Statement of Response to representations on the draft Drought Plan 2027

Yorkshire Water

November 2026

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1 Introduction

Our draft Drought Plan 2027 (DP27), summary document and supporting environmental assessments were published on our website on 22nd May 2026. We held an eight-week consultation period and received comments from eleven stakeholders.

Representations were received from regulators and a range of key stakeholders. The Environment Agency (EA) and Ofwat commented that they were satisfied our DP27 met statutory requirements and drought planning expectations. They also made some recommendations for improvements. Other stakeholders were generally supportive of the content but have concerns over longer-term water resource availability and wider drought risks impacting the environment, agriculture and other sectors.

This statement of response describes how we have considered each of the representations received. We have also made some changes to our plan and published a revised draft DP27 which can be viewed via this link Drought plan.

Our revised DP27 and statement of response have also been submitted to the Secretary of State for the Department of Environment, Food and Rural Affairs (Defra). Defra will review our statement of response as well as those of other water companies in England and Wales and formally notify each company on its views. Following this process, we expect to publish our DP27 as final by spring 2027.

In accordance with Drought Plan guidance, this statement certifies that Yorkshire Water's Drought Plan 2027 has been reviewed by our security team. This 'public' version has some information redacted or edited out for reasons of national security. It does not contain any commercially sensitive information.

2 Response to representations

The table below lists the eleven organisations who made representations on our draft DP27.

Stakeholder	Abbreviation	Section
Canal and Rivers Trust	CRT	0
Consumer Council for Water	CCW	0
Environment Agency	EA	0
Historic England	HE	0
Advanced Water Infrastructure Network	AWIN	0
Natural England	NE	0
National Farmers Union	NFU	0
Ofwat	Ofwat	0
West Yorkshire Combined Authority	WYCA	0
Severn Trent Water	STW	0
Yorkshire Wildlife Trust	YWT	0

We provide a response to each individual point made in the representations in Appendix 1 of this Statement of Response. We will continue to engage with stakeholders as we finalise our DP27 and have met with the EA during the development of our revised draft DP27 to discuss updates to our action triggers and environmental assessments.

Where we have made a change to our DP27 to address the comment we state this in Appendix 1 and provide the reference to where the change can be viewed in our published revised draft documents. Where we have not made a change, we provide a response to the comment in Appendix 1.

2.1 Changes to our plan

The most material changes to our DP27 since we published the draft have been made to build on learning from recent droughts we experienced in 2022 and 2025. These changes are presented in Section 2 of our main document with further details in Appendix 9.2. In summary they include:

- Updating our reservoir drought triggers to move away from fixed reservoir control lines to drought bands that align with the EA drought status levels (levels 1 to 4) and better illustrate the drought stages.
- Updating our water resource simulation model to better align with recent drought operations and to include inflow data from our most recent drought in 2025.
- Updating our demand reduction drought actions to include for activities to engage with non-households on voluntary reductions when there is a risk of needing a non-essential use ban.
- Adding further details on non-household and retailer communications in a drought.
- Updating level 3b actions to remove two transfer options that on further modelling were found not to be effective in drought.

In response to representations, we have:

- Made updates to our summary document to provide examples of how our customers can save water.
- Added further information to our DP27 main and summary documents on our Priority Services Register

- Added further information to the appendices on how the DP27 aligns with the Water Resources North (WReN) statement of intent (Appendix 7).
- Added a section (Appendix 9.1) summarising the changes since our previous Drought Plan (DP22).
- Updated our Worked Examples document to include a scenario that triggers level 3b actions.
- Updated environmental assessment documents to clarify monitoring and methodology details and to add further information on level 3b supply option.
- Committed to continue to liaise with stakeholders on drought planning and long-term water supply issues as part of the Water Resources North (WReN) Regional Group and through the development of our Water Resources Management Plan 2029 (WRMP29).

Appendix 1: Consultation representations and our response

The following tables list each consultee's comments and our response. Where a change is made to the DP27 documents we note the document and the section number. We have added reference numbers to the relevant consultee comments except for the EA evidence report references which were assigned by the EA.

Appendix 1.1: Canal and Rivers Trust

Ref.	Comment	Yorkshire Water Response
CRT01	The Canal & River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK, maintaining the nation's third largest collection of listed structures, as well as museums, archives, navigations and hundreds of important wildlife sites. We believe that our canals and rivers are a national treasure and a local haven for people and wildlife. It is our job to care for this wonderful legacy – holding it in trust for the nation in perpetuity and giving people a greater role in the running of their local waterways. Thank you for the opportunity to review the Yorkshire Water Draft Drought Plan 2027, the Trust is reassured that the plan acknowledges the need for	Thank you for the feedback and we will continue to inform and consult the Trust when in drought and as part of our long-term planning developing our Water Resources Management Plan (WRMP) and the WReN Regional Plan.

Ref.	Comment	Yorkshire Water Response
	agile communication at all stages between Yorkshire Water and the Trust. In the event of a drought and the triggers within the plan being crossed, the Trust are pleased to see that communication will commence upon the crossing of drought trigger one and will remain consistent until the drought has ended. The Trust are also pleased to see there will be a period of consultation ahead of any drought permit applications to understand the impact on our abstractions, as was undertaken during the drought of 2025	
CRT02	We welcome the opportunity to work closely with Yorkshire Water to support the Drought Plan implementation when it occurs.	We appreciate the CRT's support and will continue to communicate with them on drought implementation.

Appendix 1.2: Consumer Council for Water

Ref.	Comment	Yorkshire Water Response
CCW01	The Consumer Council for Water (CCW) is the independent voice for water consumers in England and Wales. Our role is to ensure that the interests of household and non-household customers are represented in water regulation and policy development, particularly in relation to affordability,	We welcome CCW's feedback on our non-technical summary document and have considered each of the recommendations in the development of our revised draft DP27.

Ref.	Comment	Yorkshire Water Response
	service, trust, transparency and long-term resilience. CCW welcomes the opportunity to respond to Yorkshire Water's consultation on its draft Drought Plan. We look forward to continuing to engage with Yorkshire Water as the plan is finalised. CCW has considered the non-technical, customer facing version of the draft Drought Plan, specifically considering if the document will help customers to understand what a drought is, what factors create a risk to the water supply, what action Yorkshire Water will take at different trigger points, how and what the customer might expect to hear from the company and what actions the customer can take directly. Our comments, therefore, are solely based on the non-technical document, not the detailed draft Drought Plan and its annexes.	
CCW02	CCW's Water Voice consumer panels allow household customers to share views with CCW and their water company, helping companies listen, learn and act on feedback to improve services and strengthen accountability. During the extreme heat event at the end of June 2026, CCW asked the Water Voice community about their water using behaviour; 665 community members took part. The survey took place between	Thank you for sharing these insights. Our DP27 describes actions and the water saving initiatives we offer we take to promote the need for water saving each year including when not in drought (see appendix 4 of our Drought Plan). Our long-term plans include an ambitious leakage and water consumption reduction programs, and we have Performance Commitment targets (i.e. regulated targets) on leakage, per capita

Ref.	Comment	Yorkshire Water Response
	25th June and 30th June, during which period June heat records were broken and East Anglia experienced three successive days of temperatures above 37°C. The findings from the survey, available on our Water Voice community webpage showed that extreme heat materially changes how households use water. 81% of Water Voice community members said their household used more mains water than usual and the average temperature at which people think their household starts using more water is around 25°C. Increased use was mainly linked to practical coping behaviours, including drinking more water, taking extra showers, keeping children and pets cool, and doing extra laundry. Some of these behaviours present an opportunity for companies to help customers use water more wisely in times of water stress. For example, 64% of community members said they were using more water than usual running the tap to get cold drinking water, 49% specifically identified using more water than normal watering the lawn. Filling a jug of water to cool in the fridge and leaving lawns to go brown are simple actions that would save water.	consumption and non-household consumption. We regularly review our water saving messages and our initiatives and customer surveys such as this provide valuable feedback.

Ref.	Comment	Yorkshire Water Response
	Whilst 81% of community members said they used more water than usual, 82% of community members said they engaged in at least one water-saving activity either regularly or during this period of very hot weather. The most common water saving habits identified were only running washing machines or dishwashers when they were full (55%), using leftover drinking water on plants (43%) and using a watering can instead of a hosepipe or sprinkler (42%). This shows people are willing to take actions to curb water use and some messages are getting through. The research highlighted an important awareness gap. Many community members were unaware that increased water demand during hot weather can put pressure on water supplies, particularly when many people use water at the same time during peak periods, such as the early evening. Better awareness of peak periods would enable people to spread usage across the day reducing the risk of peak time pressure dips or supply interruptions. Customers are willing to act, but they need clearer prompts, stronger reasons and more practical guidance. The top factors that would make people more likely to move water use to a different time of day were a financial reward or incentive at 44%, lower bills or lower charges at certain times at 42%,	

Ref.	Comment	Yorkshire Water Response
	a clear request from their water company at 35% and advice on the best times to use water at 31%. The vast majority of community members, 77%, said they would expect to hear water-saving communications during extreme heat from their water company. The water provider was also cited as the most trusted source of information about droughts, water shortages and water-saving messages, with 67% of community members citing them. This underlines the importance of company communications during extreme heat and droughts, on how customers can play their part in using water wisely. Asked what water companies should do differently when communicating with customers about extreme heat, drought or the need to save water, they said they wanted earlier, clearer and more localised communication on water levels, demand and what they should do. However, customers also expected companies to explain what action they were taking before asking the customers to change behaviour. Trust depends on companies showing action such as fixing leaks and infrastructure investment. With trust in water companies at an all-time low, there is opportunity in drought plan communications not just to help customers reduce water use during hot weather, but to earn back trust by showing how water	

Ref.	Comment	Yorkshire Water Response
	companies are prepared, transparent, and taking actions alongside their customers.	
CCW03	CCW Expectations CCW sees the non-technical draft Drought Plan document as an opportunity to help customers understand what drought, peak and high demand are, the impact of that and what customers can do to help lower the risk of low pressure and intermittent supply during these events. The document is also an opportunity to set out the role the company plays in saving water so customers can see how the company plays its part. They are a vehicle to tell people what kind of messages they should expect to receive at different trigger levels, and how they should expect to receive them. CCW expects the non-technical draft Drought Plan to be an accessible document setting out clearly - What a drought is, the challenges that impact on water resources and how the company monitors these. - The different drought levels the company has and the actions it will take, and will ask customers to take, at these trigger points.	Our non-technical summary document has been edited by a design agency to aid accessibility. We consider it to include most of the information listed by the CCW. When in a drought we will publish further information and frequently asked questions (FAQs) to explain the situation, details on water use restrictions and the ask of customers.

Ref.	Comment	Yorkshire Water Response
	- The difference customers actions might make in avoiding the need for restrictions further down the line. - How customers can expect to hear communications from the company both as risks emerge and as risks abate. - An explanation of what is and what is not covered by temporary use bans (TUBs) and non-essential use bans (NEUBs) and of customers exempt from them. - An explanation of the assistance offered through the priority services register and how to join it. - Water saving advice and where offered, links to water saving devices offered by the company. - Environmental considerations The document should be brief, include graphics (with relevant accessibility considerations) and tables where appropriate and be free from jargon and technical language wherever possible."	
CCW04	Yorkshire Water's non-technical draft Drought Plan clearly defines drought, explains how rainfall, temperature, demand, and reservoir levels affect water resources, and describes how Yorkshire Water monitors reservoirs, demand, rainfall, weather forecasts, and drought modelling.	Thank you for this feedback.

Ref.	Comment	Yorkshire Water Response
CCW05	The document sets out Drought Levels 1–4, explains the trigger points, summarises the company's actions at each level, including communications, leakage control, Temporary Use Bans (TUBs), Non-Emergency Use Bans (NEUBs), emergency measures, and the drought recovery process. However, the document could more clearly explain the actions customers would need to take at each drought level.	To more clearly explain the actions customers can take we have included additional content to the summary document and added a section "How You Can Help Protect Water Supplies During Dry Weather".
CCW06	The document encourages water saving and states that Yorkshire Water prioritises demand reduction before introducing restrictions. It suggests that customer action can help reduce demand and delay escalation, but it does not explicitly quantify or explain how customer action could help avoid future restrictions. Including examples, estimated savings, or explanations of how collective action could prevent progression to TUBs or NEUBs would help customers understand the value and impact of their actions.	We have provided estimated percentage savings from demand reductions in table 3-3 of our DP27 main document. As explained in the updated section 3.2.6 of the main plan, the recent UKWIR report 26/WR/02/22-1 concluded that "it is not possible to provide a single estimate of the savings"...."Instead, the savings should be considered as quite specific for each Household, District Meter Area and Water Resource Zone..." Given these complexities and the fact that each drought is different, it is not possible to explain how, or if, collective action prevents progression to TUBs or NEUBs.
CCW07	The communications section explains that Yorkshire Water will use multiple communication channels, engage with customers throughout the drought	We have added a paragraph to the Communications Strategy section of the Drought Plan non-technical summary.

Ref.	Comment	Yorkshire Water Response
	cycle from onset to recovery, publish formal notices in newspapers where required, and use the same channels to announce the end of restrictions. However, the document does not specify which channels Yorkshire Water will use, such as email, SMS, social media, or website updates. Customers need clear information about how Yorkshire Water will communicate with them so they can recognise and trust official communications.	
CCW08	The document gives examples of activities restricted under TUBs (such as watering gardens, washing cars, and filling pools) and NEUBs (such as commercial vehicle washing, cleaning non-domestic premises, and watering commercial plants). However, it does not comprehensively explain which activities are covered, which are not, or what exemptions apply. Instead, it simply states that many customers qualify for exemptions and that Yorkshire Water will provide further information before restrictions begin. Yorkshire Water should ensure exemptions cover customers who are registered on the Priority Services Register (PSR) because of reduced mobility or unable to make reasonable adjustments. A simple visual aid could also help customers understand these requirements more easily.	Information on activities restricted by TUBs and NEUBs is provided in our DP27 main document and the statutory and non-statutory exemptions in Appendix 4. We have added the restricted activities to the non-technical summary and highlighted there will be exceptions. When restrictions are in place we will provide information on exceptions. In recent droughts this has been in line with the UKWIR drought code of practice. However, it is possible industry guidance will change during the life of this plan, and we will provide the relevant information through our website and customer communications in advance of and during restrictions. Customers who require additional support can register for our Priority Services Register

Ref.	Comment	Yorkshire Water Response
		(PSR), and we have added additional information to our non-technical summary.
CCW09	The document discusses support for customers in vulnerable circumstances but does not mention the Priority Services Register, explain the support it provides, or describe how customers can register. The document should briefly cover these points and direct customers to information on how to apply.	We have additional information on the PSR and how to register for this within the communications strategy section of the non-technical summary.
CCW10	The document mentions environmental impact assessments. While the primary purpose of a drought plan is to safeguard public water supplies, Yorkshire Water could also explain how it seeks, where feasible, to support other sectors affected by drought, including environmental and agricultural droughts.	Section 5.5 of our main drought plan describes the coordination we are involved with in the regional and national drought groups which includes representatives of agriculture and environmental bodies. Through these forums, Yorkshire Water works collaboratively with organisations such as the EA, NE and sector representation to share information on drought conditions and potential impacts across sectors. Our summary document refers to Water Resources North on page 6 and we have added information on how we support the wider environment and other water users to page 18.
CCW11	We welcome the consideration given to accessibility within the document. However, a few changes could make it easier for customers to read	We have added some additional text to the graphic in the 'Drought actions: what we do

Ref.	Comment	Yorkshire Water Response
	and understand: Present some content in tables, such as: • Drought level → trigger → company action → customer action → communications. • TUB and NEUB comparisons. • Vulnerability support and exemptions	first, and how actions escalate?' section of our non-technical summary.
CCW12	Explain, by including a short glossary, several technical terms that currently have little or no explanation, including: • Reservoir control lines. • Compensation flows. • River abstractions. • Ordinary drought orders. • Strategic Environmental Assessment (SEA). • Habitats Regulations screening. • Soil moisture deficit.	There is a comprehensive glossary in the main drought plan document. In addition, we have now included a glossary in the non-technical summary to define the terms mentioned by CCWater.

Appendix 1.3: Environment Agency

EA letter - YWS_WCDP Representation letter Final 20260709

Ref.	Comment	Yorkshire Water Response
EA01	Environment Agency's representation on Yorkshire Water's draft drought plan This is the Environment Agency's review of Yorkshire Water's draft drought plan. We are a statutory consultee in the water company drought plan (WCDP) process and provide advice to government on the plans. We have assessed Yorkshire Water's plan against the relevant legislation, the government's expectations for the new water company drought plans, the Drought Plan (England) Direction 2025 and the WCDP guideline and supplementary technical guidance.	We note the EA considers our plan to be compliant with Directions and we have provided a respond to the recommendation and suggested improvements below.
EA02	Our view of the draft plan We expect a water company's drought plan to be easy to follow in a drought. The company's drought plan also needs to demonstrate that the company understands the impacts of its actions on the environment during a drought, and what it needs to do during recovery to improve the environment. We consider that Yorkshire Water's draft drought plan is suitable to be used in a drought, but some	Appendix 9 of our draft Drought Plan 2027 provided information on the lessons identified following the 2025 drought. Section 9.4 provided a summary of the actions we had completed and a timeframe for further actions. Our revised draft Drought Plan has been updated to include revisions to triggers (Section 2 and Appendix 9.2) and further details on our non-household

Ref.	Comment	Yorkshire Water Response
	revisions and further work should be completed. The only recommendation is that the company includes its learning from the 2025 drought. We acknowledge this was not fully possible before submission of the draft plan for consultation. The company published its draft drought plan on the 22 May 2026 for an 8-week consultation.	drought actions related to the lessons identified (Appendix 4 and 7).
EA03	Recommendations We have identified one recommendation which is significant to maintaining security of water supply and/or present a major risk to the environment during a drought. The evidence for our recommendations is shown in Annex A. We recommend that Yorkshire Water revises the following in its statement of response and final/revised draft drought plan 1. Additional work is required to ensure the lessons learned from the 2025 drought event are fully reflected within the plan. The drought last year provided a good test for Yorkshire Water's drought plan. There are still many areas of improvement to be incorporated into a final plan.	Appendix 9 of our draft DP27 included a review of the 2025 drought and lessons identified. The 2025 drought occurred during the period we were developing our draft DP27 and the timescales did not allow sufficient time for all the updates to be incorporated and therefore we made a commitment to make further updates in our revised draft plan in Section 9 of the draft main document. Our revised draft DP27 has been updated to include all the changes based on the learning from the 2025 drought. Appendix 9 has been updated to provide additional explanatory information on these changes
EA04	Directions	We note our DP27 has been found to be compliant with all Directions.

Ref.	Comment	Yorkshire Water Response
	Section 3 of the Drought Plan (England) Direction 2025 specifies what should be addressed in a water company drought plan. The company has fully complied with all Directions.	
EA05	Areas for improvement We have identified some moderate issues in the company's draft drought plan and provide the evidence for these in Annex A. The company's plan will be more effective when these improvements are made. We suggest the company improves its draft drought plan in the following areas. 1 Clarify how drought triggers are defined and used 2 Clarify how extreme drought supply options will be delivered and applied 3 Clarify how Temporary Use Bans (TUBs) will be triggered and managed 4 Ensure plan testing and scenarios are robust and supported by evidence 5 Ensure supply options are accurate and suitable 6 Clarify how Non-Essential Use Bans (NEUBs) will be triggered and used 7 Improve the clarity of environmental assessment and monitoring	Our response to these recommendations is given below against the detail the EA provided in its Annex A.

Ref.	Comment	Yorkshire Water Response
	8 Clarify the method and use of Exceptional Shortage of Rain (ESOR) 9 Clarify the approach to water quality monitoring and risks.	
EA1-9	Other considerations - recent TUBs (temporary use bans) research Recent research [Review the impacts of early implementation of Temporary Use Ban, UKWIR, 2025, WR/02/B/205] led by UK Water Industry Research (UKWIR) has concluded that temporary use bans are a useful tool to manage demand. It found that the impacts of TUBs on demand are variable and dependent on the circumstances under which they are applied, such as temperature. Water companies should use these findings to maximise the benefit of TUBs, considering where and when they will be used. The latest customer research [footnote2] led by the Environment Agency shows that two-thirds of people support TUBs when water levels fall, with a similar level of support in TUB affected areas. Water companies should review both sets of research and set out in their revised draft plans and statements of response what changes they have made in their approach to TUBS and related	In response, to these other considerations: 1. We have reviewed both the UKWIR report and the draft EA report, and we have added details of both to the references section in Appendix 10 of our revised draft drought plan. 2. We note that the reference code for the UKWIR report 'A Review of the Impacts of Communications Campaigns and Temporary Use Bans In 2025, Summary Report' was originally WR/02/B/205 but it has been changed to 26/WR/02/22-1. 3. We have updated Section 3.2.6 of our revised draft plan (which describes demand savings) to refer to this UKWIR report. It uses the updated reference number and reflects one of the key conclusions that "it is not possible to provide a single estimate of the savings from either TUBs or communication campaigns."

Ref.	Comment	Yorkshire Water Response
	communications. Water companies should implement TUBs in sufficient time. TUBs and communications should be in place long enough to have a measurable impact on reducing customer demand before companies apply for any drought permits or orders. [footnote 2] Perceptions of Temporary Use Bans (Hosepipe Bans), Environment Agency, 2026	4. We also refer to this section of the UKWIR report below in our response to the Environment Agency's Issue 3.1. 5. We have updated Section 3.2.7 of our revised draft plan (which describes customer views) to refer to this draft report. For example, section 3.2.7 of our revised plan quotes the finding that two thirds of respondents either strongly support or tend to support TUBs when levels fall.
EA10	We will set up a meeting with the company to discuss our representation and work with them to make the necessary improvements to the plan.	We met and discussed the improvements with the EA in September 2026.

EA letter - YWS_WCDP Evidence Report Final 20260709

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
R1.1 - Provision of outstanding work	The company details on page 114 of the draft plan the outstanding work still required linked to the lessons learnt from the 2025 event. Topics are: Drought scenarios: Update of water resource simulation model to include 2025 data, which could lead to changes to worked examples. Triggers: Represent the drought levels using reservoir bands to better align with the worked example included in	The full effectiveness and clarity of the plan cannot be properly assessed without this information and therefore the risk to security of supply and the environment is not fully known	The company must provide all outstanding work and update all relevant aspects of the plan and present with tracked changes when the revised plan is due alongside its statement or response. The company must also ensure any changes in drought actions or associated benefits are also reflected accurately in their Water Resource Management Plans (WRMP) forecasts and option benefits, for example the	We recognise the importance of this work and have taken action as committed in our draft Drought Plan. A copy of our revised draft DP27 with all changes marked has been provided to the EA and Defra. Appendix 9 describes the changes we have made. Our WRMP29 will align with drought action savings assumed in our DP27.

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	Appendix B of the drought planning guideline 2025. Confirmation of triggers for the transition between level 3b and level 4. Including the collating and analysing of data on emergency storage which could alter the level 4 trigger. Actions: The benefits of level 1 to 3a demand side actions have been reviewed and estimated to provide an accumulative benefit of up to 6.5% of the daily volume		savings from Temporary Use Bans (TUB's). The company should complete this for WRMP29. This should be completed when the company provides its statement of response which the company has committed to do.	

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	of water put into supply. Review non-household drought actions and develop an enhanced non-household communications strategy.			
I1.2 - Process for individual drought permits	The company has stated that it is considering a move away from the use of number of weeks from specific control lines to the use of bands. The company states that this will be finalised and a decision taken via submission of its revised draft plan. The company	Until the information is presented as complete it cannot be properly assessed. From the information presented so far, it seems that drought actions are considered rather than prescribed depending on at which point in the band they are	The company should ensure this work is completed and presented with its revised draft plan at statement or response, alongside any subsequent changes made to the plan because of their findings. This should include the narrative, diagrams and tables all aligning,	This work has been completed, and we have updated Section 2.2 -2.5 in our revised draft DP27. Section 2.7 of our draft DP27 described the proposed triggers and has now been deleted.

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	highlights that the trigger for extreme actions may change as it reviews minimum reservoir storge, currently set at 20%. The company has not made it clear exactly when it would take actions if implementing these bands. Currently the text suggests permits and orders would be implemented sooner but the graphs do not reflect this page 43-46.	alongside other factors. This means the actions the company would take and when it would take them, are not clear.	The company should be clear on the exact triggers for each potential drought action in terms of both their preparation and implementation making it clear for all stakeholders to understand. To be completed in the statement of response and revised draft plan.	
I1.2 - Process for individual drought permits	The company bases its drought triggers on available water in reservoir groups.	Without provisions for reservoirs that may see stocks out of line to the wider	The company should develop individual reservoir triggers to ensure	We are developing the individual reservoir's trigger as part of control

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	However, in recent droughts, it has been observed that singular reservoirs can see larger and faster reductions in supplies than other reservoirs in the group.	group could result in them running dry before action has been taken.	drought permits are applied for in a timely manner when the wider regional grouping has yet to meet the trigger level prescribed. To be completed in the statement of response and revised draft plan.	line update work. However, this information is not intended to be included in the DP. The decision on triggering and processing individual permits is based upon the sub-groups that each individual reservoir belong to triggering the permit.
I1.3 - Control line data for EA drought orders	The company includes individual reservoir control lines for Environment Agency (EA) drought order sites but does not include any data behind the control	Without the data behind the control lines the EA cannot accurately determine when the orders are required. As such this presents a risk to the environment.	The company should provide the EA with the data points which are behind the control lines for EA drought order sites. In addition, it would be useful to see this data for each	North West Area Reservoir 13, South West Area Reservoir 20 and South West Area Reservoir 19 North West Area Reservoir 2 and North West Area

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	lines. We need information on the control lines for the EA drought order sites North West Area Reservoir 13, South West Area Reservoir 20 and South West Area Reservoir 19 This will also be required for North West Area Reservoir 2 and North West Area Reservoir 3 when they become EA drought orders.		reservoir group to enable a clearer understanding of water availability. To be completed in the statement of response and revised draft plan.	Reservoir 3 to the Sharepoint.
I2.1 - Extreme drought management action (level 3b) availability	Appendix 5.6 outlines the company's extreme supply actions including their triggers and timescales. However, of these	There may not be enough supply actions to implement in a 1- or 2-year drought which are the most likely the company would face. For	The company should review its modelling to ensure its extreme supply actions identified as being available for 1- and 2-year droughts are	We have added 3b options to the 3 year worked example. We note that these actions have a small impact on minimum reservoir

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	actions only 4 of the 18 are triggered in a same year drought. Other extreme supply actions have a lead in time ranging from 6 months to 6 years to implement.	example, in 2025 the company was just a few weeks from level 3b actions being required.	sufficient to meet its water demands. The company should review prioritisation of its extreme actions, in combination with providing more actions for a shorter, but still severe drought. To be completed in the statement of response and revised draft plan.	stocks. We have included all actions that could be implemented quickly. It's also worth noting that in 2025 regional stocks just fell into the 3a band. If stocks had continued to fall at the steepest rate, stocks would have fallen into the 3b band within 4 weeks, but the time of year, demands, and drought measures already in place would have prevented this. Level 3b actions are designed to provide additional supplies to aid

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				recovery and resilience during a long drought, providing additional resources and allowing for repairs and outage.
I2.2 - Extreme drought management action triggers	There does not seem to be any triggers for the preparation of each action. Given the lengthy preparation required for some of the company's extreme actions. It is unclear when work would begin and therefore if they are realistic actions based on when they are proposed to be used. Such as the lead in times for	Drought actions without specific triggers could be a risk to both security or supply and the environment.	The company should review its triggers for its extreme supply actions against section 4.4 of the drought plan guideline March 2025, specifically section 4.4.2. In addition, appendix C of the drought plan guideline states: "You could consider phasing the triggers you use, particularly for	Appendix 5.6 follows the drought plan guidance ("Example format for actions in extreme droughts") and provides both triggers for when each extreme action is to be considered and a priority order for implementation. The phasing of each option will be based on priority order, and also the

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	work to be completed such as environmental assessments.		those extreme actions with the greatest uncertainty. For example, you could use the phases of preparation, mobilisation and implementation." To be completed in the statement of response and revised draft plan.	locations, duration and timing of a drought.
I2.3 - Extreme drought management actions with environmental assessments	Appendix 5.6 lists all the supply and demand actions for level 3b. Of the 18 potential supply actions various levels of environmental impacts are considered but work would be required to carry out the	There is a risk such assessments could prove the extreme supply actions are not viable from an environmental point of view.	The company should confirm which, if any, of these actions require screening out based on any negative outcomes seen in the environmental assessments that cannot be	We acknowledge that a number of the Level 3b supply-side actions represent extreme drought measures and that further environmental assessment would be required before implementation. The environmental

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	various assessments in readiness.		appropriately mitigated. To be completed in the statement of response and revised draft plan.	assessments presented within the drought plan are strategic in nature and proportionate to both the level of option development and their intended use during a severe drought. This approach is consistent with Drought Plan guidance requirements and is intended to identify potential environmental effects and future assessment requirements, rather than provide the detailed evidence needed

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				to support implementation. Throughout the options development process, several drought options have been screened out on environmental grounds, including through a Habitats Regulation Assessment (HRA). However, no additional level 3b supply actions have been excluded solely on environmental grounds at this stage, as further scheme-specific assessment would be required to determine the

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				significance of effects, the scope for mitigation and overall environmental acceptability. Some actions may ultimately prove unviable if detailed assessment identifies significant adverse effects that cannot be adequately mitigated. In such cases, the action would be removed from consideration and alternative drought management measures prioritised.

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I2.4 - Extreme drought management actions, Option 13, Doncaster Groundwater Option 1	Appendix 5.6 and the SEA. It is not clear how this option matches the WINEP [the Water Industry National Environment Programme] No Deterioration AMP8[1] implementation scheme within the Doncaster Wellfield which has the expected outcome of capping the licences within the wellfield at Recent Actual Average abstraction from between 2010 to	The EA does not believe that the actions in the Doncaster Wellfield correctly indicate the adverse environmental impact of increasing abstraction within the wellfield from the Sherwood Sandstone which would potentially deteriorate the currently 'poor' Idle Torne - PT Sandstone Nottinghamshire & Doncaster WFD Water Body (GB40401G301500).	The company should review the environmental risk associated with these actions to ensure they fully include / represent the deterioration risk to the aquifer. The company should also fully assess if this option will be available if the licences are capped in 2030 allowing no additional increase in abstraction and therefore if more actions are required to replace it.	The environmental assessment of this option has been reviewed and updated to more explicitly recognise the potential impacts associated with increased abstraction from the Sherwood Sandstone aquifer and to acknowledge the ongoing WINEP investigation within the Doncaster Wellfield. The current Environment Agency position is that abstraction licences within the

[1] "AMP" refers to Ofwat's five-year Asset Management Periods, which set water company investment levels, performance targets, and price controls; the current cycle, AMP8 is for the 2025–2030 period.

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	2015 or the No Deterioration baseline by 2030. The EA would not expect there to be any increase in abstraction allowable from the Doncaster Wellfield from the No Deterioration baseline. The licences may be capped at this in 2030, which raises the question regarding viability of the extreme actions if the company can't increase abstraction from the Doncaster Wellfield.		In addition, the company should provide information on how the WINEP investigation outcome will inform the drought plan. To be completed in the statement of response and revised draft plan.	wellfield will be capped in 2030 through the AMP8 No Deterioration scheme. However, the EA has also proposed, although not yet confirmed in writing, the introduction of a 15-year rolling average licence mechanism which could allow abstraction above the current 65 Ml/d level during drought conditions. The option therefore remains potentially available as a drought response measure, although its future operation will be influenced

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				by the outcome of the WINEP programme and any associated licensing changes. Reflecting the identified groundwater deterioration risk, the Strategic Environmental Assessment (SEA) has been revised from Minor Adverse to Moderate Adverse. This revised assessment reflects the poor status of the Idle Torne - PT Sandstone Nottinghamshire & Doncaster groundwater body, the potential for increased

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				abstraction pressure during operation of the option, the ongoing regulatory review of abstraction within the Doncaster Wellfield, and the concerns raised through consultation, whilst recognising the temporary and infrequent nature of drought use and the regulatory controls that would apply.
I2.5 - SEA report Doncaster Groundwater actions	SEA document. The 3 Doncaster Groundwater actions in table NTS 4: Page 24 Doncaster Groundwater Option	An inaccurate SEA document could result in option selection that cannot progress or omit actions that maybe required to	The company should review and update its SEA to address the 3 Doncaster Groundwater actions.	The environmental assessment of the Doncaster Groundwater options has been reviewed and updated to more

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	1: (4.3) doesn't appear to fully indicate that to comply with WFD No Deterioration of the Idle & Torne Nottinghamshire Sherwood Sandstone groundwater body (which is a poor-quality groundwater body quantitively). The company would not be able to increase abstraction above the No Deterioration baseline - only giving a minor impact from abstraction increases needed for this option. Page 25 Doncaster Groundwater Option	make the actions acceptable. This is therefore a potential risk to both the environment and security of supply.	To be completed in the statement of response and revised draft plan.	explicitly recognise the potential impacts associated with increased abstraction from the Sherwood Sandstone aquifer and to acknowledge the ongoing WINEP investigation within the Doncaster Wellfield. The current Environment Agency position is that abstraction licences within the wellfield will be capped in 2030 through the AMP8 No Deterioration scheme. However, the EA has also proposed, although not yet confirmed

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	2 Does mention WFD pressures but it is not clear what they are and whether they are related to ensuring No Deterioration of the Idle & Torne Nottinghamshire Sherwood Sandstone. Only seen as a minor impact. Page 25 Doncaster Groundwater Option 3: Does not mention WFD pressures or how increases in abstraction would negatively impact the ground waterbody through increased abstraction (same as Doncaster Drought options 1			in writing, the introduction of a 15-year rolling average licence mechanism which could allow abstraction above the current 65 Ml/d level during drought conditions. The options therefore remain potentially available as drought response measures, although their future operation will be influenced by the outcome of the WINEP programme and any associated licensing changes. Reflecting the identified

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	and 3 actions). The same comments for the 3 Doncaster groundwater actions in Table NTS4 are applicable to the Table 5-4 (which appear to be the same scores and comments across both tables) within the 5.3.2 Extreme Supply Drought actions section. Page 67 of the section states that '…none of these actions are of sufficient environmental impacts to exclude them from the DP 2027…'			groundwater deterioration risk, the significance of effect within the SEA has been revised. This revised assessment reflects the poor status of the associated groundwater body(s), the potential for increased abstraction pressure during operation of the option, the ongoing regulatory review of abstraction within the Doncaster Wellfield, and the concerns raised through consultation, whilst recognising the

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				temporary and infrequent nature of drought use and the regulatory controls that would apply.
I2.6 - Extreme drought management actions: South Area Reservoir 2 to wider reservoir system transfer and South West Reservoir 15 to other South West Reservoirs	Appendix 5.6 Both of these actions are listed as for the second year of a drought, however this means there could be uncertainty that the volumes of water will be available to transfer.	Relying on a supply option for use in year two that may not have enough water available presents a risk to security of supply.	The company should review its modelling and triggers for these actions to ensure they would be a reliable option for year two of a drought. To be completed in the statement of response and revised draft plan.	Following further modelling we removed the South Area Reservoir 2 to wider reservoir system transfer. We have also removed the South West Reservoir 15 to other South West Reservoir option as this is a resilience option and does not provide additional water in times of drought

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
I2.7 - Extreme drought management option: Pickering / Thirsk Groundwater Option 1	Appendix 5.6 states that this option is available immediately for use. However, the EA has not seen any preparation work in relation to this including the Environmental Assessment Report (EAR).	Currently this option is not permitted and therefore not ready immediately.	The company should provide detail and a timeframe for ensuring the option is permit ready. To be completed in the statement of response and revised draft plan.	This WRMP scheme should be complete by end of 2028; Appendix 5.6 has been updated to reflect this. The scheme provides additional storage on site with a new service reservoir. New boreholes will improve bacterial quality. Note that the site can currently run at 17 Ml/d. The requirement would be a drought permit to allow 17 Ml/d even when flow over the weir is zero. Due to combination of pumping into supply and testing of new boreholes

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				site has been running at 17 Ml/d this summer. This has resulted in the spring fed ponds becoming dry so there is a short-term impact which is expected to resolve once rainfall and recharge resume in autumn.
I2.8 - Extreme drought management option: Selby Aquifer Storage and Recovery Scheme 1	Appendix 5.6 Water abstracted from the River Derwent and put into groundwater via injection to a borehole under the Consent to Discharge Licence then allows it to be abstracted. Availability may be	The River Derwent abstraction has a Hands-off flow (HOF) condition in place during drought and therefore water availability maybe an issue due to low levels in the Derwent if the company wants to use this	The company should provide evidence that this option is viable. The company should provide a plan for how it would be used in combination with the Derwent abstraction e.g. how this drought level 3b option would help in	The aquifer storage system has operational limitations. We are currently renewing the time limited licence (TLL) therefore this needs investigating. There would be no potential in

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	an issue due to low levels in the River Derwent. The company states this licence was used in 2018. There are no abstraction returns for 2018 evidencing its use. The licence is currently unused. If flows are low, or the water ponded behind the barrage is of deteriorating water quality, there is a risk to the availability of water and also environmental deterioration.	option during severe drought.	a drought if Derwent flows were low. Consider if it should be an action taken earlier in a drought. To be completed in the statement of response and revised draft plan.	combination impact between this option and the River Derwent Drought Permit. The River Derwent Drought Permit would not impact flow downstream of the intake. Also, it is unlikely that the recharge phase would occur at the same time that the drought permit is implemented.
I3.1 - Sequencing of drought	The company proposes to apply for drought orders and permits 72	Whilst shortening the period from implementing TUBs to applying for	Linked to issue 1.1 the company should clarify specifically when	Our trigger for considering a TUB is when we enter level 2 of a drought.

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management actions	hours after implementing a TUB [temporary use ban]. The company measures the impact via smart metering data and says it can show the impact within this timeframe. TUBs in place during the 2025 event showed a 5% decline in distribution input (this figure includes any cumulative impacts from prior customer messaging and level 1-2 leakage reduction). The company states changing the period to 72 hours from the recommended 2	drought orders and permits could potentially increase the window for determination and implementation it raises concerns over when the TUB would be applied for. The purpose of a TUB is to reduce demand to potentially delay or remove the need for drought orders and permits. A 5% of distribution input saving is significantly greater than the contribution from the majority of drought permits and orders the company propose. It therefore suggests the company see TUBs	TUBs are triggered and why. The company should change its TUBs implementation to give a longer time for TUBs to be in place before applying for a drought permit. To be completed in the statement of response and revised draft plan.	This does not mean we automatically impose the restrictions as other variables such as temperature, rainfall, drought scenarios are taken into account. TUBs alone do not provide a 5% distribution input saving. In Appendix 4 of our DP27, we say "we estimate peak water savings up to 5% of total demand. The volumes are based on observed water savings when a TUB was imposed in the drought of 2025 and include savings from

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	weeks reduces the risks around the drought permit or order timeframe. During the drought in 2025, the company pushed its TUB application back from June to July based on a relatively low amount of rainfall.	as a gateway to apply for drought orders and permits rather than a mechanism to potentially avoid or delay level 3 supply actions		voluntary initiatives as it is not possible to disaggregate". This is supported by the *Review of the Impacts of Communications Campaigns and Temporary Use Bans in 2025*, UKWIR, 2025, 26/WR/02/22-1 which in its conclusion's states "..it is not possible to provide a single estimate of the savings from either TUBs or communication campaigns". This report also concludes that temperature and rainfall impact consumption.

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				Rainfall reduces consumption and "the sharpest change is seen at the lowest levels of rainfall, suggesting that consumption is mostly impacted by whether a day is completely dry or has some rain". Our drought action sequencing is clear that a TUB will be in place before permit/order implementation during the summer months (1 April to 30 September). We are in an unusual position where we have 47 options that require a permit or order. We balance the use of

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				our reservoirs for supply so that no area of our region is at greater risk. This means we must prepare for multiple permit/order related actions at the same time. Our experience in recent droughts has identified the time to receive permit/orders is a lengthy process and delays are not only a risk to supply but also maintaining compensation to the environment. Applications can (and have) led to public inquiries which further

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				lengthens the process. Our drought plan is therefore distinguishing between the application for the authorisation and the implementation in the sequencing of activities. TUBs are not a gateway to permits but neither should they be a prerequisite for companies commencing activities that could be required if the drought worsens but have lengthy lead times. We have amended the revised DP27 to include an

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				estimated period of seven days between advertising TUBs and advertising permits/orders.
I4.1 - Tabony table usage	Section 4.2 refers to the return period for the 1995/96 drought scenario based on Tabony tables.	We do not recommend use of Tabony tables and clearly state this in the Exceptional Shortage of Rain (ESOR) guidance documents that we do not accept analysis based on Tabony tables.	The company should remove all references to Tabony tables and use an alternative method of frequency analysis to inform estimates of return period. As per hydrological guidance for the assessment of an [exceptional shortage of rainfall] ESOR Date: May 2025. To be completed in the statement of	We have made changes in section 4.2 and several of the worked examples. Tabony tables analyses replaced with Standardised Precipitation Index (SPI) and Cunnane ranking analyses.

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			response and revised draft plan.	
I4.2 - Worked examples – Scenario testing	The company presents scenarios that are mainly based on historic inflow sequences and scenarios chosen around timing and duration of the drought. Return periods have been discussed for some of these, although Tabony tables are referenced, which we do not accept as a suitable method of assessing drought frequency. Stochastic modelling has been undertaken for the	Need for greater clarity around scenario testing to provide better evidence for levels of service and vulnerability.	The company should provide greater clarity on the scenario testing against the required levels of service and extreme drought, particularly around the frequency of occurrence. Tabony tables are not an acceptable method of assessing return period and historical inflow sequences alone are too short to represent extreme return period droughts.	We have updated text and use SPI analyses rather than Tabony tables and changed text in the Worked Examples in Section 4.2, 4.3, Annex 1.2 and 1.3 Scenarios. We have made clear where stochastic data have been used to represent droughts worse than those that have been experienced in the past.

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	drought vulnerability assessment, but it is not clear if these are represented in any of the scenario testing for the current drought plan or choice of triggers.		To be completed in the statement of response and revised draft plan.	
I4.3 - Scenario testing with year 1 orders and permits	On page 42, in the 2-year and 3-year drought scenarios, the company states it does not apply for permit/orders until year 2 of the drought, in the 3-year drought even delaying till the summer of the second year.	There is no testing of the situation where permits/orders are triggered in the first year and the drought then continues.	The company need to undertake scenario testing in which drought permits and or orders implemented in year 1 of a drought. Section 9.4 of the main plan states that the scenarios would be revisited for the revised draft so this may be improved.	We have edited a 2 year drought example (annex 1.4) to be more extreme- higher demand with permits in year 1- and to show bands. Annex 1.5 has also been edited with bands, but other examples left as lines as they show how we did operate under those rules.

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I5.1 - SW [South West] area reservoir 22	The company has removed this drought permit from its draft plan but it was present in its 2022 Drought plan. There are several compensation releases related to this reservoir and it was unclear what should be monitored, so a permit was not applied for in 2025. This is currently under investigation this AMP.	SW area reservoir 22 has been shown to run down in dry weather. Currently the company's plan does not include how the reservoir will be supported to ensure compensation provision continues in drought.	The company should provide a plan for how it will manage SW area reservoir 22 during drought or reinstate the drought permit into its plan. To be completed in the statement of response and revised draft plan.	There is a WINEP investigation this AMP on SW area reservoir 22 and until this concludes we are unable to provide the EA the required information to include this as a drought option in our Plan. With regards to support for SW area reservoir 22 this supplies another SW area reservoir as well as compensation. So, we would look to supply this other SW area reservoir by a RPS as much as possible as well as using the water in the other SW

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				area reservoir itself to preserve water for compensation at SW area 22 once this became a risk. There is also an option to pump SW area reservoir 22 however this is not something we do frequently but has been done in the past. We can support SW area reservoir 22 with water from Head a different reservoir which is done under normal operation. In 2025 the minimum level was 22% and if we maintained compensation flow

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				this would still leave 60 days of supply to 10%. When the AMP investigation is complete, we will look to re-include this option in our Drought Plan.
I5.2 - South West Area Reservoir 10	Error in table in appendix 5.3 for reservoir South West Area Reservoir 10	The MF [maintained flow]is described at its normal flow rather than the reduced flow.	The company should update the table to show the correct flow. To be completed in the statement of response and revised draft plan.	Update made to Appendix 5.3
I5.3 - River Ure drought permit	Appendix 5.5 River Ure drought permit. River Ure permit option is listed as a year-round option. It has been previously fed back	This flow band seems to occur very seldom, even in a drought, limiting the benefit obtained from this option. The permit has not been	The company should make it clear that this option is primarily a summer option and is extremely unlikely to	Whilst we acknowledge the EA's comment and agree that the benefit of this option is limited, YW will be

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	that the river has never dropped into the flow band applicable for this option in the Oct-Mar period. It therefore would not have provided benefit in any historic drought periods outside of the summer months. That is not to say it couldn't occur in the future, but it should be acknowledged that this is primarily a summer option with a very low likelihood of providing any benefit in the winter months	used in recent droughts.	offer a benefit in the winter months. The company could also consider a permit option for the next flow band above this (between 50 and 163Ml/d) as the current option seems unlikely to be useable. To be completed in the statement of response and revised draft plan.	reviewing the licence on the Ure over the next 18 months ahead of the TLL renewal date. We will review the drought option following this review

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
I5.4 - NW [North West]Area reservoirs	Appendix 5.4 The company are in pre-app for formalisation of the NW Area reservoir flow trials, and it has been confirmed the applications will be at the same volumes as the flow trials. This will remove the link between these sites, the former NW 1-3 options This means that the former NW 2 and 3 reservoirs will no longer be linked to public water supply. Therefore, the EA believes the options for the former NW 2&3 options should be based on the	As the plan is officially due to be published in 2027, it is likely the company's application will have been processed and issued by then. The actions would then become EA drought orders for the former NW 2and 3 reservoirs for environmental reasons, Former NW option 1 would be removed (which also removes the necessity of maintaining the weir).	The company should add drought permit options the flow trials pending formalisation would then become EA drought orders. (These could be included as new options and the old options removed once formalisation complete). To be completed in the statement of response and revised draft plan.	The Flow trials have been added as drought permits to the North West EAR. The EAR has been updated to reflect the former NW area reservoirs 2 and 3 becoming drought orders.

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	flow trial volumes that have been in place and are in the process of being licensed.			
I5.5 - North West Area Reservoir 11	Appendix 5.4 The company states "There is no requirement to meet a defined compensation release from this reservoir however, the licence includes a prescribed flow of 2.41 Ml/d whereby no water can be abstracted if the flow exiting the reservoir is below this level. We are not currently abstracting from the reservoir, but this Drought Plan	This removes the justification for having it as a drought permit. As the company are not abstracting from this site and the release is only required when abstracting, they can reduce flows without a permit. It's under AMP investigation and when this is licensed a permit or order would be required.	The company should remove Silsden drought permit option as the compensation can be reduced without a permit while no abstraction is ongoing. This can then be reviewed following the AMP investigation. To be completed in the statement of response and revised draft plan.	We note your comments but intend to retain this option in DP27. We are formalising the licence for this site in this AMP.

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	includes an option to bring the reservoir into supply." However, the option to bring it into supply appears not to be included in the company's draft plan.			
I5.6 - No drought option for North West Area Reservoir 14	There is currently no drought option for North West Area Reservoir 14, it was investigated in 2025 and the conclusion was brought that this was a drought order applied for by the company, as the operator is a separate entity.	This reservoir is downstream of public water supply reservoirs and therefore is not considered an EA drought Order.	The company should add a drought order option for compensation reduction at this reservoir along with providing the appropriate documentation in readiness for its use. To be completed in the statement of	We have never been close to needing an order at North West Area Reservoir 14. In recent years the lowest level the reservoir has reached is 39% and this was as a result of a planned drawdown for reservoir safety work.

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
			response and revised draft plan.	We hit 40% in September 2025 which was higher than most other reservoirs in the area. Due to the way we now use the Nidd intakes, North West Area Reservoir 14 has more inflow during the early spring months whilst they are unusable due to water quality risks. North West Area Reservoir 14 operates a complex compensation flow regime dictated by operating bands, with target compensation flows reducing in

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				the lower bands. This variable regime adequately protects stocks without the need for drought permits or orders.
I6.1 – Unclear NEUB trigger	The company has stated it will review the benefits of a NEUB ahead of applying for it but does not specifically state it will apply a NEUB ahead of any drought permits/orders. NEUBs are not represented in the diagrams showing actions and triggers example figure 2-1 page 36.	Without a trigger for a NEUB it is unclear how the company will effectively suppress non voluntary demand from non-households before potentially more environmentally damaging supply actions are used.	The company should provide a trigger for when a NEUB would be applied for and used and update any associated diagrams and commentary. This should include consideration of how early implementation of a NEUB will delay drought level 3b/4 actions. To be completed in the statement of	Our trigger for considering options that require a drought permit or ordinary drought order, including a NEUB, is at level 3a. As for all our drought options we will not automatically implement these actions depending on the specific conditions of the drought. A NEUB would restrict certain businesses

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	It is not clear under what circumstances the company would use a NEUB based on this plan. The company states in its plan that it is waiting on an industry report. However, the company has done its own cost-benefit analysis so it should be able to come up with a trigger for a situation in which a NEUB would be used.		response and revised draft plan.	more than others, impacting on their income for an estimated benefit of 0.5% of demand. The decision on when to apply for a NEUB would be made based on the information during the developing drought including environmental and socio-economic impacts and the potential to delay / avoid Level 3b / 4 actions.
I6.2 Time of year NEUB would be implemented	The company state in table 2-2, that NEUBs would be implemented between 1 April and 30 September. It is not clear why the	By only planning to implement NEUBs between 1 April and 30 October the company is limiting the full use of this action.	The company should clarify its plans to implement a NEUB ahead of more damaging drought actions, at any time of year.	Text in Table 2-2 has been deleted.

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	company would only implement NEUBs during this period. This is also not in line with the industry standard. Although demand savings might be lower in autumn/winter, a NEUB may delay more damaging actions (such as level 3b) and delay or remove the need to move to the company's level 4 emergency drought plan. Unlike TUBs, there is no seasonal period for NEUBs to be implemented in the drought planning guideline 2025 or in relevant legislation.	There is a risk the company applies for further drought permits or orders that may be more environmentally damaging, before implementing a NEUB.	To be completed in the statement of response and revised draft plan.	

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I7.1 - EAR, Implementation and monitoring of permits	Monitoring resource in the 2025 drought was an issue for the company in implementing its granted permits.	Efforts to issue the permits could have been avoided if the company was clear which permits it would not implement. Non implementation of permits meant that the company had not utilised all the benefits these permits could have provided.	The company should work with Ricardo who drafted the EARs on its behalf to ensure the monitoring conditions are proportionate to what is required to protect the environment and in terms of the company's ability to implement. The conditions should be discussed and agreed with the relevant EA area teams ahead of making any updates.	Following extensive discussions with the EA, the Environment Management Plan (EMP) has been updated to reflect a change in monitoring requirement. However, monitoring is still extensive given the number of drought options YW have and during a drought we would still consider the best options at the time to implement rather than necessarily implementing all options at once

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I7.2 - Hydrological monitoring	The hydrological monitoring referenced in the EMP is all based on existing EA & company level/flow gauges and spot flow gauging's. In appendix A for each impacted reach, it lists baseline monitoring for flows and levels as 'included', however many of these reaches do not have a local flow gauge and rely on flow estimation, either by transposition from a distant gauge or by a modelling method such as Qube.	It is unclear where baseline hydrological monitoring is included in the company's plan, this does not necessarily mean within the reach being discussed.	The company should clarify in its draft plan what is meant when it states hydrological baseline monitoring is included. To be completed in the statement of response and revised draft plan.	The main EMP sets out that BMON_H refers to the existing coverage of EA / YW hydrometric data. Though hydrometric data is not available in all reaches, there is sufficient coverage to develop flow series for hydrological assessment in each reach. No change proposed.

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I7.3 - Flow transposition methodology	Appendix A1 of the EAR methodology document and appendix A4 annexe 4 of the EAR documents. The explanation of the Gustard methodology does not clearly explain how reservoir catchments have been treated. This has been improved in the EAR reach tables following the company's drought permit applications in 2025. However it would be helpful to have a clear statement in the step by step description of the process, to explain that catchment	Lack of clarity in how the methodology has been applied and therefore the ability to fully understand the results based on this model.	The company should revise the step-by-step description of the flow transposition method to clearly describe the steps taken to adjust assessment point flows based on a donor gauge, including treatment of reservoir catchments as well as abstractions and discharges. To be completed in the statement of response and revised draft plan.	Text has been added to the methodology document to clarify approach.

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	descriptors (Area, SAAR, BFI-HOST, SPR-HOST) for both donor and recipient AP have been adjusted to remove reservoir catchments influencing the assessment points as part of the flow naturalisation process. The document refers to 'flow modifications' which may be referring to this but it is not very clear what this means.			
I7.4 - Flow transposition	The EA has previously feedback to the company in relation to the application of the flow transposition	Unsuitable gauges can mis-represent flows in smaller catchments and therefore impact the	The company should ensure only suitable donor gauges have been used for flow transposition to	Another review of the flow transposition approach has been undertaken. There are four flow

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	from large, gauged catchments to small ungauged catchments i.e. it is not appropriate to use a flow gauge on a large catchment to estimate flows on a very small tributary.	outcomes of any modelling.	small tributary reaches. To be completed in the statement of response and revised draft plan.	assessment points where the donor catchment area is 5x greater than the recipient area. All of these reaches are assigned major hydrological impact. A check of the hydrological impacts as been undertaken using Qube outputs. The Flow Transposition in the Absence of Measured Data (For Illustrative Time Series) Annex within the EARs Physical Environment Appendix A will be updated.

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
I7.5 - SEA - Reasonable alternatives	The document defines 78 individual drought actions as the reasonable alternatives, reflecting the need for operational flexibility and compliance with statutory duties to maintain water supply during droughts. Rather than selecting preferred actions itself, the SEA describes how it informs the drought plan by guiding sequencing, embedding mitigation and monitoring, and supporting iterative plan development.	Inadequate consideration of 'reasonable alternatives' introduces of risk of non-compliance and legal challenge.	The company should ensure the SEA explains in the narrative around reasonable alternatives considered in the SEA. How has the list of actions for the plan been generated and what criteria has been used in determining 'reasonable' alternatives for delivering the objectives of the plan. This narrative provides transparency in the assessment process and enables the reader to understand which alternative actions have been assessed	The drought actions included within the draft Drought Plan were developed through our drought planning process and represent measures that are technically feasible, operationally deliverable, compliant with regulatory requirements, and capable of contributing to the plan's objectives. These actions were therefore considered to be reasonable alternatives for assessment within the SEA.

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	This approach suggest that it allows environmentally lower-impact actions to be used first, while preserving flexibility to switch to alternatives if risks arise.		and why actions have been selected within the draft plan over other actions. To be completed in the statement of response and revised draft plan.	Additional narrative will be included within the SEA and revised draft Drought Plan to explain how the list of actions was developed, the criteria used to identify reasonable alternatives, and how the SEA has informed plan development. This will provide greater clarity on which actions have been assessed and why they have been included within the draft plan.
I7.6 - SEA Environmental report monitoring	Whilst the monitoring report is detailed and appears	It is hard to distinguish what monitoring is a 'must do'. The guidance is	The company should ensure that the monitoring plan is written in a way	A summary table will be added to the SEA Environment Report that will set

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	comprehensive, it is frequently framed as a series of recommendations rather than something which needs to happen.	clear that the EMP should include details of the monitoring required.	which makes it clear where monitoring is a requirement rather than just a 'recommendation'. Some form of table - detailing future monitoring requirements, when this will happen, etc would be useful. To be completed in the statement of response and revised draft plan.	out the monitoring requirements, including the relevant drought action, monitoring objective, timing/frequency, triggers and responsibilities. Where appropriate, this will cross-reference the requirements and commitments identified within the EARs to provide a clear link between the assessment findings and the proposed monitoring programme.
I7.7 - SEA Eel regulations/passes	The SEA does not drill down into specific site risks to	The is currently a potential risk to the	The company need to provide evidence that all eel passes	New ODMON_FPS and IDMON_FPS monitoring

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	identify eel passage impacts as per Eel regulation 15.	European Eel a protected species.	are still operating in an 'efficient state' (Eel Reg 15), within the affected reach for each drought activity. This applies to all eel passes that may be affected by drought, regardless of who owns them. An initial investigation maybe needed to identify and list all eel passes. To be completed in the statement of response and revised draft plan.	specification has been developed based on discussions with the EA. This will include a meaningful assessment at key fish and eel passes throughout Yorkshire that may be impacted by drought permits to ensure operability (where required). We are currently waiting for the EA to produce a list of fish passes relevant to all YW drought options and provide critical flow information (i.e. minimum head height required to ensure function)

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
				and fish passage effectiveness during onset or in drought will be assessed against.
I7.8 - EMR - European Protected Species	Several species have protection from harm to varying degrees under the 1981 Wildlife and Countryside Act 1981and/or as priority species within the Natural Environment and Rural Communities Act 2006, specifically the White-Clawed Crayfish, Water Vole and Fine-lined Pea Mussel. The company's plan does not include	Whole populations could be lost due to drought impacts without understanding of their presence.	The company should ensure the EMP is rewritten to detail how monitoring of these species would be conducted pre/during and post drought. It should Include detail of specific mitigation actions in EARs where these species are likely to be present and amend walkover survey guidance documents to suit. To be completed in the statement of	New ODMON_WCC and IDMON_WCC monitoring specification being developed to provide species specific monitoring for white-clawed crayfish. Additional section on river connectivity to riparian vegetation amended to the standard ODMON WS and IDMON_WSE surveys for water voles (as discussed with EA FBG tech specs).

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	detail on how impacts on these species would be assessed either pre/during/post drought.		response and revised draft plan.	
I7.9 - EMR - Invasive species & biosecurity	Several species are designated as invasive under the 1981 Wildlife and Countryside Act 1981and/or as invasive species under the Invasive Alien Species (Enforcement and Permitting) Order 2019. The current plan doesn't commit to following biosecurity during drought permit activity which would prevent the spread	The current plan does not take sufficiently robust measure to prevent the spread of invasive species in effect risking multiple breaches of the above legislation.	The company should ensure the EMP is rewritten to make biosecurity mandatory during drought permit related activities and include detail of specific biosecurity actions for key risks e.g. spread of crayfish plague between catchments, spread of invasive plants via walkovers etc. It should also highlight relevant biosecurity actions	The EMP has been revised to clearly state that biosecurity requirements are mandatory for all drought permit-related activities. The process will be undertaken in accordance with Yorkshire Water's EP06 procedure. Key biosecurity requirements are highlighted within the reach-specific EMP sections and

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	of invasive species, it only suggests it.		at high-risk sites in the relevant EARS and walkover survey guidance documents. To be completed in the statement of response and revised draft plan.	incorporated into walkover guidance.
I7.10	There have been a large number of issues raised by area staff in relation the Environmental reports.	Aspects of omissions or a lack of clarity within the documents could put the environment at risk.	The company should liaise with area FBG staff in Fisheries and Biodiversity to discuss specifics and agree any changes required by the revised draft plan at statement of response.	We have had several discussions with the EA's environmental teams to ensure all comments have been accounted for.
I8.1 - Omitted methodology from the plan	The plan does not contain how the company would	Stakeholders are unable to understand how the ESOR case would be applied until permits	The company should provide both an ESOR template and an overview of how it would assess	ESOR detail from 2025 permit applications added as appendix 4.4.

Area of issue	Issue and evidence	Implications	Information or changes required	Yorkshire Water Response
	assess ESOR in their plan.	and orders are applied for could result in delays or challenge.	and present the ESOR case. To be completed in the statement of response and revised draft plan.	
I9.1 - Combined sewer overflows (CSO)	The approach to monitoring CSOs needs to change and move from a focus on non-compliant spills as first flush events are potential polluting incidents, this has previously been highlighted in email correspondence.	All spills from CSOs in affected reaches need to have their impacts assessed not by full ecological walkovers but with sampling at the location using the company's existing pollution attendance procedures.	The company should update its CSO monitoring plan to include monitoring of all spills, not just non-compliant ones. The company should reach out to the relevant EA staff to discuss further as per email correspondence. To be completed in the statement of response and revised draft plan.	Following numerous email exchanges and a meeting with the EA team we have updated our EMP for CSO monitoring.

Appendix 1.4: Historic England

Ref.	Comment	Yorkshire Water Response
HE01	Thank you for consulting Historic England on the Draft Drought Plan 2027. As the Government's statutory adviser on the historic environment, Historic England is keen to ensure that conservation and enhancement of the historic environment is taken into account when preparing strategies and plans, given that heritage assets are an irreplaceable resource. This reflects national policy for the conservation and enhancement of the historic environment as set out in chapter 16 of the National Planning Policy Framework (NPPF), which requires heritage assets to be conserved in a manner appropriate to their significance and enjoyed for the benefit of existing and future generations. We set out below why the historic environment should be considered in relation to drought planning in general. We also give specific feedback on the Draft Drought Plan 2027 and its accompanying Strategic Environmental Assessment (SEA).	We welcome HE's comments on our draft DP27 and recognise the importance of conserving historic sites.
HE02	The draft Drought Plan is of particular interest to Historic England for the following reasons: 1. The vulnerability of some heritage assets (designated and non-designated as set out in the National Planning Policy Framework) to drought,	We note this summary and respond to detailed comments below.

Ref.	Comment	Yorkshire Water Response
	and the potential harm to, or loss of, significance as a result of changes to water catchment areas; 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. 3.The potential impact of changes in groundwater flows and chemistry on preserved organic and paleoenvironmental remains: where ground water levels are lowered, this may result in the possible degradation of remains through de-watering; 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; 5. The potential for unrecorded deeply buried and waterlogged archaeology within the 'natural' floodplain/estuarine/coastal deposit sequence; 6. The opportunities for conserving and enhancing heritage assets as part of an integrated approach to water, this includes sustaining and enhancing the	

Ref.	Comment	Yorkshire Water Response
	local character and distinctiveness of historic townscapes and landscapes. Historic England advises that you consider each of the above to inform an appropriate and positive response to the conservation and enhancement of historic environment.	
HE03	Evidence gathering Historic England recommends the collection and assessment of specific baseline information which could include identifying the potential for buried, waterlogged archaeological and paleoenvironmental remains of significant interest and fragility that can be associated with river valleys, floodplains, estuaries, coastal and wetland areas, including mires, bogs, peatland and water meadows. In particular, this exercise should take account of areas of archaeological importance and the potential for unrecorded archaeology and seek to establish the following: - the significance of the archaeological remains - its condition, the burial environment and state of preservation - the likely impact of development activity (e.g. potential removal or dewatering from the proposed	We note HE's comments and have considered the historical environment in developing our DP27. Where required, environmental investigations, environmental impact assessment (EIA) screening and any subsequent environmental assessment work will consider potential effects on the historic environment, including designated and non-designated heritage assets, in proportion to the nature, scale and location of the proposed works. Further consultation would take place with HE and local authority (LA) archaeological advisors at this time.

Ref.	Comment	Yorkshire Water Response
	scheme) on that significance and state of preservation. Baseline information in such environments archaeological remains can be: deeply buried archaeological remains, which means that they are unlikely to be identified by standard approaches; - waterlogged archaeological remains, which would mean they are likely to be rare and potentially important, but might require greater resources to excavate and subsequently deal with; - Indirectly impacted archaeological remains: currently well-preserved known and unrecorded, designated and non-designated buried archaeology in the vicinity which may be adversely affected by changes to the water environment. Waterlogged archaeology may be nationally important if it is well preserved, rare, of exceptional significance and evidence exists for it to be understood in terms of its contemporary landscape context. Where nationally important archaeology owes its significance to waterlogging and is in proximity to the scheme, changes in the water environment should be avoided that may cause harm in order to conserve its significance.	

Ref.	Comment	Yorkshire Water Response
	Although it may be appropriate for this evidence gathering and assessment to take place at the more detailed design/application stage, it is important to raise these issues and signpost how they might (further down the line) be tackled as the consideration of waterlogged archaeology may be costly to deal with; and deep floodplain, estuarine and coastal deposits difficult to evaluate by standard techniques. The approaches required are likely to include deposit modelling and assessing the probable condition and state of preservation of any buried archaeology. As these are not techniques regularly used in all desk-based assessments, the need for them to inform the design stages of water-related proposals should be appreciated early on. This will help to reduce the risks for the development as well as maximising archaeological understanding and consistency with national planning policy for the conservation and enhancement of the historic environment. The plan should identify the need for a deposit model, based on existing borehole and other information, as well as a preliminary assessment of the likely state of preservation of any buried archaeological remains, based on previous archaeological work in the locality. Further advice on the preservation and survival of archaeological remains, in particular waterlogged remains, can be	

Ref.	Comment	Yorkshire Water Response
	found in our guidance Preserving Archaeological Remains:https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/ Guidance for deposit modelling and archaeology can be found here: https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology.	
HE04	Please note also that in order to take account of unrecorded and non-designated archaeology, the relevant Historic Environment Record (HER) should be referred to, and the views of local authority archaeological advisers sought.	We acknowledge this comment. Where appropriate, and subject to the nature and location of the proposed action, we will engage with the LA archaeological advisers regarding drought management actions that have the potential to affect designated heritage assets, particularly those of the highest significance.
HE05	We welcome that Historic England are identified as a non-statutory consultee under paragraph 11.4 of the draft plan. Where appropriate, we would expect to be notified of drought management actions likely to affect designated heritage assets, in particular assets of the highest significance (defined in the NPPF as scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites).	We acknowledge this comment. Where appropriate, and subject to the nature and location of the proposed action, we will engage with HE regarding drought management actions that have the potential to affect designated heritage assets, particularly those of the highest significance.

Ref.	Comment	Yorkshire Water Response
HE06	We welcome the reference to the need for a full environmental investigations and EIA screening for a number of the extreme supply-side options set out under Appendix 5, especially where the construction of new or extended infrastructure is required, such as pumping stations, water treatment works or intakes along with associated pipelines. Where appropriate, depending on the context of these options, this work may need to include an assessment of the potential impact on the historic environment.	We welcome HE's support for the commitment to undertake further environmental assessment for relevant extreme supply-side options. Where required, environmental investigations, EIA screening and any subsequent environmental assessment work will consider potential effects on the historic environment, including designated and non-designated heritage assets, in proportion to the nature, scale and location of the proposed works.
HE07	Parts of the region are experiencing a period of major expansion, with urban extensions and new settlements under-construction or planned. In the course of your operations, we trust that you will consult the relevant Historic Environment Records and seek the necessary advice from the relevant local authority conservation officers to ensure that impacts on heritage assets are avoided or, where this is not possible, minimised through appropriate mitigation measures.	We include HE as a consultee for our Drought Plan, WRMP and WReN Regional Plan. If we need to seek planning permission for drought actions or any actions to meet longer term supply / demand needs our preference would be to avoid or minimise the impacts and we would work with HE.
HE08	This opinion is based on the information provided by you in the document dated 24 March 2026 and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object	We note HE's position on this.

Ref.	Comment	Yorkshire Water Response
	to any specific development proposal which may subsequently arise from this or later versions of the plan which is subject to consultation, and which may, despite the SEA, have adverse effects on the environment.	

Appendix 1.5: Advanced Water Infrastructure

Ref.	Comment	Yorkshire Water Response
AWIN01	We are happy with all the inclusions regarding NAVs [new appointees and variations] in the dDP, thank you very much for the steps taken by Yorkshire Water following pre-consultation.	Thank you for the feedback

Appendix 1.6: Natural England

Ref.	Comment	Information or changes required specified by NE	Yorkshire Water Response
NE01	Natural England was consulted on the Yorkshire Water Draft Drought Plan 27 on 22nd May 2026.	-	We thank NE for its feedback and have responded to the detailed comments in the Annexes.

	We have considered the draft plan against the full range of Natural England's interests in the natural environment. Our detailed response is attached in Annex 1 and a summary is given below for ease of reference. Policy and legislative context relevant to the advice is set out in Annex 2 to this letter. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. More information on our role in advice to the water sector can be found in Annex 3 of this letter.		
NE02	SUMMARY OF NATURAL ENGLAND'S ADVICE • The dDP has been partially considered under the Conservation of Habitats and Species 2017 Regulations as amended, known as a Habitats Regulations Assessment (HRA).	-	Please see the detailed comments below.

	• An HRA has been undertaken on all but the proposed Extreme Drought Options which will require further assessment as described should they be developed further. • The HRA Stage 1 screening does not identify all the likely significant effects on the Humber Estuary [Special Area of Conservation/Special Protection Area] SAC/SPA/Ramsar and Lower Derwent Valley SAC and we do not concur with the conclusions of the appropriate assessment based on the information provided which is considered insufficient to support the current conclusion of no adverse effect on the integrity of the features concerned. There are potentially other likely significant effects on the Humber Estuary SAC/SPA/Ramsar features, specifically lamprey species, and Lower Derwent Valley SAC lowland hay meadows that do not have appropriate assessments. In addition, all aspects of the river and sea lamprey life cycle in accordance with their conservation objectives may not have been considered at		

	the likely significant effect and appropriate assessment stages as the evidence and conclusions primarily only relates to the upstream migration of the species and not other key functional stages, supporting processes and distribution which may be impacted by the proposed Drought plan options. These deficiencies in the HRA should be rectified before the final plan. • The dDP has been adequately considered under the UK legislation by The Environmental Assessment of Plans and Programmes Regulations 2004 SI No.1633 (Strategic Environmental Assessment (SEA) process). • The dDP has selected options with the least / lesser environmental impacts in preference to those with greater impacts. We recognise that strategic drought management planning plays an essential role in bringing partners together to inform the actions, monitoring and water resource capital investment programmes		

	needed to deal with drought and that it can also help deliver on the government's wider 25 Year Environment Plan (YEP).		
NE03	The legislative and policy context for Natural England's advice is set out in Annex 2 to this letter. Draft Environmental Assessment Reports (EARs) are part of the pre-application consultation on the drought options (orders and permits). As pre-application consultations they are within remit of Natural England chargeable services. Detailed comments on the EARs are therefore not included within this statutory response except in so far as they directly pertain to the conclusions of the HRA and SEA of the dDP.	-	Please see the detailed comments below on Annex 2. We note NE's position on EARs as a pre-application consultee.
NE04	The plan has largely complied with the policy and legislation set out in Annex 2. The HRA is a clearly identifiable document with all the relevant sites and their interest features correctly identified.	Review and update HRA Stage 1 screening to ensure all potential LSEs [likely significant effects] are identified and assessed. Natural England explicitly states that not all likely	Please see the detailed comments below.

	However, Natural England does not agree that all likely significant effects have been identified and the ones that have, sufficiently justified in the appropriate assessment as explained below:	significant effects have been identified.	
NE05	An HRA has been undertaken on all but the proposed Extreme Drought Options which will require further assessment as described should they be developed further	Develop HRA for extreme drought options further	We have updated the HRA for extreme drought options and, where required, undertaken Stage 2 Appropriate Assessments. The revised HRA report includes these updates, and any outcomes have also been acknowledged in the SEA for these options.
NE06	Lower Derwent Valley SAC: Lowland hay meadow feature – The HRA currently concludes potential effects 'none – no LSE' but the increased annual abstraction on the Derwent will increase daily flows by 20 Ml/d at Site 2 to abstract more at Site 1. The lowland hay meadows downstream of Site 2 are sensitive to inundation at key parts of the year, predominantly in spring and summer and surcharge of the cloughs by the river at all times in some areas is a known factor	Evidence and justification should therefore be provided to support the conclusion of no LSE or no AEOI.	Commentary for River Derwent SAC should have also applied to Lower Derwent Valley sites. The licence resets in April so there is no requirement for a drought permit post-March. As the permit would only be implemented between November and March, there is no risk to summer flows. We will use available level data to determine the likelihood of lowland hay meadow features

	potentially contributing to decline of this feature by not allowing water to drain from this feature at key times. Additional flow, whilst contributing to more natural conditions of the River Derwent SAC could have an effect on this feature.		flooding during the potential early spring (March) implementation of the drought order. If flooding is unlikely to occur or where it may occur will be insignificant in nature, no LSE can be confirmed. If flooding is determined to be either likely or significant then a stage 2 assessment may be required to confirm that the option will have no impacts on the lowland hay meadow feature. No Likely Significant Effect can be confirmed for middle and late spring (April, May) along with Summer (June, July, August) since the drought order would not be implemented during these seasons.
NE07	Humber Estuary SAC: River lamprey and sea lamprey features – the evidence to support the conclusions is based upon the Scott Wilson (2011) report (Scott Wilson (2011). Yorkshire Water Drought Plan: Assessment of Possible Impact on Humber Estuary SPA/SAC. Final Report Revision 2 February 2011. Report for Yorkshire Water). Natural England agrees that	The report however only considers impacts of a range of drought permits on the upstream migratory phase of both lamprey species in relation to attractant flow, depth over weirs, entrainment and dissolved oxygen. It does not consider the range of	We have undertaken environmental assessments of all our drought options and, as a result, currently hold sufficient baseline information, including fish survey and river habitat survey (RHS) data, to inform the HRA of any potential impacts of drought permit implementation on river/sea lamprey habitats

	this report is still relevant even though it relies on data that is now quite old.	drought options against other key phases of the lamprey life cycle relating to their spatial distribution, and the population, structure, function and supporting processes upon which they rely in accordance with their conservation objectives. For example, there is no assessment of the implications of the proposed drought permits on the spawning areas which would cover extent of spawning areas and any potential impacts upon nests/redds during the egg incubation period. Other key aspects of the life cycle requiring assessment would be the impacts upon the larval (ammocoete) stage (3-5 years residing in silt beds in slack water) and the downstream migration of young adults (usually July to September). Evidence and justification to	within affected reaches. This includes habitats used for spawning, ammocoetes and downstream migration. Environmental assessments for our drought options have focused on reaches within the Zone of Influence (ZoI), defined as "the point of permit condition change (e.g. impounding reservoir, river abstraction) to the point at which the flow change compared to river flows without a drought action have reduced to negligible". Beyond the ZoI, reaches are considered to have negligible impacts on river flows and as such LSEs on lamprey can be reasonably discounted. We have updated the HRA to explicitly consider potential effects of drought option implementation on lamprey habitats and supporting processes across all relevant life stages. This includes a review of affected reaches with records of river and / or sea

		support any conclusions about these other aspects should be provided.	lamprey, together with an assessment of the extent of potentially suitable habitat within the ZoI, to determine whether drought permit implementation could affect habitat availability or function and whether any such effects could undermine the conservation objectives or site integrity of the Humber Estuary SAC.
NE08	The appropriate assessment mentions that the North Area Reservoir 1 option may impact upon the spawning period for sea lamprey and the downstream migration of both lamprey species.	But there is insufficient or no further justification to rule out adverse impact. The conclusion that the barriers mean that functional habitat will be limited so there will be no adverse impact is not one concurred with by Natural England.	Current wording in the HRA implies that functional habitat is limited due to the presence of barriers. We have amended the wording to remove references to barriers limiting habitat availability and making clear that the assessment of no LSE is due to the short length of the impacted reach (1.7km) and moderate impact to aquatic habitat. Substrate within the reach is predominantly cobble and boulder with gravel being a minor constituent, providing limited spawning habitat. The short reach and limited spawning habitat mean

			adverse impacts on lamprey within the reach are unlikely to have an adverse effect on integrity.
NE09	The Scott Wilson (2011) report looked at the worst drought year (1996) with a 10% reduction in flow as a baseline and then with the implementation of all drought permits which is a worst (or beyond worst) case scenario. Under these scenarios the passability of Naburn Weir (noted as the key one for migration with all others passable if this one is) was significantly reduced but there were still times identified when both sea lamprey and river lamprey could in potentially pass and migrate upstream. If there is still the opportunity to migrate upstream in the worst case scenario drought year with all drought options implemented, then the window of weir passability in a normal year would be much greater. The modifications to the fish pass at Naburn Weir since the report should also contribute towards improving the passability. Based upon this and that the larval stage is considered to	Due to this and the precautionary principle, without evidence to the contrary it should be presumed that they are using suitable spawning areas and residing in suitable larval habitat throughout the catchment and migrating downstream from those areas. The assessment in relation to impacts of the options on all river and sea lamprey life cycle phases should therefore be reviewed and updated taking this into consideration.	We have updated the River Ouse drought option to make clear that passability is good and possible even during the worst-case drought scenario. The assessment has been updated on the premise that all life cycle phases could be impacted.

	be 3-5 years for river lamprey and 5 years for sea lamprey, it is likely that that there has been a large amount of passability and recruitment within this timeframe and so the barriers and functional habitat conclusion cannot therefore be justified because you would have to consider this whole timeframe and not any individual drought year.		
NE10	The plan has complied with the policy and legislation as set out in Annex 2. The SEA has followed the correct consultation procedure and the phasing of drought plan options been selected so that the least damaging options have been selected first. All high value receptors have been identified and impacts have been set correctly. However, the outcomes of the SEA and HRA are not consistent with each other as the SEA identifies a moderate impact of water flows which could have an impact upon DO levels and lamprey which is not taken into account in the HRA (see HRA comments above).	Reconcile the two assessments so that impacts identified in the SEA are reflected within the HRA conclusions.	We acknowledge that there is an apparent inconsistency between the SEA and HRA in the description of potential effects. The SEA and HRA have been reviewed and updated, where appropriate, to ensure that potential impacts on water flows, dissolved oxygen levels and lamprey are consistently represented across both assessments and reflected in the HRA conclusions. It should be noted that the SEA and HRA apply different assessment frameworks and significance criteria. As a result, an effect identified as significant within the SEA does

			not necessarily indicate an adverse effect on site integrity within the HRA. Nevertheless, we will review the assessments to ensure that the evidence, assumptions and conclusions are clearly explained and appropriately aligned across both documents.
NE11	DWPPs exist for several SSSIs [sites of special scientific interest] and they can be supplied by the EA or Natural England on request. SSSIs with DWPPs in the DWMP Study Area • Fairburn and Newtown Ings SSSI • Hornsea Mere SSSI • Malham Tarn (Malham - Arncliffe SSSI) • River Derwent and Pocklington Canal SSSIs (Joint Plan) • River Hull Headwaters SSSI The Natural England led Catchment Sensitive Farming (CSF) Programme works with farmers and	Although majoring on diffuse sources of water pollution, Appendix B should include reference to the Environment Agency (EA)/NE SSSI Diffuse Water Pollution Plans (DWPPs) DWPPs exist for several SSSIs and they can be supplied by the EA or Natural England on request.	We acknowledge this comment. Appendix B has been reviewed and updated, where appropriate, to include reference to EA/NE SSSI Diffuse Water Pollution Plans (DWPPs).

	landowners to address including diffuse pollution. There are a number of CSF Catchment Delivery Plans in production across the study area.		
NE12	The plan has complied with the policy and legislation as set out in Annex 2. The relevant protected landscapes have been correctly identified (including future designation of the Yorkshire Wold National Landscape) and potential impacts have been considered.	-	-
NE13	The plan has largely complied with the policy and legislation as set out in Annex 2. An assessment of impacts on SSSIs been conducted which correctly identifies potential impacts. The dDP and SEA have taken into account the duty to further the conservation and enhancement of SSSIs and the monitoring of any SSSI impacts is sufficient. The section could however be improved by taking the current condition of SSSIs and resilience to drought into consideration and whether these could be enhanced.	The section could however be improved by taking the current condition of SSSIs and resilience to drought into consideration and whether these could be enhanced.	We acknowledge this comment. While the drought plan and SEA have considered SSSI impacts and appropriate monitoring, we have reviewed the relevant SEA text to consider whether additional context on SSSI condition and resilience to drought can be included, where appropriate.

NE14	Biodiversity in the SEA The plan has complied with the policy and legislation as set out in Annex 2. An assessment of impacts on habitats and species of principal importance for the conservation of biodiversity has been carried out. Relevant water dependant priority habitats and species and potential impacts upon them have been identified. Duties to restore priority habitats and species has been taken into account and monitoring is sufficient. "	-	-
NE15	Climate change in the SEA The plan has complied with the policy and legislation as set out in Annex 2. The assessment of impacts of the drought plan options has taken account of climate change and the need for wildlife to adapt to climate change."	-	-
NE16	Protected species The drought plan Environmental Assessment Reports (EARs) include a clear, timetabled approach to monitoring and mitigating any	-	-

	protected species potentially affected by options.		
NE17	Water Framework Directive Assessment Comments on WFD are provided by the Environment Agency.	-	-
NE18	Order of options and levels of service The prioritisation of drought options has taken account of the impact on the environment and is ordered with the least potentially harmful options selected before those with potential environmental impacts.	-	-
NE19	Natural capital and resilient landscapes and seas The plan has improved or prevented decline in natural capital and addressed resilience.	-	-
NE20	Connecting people with nature – demand management The plan has complied with the policy and legislation as set out in Annex 2. The demand management includes leakage reduction and	-	-

	voluntary measures in the pre drought period in line with policy and legislative targets.		

Appendix 1.7: National Farmers Union

Ref.	Comment	Yorkshire Water Response
NFU01	Dear Yorkshire Water, Thank you for the opportunity to comment upon your draft Drought Plan. The impact of drought on agriculture and the increasing frequency of that impact on businesses is made clear in the Climate Change Committee 'A Well-Adapted UK' report and the House of Lord's Climate Change Committee report 'Surviving drought: reclaim the rain'. While it is not required for water company drought plans to explicitly involve agriculture we would strongly encourage early communication with the sector where environmental and agricultural impacts are likely to occur.	We recognise agriculture as a key stakeholder when in drought and when developing our drought plan, WRMP and the WReN Regional Plan. Section 5.5 of our DP27 explains the role of the National Drought Group in informing other sectors of the national drought position and the role of WReN in establishing a regional forum for collaborating across sectors when an area of our region is in drought. This group will include agriculture and other water-dependent sectors. The EA and NE will also be represented and will advise on the environmental and agricultural drought status. If any agricultural abstractors are impacted by licence constraints such as hands-off-flows they will be informed by the EA. When our area is in drought, we will contact the NFU and other agricultural stakeholders

Ref.	Comment	Yorkshire Water Response
		at level 1 to raise awareness and we will provide further updates as the drought progresses. We will also provide notification of drought actions including links to FAQ if water use restrictions or supply-side actions are likely to be needed. Prior to submitting any supply-side drought permit or order applications we will notify downstream abstractors, including any agricultural abstractors, with potential to be impacted by specific actions.
NFU02	This may be cross-sectoral communication where surface flow and groundwater abstraction constraints are likely to come into force, private water supplies running dry and supply and pressure issues for business customers in water supply zones. 2025 was the first occasion regional water resource groups were required to produce drought statements of intent with aims to support coherence across water company boundaries in terms of drought triggers and actions and act as a coordination and communication hubs, helping companies maintain consistent messaging, understand regional pressures, and escalate issues collectively to the Environment Agency or Defra. Most regional groups host specific drought groups to facilitate cross-sector communication and planning. We would like to see a further commitment in drought plans for water	We will align with the WReN drought statement of intent on cross sector collaboration on drought management. A multi-sector drought group that includes representatives from agriculture will meet bi-annually and increase to monthly when prolonged dry weather or an environmental drought has been declared by the EA. Through this group we will share information on the current and forecast water supply situation for our area. The EA and NE will also attend the group and share information on projections for agricultural and environmental impacts. The WReN Drought Group is described in Section 5.5 and we have added a sub section to Appendix 7 to

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	companies to support and participate in the regional process with an emphasis on early triggers where environmental and agricultural impacts are predicted.	explain how we align with the WReN drought statement of intent.
NFU03	However, given the increasing frequency of drought events, drought communications need to be on a continuous basis focused on resilience as well as ramped up as triggers are met. Water companies are not responsible if private water supplies run dry but are likely to be called on either through additional usage of mains water for businesses or in requests for support, particularly in welfare critical situations with livestock. We would like to see further commitments in drought plans to work proactively with responsible bodies such as Local Authorities, Local Resilience Forums and industry bodies, such as the NFU, in communicating about resilience measures when private or business water supplies are disrupted.	Our Drought Plan is an operational plan that sets out how we react to drought conditions and manage supplies for public water supply. We can offer advice to anyone who is not a Yorkshire Water customer and relies on their own private water supplies. If water availability or quality is a concern, they should contact their local council. Where there is a danger to life or human health the council may contact us to provide alternative water supplies. We agree drought resilience is an ongoing conversation, and that business and private supplies need to be addressed nationally. We discuss water resources and drought management with the EA, NFU and other stakeholders at the regional and national level as part of the WReN Regional Group. We would welcome the opportunity to discuss this topic with the NFU and other sectors as part of WReN.
NFU04	Finally, the ideal situation is increase resilience and reduce the need for drought plan actions to be	Our Drought Plan is our operational plan for public water supply resilience. We recognise

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	applied. Where opportunities exist to improve public water supply resilience by investing in agriculture (by reducing mains demand by agriculture in peak periods with alternative options such as more stored water for example) that collaborative approaches are taken to maximise the incentives and value obtained from that investment. We ask for greater collaboration between water companies, with water abstractor groups and with regional groups on programmes that support investment in on-farm drought resilience measures.	drought resilience is needed for all sectors and are keen to participate in regional and national discussions. Within our AMP8 Water Efficiency programme we are offering rainwater harvesting subsidies for large business customers. As part of the WReN Regional Group, we are keen to work with agriculture and regulators to help identify the investment needs and available options.
NFU05	Page 23 states 'The stochastic modelling has increased the occurrence of extremely dry years, revealing vulnerabilities in our water supply system, which has resulted in lower levels of service for our level 4 restrictions than those stated in our WRMP19 and Drought Plan 2022'. We are keen to understand more about the impacts this modelling has found, and if rural or agricultural business, their location on the network may be at greater risk.	The modelling approaches we use in line with regulatory guidelines has changed since we produced WRMP19 and DP22. This has led to our WRMP24 showing a greater risk of deficits in dry years due to climate change when compared to the previous methodology outputs. Growth and environmental protection are also contributing to the WRMP24 deficit. The methodology change has the largest contribution to the deficit, and the output does indicate a greater risk to agricultural businesses (as well as our other customers). Both approaches show a risk of climate change reducing available supply but there remains much uncertainty over the scale and timing of the risk materialising and level

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		4 restrictions would only be needed in an extreme weather event. Regardless of which approach we use, we recognise there is a need to offset the impacts of climate change, and we are investing in demand reduction and new supplies to improve our resilience to dry weather as detailed in our WRMP24.
NFU06	Page 31 has a useful overview of trigger levels and actions; would it be possible to include 2025 levels?	We have updated our approach to triggers and provide an explanation of this in our main DP27 document. Appendix 9.2 includes the 2025 scenario using our updated triggers, with further details about how we actually operated in 2025 in the worked examples document - section 4.7.
NFU07	Page 32, we welcome the ongoing communication mentioned when 'Regional reservoir stocks cross EA early warning trigger line', but also keen to explore how earlier warning or risks can be shared to help our members plan and build resilience within both sectors. This is also covered on Page 62, section 5.2.	In our revised draft DP27 we have altered our approach to tracking drought levels to better align with the guidelines (see Section 2 of our main DP27 document). The equivalent to the EA Early Warning trigger line is entering the level 1 band and we have updated the text for communicating with stakeholders to reflect this. The NFU would be contacted as part of our stakeholder plan.

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NFU08	Page 33 states that you will 'Advertise/provide notice and start public consultation on drought orders/permits applications. Review any representations and objections received on drought orders/permits'. As experienced in 2025, a delayed early warning of permits and catchment maps prevented us from informing our members about the permits/orders. With earlier engagement, we have the opportunity to support messaging and reduce any inquiries and delays.	Our preparation for supply-side drought order/permits starts in advance of the notices being published. Two or three weeks before we expect to submit formal applications, we will send the EA a draft application as part of its "pre-application" requirements. During this period downstream abstractors with potential to be impacted by the actions will be notified of our intention to apply for the order/permit in advance of the formal published notice. We will add the NFU as an interested stakeholder and we will endeavour to discuss any specific issues ahead of the formal applications.
NFU09	Page 46 explores 'Pressure reduction'. Such measures can also impact livestock business and so we would welcome further details and a conversation on how such measures will be implemented in a way that protects livestock and support members work to meet animal health and welfare regulations.	We always aim to provide enough water pressure at the boundary to be above minimum standards even when measures have been taken to reduce water pressure to reduce demand. In a situation where this affects livestock supplies YW would generally be contacted and we could adjust pressures to assist for a period of time but ultimately any farm that has livestock should have sufficient water storage onsite that is capable of being filled at minimum pressures.

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NFU10	Page 55, Private Suppliers provides a useful overview of the steps the company will take. The NFU provides advice and guidance to its members, with many falling into this category. This coupled with increased interest and enquiries from RF, we would welcome a further conversation on this topic.	We would be happy to discuss with the NFU, and we have added a link to the NFU website in Section 3.5 of our DP27 main document.
NFU11	Page 57, section 4.2 states you will 'Consult commercial and agricultural water users on any actions they would consider to help reduce water supply or find alternative sources, for example, reducing production output. This would be voluntary only'. We would be keen to understand how we can raise this opportunity with our members.	We welcome the opportunity to discuss with the NFU and potentially their members.
NFU12	Page 57, section 4.3 include temporary overland pipes. This measure was adopted in 2022. Any such measure that crosses farmland will have an impact, and we would welcome further conversations on how such measure could be adopted, whilst minimising member impacts.	Temporary overland pipe options are not defined specifically as their need arises in relation to specific drought and site-specific operational conditions. They would be addressed and discussed with affected landowners on a case-by-case basis as permissions and consents will vary depending on the specific site context. Where temporary assets might need to be located in sensitive/designated areas, we would undertake the relevant checks and consents (such as SSSI Assent, HRA, Flood

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		Risk Activity Permit, tree preservation order etc).
NFU13	Page 64, section 5.2.2 talks about work with WReN, but we would also encourage the Plan to work with other Water Resource Regions e.g. WRW.	We work with other regions as part of the National Drought Group as described in Section 5.5.

Appendix 1.8: Ofwat

Ref.	Comment	Yorkshire Water Response
Of01	Good operational planning and robust communication strategies to implement actions during droughts are an essential part of a water company's duty to deliver secure, reliable, sustainable and affordable supplies of water. Water company drought plans are an important part of a company's strategy to protect customers and the environment in extreme events, which complements their latest water resources management plans 2024 (WRMP24). By laying out the actions the company will take in drought situations over the next five years, these plans ensure that planned levels of service for customers and the environment are implemented and maintained as agreed, and escalation recourse through drought orders is only utilised as appropriate. As a statutory consultee, we appreciate the opportunity to provide feedback on Yorkshire Water's	We note Ofwat's comments on drought planning and appreciate the feedback.

	draft drought plan 2027. Ofwat's oversight of the plans is part of our duty to protect the interest of consumers and the environment, through ensuring that water companies properly carry out their statutory functions, and plan effectively for the challenges they are likely to face.	
Of02	Overall, Yorkshire Water's draft drought plan 2027 meets our expectations for this stage of drought planning. We welcome that the plan explains how the sequencing of drought measures has been designed to protect customers and the environment, with demand-side restrictions considered ahead of supply-side options where appropriate. We have provided feedback on areas where the plan will still benefit from additional detail which are: • stakeholder communication plan, communicating with customers in vulnerable circumstances; and • regional plan alignment. Our feedback can be found in the appendix to this letter below. The final drought plan should take account of the concerns outlined our feedback, and other responses the company will receive from stakeholders to its consultation. We appreciate Yorkshire Water's continued collaboration in refining its plan to ensure it delivers outcomes for customers and the environment.	We are pleased our plan has met with expectations and provide individual responses to the detailed comments below.

Of03	Stakeholder and customer engagement – communication plan We welcome the inclusion of a communication plan in Yorkshire Water's draft drought plan, including the recognition that clear and timely communication is important to support customers, retailers and other stakeholders during drought. However, the company's plan has not clearly set out the expected frequency of communications at each drought trigger level.	Customers - we promote water saving across a range of media channels during all years, not just drought years. Appendix 7 explains the escalation of messaging at different drought levels (Table 20) and lists the channels we use to promote the messaging. The content and channels are scaled up as a drought escalates but not by a fixed frequency at each drought level as this will depend on a range of factors including availability of advertising space and media interest. We will proactively release press releases each week and increase our spend on paid for channels, however the key change at each level is the tone of the message and the increasing severity of the drought situation. NAVs and retailers - Our communication with NAVs and retailers is explained in Section 5.2. In alignment with the Retail Wholesale Group Good Practice Guide, once drought level 1 is reached, communications would be provided to retailers once a month, as a minimum. As the drought worsens, we would increase communication frequency, but this is likely to be to provide information on specific actions such as TUBs and is not a fixed frequency related to drought levels. We would respond to any

		NAV or retailer requests to meet more frequently at any drought stage. Regulators - Our regular communications with regulators in a drought is with the EA from level 1 onwards. As stated in section 5.2.3 the frequency of the liaison will be agreed with the EA Area Drought Co-ordinator following the first contact. In previous droughts this has tended to be weekly at level 1 increasing to twice weekly by mutual agreement. There is no fixed frequency at any level. There is no specific requirement to meet Ofwat, the Drinking Water Inspectorate (DWI) or Defra on a regular basis. We would contact Defra in advance of submitting drought order applications and respond to any requests from Defra to meet. We would contact the DWI if there was a specific water quality issues to discuss or permissions to be sought for implementing options, but this would be site specific and not necessarily a requirement in all droughts.
Of04	Supporting customers in vulnerable circumstances We acknowledge that Yorkshire Water refers to vulnerable customers in its draft drought plan. However, detail is lacking on how Yorkshire Water will provide a high standard of service and support for customers who need extra help during droughts.	We recognise that customers in vulnerable circumstances may be disproportionately affected by drought and drought measures. We will provide accessible communications on the drought situation and customers on our Priority Service Register (PSR) are

	Ofwat expects companies to develop services that are inclusive by design, identify and record customers' needs, and have clear strategies for supporting customers in vulnerable circumstances.	exempt from TUBs until we reach a severe drought status. At level 4 we would prioritise vulnerable customers. Additional text has been added to Appendix 7 under ""Target audience"" and to our summary document referencing our PSR and how we support vulnerable customers.
Of05	Regional Plan alignment We welcome that Yorkshire Water's draft drought plan refers to the Water Resources North (WReN) Drought Group Statement of Intent and recognises the role of regional collaboration in drought planning and response. However, Yorkshire Water does not explain how the drought plan aligns with the regional Drought Group Statement of Intent or where the plans deviate from each other.	We have added a table to Appendix 7 that outlines how our plan aligns with the WReN statement of intent. This shows that it is aligned in most respects although there are some areas of the WReN statement that (for example, medium and long-term water resources planning) that are covered in our WRMP24 instead of our drought plan.

Appendix 1.9: West Yorkshire Combined Authority

Ref.	Comment	Yorkshire Water Response
WYCA01	I am writing to you in response to Yorkshire Water's draft Drought Plan 2027. As we face up to the realities of a changing climate, it is more important than ever that we conserve and manage our resources carefully, and that includes water. Water is needed in homes,	We acknowledge the WYCA's concerns and will continue to consult them on the development of our plans. We respond to specific comments and recommendations below

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	schools, businesses, and health and social care settings, and having an adequate supply is essential for ensuring human health and safety. However, it is not just a resource, but an important feature of our landscapes and a habitat for hundreds of native species.	
WYCA02	The current system does not allow for the good management of water. Our rivers are impacted by pollution from sewage spills, pharmaceutical chemicals, agricultural contamination and road runoff. There are repeated leaks of both sewage and fresh drinking water from failing infrastructure. Reservoirs run dry, and shortfall is made up by increasing abstraction from our rivers, when they are already under pressure from repeated droughts and floods. We need a step change in how we address our use of this precious resource. In order to correct the failings of the current system significant change is required. It is good to see Yorkshire Water preparing for future extreme weather conditions and we welcome the opportunity to shape the document through this consultation. However, more consideration needs to be given to increasing investment in this critical infrastructure and	We recognise the importance of water company investment in critical investment and present our strategy for investing in demand reduction and new water supplies in our Water Resources Management Plan (WRMP24).

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	minimising the adverse impacts on communities and the natural environment.	
WYCA03	Yorkshire Water have worked with the Combined Authority and partners to deliver significant schemes, particularly those relating to nature-based solutions e.g. Landscapes for Water. This could be used as a catalyst to deliver more – at scale.	We welcome the opportunity to continue to work with WYCA on nature-based solutions and we provide details on the work we are doing in our response to comment WYCA11.
WYCA04	Lacks any real ambition or innovation to drive a step change in the management of our water resources.	Our Drought Plan has been created in accordance with statutory and regulatory guidelines and is deemed to be compliant. It is an operational plan that sets out how we react to drought conditions using the actions we can deliver in a short time period. Its purpose and content are defined by legislation and regulatory guidelines. Our ambition to reduce leakage, enable reduction in water use and develop new supplies is set out in our Water Resources Management Plan (WRMP). Our WRMP is our long-term (60 years) strategy for providing a reliable water supply for customers and minimising water supply impacts on the environment. The plan takes into account population and economic growth, changes in climate patterns and sustainable abstraction.

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		As part of our WRMP we work with the EA to understand which of our abstractions are a risk to the environment and will make reductions to protect the environment as required. In addition, we have an overarching business plan which outlines our wider investment in the region, including investment in programmes like Great Yorkshire Rivers, Landscapes for Water and other environmental conservation/restoration programmes. Our regulators (EA, Ofwat and DWI) set the requirements for what we should include in our plans and provide us with guidelines to follow, and we review the plans every five years.
WYCA05	Focuses on increasing supply (including by abstracting water from rivers), rather than limiting usage and wastage.	Our Drought Plan complies with regulatory guidelines on drought action sequencing. It begins with demand reduction options, appealing for voluntary reductions at level 1 and imposing a TUB at level 2. Details on our demand reduction actions are provided in Appendix 4 and details on our communications requesting water use reductions in Appendix 7. As part of our normal operations we will at times reduce use of reservoir supplies and maximise use of licenced river abstractions where possible. This is to conserve reservoir supplies for later in the year when rivers are low

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		and we cannot abstract as much. This maximisation of river abstractions is within our permitted volumes which are authorised by the EA. The EA regularly reviews abstraction licences as part of its Abstraction licensing strategies (CAMS process) - GOV.UK. As well as a water supply benefit, maximising rivers when the water is available retains water in our reservoirs for meeting compensation requirements far longer in dry weather than if we did not maximise river sources earlier in the year. Supply-side actions to increase river abstractions begin at level 2/3a and are only required in more extreme drought events. Our WRMP24 sets out our plan for reducing the frequency of implementing drought actions
WYCA06	Does not detail any plans for assisting customers with increased rainwater harvesting or water saving.	Our DP27 describes our demand reduction drought actions in Section 3.2 of the main document and Appendix 4. Drought water saving communications are described in Section 5 of the main document and in Appendix 7. We are also implementing demand reduction actions as part of our annual activities. Within our WRMP24 Water Efficiency programme we are offering rainwater harvesting subsidies for large business customers. We also provided water butts for community groups last year as part of our

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		water saving campaign. We are continuing to review options to include more rainwater harvesting options in our current programme and in our strategy for future WRMPs. We introduced an enhanced water efficiency campaign in 2025/26 which was further accelerated with our reactive water saving messaging due to the dry weather we observed prior to introducing a temporary use restriction. YW was part of the pilot for the national Water Saving Campaign ""Lets save water"" launched by Ofwat this year and we are now working on how our water saving campaign integrates with the national campaign to maximise customer awareness of the importance of water saving. We attend events across Yorkshire to speak to our customers face-to-face. These range from high footfall events such as the Great Yorkshire Show and RHS Wentworth, to smaller events like Alderman Kneeshaw fun day and pop ups at our reservoirs. We also engage schools across the region about how they can promote water saving with their pupils. Reducing consumption is not only something we believe is important, but it is also part of our Performance Commitments (regulatory

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		targets) to reduce both 'per capita' and non-household consumption.
WYCA07	Has little detail on leakages and their effect on water supplies, although 21% of Yorkshire's water was wasted on leakages last year.	Reducing leakage is always one of our highest priorities and is one of our Performance Commitment targets. We also have a long-term target to reduce leakage by 50% by 2050 compared to levels in 2017/18. Last year, we achieved an 18.5% reduction compared to 2017/18 and we are continuing to drive further improvements through initiatives such as water main replacements and targeted network investment. This is set out in our WRMP24. We continue to invest heavily in finding and repairing leaks across our network, with dedicated teams working around the clock to identify and resolve issues as quickly as possible. Our leakage detection teams use a range of technologies, including acoustic monitoring and advanced data analytics, to identify leaks that are not visible above ground and enable faster repairs. We are also investing in smart water meters, which help us identify leaks on both our network and customers' private supply pipes more quickly, reducing water lost and improving efficiency.

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		During dry weather leakage breakouts can increase and we deploy additional leakage teams to help counteract the increase as described in Appendix 4.
WYCA08	Relies on increased abstraction of our rivers, lowering water levels, concentrating pollutants. This puts our communities at increased risk from pollutants and our environment at risk of increased ecological damage.	Our drought action sequencing begins with demand reduction actions, and we only use supply-side actions in extreme circumstances when we apply for temporary authorisation to increase abstractions or reduce reservoir compensation flows. Under normal operations our use of river and reservoir supplies is constrained by abstraction permissions designed to protect the environment and enforced by the EA. See response to comment WYCA05 also. Our WRMP24 provides information on environmental risk from abstractions, and where reductions will be imposed to protect the environment in the future. It also provides our plan to be more resilient to drought and reduce the frequency of drought actions. Once this is achieved, we will still have a statutory requirement to produce a drought plan and regulators will expect us to include supply options as well as demand.

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WYCA09	As the climate crisis worsens, planning for extreme weather events and changing conditions is essential. Water is a key resource, needed in homes, businesses, and agriculture, and also in our natural environments. Yorkshire Water are a key partner of WYCA, and we want them to work with us and our partners to deliver the right infrastructure, in the right place, to manage our response to the changing climate. We also recognise the challenges of planning for water in a more challenging climatic environment. The right investments can support growth and investment confidence in West Yorkshire, which underpins our emerging work on the Spatial Development Strategy, linking with our welcomed and positive engagement with Yorkshire Water on the West Yorkshire Strategic Infrastructure Partnership and work on the Combined Authority's Infrastructure Strategy.	We also welcome the opportunity to continue to collaborate with the YWCA and other stakeholders.
WYCA10	Yorkshire Water are a major landowner in the region, with enormous levels of investment going into West Yorkshire. We welcome this investment. But the Authority encourages them to be bolder, more innovative and deliver the infrastructure we need sooner – climate change will not wait, and	Our plan to offset the impacts of climate change and other risks to future water supply (growth and environmental protection needs) is set out in our WRMP24. We must balance the need for additional infrastructure with affordability and alternative options such as leakage reduction and water efficiency

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	neither should the investment to mitigate its impacts.	initiatives. We know the WYCA is supportive of this twin-track approach, and we are keen to continue engaging with them on nature-based solutions and where we can collaborate (see below).
WYCA11	This doesn't just mean replacing pipes, upgrading pumping stations and water treatment facilities, but also helping us to make our landscape more resilient to climate change. We need to restore our ecosystems and the services they provide us in terms of water storage, flood mitigation, air quality, and reduction in wildfire risk. Yorkshire Water is a major landowner in the region and has already invested in some natural infrastructure, such as restoring clough woodlands and re-wetting peatland, but this investment must continue and be scaled up.	Nature First is our commitment to invest in nature-based solutions across Yorkshire. We recognise that the water industry is dependent on nature. By restoring natural processes, we can deliver a more resilient service for our customers while helping the region adapt to and mitigate the impacts of climate change. Yorkshire Water is investing significantly in peatland restoration and biodiversity in AMP8 both across its own landholdings on land that is predominantly SSSI and on land not in the company ownership to deliver this. This also includes our Beyond Nature programme where we are working with our farming tenants to support farm businesses and regenerative agriculture techniques and the Landscapes for Water programme which has delivered NFM improvements such as leaky dams and woodland clough planting working in partnership with the National Trust. Outside of YW land we also work extensively with farmers as part of our Sustainable Landscapes programme - focusing on farm engagement

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		and soil health, this aims to reduce pressures of agrochemicals and soil run off on water quality. We are now working with c. 22% of the arable land in Yorkshire. We recognise the important role that land management and nature-based solutions can play in building long-term resilience to drought, flood risk and climate change, and we will continue to work with partners to deliver catchment and habitat restoration initiatives that provide benefits for water resources, biodiversity and local communities, while balancing the varied responsibilities and uses of our landholdings including delivery of carbon and climate change objectives.
WYCA12	The Authority wants to see Yorkshire Water playing a larger role in the delivery of nature based solutions to protect the region, not just for us, but for our nature too. The Combined Authority and our partners have co-invested with Yorkshire Water to these types of scheme, for example Landscapes for Water. This is a great example of partnership working can be used as the catalyst to deliver more – at scale.	We welcome the WYCA's ambition for us to play a larger role in delivering nature-based solutions that protect communities, strengthen climate resilience and support nature recovery. We already deliver significant programmes through our land management, catchment work and strategic partnerships, including peatland, wetland, woodland and priority habitat restoration. Landscapes for Water demonstrates how co-investment and shared expertise can accelerate delivery at scale, with Yorkshire Water, WYCA, the National Trust and

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		other partners working across 5,500 hectares in the Upper Calder and Colne catchments to reduce flood risk, improve biodiversity and build climate resilience. We are committed to building on this approach by expanding investment in nature-based solutions and developing a stronger pipeline of collaborative, investable projects with the Authority and regional partners. Our AMP8 plans include further peatland and wetland restoration, wider sustainable land management and stronger alignment with the Local Nature Recovery Strategy. By coordinating priorities and combining public, private and third-sector funding, successful partnerships such as Landscapes for Water can provide the catalyst for greater action—protecting water resources and communities while creating more bigger, better and better-connected places for nature.
WYCA13	Our LNRS [Local Nature Recovery Strategy] has been carefully developed with partners, including Yorkshire Water, to deliver a bigger, better, more connected landscape for wildlife and the climate. Yorkshire Water's future plans, as a key landowner and resource manager, must support	We welcome the West Yorkshire LNRS and value the opportunity to contribute to its development. We support its nature-first approach and its ambition to create a bigger, better and more connected landscape, with water as the "Big Blue Thread" linking action for wildlife, people and climate resilience. As a

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	us to deliver those ambitions, not degrade our efforts.	major landowner and industry reliant on a resilient natural environment to deliver water and wastewater services, we recognise our responsibility to ensure that our future plans positively contribute to these shared priorities whilst balancing the varied responsibilities and uses of our landholdings. We will use the LNRS and its Local Habitat Map to inform our strategic planning, investment and land-management decisions, identifying opportunities to restore and connect habitats, strengthen catchment resilience and manage water positively for nature and communities. We will continue working with the Combined Authority and other partners to coordinate delivery, share evidence and align investment so that Yorkshire Water's activities support the region's nature recovery ambitions.
WYCA14	Overall, the Yorkshire Water (YW) Drought Plan does provide a thorough overview of their plan to respond to drought conditions, but it suffers from considering water primarily a marketable or usable resource, rather than an important element of our landscapes, an essential resource and habitat for our native species. The concentration is on ensuring supplies for	Our Drought Plan is an operational document that describes how we react to drought conditions. We have a duty under Sections 39B and 39C of the 1991 Water Industry Act (as amended by the Water Act 2003) to prepare, publish and maintain a drought plan. This does not mean that we don't recognise the importance of avoiding environmental harm where possible. Our WRMP considers

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	customers, and whilst this is vital, usage must be balanced against planetary cost.	environmental protection, and investment decisions are based on a best value plan approach and not cost alone, although we do need to consider customer affordability. We describe our demand management actions and work on nature-based solutions in the responses above. We recognise we have more to do and are keen to continue to collaborate with the WYCA and other organisations on balancing water supply needs with environmental protection.
WYCA15	As the climate changes, we are moving into a pervasive drought-flood cycle, marked by dry, hot summers, followed by warm, wet winters, which makes storing water and planning appropriately much more difficult. These cycles also increase the amount of pollution in our rivers, by increasing road and agricultural runoff, which is then further concentrated as the water levels drop, de-oxygenating the water and leading to algal blooms and species die-off.	We note the WYCA's concerns and will continue to collaborate with them and other sectors.
WYCA16	YW's Drought Plan concentrates on increasing supplies wherever possible, with rivers being the first port of call – this will further decrease water levels and further increase pollution concentration, which could lead to catastrophic environmental effects. We need to change our	See response WYC05 and WTC08 on use of river abstractions in drought. We agree with the WYCA's ambition to avoid environmental harm where possible and recognise we and other water companies have a significant role to play. As stated in our drought plan, we promote

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	relationship to water as a resource, doing what we can to limit use even during periods of non-drought, in order to balance our need to ensure supplies against the need to preserve and protect our environment, and the Drought Plan should reflect this change. Water is a critical resource, and we need to ensure there is a good supply for people in West Yorkshire, especially during droughts and heatwaves, where an inadequate water supply could pose a threat to health; the Drought Plan should balance this need with environmental responsibility.	the need for water saving each year regardless of drought status and we have a range of water saving initiatives (see appendix 4 of our Drought Plan and response to WYCA08). Our long-term plans include an ambitious leakage and water consumption reduction programs, and we have performance commitment targets on leakage, per capita consumption (PCC) and non-household consumption. Both our Drought Plan and WRMP are designed to balance environmental needs with water supply requirements, and we recognise there is a need to continue to look for ways to support nature recovery (see response to WYCA11, 12 and 13).
WYCA17	As stated above, there is a need to rethink our water use at scale, and begin moving towards year-round conservation, whilst the actions in the Drought Plan align with EA drought stages. YW should be proactively messaging customers about limiting use year-round; even in Level 1 of the drought stages, 'no drought', reducing usage helps conserve stocks for periods of drought and reduce the need for abstraction. YW should offer leak detection, rainwater harvesting, and low-flow taps/showerheads to help achieve this – this may be available through their 'Save Water' programme, but there is no detail about how	We agree water conservation is important year-round regardless of the drought position. Section 5 of our DP27 makes reference to this and our Appendix 4 lists our water saving initiatives. Our DP27 will be in place for 5 years and the exact mix of initiatives may change over this period therefore we provide details on our webpage which will be updated as required. We have added text to Section 5 to signpost where customers can find more information on our website. We have also added an additional

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	often this is promoted directly to customers, or the specific measures available.	page to our DP27 Customer Summary on water saving.
WYCA18	Communications plans must focus on changing people's relationship to water use wholesale, encouraging water-saving as the norm, without triggering feeling of loss around limiting water use. Using collective responsible behaviour and framing water-saving as something we can all participate in is key. This is not just something for YW to act on, but for every water company to act in concert in order to produce society-level change.	We agree with WYCA views on encouraging normalisation of water saving. Our water saving campaigns use positive language and do not mention hosepipe bans/restrictions. They focus on small changes people can make to save water, offer free devices, and help them save money too if they are on a water meter. Similarly, the national 'Lets save water' campaign covers all of England and Wales, and different companies could have hosepipe restrictions at different times. As such, it too uses positive behaviour change messages, not messaging restrictions.
WYCA19	Communications plans also need to be improved; all customers need to be contacted directly, with emails and postal campaigns, as well as advertising, and these communications should reach the whole network to reduce overall pressure on water stocks, not just concentrate on those areas experiencing drought.	There are General Data Protection Regulation constraints that limit the contact we can make with customers via emails. However, in times of drought or periods of high demand we may send customers service emails advising them how to save water and why. Water saving is covered in our annual billing letters to customers which is sent directly to customers via post. During times of drought, we will consider door drops to customers.

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WYCA20	These comms should also include simple explanations of aspects of climate change, and how they can make drought planning more difficult – we're currently caught in a pervasive drought-flood cycle that causes climate 'whiplash', as we veer between one extreme and the other. Explaining to customers that a wet, rainy winter doesn't mean that reservoirs are refilled and water stocks are back to normal levels is key to helping them understand the situation and limit use.	This message is covered in owned channels such as press and social media rather than paid for advertising to ensure we have the space to tell the story.
WYCA21	The plan mentions that droughts are occurring more frequently, for longer durations, and are more severe than seen before in the historic record – this needs to be communicated to customers so that they aren't complacent or wasteful about water use.	This message is covered by our owned channels for example press and social media. The current water efficiency campaign ran by Ofwat covers the impact of climate change of water supply. We will take learnings from this campaign and apply to our strategy during the next AMP.
WYCA22	We are currently in a cost-of-living crisis, and water bills have been highlighted as a key issue; however, YW are currently wasting 267.7 megalitres a day through leakage. This wastage within the organisation could be increasing water costs, which are passed onto customers, but acknowledging the wastage could also help customers change behaviour, by encouraging	Although there is a cost to treat water there is also a cost to track and repair leaks and to replace mains. Leakage repairs require road closures and lead to traffic disruption and leakage activity can only be enhanced if funding is available. However, we must also consider affordability and minimise bill increases. This adds complexity to the cost

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	them to look at where wastage occurs in the home, and how this could cost them more, particularly if they have a water meter. By making the wastage/cost link clear, and by encouraging customers to work to reduce wastage alongside the company's efforts, it could help encourage collective action.	saving case as the water treatment cost savings of leakage reduction are outweighed by the financial and social costs of leakage repairs. This does not mean water companies should not continue to reduce leaks but the main driver for leakage reduction is not cost savings, it is the need to offset population growth, climate change and avoid detrimental abstraction. We therefore plan leakage reduction over the long term to balance the costs and benefits with bill increases and supply-demand needs. We agree that customers can benefit financially from not wasting water and we promote the links to reducing both water and energy bills. We have added a comment on this benefit to our summary document.
WYCA23	Particularly with the roll-out of smart meters, can incentives be offered to customers who voluntarily reduce their water use, especially during drought periods? This could also aid the uptake of smart meters, by providing a direct benefit to those who have them installed, aiding YW's programme, which is currently low on uptake (around 1% of YW's customers).	Across our supply area 63% of household customers are on a metered supply and nearly all of our non-households. Over the next five-seven years we are upgrading meters to smart meters and introducing smart networks. This will enable us to consider and trial options such as incentives.

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WYCA24	In terms of influencing customer behaviour, YW should be engaging behavioural change experts to create usage reduction plans for year-round use. Language such as 'ban' and 'restrict' can trigger worries of loss, versus 'protect' and 'save', which encourage collectivism. Designed behavioural change plans could help reduce breaches of drought measures, as well as year-round conservation.	Our current campaigns are all underpinned by the COM-B behaviour change theory. The COM-B model is a behaviour change framework that explains that a behaviour will only occur when people have the Capability (knowledge, skills, ability), Opportunity (resources, environment, support), and Motivation (desire, beliefs, habits) to perform it. It is widely used to identify barriers to behaviour change and design targeted interventions that help people adopt and sustain new behaviours. We are also a large contributor to the national water efficiency campaign (WEC) we look forward to reviewing the learning from the WEC and applying them to our own campaigns in the future.
WYCA25	There is little in the plan about assisting customers to capture rainwater through water butts or rainwater harvesting systems, where it can be used in the garden or for functions that don't require drinking-quality water. An accompanying programme to help install rainwater harvesting measures in homes would assist with reducing usage, but it must have measures that make it available to a range of homes, including rental properties, shared	Within our ongoing Water Efficiency programme, we are offering rainwater harvesting subsidies for large business customers. We also provided water butts for community groups last year as part of our water saving campaign. Fully retrofitting existing homes is dependent on factors such as roof area, garden space, drainage layout, and what the harvested water

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	ownership schemes, flats, and harder-to-retrofit homes.	will be used for which can incur significant installation costs and require ongoing maintenance to protect homeowners. These actions require funding and potentially government grants for homeowners and developers. We will always consider what more we can do when we review our options every five years for our WRMP but large-scale projects for water recycling require a range of considerations including water quality compliance, maintenance programmes, liability agreements and government initiatives. Installing in new homes would be addressed by the developers and should be considered at the planning stage. We have been consulting with Ofwat on updates to the building regulations for new developments to include water efficiency measures including rainwater harvesting which would help to mandate this for new developments.
WYCA26	Communications to customers must go out proactively and regularly, not just be available on the website – they must also contain the why, not just the how. Customers pay a lot for their water and feel entitled to use the service they pay for, so helping them understand usage	We have added additional text to Appendix 4 to explain our water saving campaign is live throughout the year with advice on water saving based on the season. During the spring and summer, we communicate with customers on a weekly basis through social media about

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	restrictions is key. The current plan doesn't suggest communicating until there is a drought risk, but communicating with customers year-round and increasing communicating about limiting usage at the first sign of warmer weather could be an important tool, particularly as water use goes up in drought periods.	our reservoir levels. For example, winter creative focuses on swapping baths for showers, only running dishwashers and washing machines when full. We increase our messaging during the spring and summer to include outdoor use. We also have high demand messaging which will trigger in high temperatures. All ads drive traffic to our website where customers can engage with water saving tips and order water saving products. Now the national water efficiency campaign is live we will be updating our website to link through to this so that customers can understand the impact of climate change on water resources.
WYCA27	YW mentions working with stakeholders to communicate – there should be a proactive plan to work with the Combined Authorities and Local Authorities to help get the messaging out to residents from trusted sources.	During droughts we provide regular updates to the Combined and Local Authorities and would welcome their support on sharing messages
WYCA28	The drought plan aims to communicate with commercial users as well as households, which is good, but how will restrictions be enforced? The usage restrictions and bans don't mention any penalties for breaches.	Under the Water Industry Act 1991 and Water Resources Act 1991, the penalty for breach of a TUB is £1000 and for drought orders including a non-essential use ban a maximum of £5000. Convictions on indictment have no limit.

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		The legislation gives a court power to fine customers who ignore restrictions and the fines will be paid to the Treasury. It is important people respect the restrictions when they are in place. If we are told repeatedly about someone breaking the restrictions, the first thing we do is remind them of their obligations. This is usually enough. However, if they continue to use a hosepipe, we may escalate our enforcement accordingly. Our colleagues are regularly out and about as part of their day-to-day work. If they spot people breaching the restrictions as they go about their day-to-day jobs, they may speak to them, or we may send them a letter reminding them of their obligations.
WYCA29	Reducing leakages will also help conserve water stocks – whilst YW cover a large area and the infrastructure needed to support is extensive, the current level of leakage from the system is unsustainable. Fixing leaks would go a long way to supplying the amount of water they have suggested they need long-term.	See WYCA07 response.
WYCA30	Yorkshire Water's Water Resources Management Plan suggests they will need an additional 87 megalitres a day by 2050 to meet demand. But in 2025, 21% of water stock was lost to leaks, and their performance dashboard for 2025 put this at	We continue to invest in leakage reduction and have a long-term leakage target to halve leakage compared to 2017/18 levels, see response to WYCA07. Leakage repairs are part of our year-round activity, and our drought

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	267.7 megalitres per day. Whilst there will always be some level of leakage in as large and complex a system as YW have to maintain, eliminating leakages to the fullest extent possible – and investing in the right infrastructure and staffing in order to do this year-round – will go a long way to reducing water stress in Yorkshire.	plan focuses on the action we take in droughts to counteract increased leakage breakouts due to ground movement when dry.
WYCA31	When leaks are detected, YW should ensure that there are enough trained engineers to respond, and that they have been equipped with the right materials to effect a permanent fix – we have had several complaints from residents of slow response times to leaks, and problems recurring shortly after the site has been fixed. If a leak has occurred, then the pipes should be replaced, to provide resilience going forwards.	We continue to invest heavily in finding and repairing leaks across our network, with dedicated teams working around the clock to identify and resolve issues as quickly as possible. Our leakage detection teams use a range of technologies to identify leaks that are not visible above ground and enable faster repairs. Many repairs must be planned with the highways and local councils, which can lead to delays in repair times. Other repairs are complex and require adequate planning and resource provision to ensure we continue to supply water to customers whilst we repair the leaks. We don't always get it right first time and sometimes have to return to site to resolve the issue. We are working hard to improve this.

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		YW are replacing over 1000km of the water network between 2025-30 which will provide resilience going forward, preventing leaks from occurring.
WYCA32	It is also notable that there is nothing in the plan about repairing or restoring reservoirs in order to ensure they are safe and fit for purpose going forwards. As reservoirs dry out in drought conditions, infrastructure such as concrete retaining walls becomes exposed and affected by extreme heat. In order to minimise the risk of reservoir failure, as outlined in the Reservoir Reform Programme, these assets should be regularly inspected, maintained, and Yorkshire Water should be preparing climate risk assessments for each one, to ensure they are able to cope with the increased pressure of the drought-flood cycle.	We manage over 100 reservoirs, and they are essential to maintaining water supply at all times, not just in droughts. Out management of reservoirs is carried out in accordance with statutory legislation, industry standards and best practice and through portfolio risk assessment. The portfolio risk assessment utilises the risk assessment for reservoir safety (RARS) methodology published jointly by the Environment Agency (EA) and department for the Environment, Fisheries and Rural Affairs (Defra) in 2013. We invest c. £12M per annum maintaining and improving reservoir assets to ensure their continued safety and ongoing compliance against statutory legislation. The risk of climate change affecting reservoirs has been recorded on our risk register and we will continually monitor and assess all risks to identify when additional actions are needed.
WYCA33	West Yorkshire's Draft Infrastructure Plan notes water scarcity as a key issue for the region, particularly the increased demands on supply with a growing population and climate change.	Our long-term plans for offsetting the impacts of climate change, maintaining existing and

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	Climate change further decreases certainty of supply and leaves the region more exposed to climate-related risks. There is therefore a need to ensure that the water network is as efficient as possible, that existing assets are maintained and upgraded to ensure consistent service, and that there is additional network capacity and an adequate supply to manage future risks. As stated above, demand reduction, good infrastructure, and efficient use of the water we have is key to managing these risks.	investing in new assets/infrastructure are set out in our WRMP24 and PR24 Business Plan.
WYCA34	There is also the risk of further strains being placed on water supplies from new industries – in particular, that of datacentres, which use huge amounts of water for cooling server racks, thus contaminating it with dust, minerals, and chemicals, making it both unsuitable to reuse for cooling and unable to be returned to the environment without being significantly cooled and cleaned. Even closed-loop cooling methods, which reuse water internally within the data centre, are not a solution, as they effectively impound the water they use permanently, which can be as much as can be used by a town. Demand for fresh water is expected to exceed supply by 40% by the end	The amount of water used by data centres depends on the cooling technology used, whether it is air based or water based. Water based cooling systems can also be open or closed loop. Air-based cooling systems do not use water, but their energy requirements are greater. Where a development asks Yorkshire Water for a mains supply, we assess the requested demand and the capacity of our network, while protecting resilient supplies for existing customers. Developers may also consider other sources of water for cooling.

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	of the decade and 55% of global data centres are in river basins with high risk of water pollution, meaning much of the local water may be unsafe for use, increasing the pressure on clean water supplies and worsening the overall water scarcity in the regions. Additionally, nearly 68% of data centres are near protected areas or Key Biodiversity Areas, which rely on clean water supplies for communities and ecosystems – if the water is used instead for data centres, this poses a significant risk to both habitats and people. However, water cooling is not the only solution for data centres – air cooling can be equally effective and whilst it requires additional electrification, does not put additional stress on water reserves. The desire for water for non-essential uses, such as datacentres, cannot be allowed to impact on the ability of water companies to provide safe, clean water to their customers, and protect the environment. It would be good to see a commitment from YW on this, and abstraction should not increase to meet these demands.	We have a policy on sensitive customer and site-specific arrangements that prioritises non household customers as sensitive premises using definitions provided in the Security and Emergency Measures Direction (SEMD), section 208 of the Water Industry Act 1991. Data Centres are classed as critical national infrastructure and are classed as tier 3 sensitive customers. Tier 1 and 2 non-households (e.g. hospitals, nursing homes, hospices) would take priority over data centres if emergency arrangements were needed.
WYCA35	In the last few years, there has been increasing use of NAVs on new build housing sites, meaning that YW are not responsible for water or	Under the Water Act 2014, NAVs are responsible for their customers, including in a drought and we have added this point to Section 5.2 of our

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	sewerage on those sites – it is effectively a private company, which may not be clear to residents. Who is responsible for delivering bottled water or managing standpipes on these sites in the event of a severe drought?	main DP27 document. NAVs are water companies just like Yorkshire Water and are regulated by Ofwat. We are interested in the assertion that this may not be clear to residents and would be interested if WYCA have any evidence for this. Ofwat and Defra could be lobbied if there is evidence of an information gap for residents, with a view to this being addressed. Ofwat has an information page on NAVs (https://www.ofwat.gov.uk/regulated-companies/markets/nav-market/) but we agree it isn't clear what residents should expect from NAVs in a water outage. NAVs are required to prepare drought plans so there should be information in there for residents for each NAV site, e.g. https://www.iwnl.co.uk/help-and-advice/drought-plan/.
WYCA36	WYCA has been working on designing our Local Nature Recovery Strategy over the past two years. We have worked positively with Yorkshire Water as part of this process and have welcomed their support in the Strategy's preparation.	We are pleased to be supporting this initiative and welcome WYCA's feedback
WYCA37	As we move into delivery of the LNRS [local nature recovery strategies] the environmental impact of YW's Drought Plan could conflict with	We recognise the importance of LNRSs and the role that water availability and quality play in delivering their objectives. The Drought Plan

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	our ability to deliver it. Water is the connecting factor in our LNRS, linking our landscapes through a 'big blue thread'. Increased abstraction and reduced conservation of water could impact on a number of priorities set out in the LNRS around water availability and quality, and would prevent habitats from delivering the ecosystem services that Natural England has set out, and the LNRS is designed to support.	has been developed to maintain essential water supplies while seeking to avoid or minimise adverse environmental effects. Measures involving increased abstraction are subject to regulatory oversight and would only be implemented in accordance with relevant permits, licence conditions and environmental safeguards. We acknowledge the concern that drought management measures, particularly those involving increased abstraction, have the potential to affect water-dependent habitats and ecosystem services if not appropriately managed. Potential effects on water resources, water-dependent habitats and designated sites have been considered through the SEA and HRA, as well as Environmental Assessment Reports (EARs) prepared for individual drought permit and drought order options. These assessments informed the development of the Drought Plan and identify mitigation and monitoring measures, where necessary. It should also be noted that drought measures are temporary and would only be implemented during specific drought conditions when other demand management have been exhausted or are insufficient. Yorkshire Water will continue to work with regulators and environmental

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		stakeholders to ensure that any potential interactions between drought management measures and the objectives of relevant LNRSs are appropriately considered and managed.
WYCA38	Drought Permits mainly concern reducing compensation flows from reservoirs out to rivers, thereby reducing river levels overall, and concentrating pollution – what proactive monitoring is being undertaken by YW to monitor and minimise environmental impact? The monitoring mentioned in the plan is based on customer reports and reports from local volunteer environmental groups, not from YW themselves.	A comprehensive monitoring plan is outlined in our Environmental Monitoring Plan. This includes the baseline surveillance monitoring of fish, macroinvertebrate, habitat quality, white clawed crayfish etc in all reaches that have been assessed to be impacted by drought permits. This monitoring programme has been designed and coordinated with the EA. During onset or in drought phases of a drought year, walkover assessments for river condition and fish habitat, Fish pass effectiveness and white-clawed crayfish will be conducted to inform YW and the EA of any emerging environmental risk. A mitigation plan for each reach has also been developed and where surveys have identified environmental risk, mitigation options from the mitigation plan will be implemented in coordination with the Environment Agency. Following a drought, a post drought recovery monitoring programme will be established to determine if any significant impacts are observed (i.e. change in

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		fisheries assemblage / abundance) in comparison to the baseline survey programme.
WYCA39	A reduction in river levels could also increase habitat fragmentation during the time of year when species are most active, reducing the amount of viable territory, food sources, and affecting species' ability to move around the region, creating an 'island' effect. Rivers function as connective corridors, and support habitats such as wet woodlands, wetlands, and floodplain meadows. As river levels fall, this also exposes riverbanks, leaving them vulnerable to erosion, which can increase flooding.	We acknowledge this comment. Potential impacts of reduced river levels and flows on habitats and species, including impacts on habitat connectivity and associated ecological receptors, have been considered through the drought permit / order EARs and the SEA. These assessments identify the potential environmental effects of drought management actions and the mitigation and monitoring measures required to manage associated risks.
WYCA40	Rivers currently are affected by four main sources of pollution; sewage, road runoff, pharmaceutical contamination, and agriculture. When these are further concentrated and rivers run more slowly due to reduced flow, there is additional risk of humans or animals contracting pollution-linked diseases, such as E.coli and Weil's Disease.	We recognise river health is affected by multiple sources, and we have a significant role in enabling improvements. To reduce pollutant loads we are investing £1.5bn on improving storm overflows and spills reduction - further information is available in PR24 Business Plan. Road run off is a highways issue unless it commutes with our sewer system. The water industry surveyed pharmaceuticals and other hazardous substances in wastewater discharges and receiving watercourses in the Chemical Investigations Programme Phase 2 (CIP2) from 2015 to 2020. No significant risk to

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		the environment was found when the concentrations detected were modelled by the EA for dry weather flows. Current plans are to repeat this survey and modelling in CIP5 from 2030 to 2035. The Environment Agency also monitors for pharmaceuticals and other hazardous substances in watercourses, with results published on its Water Quality Explorer (Nhttps://environment.data.gov.uk/water-quality). Since 2020 no Yorkshire Water wastewater discharges have been identified by the EA as containing pharmaceuticals posing a significant risk to watercourse health. Our Drainage and Wastewater Management Plan is a 25-year plan to reduce pollution, reduce sewage spills and improve water quality across the region and will collaborate with our WRMP where applicable. Our Pollution Incident Reduction Plan sets out our commitment to improving asset performance to protect the environment. Addressing pollution at source is also a key objective in the government's white paper on regulation reform which will look to bring together more collaboration, ensure legislation changes and provide funding streams (A New Vision for Water, January 2026).

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WYCA41	Climate change is impacting on rainfall levels, meaning that the upland reservoirs that provide most of England's drinking water supplies are becoming a less reliable source of water, and to increase resilience, other options should be considered – this is mentioned in the plan. One option under consideration by YW is the possibility of desalinating seawater as a way of increasing supplies, which has been used successfully by other countries. However, it carries significant environmental and energy costs, in particular the highly-concentrated brine that is returned to the sea as a by-product of the process, which can cause environmental issues by unbalancing the ratio of salt to water. If YW are pursuing this as a solution, which could deliver resilience in drinking water supplies in an emergency, it must be carefully researched and designed to minimise the energy cost and the environmental effects.	We agree with the WYCA comments on minimising energy and environmental impact of new supply schemes. If desalination was taken forward as a permanent solution through the WRMP it would require significant further investigation and design and be subjected to planning requirements and environmental mitigations to seek all necessary approvals.
WYCA42	Even in extreme droughts, further restrictions on water use are not imposed – the plan counts on increasing supply, not decreasing demand. Whilst it is important to ensure customers have access to clean, drinkable water, tankering in supplies or desalinating seawater is not a long-term solution.	The type of restrictions water companies can impose is defined by legislation. The regulatory process specifies the drought levels at which drought restrictions and extreme actions are triggered. Restrictions through a TUB are imposed at drought level 2, a NEUB at level 3a if an ordinary drought order is granted and

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		extreme options such as tankering or desalination at drought level 3b. At level 3b we would also consider extreme demand actions such as removal of non-statutory exemptions from a TUB and NEUB. More extreme restrictions on supply include rota cuts and standpipes and are a level 4 drought action. They would require an emergency drought order to be granted by Defra. Our DP27 explains level 4 actions and the need for an emergency drought order in Section 4.6. Our drought plan is not proposing long-term solutions and tankering and desalination in the context of the extreme drought options would be temporary measures only. Desalination as a permanent solution is considered as part of the long-term WRMP process. We agree with WYCA concerns on this option but as population increases and other sources of supply become exhausted or must be reduced to protect the environment, we cannot rule out desalination.
WYCA43	On environmental impacts of increasing supplies, it is good to know that environmental impact of additional infrastructure/construction has been considered, and that, where possible, YW will consider the lowest-impact options first. However, the report contains the phrase "All the drought permit/order options would deliver	We acknowledge this comment. The reference to beneficial effects on air and climate relates to the role of drought actions in maintaining water supplies during drought conditions, thereby supporting resilience to the impacts of climate change. However, we recognise that

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	minor to major beneficial effects on human health and economic activity…. as well as air and climate, through their ability to bolster resilience to the effects of climate change." The benefits to air and climate are not backed up or explained at any point.	this benefit is not clearly explained in the current text. We have reviewed the relevant SEA wording and updated to better explain the basis for any identified benefits and ensure the assessment conclusions are clearly supported by the accompanying narrative."

Appendix 1.10: Severn Trent

Ref.	Comment	Yorkshire Water Response
SVT01	Thank you for the opportunity to comment on your draft drought plan. This response is from Severn Trent and Hafren Dyfrdwy. We would like to encourage continued collaboration between our organisations in drought and dry weather, which has been beneficial to both companies in previous events. We welcome the detail you have included in your draft Drought Plan in relation to Severn Trent, as discussed and agreed during the development of both of our plans.	We also welcome collaboration both in drought and developing drought plans
SVT02	As outlined in our own plans, we would like to continue working together to align our messaging to ensure that, where appropriate, we make sure that hot/dry weather and drought messaging is consistent between Yorkshire Water, Severn Trent, Hafren Dyfrdwy and the associated NAVs within our supply areas. We are committed to continue our regular resource position updates during drought and working together to ensure optimum management of the Derwent Valley reservoirs.	We share Severn Trent's commitment to aligning messaging as appropriate for the drought situation and maintaining regular contact on the operation of the Derwent Valley reservoirs.
SVT03	As a general comment the document is very well-designed from an accessibility perspective. We look forward to continuing to work closely with you through the implementation of our plans.	We thank Severn Trent for this feedback.

Appendix 1.11: Yorkshire Wildlife Trust

Ref.	Comment	Yorkshire Water Response
YWT01	Yorkshire Wildlife Trust welcomes the opportunity to comment on Yorkshire Water's Draft Drought Plan 2027. We broadly support the plan and particularly welcome the recognition that protecting rivers, wetlands and wildlife is a core objective of drought planning alongside maintaining resilient public water supplies. This is increasingly important given the combined pressures of low flows, poor water quality, habitat degradation and climate change on Yorkshire's freshwater environment. We also welcome Yorkshire Water's twin-track approach, under which demand-management measures are generally introduced before supply-side actions that may have greater environmental effects. The comprehensive environmental assessment accompanying the plan provides an important basis for understanding and mitigating those effects. However, we believe the final plan should be strengthened in six areas.	We appreciate the YWT's feedback and respond to specific points below.
YWT02	The plan recognises that climate change is increasing drought risk and uses historical and stochastic	We plan for climate change, growth and sustainability scenarios in our WRMP. Our

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	drought scenarios to test the resilience of Yorkshire's water-supply system. We would welcome greater transparency about how these scenarios relate to different levels of future global warming. Yorkshire Water should demonstrate that it is: • actively adapting its water-resource system for approximately 2°C of global warming by 2050; • preparing infrastructure and operational pathways for the possibility of approximately 3°C of warming by 2100; and • stress-testing the system against plausible 4°C scenarios. These should not be treated as forecasts of a single future. They should be used to identify where the system may fail, where environmental thresholds could be crossed and which investments or operational changes have long lead times."	WRMP24 looks at the long-term supply and demand needs and applies an adaptive plan approach. This means if the future is more or less adverse than originally planned for, we can increase or decrease the number of initiatives we are investing into to improve drought resilience. In our drought plan we have stress tested our system by using some of the extremely dry stochastic inflows and sustained high demands which are equivalent to testing the system under changes in climate. We will carry out further analyses of climate change for our WRMP29, where we are testing the system at Global Warming Levels (GWLs) of 2°C and 4°C for a number of the Regional Climate Models (RCMs).
YWT03	Stress-testing should include compound events, such as successive dry winters, prolonged summer heat, elevated household and commercial demand, reduced groundwater recharge, wildfire, deteriorating raw-water quality and low river flows occurring simultaneously	Our Drought Plan is an operational plan for reacting to droughts to meet water supply needs. We stress test scenarios for multiyear events and elevated demand for potable water supply. It complies with the statutory requirements but does not cover all the drought risks mentioned here, which are outside the scope of water company planning. The EA work with NE,

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		environmental non-governmental organisations and local conservation groups to protect the environment from droughts as noted in Drought: how it is managed in England - GOV.UK. Appendix 7 of our DP27 includes a section on water supplies to aid firefighting.
YWT04	The test of resilience should not be limited to whether public water supplies can be maintained. It should also consider whether they can be maintained without causing unacceptable or potentially irreversible ecological damage.	We agree with this objective and our WRMP24 presents our plans for improving drought resilience so that we become less reliant on drought actions. We have a comprehensive environmental assessment and monitoring programme to assess potential ecological impact during drought years, and non-drought years.
YWT05	We welcome the inclusion of baseline, in-drought and post-drought environmental monitoring. The Environmental Monitoring Plan provides an important framework for understanding the effects of individual drought actions and assessing subsequent ecological recovery. However, ecological harm may occur before formal drought triggers are reached. Repeated periods of low flow, high water temperature and reduced groundwater recharge can progressively weaken	We acknowledge the importance of understanding the wider environmental effects of drought. We have agreed with the regulators (EA and NE) key environmental receptors that are functionally linked to activities that we could undertake as part of our Drought Plan, i.e. fish, invertebrate and white-clawed crayfish, downstream of reservoirs where the release regime can reduce through drought permits. These key receptors are monitored as part of a continuous programme to characterise the

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	freshwater ecosystems, even where none of those periods individually constitutes an official drought. Yorkshire Water should therefore monitor cumulative water stress across seasons and years, including: • the frequency and duration of low-flow and high-temperature conditions; • changes in dissolved oxygen, water quality and ecological connectivity; • effects on headwaters, wetlands, ponds, springs and groundwater-dependent habitats; • changes in fish movement, aquatic invertebrates and vegetation; and • the extent and rate of ecological recovery following previous periods of drought or water stress. This should examine how repeated stress changes the behaviour and ecological functioning of catchments as a whole, rather than considering only the direct effects of an individual drought permit or order.	long-term environmental baseline, as well as intensively before, during and after an instance where drought permits/orders are implemented. The wider impacts of an environmental drought including the monitoring of receptors that are not agreed to be functionally linked to specific drought plan activities are not the focus of the drought plan.
YWT06	We also encourage Yorkshire Water to publish the principal findings from ecological monitoring undertaken during and after the 2022 and 2025	The environmental monitoring undertaken during a drought is specifically coordinated to determine the environmental response from implementation of drought

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	droughts, together with a clear explanation of how that evidence has informed the final plan	permits/orders. These assessments were shared weekly with the EA during the implementation of permits and orders in 2022 and 2025 and relate to specific YW assets.
YWT07	The environmental assessments identify the likely impacts of individual supply-side actions and propose monitoring and mitigation measures. The final plan should explain more clearly how monitoring evidence will influence operational decisions as a drought develops. In particular, it should identify: • the ecological indicators and thresholds that will be monitored; • how cumulative and in-combination effects will be assessed in real time; • what additional mitigation will be triggered if impacts exceed predictions; and • the circumstances in which a particular action would be modified, delayed or discontinued This is important because the impacts of drought actions will occur alongside the effects of the drought itself, existing pollution pressures, wastewater discharges and abstraction by other users. The Habitats Regulations Assessment recognises the need	The specifications for baseline, onset of drought, in drought and post drought monitoring, as well as the process for determining and implementing in drought mitigation is detailed in the Drought Plan EMP which is discussed and approved by the EA.

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	to consider inter-option and wider incombination effects.	
YWT08	Where there is uncertainty about the ecological consequences of an action, the plan should apply a precautionary and adaptive approach. The protection of public water supplies is essential, but it should not follow that every level of environmental impact becomes acceptable during a severe drought	We acknowledge this comment. This represents the approach that we currently take and will continue to take in relation to drought plan implementation
YWT09	Yorkshire Water should develop an earlier, more graduated and publicly visible approach to demand management. This could include accessible seasonal reporting on: • reservoir, river-flow and groundwater conditions; • current demand compared with normal seasonal demand; • indicators of environmental water stress; • the outlook under different weather scenarios; and • the actions being requested of households and businesses at each stage The final plan should set out earlier trigger points for voluntary and targeted action and explain how Yorkshire Water will evaluate the actual water savings achieved by different interventions.	Section 1.4 of our main drought plan document and Appendix 4 explain our water situation (or Watsit) report (Water situation report) which is published monthly and provides data on rainfall, river flows, groundwater levels, reservoir storage, and demand for the Yorkshire region. It also compares recent demand for each month of the year to the last three years. Monitoring environmental water stress is primarily the role of the EA but as mentioned above YW do have an extensive baseline monitoring programme in all reaches that have been assessed to be impacted by drought permits, designed and coordinated with the Environment Agency. We monitor our supplies daily and use a simulation model to forecast a developing

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	This would help make water conservation a normal part of seasonal resilience rather than an emergency response introduced late in a drought. The final plan should set out earlier trigger points for voluntary and targeted action and explain how Yorkshire Water will evaluate the actual water savings achieved by different interventions. We welcome the use of smart-meter information to improve understanding of demand. This should support earlier warning, leakage detection and targeted assistance, while ensuring appropriate affordability and data protections for customers	drought under a range of scenarios (for further information see Section 1.5 and Appendix 4). Our water conservation activities are not reserved for droughts. We have an ongoing water efficiency programme offering initiatives to household and business customers. Within our WRMP24 Water Efficiency programme we are offering rainwater harvesting subsidies for large business customers. We also provided water butts for community groups last year as part of our water saving campaign. We are continuing to review options to include more rainwater harvesting options in our current programme and in our strategy for future AMP periods. We introduced an enhanced water efficiency campaign in 2025/26 which was further accelerated with our reactive water saving messaging due to the dry weather we observed prior to introducing a temporary use restriction. YW was part of the pilot for the national Water Saving Campaign ""Lets save water"" launched by Ofwat this year and we are now working on how the YW water saving campaign integrates with the national campaign to maximise customer awareness of the

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		importance of water saving. We use a range of channels to promote water saving each year and information is available on our website (Water Saving). As a drought develops, we use these channels to notify customers, enhance the tone of the messages and increase the scale of the initiatives (see Appendix 7). Evaluating savings for each initiative is difficult as customers will be exposed to several initiatives making it difficult to disaggregate and measure the benefits. In 2025 we observed some changes in demand as a result of drought actions. We describe this in Table 3-3, section 3.2.6 of the main plan as well as in Appendix 9 (Lessons identified 2025). We also participated in a United Kingdom Water Industry Research (UKWIR) project *A Review of the Impacts of Communications Campaigns and Temporary Use Bans* (26/WR/02/22-1) which concluded "that the response of customers to both communications campaigns and TUBs is highly varied. This report suggests that a single value for the demand savings resulting from TUBs fails to capture the influence of temperature, location and

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		property type. ….. Because of these varied results, it is not possible to provide a single estimate of the savings from either TUBs or communications campaigns." As we move to a smarter network system, we will benefit from more readily available data and use this to find new and improved ways of promoting the need for water saving and finding and repairing leaks.
YWT10	We also encourage Yorkshire Water, the Environment Agency, Ofwat and Defra to consider whether the current regulatory framework provides sufficient flexibility for more graduated demand measures between general appeals for restraint and formal restrictions	We would be interested to hear the YWT's ideas on this and to work with regulators
YWT11	Given the increasing risk of prolonged drought, the plan should demonstrate continued ambition on: • reducing leakage; • expanding smart metering; • supporting household water efficiency; • protecting vulnerable customers; and • reducing avoidable use within Yorkshire Water's own operations	Our WRMP24 Water resources management plan provides details of our demand strategy. Our long-term ambition will contribute to the Government's Environmental Improvement Plan to half leakage compared to 2017/18 levels by 2050, reduce average per capita consumption to 110 litres/head/day and reduce non-household consumption by 15%. Key to our strategy is the installation of smart meters

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		and 1.4 million existing meters will be replaced with smart technology by 2030. Vulnerable customers registered on our Priority Services Register are exempt from a temporary use ban and NEUB. TUBs and NEUBs restrict certain uses of water but do not restrict water supply to customers. Water supply restrictions would only apply in an extreme and unprecedented drought event. In these circumstances we would prioritise vulnerable customer needs as part of our emergency response. We are conducting water efficiency audits on our own sites to improve efficiency, and we are working with colleagues internally to review opportunities to reduce any avoidable use.
YWT12	The plan should also address commercial and industrial demand more systematically. This should include targeted engagement with water-intensive sectors such as food production, manufacturing, power generation, agriculture and data centres.	In our draft DP27 we included direct communication with large commercial users as a level 3b drought option. In our revised draft plan, we have added additional earlier non-household options at level 3a. To bridge the gap between a temporary use ban and a non-essential use ban we have added an option for a communication campaign to request commercial non-essential use reduction on

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		a voluntary basis. We have also added an option to contact non-household groups and representatives such as hotel chains, the tourist industry and local authorities responsible for public amenities and civic facilities such as parks, swimming pools and schools, and other organisations.
YWT13	Demand-management measures should be fair and proportionate. Households should not be expected to carry a disproportionate burden while significant avoidable commercial use continues.	Our drought demand management activity is aimed at both households and commercial water uses. We are also delivering demand reduction initiatives to non-households as well households as part of our ongoing water efficiency campaign including offering rain water harvesting subsidies to large business customers.
YWT14	We recognise that the Drought Plan is primarily an operational plan and that major investment decisions sit principally within wider water-resource planning. Nevertheless, drought resilience cannot be secured solely through emergency operational measures or a small number of major infrastructure projects. Yorkshire Water should connect implementation of the Drought Plan with its wider investment in water resources, catchments and nature-based solutions.	Our WRMP plans investment in demand reduction and new supply schemes for meeting growth, offsetting climate change, mitigating environmental impacts of water abstraction and improving drought resilience so that drought actions are needed less frequently. We are committed to working across our organisation in the development of our next WRMP to incorporate the use of landscape place-based and nature-based solutions which increase resilience in the water environment,

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		more so in the time of drought. Through programmes such as Nature First, Landscapes for Water and Sustainable Landscapes, we work with farmers and regional partners to strengthen catchment resilience, improve natural water storage, and deliver catchment and habitat restoration that benefits water resources, biodiversity and local communities while increasing resilience to drought, flooding and climate change. Our AMP8 plans include further peatland and wetland restoration, wider sustainable land management and stronger alignment with the Local Nature Recovery Strategy. By coordinating priorities and combining public, private and third-sector funding, successful partnerships such as Landscapes for Water can provide the catalyst for greater action—protecting water resources and communities while creating more bigger, better and better-connected places for nature. We are also developing Integrated Water Management Plans to identify opportunities for multi-benefit solutions that deliver wider environmental and social benefits alongside

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		water resource and drought resilience outcomes.
YWT15	Yorkshire Water should explore a distributed network of water retention and storage throughout the landscape. Depending on location, this could include: • restored wetlands, floodplains and peatlands; • naturalised river corridors; • appropriately designed off-line farm and landscape storage; • sustainable drainage and urban rainwater capture; • soil and land-management measures that improve infiltration; • business water reuse and rainwater harvesting; and • local storage that reduces pressure on public supplies and abstractions during dry periods. These measures will not all create directly deployable public water supply. However, collectively they can slow the movement of water through catchments, support groundwater recharge, maintain ecological refuges, reduce demand for treated water and improve resilience to both drought and flood.	We agree with the YWT's comments and although we consider such options as groundwater recharge for water resource benefits we are also committed to investing in nature-based solutions across Yorkshire to improve water resilience, tackle climate change and support nature recovery through our Nature First initiative. Through programmes including Beyond Nature, Sustainable Landscapes and Landscapes for Water, Yorkshire Water is restoring peatlands and habitats, supporting regenerative farming, improving soil health and delivering natural flood management. Please see the response to WYCA representation also.
YWT16	We encourage Yorkshire Water to continue working with environmental organisations, land managers and	The initiatives we describe above include working with partners such as the National

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	catchment partnerships to identify where such interventions could provide the greatest combined benefit for water security, nature recovery and climate resilience.	Trust and farmers across around 22% of Yorkshire's arable land, and we aim to expand these initiatives through AMP8, creating lasting benefits for water resources, biodiversity, climate resilience and local communities.
YWT17	In conclusion, Yorkshire Wildlife Trust supports the overall direction of the Draft Drought Plan, including its emphasis on demand management before more environmentally damaging supply-side measures. However, the increasing likelihood of hotter, longer and more complex drought events requires a broader understanding of resilience. Drought planning must consider not only acute emergencies, but the cumulative effects of repeated water stress on the ecological functioning of catchments. We therefore ask Yorkshire Water to strengthen the final plan by: • making its climate scenarios and resilience assumptions more explicit • monitoring cumulative water stress and ecological recovery; • setting out clearer environmental thresholds and adaptive decision rules; • introducing earlier and more graduated demand management;	Please see responses above. We would also welcome the opportunity to continue engagement.

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	• strengthening action on leakage, efficiency and non-household demand; and • connecting operational drought planning with distributed storage and landscape-scale catchment resilience. We would welcome continued engagement with Yorkshire Water as the plan is finalised and implemented.	