and Water Management Act 2010. (https://www.gov.uk/government/publications/sustainable-drainage-systems-review) This will provide a framework for the approval and adoption of drainage systems, a sustainable drainage system approving body within unitary and county councils, and national standards on the design, construction, operation, and maintenance of sustainable drainage systems for the lifetime of the development.

Consultee	Feedback	YW Response
North Yorkshire County Council	NYCC work closely with YW on a number of high-profile risk areas e.g. Malton. We would welcome further discussion with YW around the key areas of flood risk within the YW/NYCC area. We note that a number of key areas are covered within the assessment but note that there may be more areas of flooding that YW are not aware of or vice versa. At the very least there may be areas where NYCC and other Risk Management authorities are looking to carry out works which are also identified as priorities for Yorkshire Water. The presence of Yorkshire Water engaged at a partnership level in terms of flood risk initiatives/meetings e.g. RFCC, North Yorkshire Flood Risk Partnership would facilitate this. The Northumbria Integrated Drainage Partnership is a good example of an integrated approach and something NYCC would like to explore with YW.	We welcome this invitation to work closer together and to explore the integrated model approach. We welcome the sharing of information. Following the engagement workshop in January 2023, we will process the information and insight gained and through our partnerships team, we will work with you to develop next steps.

Consultee	Feedback	YW Response
Customer Comment	I think consideration is needed for heatwave scenarios in combined sewers where insufficient water is going through sewer systems due to water bans with also reduction in surface water.	Our sewers are generally constructed to ensure flows achieve a self-cleansing velocity at sufficient frequencies. We note this feedback and will consider assessing the potential impact of climate change on the frequency that self-cleansing velocities are achieved during future cycles of the DWMP.
Customer Comment	Save massive ££££ by prioritising water meters which would hp pay for my expensive plan choice. ie pay customer a discount to get one	Water meters are free to our customers, and we encourage customers to review our website for more information on water meter installation: https://www.yorkshirewater.com/bill-account/water-meters/request-a-meter/
Customer Comment	Spend more time on action and less time on writing documents that mean nothing. Too late for planning just get on with the urgent work.	Delivering high quality service is our highest priority. Production of a long-term plan is a critical part of the overall activities that we carry out to ensure our services remain resilient into the future. One of these measures is to produce a future focused plan to aid with future investment and to assess the extent of the issues we need to resolve in future AMPs. This is done alongside our day to day reactive and proactive work.

Consultee	Feedback	YW Response
Customer Comment	simplify, simplify, simplify	Ahead of our final publication we will work to ensure our customer and non-technical documents are appropriately simplified in comparison to the wider technical document. We will also look to use other tools to engage with our wider customer base and stakeholders. The production of the detailed technical document is required for those stakeholders interested in any of the numerous technical elements that are required to develop such a plan.
Customer Comment	It all seems to be well thought out	We welcome this comment.
Customer Comment	very good plan, but we need to think seriously about the environment first and reducing the flood level, and the drainage should then be easier to manage	We welcome these comments and continue to focus on our company aspirations and regulatory targets which aim to both protect the environment and minimise flood risk.