Statement of Response to draft Drought Plan 2017

May 2018

It's part of our Blueprint for Yorkshire

1. Introduction

Our draft Drought Plan 2017 was submitted to Defra in November 2017 and is published on our website https://www.yorkshirewater.com/resources#ls2. We held a seven-week public consultation on the draft Drought Plan from 29 January 2018 to 19 March 2018. Statutory consultees and interested parties most likely to be affected by our actions during a drought were notified of the consultation. Paper copies of our draft Drought Plan were available on request from our Head Office in Bradford.

This statement of response explains the changes we will make to our Drought Plan as a result of the consultation. We received representations on our draft Drought Plan 2017 from the Environment Agency and Natural England. We have considered each of the comments made in the representations and how we should address them. Section 2 gives an overview of the comments, including a table providing our response to each individual issue, stating whether or not the issue has led to a change in the final Drought Plan.

We will continue to develop our final Drought Plan in consultation with the Environment Agency and Natural England. The final plan will be sent to the Secretary of State for the Environment, Food and Rural Affairs (Defra). The Secretary of State may direct us to modify the plan and/or hold a public hearing or inquiry prior to publication of the final Drought Plan. Once we receive notification form the Secretary of State that we should publish our final Drought Plan we will publish it on our website and make paper copies available.

2. Response to Representations

Natural England's representations raised issues on our Habitat Regulation Assessment (HRA) screening and advised further clarity was needed on potential monitoring and mitigation of the impacts of our potential drought actions on designated sites. We have had ongoing discussions with Natural England during the pre-consultation phase of our draft Drought Plan and Natural England has suggested a further meeting to discuss their recommendations. We welcome Natural England's offer for further discussions and will meet with them before publishing our final Drought Plan. Table 1 provides a response to specific comments raised by Natural England.

The Environment Agency's representation provided recommendations on four key issues for us to address in the final plan and two issues for further improvements. Our response to the four recommendations is given below and Table 1 includes comments on specific points raised relating to the recommendations and the two further improvements.

Recommendation 1 - Testing the plan under a range of drought scenarios and outlining the timing and sequencing of actions

We discuss drought scenarios of varying magnitude and duration in Section 2 of our draft Drought Plan based on historic droughts and more extreme events not previously experienced.

Our final plan will include additional details on the drought actions used in these example scenarios. In any drought event our initial actions will be a communication campaign requesting voluntary reductions in demand use, operational changes to move available water supplies around our region and enhanced leakage reduction activities. If the drought continues we may need to implement temporary use bans and apply for, then implement, drought orders to restrict non-essential use and supply side drought permits or orders to increase abstraction or reduce compensation releases (ordinary supply side drought options). In an extreme drought, never previously experienced, we would consider the long-term drought options that are presented in Section 3 of our draft Drought Plan.

In a future drought event the supply side actions including long-term drought options and the sequence of these actions may differ to the scenarios presented, but they will always be preceded by demand side drought actions and we will always apply for a non-essential use drought order at the same time as our first supply side drought permit or order application. Appendix 1 of our draft Drought Plan presents reservoir stocks for each of the scenarios described in Section 2 against reservoir control curves. In our final Drought Plan Appendix 1 will include additional text describing the timelines for drought actions and associated triggers related to the scenarios.

Recommendation 2 - Provide further clarity on changes to the Strategic Environmental Assessment (SEA) and clearly identify any resulting implications

This recommendation is specific to our long-term drought options to enter into a bulk supply agreement with Northumbrian Water. We have two alternatives for transferring the bulk supply from the source to an existing raw water main that takes water from the River Ouse to a water treatment works. The options are a river transfer (Tees to Swale transfer option) or a direct pipeline (Tees to Derwent pipeline option).

Some SEA outputs in the draft Drought Plan 2017 are different to previous assessment due to modifications of certain objectives, including sub dividing the bio-diversity category. In our draft Drought Plan 2017 the Tees to Swale transfer option SEA screening concluded the bio-diversity impacts would be minor adverse, whereas the Tees to Derwent pipeline option resource use impact was classed as major adverse. The Environment Agency comments highlight the Tees to Swale transfer option poses an INNS (invasion of non-native species) risk. We have taken these comments into account and the SEA in our final Drought Plan will classify the Tees to Swale transfer option bio-diversity as major adverse. However, the Tees to Derwent pipeline resource use category will remain as major adverse due to the need to install a 50km pipeline. Both Tees options remain in our final Drought Plan however, further environmental impact assessments would be carried out and mitigation measures identified if we were considering implementing a Tees transfer in a drought.

Recommendation 3 - Complete appropriate Environmental Assessment Reports (EARs), monitoring and mitigation plans.

We have created EARs for all ordinary supply side drought options requiring drought permits or orders. Long-term drought options have only been subject to environmental screening (rather than full EAR). In the event of a long-term drought, these options would be subject to detailed environmental assessment (including environmental impact assessment, where necessary) to ensure adverse impacts were mitigated. Draft versions of the EARs and our drought monitoring and mitigation plans have been shared with the Environment Agency, who has provided comments and suggested improvements.

We agree the EARs require updates to address the Environment Agency's comments and ensure we are drought ready. We are in the process of creating draft drought permit/order applications for each of the potential applications we could be required to submit in a drought. The EARs will accompany any supply side drought permit or order applications we make. We will address the Environment Agency's comments when finalising the EARs to support the applications, including recommendations to consider Local Wildlife Sites (LWSs). We are also planning to carry out further studies between 2018 and 2023, i.e. prior to finalisation of the 2023 Drought Plan in consultation with Natural England, on certain designated sites. When complete, the results of these studies will be incorporated into the relevant EARs.

Recommendation 4 - Provide further clarity regarding bulk supply arrangements with neighbouring water companies

This recommendation relates to a potential bulk transfer agreement with Northumbrian Water that we would consider in a long-term drought situation. Northumbrian Water has stated in its Drought Plan, published December 2018 that there is potential for 40Ml/d to be made available to Yorkshire Water in a drought. This is consistent with the provisional volume we stated in our draft Drought Plan and we will update the text to clarify the available volume.

During a drought we would be communicating with Northumbrian Water on drought actions and any impending need for the bulk supply. The Environment Agency has commented our Drought Plan requires further clarity on the bulk supply arrangements and that the uncertainties and risks need to be understood. We are in full agreement with this comment and will enter into further discussions with Northumbrian Water and the Environment Agency to fully address this recommendation. We will start discussions before publishing our final Drought Plan and ensure our final plan reflects the outcome of these discussions.

Table 1 Yorkshire Water's response to draft Drought Plan 2017 consultation comments

Area of issue	Information or changes required	Yorkshire Water response
Environment Agency Recommendation 1 - Testing the plan under a range of drought scenarios and outlining the timing and sequencing of actions		
Issue 1.1 Clarification of permit types and measures covered.	The whole draft Drought Plan would benefit substantially from spelling out, clearly and simply, what is meant by the following terms, where and when they will be used, and what their implications are for customers and the environment: Demand-side Measures Supply-side Measures Drought Permits Drought Orders Temporary use bans non-essential use bans	Drought management actions are discussed in Section 3 of the draft Drought Plan and further details provided in Appendix 3, 4 and 5. However, we recognise the plan would benefit from clarity on specific terms. To provide an early explanation of the types of drought actions and when authorisations are required, Section 1 of the final Drought Plan will include a sub section to explain the terms listed in the Environment Agency's comment. Section 3 of the final Drought Plan will state the activities that would be prohibited by a demand side (non-essential use) drought order and further details, including exceptions, will be added to the Appendices. The references to drought orders and drought permits in the final Drought Plan and Appendices will, where relevant, distinguish between non-essential use drought orders and supply-side drought orders/permits.
Issue 1.2 Testing the plan: Scenarios and Worked Examples. Identify what actions the water company would take in different scenarios. Prepare and justify the order the company will implement drought permits and drought order.	Link the scenarios tested to the drought response surface to show how the scenarios test the plan across the range of possible droughts. Include worked examples illustrating in more detail the principles set out in Figure 2.4 for the scenarios in Appendix 1, setting out: • What actions taken • When, relative to local and regional stock levels • Where site-specific actions are sought	The final Drought Plan will expand on the details on our drought scenarios provided in Section 2 of the draft Drought Plan, and further text and timelines will be included in the worked examples in Appendix 1. The drought response surface presented in the draft Drought Plan will be replaced with a more recent version from our draft WRMP, with the 1995-1996 and 1929 droughts added to the response surface.

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	e.g. expand the text accompanying each scenario in Appendix 1: where Drought Permits or Orders are needed, give examples of which DP/Os you might seek to meet this need and when.	
Issue 1.3 Presentation of Water Resource Zone and reservoir group planning	Please Emphasise that Appendix 1 graphs (and equivalents in main Drought Plan) are planning tools and that the charts for the whole Water Resource Zone are the summary i.e. what customers would actually experience. This may require some presentational changes, especially in the Appendix 1 charts and summaries.	The final Drought Plan text will, where relevant, reiterate that decisions to impose temporary use bans and supply side drought permits/orders would be operational decisions made at the time based on the specific drought situation. However, it is likely the decision would only be made if temporary use bans were triggered in three or more areas. We would not necessarily wait for the regional trigger to be crossed, although this is likely when triggers are crossed in three or more areas. These examples are only indicative of likely actions in specific examples. The area reservoir graphs are to aid operational planning, and a temporary use ban or supply side drought permit/order trigger being met in one area would not necessarily lead to a temporary use bans being implemented.
Issue 1.4 Levels of Service for Rota Cuts	Clarify how return periods have been calculated for Level 4 (Rota Cuts, etc.) demand-side measures.	The final Drought Plan text will describe the return period analysis which led to a greater than 1 in 500 years return period for rota cuts/standpipes. It will refer to the handbook of source yield methodologies - greater than 1 in 500 year return period results from analysis of reservoir levels going below emergency storage. We would expect to implement long term drought options in advance of this. Other return periods for drought events are based on rainfall analyses using Tabony Tables, and extreme value analysis. Our long-term drought options are for very rare events, but we think it prudent to have a plan for such events (however unlikely). Our 1995/96 drought was unprecedented, based on analysis of previous rainfall in had a return period of 1:1000

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		years, we therefore consider it prudent to plan for extreme events. In our final plan we will explain the nature of return period analyses for droughts which consider both drought magnitude and duration.
Issue 1.5 Levels of Service for Drought Orders and Permits	YWS needs to clarify that this Level of Service applies to all supply-side and demand-side Drought Permits and Drought Orders (and not to Drought Orders for Non-Essential Use Bans only).	The final Drought Plan will expand on the levels of service description in Section 1.4 to make it clear the "no more than 1 in 80 years on average" level of service is referring to both demand side (non-essential use) drought orders and supply side drought permits/orders.
Issue 1.6 Non-Essential Use Bans	YWS needs to confirm it intention to apply for demand-side Non- Essential Use Bans at the same time as for Drought Permits for supply-side measures. YWS needs to show that it will use demand restrictions ahead of drought permits that pose a risk of damage to the environment. YWS should explain what supply- side Drought Orders it envisages needing.	We will apply for a drought order to impose a non-essential use ban at the same time as we apply for our first supply side drought permit/order. When the trigger for supply and demand side drought orders/permits is crossed we may not be required to implement all our supply side permit/order actions immediately, but we will always apply for a drought order to restrict non-essential use at the same time as we apply for our first supply side drought permit/order in a drought. Table 2.1, Figure 2.4 and Table 2.2 in Section 2 of the final Drought Plan will clarify that we will apply for demand side (non-essential use bans) at the same time as we apply for a supply side drought permit/order. The supply side permits/orders we envisage needing depends on the situation at the time (based on water resource availability and environmental impacts). Scenarios in Section 2 and Appendix 1 show which supply side permits/orders we would have applied for at the time in the particular examples, but emphasise that our actions will depend on the situation. For example, if a drought affects our region in the east in particular and River Ouse flows are very low, we would look to invoke the Tees transfer option rather than an increase in River Ouse abstraction. But, if the drought was mainly to the west, with low reservoir inflows but healthier flows in the Ouse,

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		we are likely to increase the River Ouse abstraction.
Issue 1.7 Long-term options	YWS should confirm whether Non- Essential Use Bans would be in place and impacting on customers before long-term options are sought.	As discussed in our response to Issue 1.6, we will apply for drought orders to impose non-essential use bans at the same time as we apply for our first supply side drought permits/orders. At this stage we would be considering the likelihood of needing long-term options and may start investigations but would not be implementing long-term drought options. To clarify this, the final Drought Plan text will explicitly refer to non-essential use drought orders where applicable. It will also state that, although we could be investigating long-term options, we will not start implementing until after non-essential use bans were in place.
Issue 1.8 Consultation on Temporary bans on water use	YWS need to clarify whether this consultation covered both temporary use bans and non-essential use bans. YWS should set out how the differences were explained to consultees and what views were given on the different types of ban.	The consultation was on the implementation of the new temporary use bans only, not non-essential use bans. The consultation included some non-household customers but all questions referred to water use impacted by a temporary use bans and not to non-essential use restrictions. The final Drought Plan will be amended to provide clarity on this in Section 3.
Issue 1.9 Specify where the information (used for estimating demand savings) comes from and highlight any uncertainties.	YWS needs to explain how demand savings from Temporary Use and Non-Essential Use bans are calculated. Provide justification for the estimated savings given in Appendix 3.	Our final plan will include details of our estimated potential water savings for temporary use bans and restriction of Non-Essential Use, to support demand savings shown in Appendix 3. This will include detail on how these savings align with estimated water savings presented in relevant UKWIR reports such as the Code of practice and guidance for water companies on water use restrictions (2013) and Understanding the Impacts of Drought Restrictions (2013). We will also add text to the final Drought Plan regarding the relationship between the savings and deployable output in our WRMP, as presented in table 10 of our draft WRMP.

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Environment Agency Recommendation 2 - Provide further clarity on changes to the Strategic Environmental Assessment (SEA) and clearly identify any resulting implications		
Issue 2.1 To identify clearly key environmental effects that will result from implementation of actions within the draft drought plan.	YWS need to explain what has changed in the assessments to cause such large-scale changes in the SEA outcomes and justify the decisions reached with regard to the Environment Agency's long-held concerns regarding cross- catchment river transfers and INNS risks. The draft Drought Plan (s3.10 p43) should be reviewed in line with this work.	For the latest SEA, certain objectives have been modified slightly to better reflect best practice guidelines; this includes the biodiversity category, which has been split into two sub-categories. Therefore, some individual impact criteria and objective assessments may have changed slightly, although this should be viewed in the context of the overall SEA, for which the overall messages remain the same. The long-term drought options have only been subject to environmental screening (rather than full EAR). In the event of a long-term drought, these options would be subject to detailed environmental assessment (including Environmental Impact Assessment, where necessary). which would incorporate mitigation measures for adverse impacts, where possible. In the draft plan, minor impacts on biodiversity were identified in the SEA for the Tees to Swale river transfer option. The screening assessment did identify potential impacts on NERC species due to Crayfish plague. With specific reference to the concerns regarding river transfers/INNS, on reflection, we agree the bio-diversity category should be amended to major and the final Drought Plan will reflect this. This should be viewed in the context of the SEA overall and the adverse/beneficial impacts across all categories. For the Tees-Elvington pipeline, we consider the major adverse impact regarding resource use, is appropriate given the requirement to construct a 50km pipeline to implement this option. We do not consider the SEA to definitively prioritise one of the Tees options above the other in our Drought Plan, as factors other than the SEA would be considered when making decisions on significant infrastructure investments in a drought

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		situation. The INNS objective, mentioned above, for the Tees to Swale river transfer would influence our decision but we would also take into account possible mitigation measures. The purpose of SEA is to provide high level and strategic overview of potential environmental effects, and options involving significant infrastructure (including the river-transfers) would likely be accompanied by regulatory engagement/consultation and with detailed Environmental Impact Assessments at the time of implementation. We have not made any changes to Section 3.10 of the final Drought Plan in regard to Issue 2.1. Both Tees options remain as drought options in our final Drought Plan.
Environment Agency Recommendation 3 - Complete appropriate Environmental Assessment Reports (EARs), monitoring and mitigation plans.		
Issue 3.1 To ensure that drought permits/drought orders do not adversely affect designated sites.	YWS need to work with Natural England to establish sensitivity of SSSIs and set out monitoring and mitigation.	Environmental studies were undertaken during AMP6 to assess the sensitivity of certain SSSIs. These studies recommended further work (including monitoring and data collection) which will be continued during the remainder of AMP6 and completed during AMP7 subject to confirmation of funding. A meeting to discuss this work with Natural England will be held in 2018. Once the studies are complete, the results will be incorporated into the EARs which will support drought permit/order applications (see Issue 3.6 response) to ensure we are drought ready.
Issue 3.2 EAR-EMPs For all permits and orders: an environmental assessment showing the likely effects of the permit or order on the environment how the water company will monitor	Ensure that reports are completed and checked prior to the onset of drought so that they are application- ready.	We will ensure that comments received from the Environment Agency on the EAR-EMPs will be addressed, thereby ensuring completion of the reports and that they are application ready. Where possible, this work will take place between draft and final Drought Plans, with more detailed work on e.g. SSSIs (mentioned in 3.1) taking place between the 2018 and 2023 Drought Plans.

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potential environmental impacts (these should be set out in their environmental monitoring plan) how the water company will mitigate or compensate for any adverse effects		
Issue 3.3 Combined sewer overflow (CSO) maintenance as a drought-related pollution mitigation measure	YWS need to clarify what progress has been made on CSO management, what benefits experienced and what further developments are planned.	Further work pertaining to CSOs during AMP6 has focussed on all abnormal operations for our CSOs and intermittent assets, in addition to drought situations specifically. Furthermore, in AMP7 we are also assessing all CSO operations with frequently operating overflows.
Issue 3.4 Rainfall justification Include an assessment of the rainfall patterns that could cause the drought permit or order being required (please see the exceptional shortage of rain position statement). Prepare (as much as possible) a case for 'exceptional shortage of rain' (Please see exceptional shortage of rain guidance).	For each permit site (or group thereof), please set out what rainfall data YWS will provide in its application to make the case for an "exceptional shortage of rain" and how it will use this to show the appropriateness of the permit sought.	We are currently preparing an example drought permit application and have added an exceptional shortage of rainfall case example. The final Drought Plan will include text relating to exceptional shortage of rainfall in our scenario descriptions, and different sources for return period analyses will also be discussed in the scenarios.
Issue 3.5 Prepare arrangements for advertising the use of drought permits/orders.	Provide clearer information for customers, e.g. advertising times are implicit in Appendix 5's Implementation timetable notes but only for those familiar with the process; public hearing venues and other preparatory measures are not discussed.	The timescales for drought permit/order applications are discussed in section 2.7 and in Table 2.2. The final Drought plan will include further details on the application process for supply side drought permits/orders and non-essential use drought orders. This will include details on advertising arrangements, raising objections and public hearings in accordance with Defra guidance on applying for a drought permit, order or emergency drought order, November 2015.

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Issue 3.6 Drafts of the permit needed to accompany drought permit or order application.	Put forward a timescale for sharing these with the Environment Agency.	Supply side draft drought permit or order applications are being prepared. We will share an example for one reservoir group area with the Environment Agency by the end of July, and agree timescales on others following feedback.
Environment Agency Recommendation 4 - Provide further clarity regarding bulk supply arrangements with neighbouring water companies		
Issue 4.1 To include the approvals (agreements) the company has from other water companies relating to bulk supplies, transfers of water etc. that could be considered drought measures.	YWS needs to provide more certainty regarding volumes of water available and arrangement for the bulk supply in an escalating drought if it wishes to include this option in the final Drought Plan.	At the time of writing the draft Drought Plan Northumbrian Water was still modelling its drought scenarios as explained in Section 3.10 of our draft Drought Plan. The drought scenarios included in our draft Drought Plan assumed a Northumbrian Water import of 40Ml/d could be available based on volumes provided for our 2013 Drought Plan. Since we submitted our draft Drought Plan to Defra, Northumbrian Water has stated in its Drought Plan, based on updated modelling, the volume that could be available to us in a drought is 40Ml/d. As this is consistent with the volume we used in our draft Drought Plan scenarios, we have made no changes to the bulk supply volume in our final plan scenarios. We will continue to discuss the details of the potential transfer arrangements with Northumbrian Water and the Environment Agency. We will update our final Drought Plan to reflect the outcome of these discussions and confirm a potential 40Ml/d could be available from NWL. Once we understand the details of such an arrangement and how it would be operated, if needed in a long-term drought, we will be able to assess the uncertainties and risks of the option. If the details are not clarified until after our final Drought Plan is published and the outcome results in a material change to our Drought Plan, we will amend the Drought Plan and republish as soon as possible after the issue is resolved. Before we finalise in our Drought Plan, we will discuss the option and the uncertainties with the Environment Agency, to

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		ensure it is also in agreement with any transfer arrangements.
Environment Agency Improvement 1 - Provide further clarity on joint communications with neighbouring companies during a drought		
Issue 1.1 Working with other Water Companies If the drought affects other water companies, the water company will work with them and the Environment Agency/Natural Resources Wales to share information and develop joint communication activities.	Set out clearly how and when Yorkshire Water will work with its neighbouring water companies to develop joint communications and to ensure these are clear and consistent to all customers.	Further details on how we will work with neighbouring companies will be included in the final Drought Plan, including the potential role of Water Resources North in coordinated planning and communication for the north of England. We will also include details of the potential coordination role of Water UK for joint planning and communication, particularly if the drought impacts on multiple water companies.
Environment Agency Improvement 2 - Provide further clarity on reviewing performance and applying lessons learnt during a drought		
Issue 2.1 Review performance during and directly after a drought	To provide clarity for customers through more direct information on what the water company will consider and how it will review performance. Also to confirm commitment to applying improvements to Water Resource Management Plan and annual reviews of drought plan.	The final Drought Plan will include additional text to expand on how we will review performance during and after a drought and incorporate lessons learnt into the Drought Plan. This includes references to data analysis, environmental monitoring and customer and stakeholder engagement. We will add a commitment to review the Drought Plan annually and we will confirm the potential for lessons learnt in a drought to impact on our WRMP. Detail will be included on the potential role of Water UK in a coordinated national review and understanding of performance and lessons learnt to inform all water companies.

Information or changes required	Yorkshire Water response
Natural England's comments in relation to our Drought Plan's Habitat Regulation Assessment screening of options and impacts.	
It is acknowledged that the exercise has identified certain sites within close proximity to the proposed long-term drought options which could be impacted by the drought plan implementation. We welcome the importance of ongoing discussions to be held with Natural England to determine the extent of this process, stages of assessment and approach to minimise uncertainty. However, no time frame have been given or amendments to previous Plan clarified.	In the summer of a second year of a drought, if reservoir regional stocks are six weeks away from crossing the drought control line (DCL), we would start considering the use of the long-term options. We will build on the preliminary Environmental Assessment Report (pEAR) for the long-term options, completed prior to finalisation of this Drought Plan, and a full Environmental Assessment will be completed to consider any potential impacts and monitoring and mitigation arrangements will be set out in detail. If required, the long-term options would likely be implemented during the spring/summer of a 3rd year of drought. We would therefore have a year to gather further environmental baseline information and finalised the environmental assessments.
In relation to European Sites, it has been observed that the River Derwent SAC was not screened for potential impact under Table 6.4, Appendix 6, Screening of Demand Drought Options for impact of European Sites specifically in relation to the Tees to Derwent transfer option potential construction. In addition, screening might include Lower Derwent Valley SAC in relation to its close proximity based upon the broad outline of the transfer option.	The HRA report will be updated to reflect these suggested changes (noting that it is Table 6.5).
Editing correction under Table 6.4 . Screening of Demand Drought Options for impacts on Europeans Sites. Dark Peak (South Pennine Moors SPA Phase 2) should only be Merlin (Falco columbaria), Golden Plover (Pluvialis apicaria) and bird assemblage. South Pennine Moors SPA Phase 2 should be the only 'Moors' SPA with bird assemblage attributed to it.	The HRA report will be updated to reflect these suggested changes (noting that it is Table 6.5).

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Potential assessment errors - The assessments identifying 'moderate adverse impacts' ie. for lamprey or level of detail is so coarse (NERC fish species) in the SEA screening tables, but the assessment can't conclude anything though for the HRA screening concluded no LSE, the two don't reconcile with each other. There may be a subtle differentiation that may need to be clearly defined.	Moderate impacts on river lamprey and sea lamprey were identified for some river abstractions in the Environmental Assessment Reports and the SEA. These impacts, however, were identified as short-term and reversible. As such, in undertaking the HRA screening, the impacts were not considered to be of a magnitude that will result in LSE on European sites. This includes the assessment of the long-term options which are associated with the Humber Estuary.

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