

Data Protection Office
Yorkshire Water Services Ltd
Halifax Road
Bradford
BD6 2SZ

21 August 2026

Reference Number: EIR

Dear

We refer to your email dated the 27 May 2026 in relation to the information provided to you in our response to EIR

We logged your internal review reference as EIR for this case.

Original request EIR

We received your request for information on 28 April 2026 and recorded this as EIR

1. "1. Asset Location and Specification

Please provide:

- *Maps, plans, or asset records identifying the location of all water mains, trunk mains, feeder mains, and associated infrastructure within:*
 - *Garnett Street*
 - *Old Gate*
 - *Market Street (where connected to the above)*
 - *b) The specification of these assets, including:*
 - *Pipe diameter*
 - *Material type*
 - *Installation date (or estimated age)*
- *Classification (e.g. trunk main, distribution main, transfer main)*
-

2. Maintenance, Inspection, and Repair History

2. *Please provide records from 1 January 2010 to present for the above area, including:*
- *a) Maintenance schedules and inspection reports*

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Yorkshire Water Services Limited Western House Halifax Road Bradford BD6 2SZ
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- b) Records of repairs, interventions, or emergency works
- c) Any known defects, weaknesses, or condition assessments
- d) Records of repeated excavation or reinstatement works

3. . Burst Main Incident – 2016

Please provide all records relating to the reported burst water main in or around early 2016 affecting Garnett Street and surrounding properties, including but not limited to:

- a) Exact date and location of the burst
- b) Cause of failure (including any engineering assessment)
 - c) Internal incident reports and post-incident reviews
 - d) Records of properties and businesses affected
- e) Any risk reclassification or mitigation measures implemented following the incident

4. Ground Conditions and External Stress Factors

- Please provide any assessments, reports, or internal communications relating to:
 - a) The impact of the December 2015 flood event on water infrastructure in this area
 - b) Ground stability, washout, or subsidence affecting pipe bedding
 - c) The impact of traffic loading and/or vibration (including heavy vehicles) on pipe integrity
 - d) Any identified risks associated with ageing infrastructure in this location

5. Easements, Restrictions, and Land Use Controls

4. Please provide:

- a) Details of any easements, wayleaves, or restrictions placed on land above or adjacent to these assets
- b) Any documented restrictions on planting, excavation, or construction due to the presence of water infrastructure
- c) Any correspondence with landowners relating to such restrictions

6. Risk Assessments and Forward Planning

5. Please provide:

- a) Any risk assessments carried out for this infrastructure corridor
- b) Any modelling or analysis relating to potential pipe failure scenarios
- c) Any consideration of cumulative risk factors (including flood impact, ground movement, and traffic loading)

7. Coordination with External Bodies

- Please provide records of any consultation, communication, or coordination with:
 - The Environment Agency
 - Calderdale Council
 - Any contractors or third parties
 - ...specifically relating to:

- Infrastructure risk in this area
- Flood recovery or mitigation works
- Proposed increases in traffic or construction activity (including heavy vehicles)”

In relation to question 7:

On the 22 April 2026 we wrote to request clarification in relation to this question:

“7. Coordination with External Bodies

Please provide records of any consultation, communication, or coordination with:

- The Environment Agency
 - Calderdale Council
- Any contractors or third parties
 - ...specifically relating to:
 - Infrastructure risk in this area
 - Flood recovery or mitigation works
- Proposed increases in traffic or construction activity (including heavy vehicles)

We are currently discussing this aspect if your request internally, at present this indicate that a number of different business units may be involved in or hold information relevant to engagement with external bodies.

To ensure we carry out proportionate searches and engage with the correct teams, it would be helpful if you could provide any further clarification on the scope of the request, for example:

- Any specific locations, assets, schemes or projects
 - Relevant time periods for reports
 - Whether you're interested in any particular types of engagement
 - Whether the request relates to planned, ongoing, or historic activities
- Any additional detail you can provide will help us identify the most relevant business areas and ensure that our response meets your request.”*

You responded on the same day to confirm:

“I am happy to clarify the scope of Request 7 to assist with proportionate and targeted searches.

The request relates specifically to the following area in Hebden Bridge (HX7 6AL):

- Garnett Street

- Old Gate
 - Market Street (where it connects to the above)
- The adjacent slope/land above Garnett Street where infrastructure easements may be present

This should be treated as a defined infrastructure corridor rather than isolated points.

This request relates to water infrastructure within that corridor, particularly:

- Any **trunk mains, transfer mains, or high-pressure pipelines**
- Associated infrastructure such as valves, chambers, or control points

The request specifically concerns any coordination or communication relating to:

- The **Environment Agency flood alleviation works in Hebden Bridge**
- Any **planned or proposed use of roads (including Old Gate and surrounding streets) for construction traffic or heavy vehicles**
- Any works or assessments that may affect or interact with underground water infrastructure in this area

Please limit the search to:

- 1 January 2015 to present

(This captures the period following the 2015 flood event through to current planning and proposed works.)

I am specifically interested in:

- Risk assessments or discussions relating to **infrastructure vulnerability**
- Consideration of **ground stability, vibration, or traffic loading impacts**
- Any identification of risk to water infrastructure arising from external works
- Internal or external communications where these risks are discussed or assessed

This includes (but is not limited to):

- Emails
- Reports
- Meeting notes
- Technical assessments
- Consultation responses

*This request relates to understanding whether risks to **existing high-pressure water infrastructure within this corridor** have been identified and considered in relation to external works and increased vehicle loading."*

Our response to EIR

We responded on the 22 May 2026 with:

1.

"Question 1 response

We confirm that the statutory water maps are available, at all reasonable times, for inspection by the public free of charge at YW's registered office in accordance with S198(2) Water Industry Act (WIA) 1991. If you wish to see the sewers and water mains, there are three ways to obtain this information:

Book an appointment online:

Firstly, to book an appointment please visit our [online booking system](#). The records we hold can then be viewed at Western House, Halifax Road, Bradford BD6 2SZ. The mapping terminal is available between 9.00am – 4.00pm, Monday to Friday with the last appointment available at 3.30pm. Viewing appointments may be booked 7 days in advance.

Local council offices:

The second option is to visit your local council offices where our records are also available to view free of charge. Arrangements vary between councils so please call them first.

Purchase maps:

Both the above options are only to view the sewer plans and water mains. If you wish to have a paper copy or electronic version of the records, these can be ordered, for a fee, on [SafeMove's website](#). Please note that the maps only show pipes owned and plotted by Yorkshire Water and do not show private pipes or property connection details. Some unplotted public assets may not be shown.

2. Question 2 response

Please find attached job history for clean water works in this area.

3. Question 3 response

Mains Repair ref. 19174614: date 24/04/2016

Location: Easting 399097, Northing 427250

Main Type: 8 inch, Asbestos cement. Replaced with 5.5m of ductile iron 200mm

Failure Type: catastrophic

Failure Cause: lay conditions, crack length 300mm, 150mm hole

Please see attached incident report. We are writing to inform you that your request for environmental information in relation to this question has been partially refused in accordance with the Environmental Information Regulations (EIR) 2004. Under Regulation 12(3), this refusal is based on the grounds that the requested information constitutes personal data relating to an individual other than the applicant. Protecting the privacy and personal data of individuals is a fundamental principle, and as such, the provision of this information would

contravene the data protection principles set out in Regulation 13. Regulation 13 stipulates that personal data shall not be disclosed if the release of such information would contravene any of the data protection principles in the UK GDPR or the Data Protection Act 2018. While we strive to provide as much information as possible in response to environmental information requests, we must also balance this with our obligation to protect personal data. Therefore, specific details that would enable the identification of individuals in the incident report have been redacted.

4. Question 4 response

5.

In relation to points (a), (b) and (c) Yorkshire Water does not hold recorded information in relation to formal assessments, reports or internal communications specific to these matters for the location in question. This is because we do not routinely undertake studies of this nature as a water provider unless this was driven by a particular incident or scheme. As such, this information is not held in accordance with Regulation 12(4)(a) of the Environmental Information Regulations 2004.

However, we have provided high-level information based on network modelling and risk-based assessment approaches, which are used to understand and prioritise risks across our asset base. Our modelling consider a range of factors, including historic performance (such as burst history) and known pressures on the network, to inform investment and operational decisions which also supports the information.

We operate and maintain an extensive water supply network of approximately 32,000 km of water mains. Given the scale of this network, it is not feasible to produce detailed, location specific reports for all potential external influencing factors unless a defined need arises.

5. Question 5 response

Within the locations you specified we hold records confirming that these exist, these secure rights of access for inspection, maintenance, repair and renewal. In accordance with section 12(5) paragraph (a) of the EIR, a public authority may refuse to disclose information to the extent that its disclosure would adversely affect international relations, defence, national security or public safety. Whilst we understand that for the purposes of public interest it would be beneficial to obtain this information we also have to considered whether it would be in the wider public interest to disclose the information. When weighed against the potential risk to national security and public safety for our clean water infrastructure. In applying the public interest test, while we recognise the benefit of transparency, we consider this is outweighed by the strong public interest in protecting water infrastructure and preventing increased risk of damage,

interference or misuse. Detailed site specific information for Easements, Restrictions and Land Use Controls has been withheld from our response.

6. Question 6 response

In accordance with section 12(5) paragraph (a) of the EIR, a public authority may refuse to disclose information to the extent that its disclosure would adversely affect international relations, defence, national security or public safety. Whilst we understand that for the purposes of public interest it would be beneficial to obtain this information we also have to considered whether it would be in the wider public interest to disclose the information. When weighed against the potential risk to national security and public safety for our clean water infrastructure.

Disclosure of details relating to the location of modelling presents a significant risk to public safety and the national security of Critical National Infrastructure (CNI). Safeguarding national security includes the protection of potential targets, even if there is no evidence that an attack is imminent. The clean water network form part of the CNI of this country and could be perceived as a potential target for such an attack. Having considered your request in line with the above, it is our belief that releasing a detailed modelling information could potentially pose a risk to national security. We also have to consider the guidance issued to us by DEFRA on what we can make available in the public domain in relation to Critical National Infrastructure (CNI). We recognise the importance of transparency and accountability, and we have carefully considered whether the public interest in disclosure outweighs the potential harm. However, we believe that in this case, the public interest in maintaining the exemption outweighs the public interest in disclosure. The potential risks associated with releasing the information are too significant to justify its disclosure, as such we will not be disclosing the information to you.

Whilst we have refused your request for detailed modelling we can advise we promote schemes based on the analysis of historic failures, we factor multiple considerations into our decisions including mains condition, age, leakage and ODI performance. Modelling for this area confirms the average pipe age is 40.27 and that there has been a total of 32 pipe failures.

The risk assessment risk bands are:

Asset risk rank	Asset risk band
462	B-High
418	B-High

7. Question 7 response

On the 22 April 2026 we wrote to request clarification in relation to this question:

"7. Coordination with External Bodies

Please provide records of any consultation, communication, or coordination with:

- *The Environment Agency*
- *Calderdale Council*
- *Any contractors or third parties*

...specifically relating to:

- *Infrastructure risk in this area*
- *Flood recovery or mitigation works*
- *Proposed increases in traffic or construction activity (including heavy vehicles)*

We are currently discussing this aspect if your request internally, at present this indicate that a number of different business units may be involved in or hold information relevant to engagement with external bodies.

To ensure we carry out proportionate searches and engage with the correct teams, it would be helpful if you could provide any further clarification on the scope of the request, for example:

- *Any specific locations, assets, schemes or projects*
- *Relevant time periods for reports*
- *Whether you're interested in any particular types of engagement*
- *Whether the request relates to planned, ongoing, or historic activities*

Any additional detail you can provide will help us identify the most relevant business areas and ensure that our response meets your request."

You responded on the same day to confirm:

"I am happy to clarify the scope of Request 7 to assist with proportionate and targeted searches.

The request relates specifically to the following area in Hebden Bridge (HX7 6AL):

- *Garnett Street*
- *Old Gate*

- Market Street (where it connects to the above)
- The adjacent slope/land above Garnett Street where infrastructure easements may be present

This should be treated as a defined infrastructure corridor rather than isolated points.

This request relates to water infrastructure within that corridor, particularly:

- Any trunk mains, transfer mains, or high-pressure pipelines
- Associated infrastructure such as valves, chambers, or control points

The request specifically concerns any coordination or communication relating to:

- The Environment Agency flood alleviation works in Hebden Bridge
- Any planned or proposed use of roads (including Old Gate and surrounding streets) for construction traffic or heavy vehicles
- Any works or assessments that may affect or interact with underground water infrastructure in this area

Please limit the search to:

- 1 January 2015 to present

(This captures the period following the 2015 flood event through to current planning and proposed works.)

I am specifically interested in:

- Risk assessments or discussions relating to infrastructure vulnerability
- Consideration of ground stability, vibration, or traffic loading impacts
- Any identification of risk to water infrastructure arising from external works
- Internal or external communications where these risks are discussed or assessed

This includes (but is not limited to):

- Emails
- Reports
- Meeting notes
- Technical assessments
- Consultation responses

This request relates to understanding whether risks to existing high-pressure water infrastructure within this corridor have been identified and considered in relation to external works and increased vehicle loading."

We further contacted you on the 27 April 2026:

"Thank you for providing the additional clarification in relation to your request.

Following receipt of this, we have met with the relevant business area today that we consider is most likely to hold the information within scope of your request, to ensure that appropriate searches are undertaken. During this discussion, we'd discussed the possibility of obtaining your contact details for us to share with a colleague in this area. Should you agree, they would welcome the opportunity to have a conversation with you to explain our operational business processes and work in practice. The purpose of this would be to help provide details on our business operations and support us in confirming that the information we are providing fully addresses your request under the Environmental Information Regulations.

If you are happy to provide contact details, please can you provide a contact telephone number by return email."

You confirmed via return email on the same day:

"At this stage, I would prefer to proceed with the formal Environmental Information Regulations (EIR) process and receive the written response to my request.

Once I have reviewed the information provided, I would be happy to consider whether a discussion would be helpful to clarify any points arising."

We have carefully considered the clarified scope of this request and recognises that it relates to a legitimate public interest issue concerning flooding and the potential impact on existing water infrastructure. However, we consider that complying with the request would be manifestly unreasonable under regulation 12(4)(b) of the Environmental Information Regulations 2004. Although the request is geographically defined, responding in full would require extensive manual searches across multiple systems and teams. In particular, the request seeks a wide range of unstructured information, including emails, meeting notes and internal and external correspondence, over a period from 2015 to the present. Yorkshire Water does not hold this information indexed by street level infrastructure corridors or by criteria such as "consideration of risk" or "infrastructure vulnerability". As a result, staff would be required to review large

volumes of material on a document by document basis to determine relevance to your request. In applying the public interest test, we recognise the strong public interest in transparency, flood resilience and understanding how risks to infrastructure are identified and managed. However, this must be balanced against the public interest in ensuring that the company can continue to carry out its core functions effectively. On balance, we consider that the public interest in maintaining the exception outweighs the public interest in disclosure in this instance.

Your internal review request EIR

You contacted us on the 23 June 2026 to request an internal review of our response to EIR advising:

"I am writing to request an Internal Review of aspects of Yorkshire Water's response to Environmental Information Request EIR

Firstly, I would like to acknowledge and thank Yorkshire Water for the information that has been disclosed. The response has confirmed several important matters relating to infrastructure within the Garnett Street / Old Gate corridor in Hebden Bridge, including:

- *A catastrophic mains failure in April 2016*
 - *The presence of an 8-inch asbestos cement main*
 - *Replacement works involving ductile iron pipework*
 - *A recorded history of 32 pipe failures within the area*
 - *Internal "B-High" risk classifications*
 - *The existence of easements/restrictions associated with the infrastructure*
- I appreciate the level of detail that has been provided in these areas.*

However, I request an Internal Review specifically in relation to the refusal of Question 7 under Regulation 12(4)(b) ("manifestly unreasonable").

My reasons are as follows:

1. The Request Was Geographically and Thematically Narrowed

Following Yorkshire Water's clarification request, I significantly narrowed and clarified the scope of Question 7.

The request was limited to:

- *A defined infrastructure corridor within Hebden Bridge*
 - *A defined timeframe (2015–present)*
 - *Specific categories of infrastructure*
- *Specific categories of external engagement*
- *Specific public works and traffic concerns*

The request therefore concerns a clearly identifiable subject matter rather than an open-ended trawl for information.

2. Public Interest Is Substantial

The disclosed information confirms:

- *Historic catastrophic infrastructure failure*
 - *High-risk asset classifications*
 - *Repeated failures within the corridor*
- *Infrastructure considered sensitive enough to engage Critical National Infrastructure considerations*

The request relates directly to understanding whether interaction between this infrastructure and proposed external works, including heavy construction traffic and flood alleviation activity, has been considered.

Given the potential implications for:

- *Public safety*
- *Infrastructure resilience*
- *Flood recovery and mitigation*
- *Protection of critical infrastructure*

...I believe there is a very strong public interest in disclosure.

3. Consideration of Partial Compliance or Refined Searches

I respectfully request that the Internal Review consider whether the refusal has been applied too broadly.

In particular, I ask whether proportionate and targeted searches could reasonably be undertaken using:

- *Relevant project names*
- *Defined locations*
 - *Keywords*
- *Specific teams already identified during Yorkshire Water's internal discussions*

It may be possible to provide at least partial disclosure, summaries, or limited searches without requiring an unreasonable manual review of all records.

4. Engagement With External Bodies

The request concerns communication and coordination with:

- *The Environment Agency*
 - *Calderdale Council*
- *Contractors or third parties*

...in relation to infrastructure interaction and risk.

Given the acknowledged existence of high-risk infrastructure in this corridor, I believe there is a legitimate public interest in understanding whether these matters have been discussed or assessed in relation to external works and increased vehicle loading.

*I would therefore respectfully request that Yorkshire Water reconsider the application of Regulation 12(4)(b) to Question 7 and undertake a further review of whether fuller or partial disclosure can reasonably be achieved.
I look forward to the outcome of the Internal Review."*

Our response to your internal review EIR

We have now completed an internal review of the handling of your request. As part of that review, we have reconsidered the scope of your request, the clarification you provided, the searches and enquiries undertaken by Yorkshire Water, the application of Regulation 12(4)(b), and the steps taken to provide advice and assistance.

For the reasons set out below, the internal review upholds the original decision to rely on Regulation 12(4)(b) of the EIR on the basis that compliance with the request in its entirety would be manifestly unreasonable.

Your request was for a broad range of environmental information relating to the potential impact of flood alleviation works and related activities on Yorkshire Water infrastructure in and around Old Gate, Garnett Street, Market Street and surrounding area in Hebden Bridge.

The request included, but was not limited to:

- emails
- internal and external correspondence
- meeting notes
- technical assessments
- reports
- records of discussions
- information concerning water infrastructure vulnerability
- information concerning flood mitigation works
- information concerning the use of roads for construction traffic or heavy vehicles
- information spanning the period from 1 January 2015 to the date of the request.

We recognise that the subject matter of your request concerns environmental information within the meaning of Regulation 2(1) of the EIR, including matters relating to water infrastructure, flood alleviation works, development works and potential effects on the environment and built infrastructure.

We also recognise that your request relates to a legitimate matter of public interest, in the management of flood risk, the protection of water infrastructure, and the potential impact of external works on existing public utility assets. As part of the handling of your request, we took steps to assist you in clarifying and refining the scope of the information sought. On 22 April 2026, we sought clarification from you regarding the scope of the request. Following your response, the scope of the request remained broad and was expanded by the clarification provided.

We then undertook discussions with the business area considered most likely to hold relevant information. On 27 April 2026, we offered you the opportunity for direct engagement with the relevant operational team. The purpose of that offer was to explain Yorkshire Water's business processes, understand in more detail the information you were seeking and establish whether searches could be focused in a more proportionate way. You confirmed that you wished the matter to proceed through the formal EIR process and that you wished to receive a written response.

Regulation 12(4)(b) of the EIR provides that a public authority may refuse to disclose environmental information to the extent that the request for information is manifestly unreasonable.

Having reconsidered the request at internal review, we remain satisfied that compliance with the question in its entirety would impose a disproportionate burden on Yorkshire Water.

The request is geographically defined, but it is not limited by reference to a specific known project file, reference number, correspondence chain, named individual, document type or business process. It seeks a broad category of information across an 11-year period, from 1 January 2015 to the present. The information requested is not held or indexed by reference to:

- street-level infrastructure corridors,
- infrastructure vulnerability,
- traffic loading,

- flood mitigation discussions,
- construction traffic impacts,
- overland diversion proposals,
- the specific combination of Old Gate, Garnett Street, Market Street and surrounding streets,

As a result, we cannot identify all information within scope of your request through a simple search of a single system or file. It would require extensive manual searches across multiple business areas and records systems, followed by document by document review to determine whether each item falls within scope and whether any exemptions apply.

To comply with your request following our engagement, we identified that information was potentially held across a number of business areas

- clean water networks teams
- wastewater networks teams
- developer services
- capital delivery
- flood resilience and environmental teams

We undertook a preliminary search using the terms 'Garnett Street', 'Old Gate', 'Market Street' and 'Flood alleviations works in Hebden Bridge'. This search returned 37 Mailboxes with results and 164 items. In reviewing the 164 emails returned in the scope of your request, the emails related only to our cascade of your EIR request out to the business and were duplicates.

To ensure reasonable steps were taken to identify information falling within the scope of your request, we broadened our searches using the term "Hebden Bridge". Your original request covered the period from 2015 to the present. However, as part of our response to EIR searches conducted for the period 2020 to 2024 using this term returned in excess of one million results across approximately 10,000 locations within the organisation.

For the purposes of our searches and interpretation of this request, we have considered the request to relate to information concerning the clean water network. It is not always possible to distinguish, through email searches alone, whether correspondence relates specifically to the clean water network or the

wastewater network, as terminology and discussions may overlap and relevant emails do not consistently identify the particular network to which they refer.

You advised at internal review you were happy for a summary, as such we have asked for an overview on the impact of the water mains impacted in this area, please find this below.

Yorkshire Water was contacted by the Environment Agency's contractor, BAM, regarding the Hebden Bridge Flood Alleviation Scheme and the need to assess potential impacts on existing clean water assets.

The engagement involved reviewing information submitted as part of the planning application and associated proposals to identify whether any Yorkshire Water infrastructure would be affected by the scheme.

Following this review, it was identified that works at three locations in Hebden Bridge would require temporary above-ground diversions of water mains. Appropriate protection measures, including barriers and other safeguards were proposed to protect the infrastructure during construction.

Of the three locations identified, only the diversion at Old Gate falls within the streets specified in your request. The engagement concerns water main diversions required to facilitate flood alleviation works affecting the Yorkshire Water clean water network at Old Gate, Hebden Bridge.

Discussions have focused on the diversion of existing water mains and the provision of temporary overland pipework at Old Gate to maintain water supplies while construction of the flood defence scheme is undertaken. In particular, two high-pressure water mains, operating at pressures in excess of 10 bar, are located within the works area.

It is proposed that these mains will be temporarily disconnected and replaced with overland pipework to ensure continuity of supply to downstream customers throughout the construction period.

If you are not satisfied with the outcome of the internal review you have the right of appeal to the Information Commissioner who can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane

Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113
Web: <http://www.ico.org.uk>

Thank you for contacting Yorkshire Water.

Yours sincerely,
Data Protection Team
Email: EIR@Yorkshirewater.co.uk