Draft Regional Plan 2022

Statement of Response

September 2023

WReN
Water Resources North

Contents

1. Our consultation process

The Water Resources North (WReN) draft Regional Plan was developed alongside the water companies' draft Water Resources Management Plan 2024 (WRMP24) to set out how we intend to achieve a secure, resilient, and sustainable supply of water across the region, protect and enhance the environment, both now and in the long term. The regional planning process commenced in early 2020 and our draft Regional Plan was developed through ongoing consultation:

- working closely with regulators, regional groups, water companies and other relevant parties through direct liaison as well as regular regional working group meetings, and in particular with Severn Trent Water and Water Resources West (WRW) on the Derwent Valley Strategic Resource Option (SRO).

- working with other sectors through our regular WReN Stakeholder Steering Group meeting and targeted forums in order to understand the challenges, opportunities and the actions required to refine the approach for integrating other sectors into future regional planning cycles.

Have your say

The WReN draft Regional Plan was published on our website on 18 November 2022 for a 14-week consultation period until 22 February 2023 with stakeholders and regulators alongside the three water company level draft WRMPs. The draft Regional Plan was also circulated direct to stakeholders via email and through consultation events including those for water company level plans as well as a dedicated draft Regional Plan webinar held on Wednesday 7 December 2022 which was attended by 20 stakeholders.

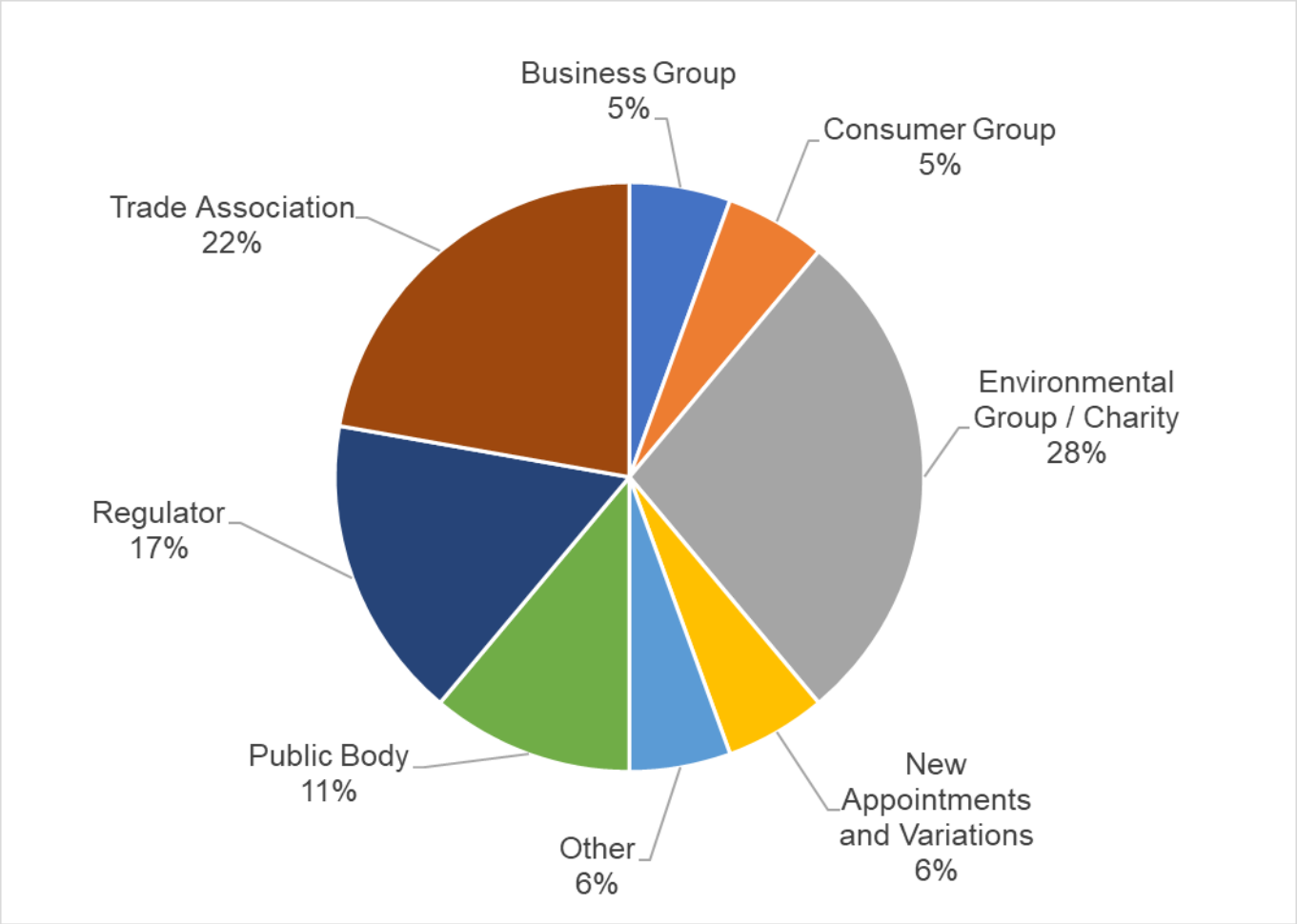
Plan	Consultation start	Consultation end
Water Resources North draft Regional Plan	18 November 2022	24 February 2023
Yorkshire Water draft WRMP24	18 November 2022	24 February 2023
Northumbrian Water draft WRMP24	18 November 2022	24 February 2023
Anglian Water (Hartlepool Water) draft WRMP24	21 December 2022	29 March 2023

During the consultation period we received formal written responses from 18 stakeholders. The range and distribution of stakeholders who provided written responses are presented in **Figure 1** overleaf.

- We have shared feedback from our draft Regional Plan with water companies so they can consider in their revisions to WRMPs alongside feedback from the WRMP consultation.

- We have taken on board any relevant feedback on the three water company level WRMPs to ensure continued alignment with draft WRMPs.

Figure 1 Range and distribution of stakeholders who provided written feedback on our draft Regional Plan



2. Feedback respondents and key topics

Comments from the 18 stakeholders who provided formal written feedback (respondents) have been reviewed and grouped by topic to provide an ***indication*** of the most common feedback themes. A summary of the content that each key topic covers is provided in **Table 1**.

Table 1 Summary of key feedback topics

Key feedback topic	Topic content
Alignment with other water resource plans	Consistent information between water company WRMPs and Regional Plans both within WReN and across other regions and water companies
Costs and affordability	Affordability of investing in certain drivers, efficiencies, pace of investment, funding of non-Public Water Supply (non-PWS) sector
Decision making & best value planning	What is driving the differences and the relative benefits between best value and least cost plans, and what this means for customers, adaptive planning; scenario and sensitivity testing
Demand management	Leakage and water efficiency ambitions, demand management information, metering, and pace of delivery
Drought resilience	1 in 500 year v 1 in 200 year drought resilience (pace, cost and benefits)
Environment	Environmental destination drivers, abstraction licence reductions, environmental flows, historic environment, biodiversity net-gain, environmental assessment of options
Non-public water supply	Inclusion of non-PWS into the planning process, development of joint options, impacts of new development and net zero ambitions (particularly power and agricultural sector), and competing demand for future water
Options detail	Visibility of information on options
Options sufficiency	Scheme range and type of options, inclusion of Nature Based Solutions and water recycling/grey water reuse
Regional transfers / SROs	Loss of Severn Trent Water import, Upper Derwent Valley reservoir expansion (UDVRE), Tees transfer, transfers between WRW and WReN, Kielder to United Utilities (UU) / WRW transfer
Stakeholder engagement	Multi-sectoral engagement, transparency, accessibility of information
Supply-demand forecasting	Assumptions associated with forecasts particularly demand and non-household

Table 2 presents a list of the 18 stakeholders against the key topics of their feedback. The top 4 feedback topics by number of respondents were **environment** (11 respondents), **non-PWS** (10 respondents), **stakeholder engagement** (9 respondents) and **demand management** (9 respondents). The distribution of key feedback topics based on number of respondents who commented under each topic is presented in **Figure 2**.

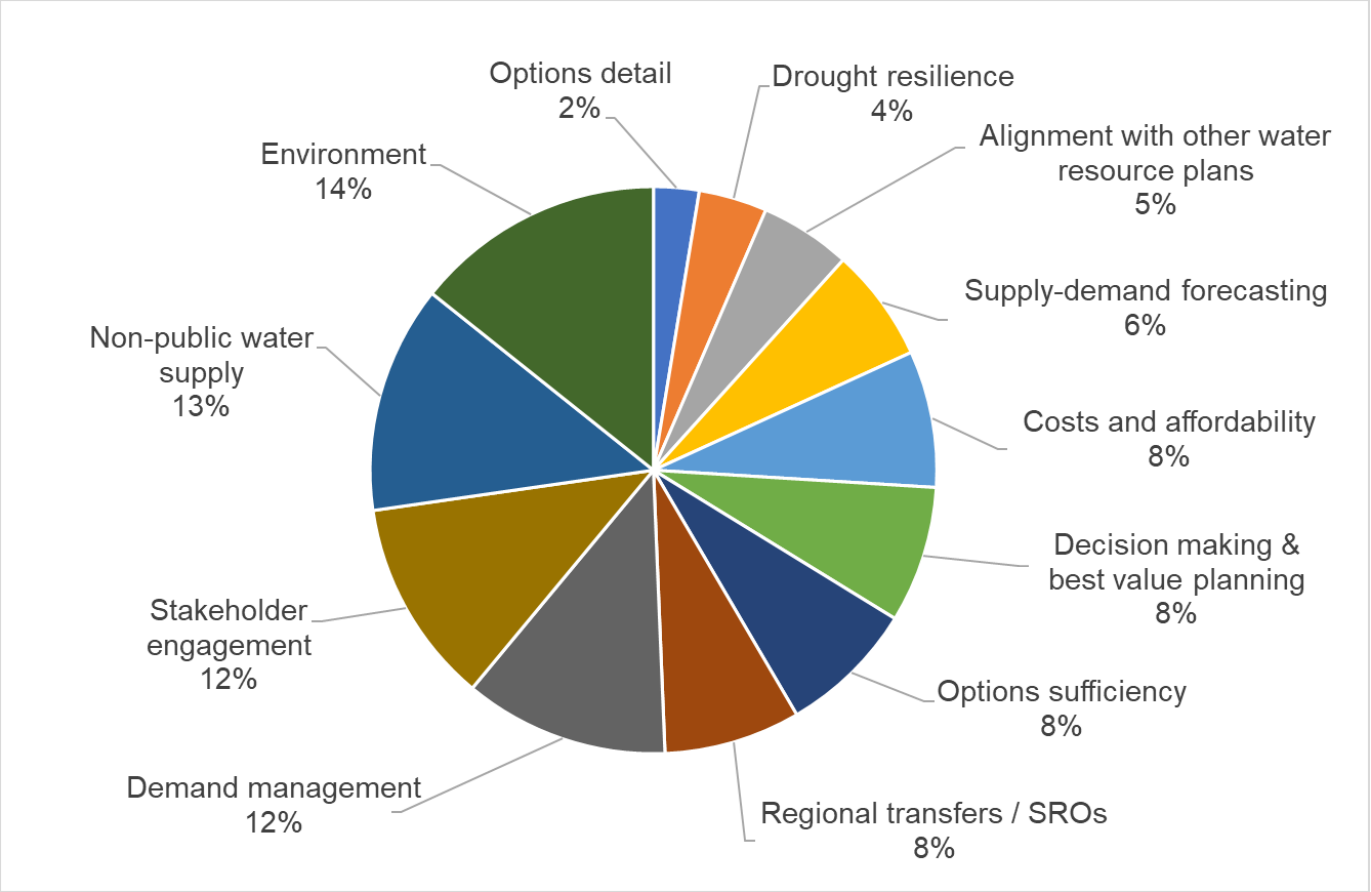
Table 2 Stakeholder type, entity and major feedback themes

Stakeholder type	Entity	Key feedback topics
Business Group	Birdsall Estate	Non-PWS
Consumer Group	Consumer Council for Water (CCW)	Costs and affordability, Demand management,

Stakeholder type	Entity	Key feedback topics
Environmental Group and Charity	Blueprint for Water	Decision making & best value planning, Demand management, Environment, Non-PWS, Options sufficiency, Stakeholder engagement, Supply-demand forecasting
	Calder River Trust	Demand Management, Drought resilience, Environment, Stakeholder engagement
	Canal & River Trust	Non-PWS, Options sufficiency, Stakeholder engagement
	Inland Waterways Association (IWA)	Environment, Non-PWS
	Waterwise	Decision making & best value planning, Demand management, Environment, Supply-demand forecasting
NAVs[1]	ESP Water Ltd	Demand management, Non-PWS, Stakeholder engagement
Other	Water Resources West (WRW)	Alignment with other water resource plans, Regional transfers / SROs
Public Body	Historic England	Environment, Options detail
	Peak District National Park Authority	Environment, Regional transfers / SROs
Regulator	Environment Agency (EA)	Alignment with other water resource plans, Costs and affordability, Decision making & best value planning, Demand management, Drought resilience, Environment, Non-PWS, Options sufficiency, Regional transfers / SROs, Stakeholder engagement, Supply-demand forecasting
	Natural England (NE)	Alignment with other water resource plans, Environment, Options sufficiency, Regional transfers / SROs, Supply-demand forecasting
	Ofwat	Alignment with other water resource plans, Costs and affordability, Decision making & best value planning, Demand management, Drought resilience, Environment, Options sufficiency, Regional transfers / SROs, Stakeholder engagement, Supply-demand forecasting
Trade Association	Country Land and Business Association (CLA)	Demand management, Non-PWS, Options detail, Options sufficiency, Stakeholder engagement
	Energy UK	Costs and affordability, Decision making & best value planning, Environment, Non-PWS, Regional transfers / SROs
	Horticultural Trades Association (HTA)	Costs and affordability, Demand management, Non-PWS, Stakeholder engagement
	National Farmers Union (NFU)	Costs and affordability, Decision making & best value planning, Environment, Non-PWS, Stakeholder engagement

[1] New appointments and variations (NAVs) are limited companies which provide a water and/or sewerage service to customers in an area which was previously provided by the incumbent monopoly provider.

Figure 2 Illustrative distribution of key feedback topics



3. Summary of feedback and our response

An overview of the feedback points under each key topic is presented below along with a summary of the main changes that we will implement within the final Regional Plan.

Alignment with other water resource plans

Regulators in particular emphasised the need for ongoing alignment between company WRMPs in the WReN area and the Regional Plan, including to reflect the latest updates to guidance, policy and to reflect lessons learnt from the 2022 drought. Building on the inter-regional reconciliation process, the need to ensure consistent plans with neighbouring regions was also emphasised, particularly around the cessation of the Derwent Valley transfer from Severn Trent, Kielder and associated SRO schemes. A specific discrepancy between the company plans on the timing of internal regional transfers from Northumbrian Water and Yorkshire Water was also raised.

- Ensure alignment of our final Regional Plan with the outcomes of the inter-regional reconciliation 3 exercise.
- Engage with neighbouring regions and companies to ensure alignment of plan narrative, in particular to update on the status of SRO and other strategic schemes.
- Update the final plan to reflect the updated position on transfers within WReN, and ensure that the timing of transfers is suitably aligned.
- Make updates to the plan in line with the latest guidance and policy, drawing on the underpinning work at a water company level.

Costs and affordability

There was support to our approach for phasing investment in the plan to mitigate the impact on customer bills, however, there was a general request (relevant to all companies and regions) to ensure that affordability did not impinge on delivering environmental solutions in a timely manner. The WReN plan has emphasised the need for environmental investigations to identify appropriate, best-value solutions.

- Update the final plan with the latest profiling of investment in line with company WRMPs, along with appropriate update of the plan narrative. This will continue to emphasise the importance of affordability.
- Updates to the proposed investigation and scope definition for environmental improvements, including timeline and trigger points.
- Revision of the timing of expected resolution of environmental destination needs in the River Derwent SAC to an earlier 2040 date (from 2050 previously) in line with the Yorkshire Water rdWRMP24 position. 2027 will now be the decision point for this investment.

Decision making & best value planning

Whilst extensive scenario and plan testing has been completed, several responses have indicated the need for the impact and decision-making of scenarios to be further drawn out in the WReN Regional Plan (beyond that included in the water companies). Further sensitivity testing and/or justification on the timing of achieving policy targets (e.g. drought resilience) and/or on the profile of delivery (e.g. for leakage and demand management) has also been raised by regulators. There is evident concern at the inherent uncertainty of non-household demand needs from the energy sector, and the potential impacts of this on the plan.

- Update and expand the explanation of plan scenarios and their impacts, including the Ofwat Common Reference Scenarios. This will draw on further work completed by water companies.
- Updates to the plan pathway representation to reflect the outcomes of inter-regional reconciliation and plan scenario testing.
- Further summary justification on the timing and profiling of delivery, following further sensitivity testing at a Company level.

- Further explanation of the uncertainties on energy sector demand, and how change would be managed/accommodated to ensure supply-demand needs are met within the best-value plan.

Demand management

There was generally a request for WReN to include further information in its final Regional Plan to demonstrate in more detail that all aspects of demand management will be delivered and that water companies should be more ambitious with respect to leakage reductions. There was acknowledgement of WReNs engagement to date but also that more collaboration was needed, particularly with wider stakeholders including non-PWS, to influence and support consumers in reducing demand to help meet targets.

- Updates to reflect the changes in the WReN water companies' revised draft WRMP24's associated with the preferred leakage strategy and programme to manage and reduce leakage.
- Further justification of the demand reduction profile and targets including detail on how we intend to deliver all aspects of demand reduction through working together with retailers, household / non-household customers, NAVs[2] and other stakeholders.
- Update the plan to reflect updates to the adaptive monitoring plan including in relation to demand performance.

Drought resilience

Broadly, the approach outlined in the draft plan to operate to a 1 in 200-year level of service for emergency drought orders (Level 4 restrictions) in the Yorkshire Grid prior to moving to a 1 in 500-year resilience level has been supported. However, feedback has indicated a need to undertake further sensitivity testing on the timing of moving to the improved service level (around the 2039 policy target date), to affirm the best-value plan.

- Update final plan with sensitivity testing approach and findings of the Yorkshire Grid to the timing of moving to the 1 in 500-year drought resilience level.
- Revision of the best-value plan as appropriate, with supporting justification.

Environment

Broadly, the need for environmental improvement was supported. A key concern particularly for regulators, was the timeline for Environmental Destination in relation to abstractions from the Yorkshire River Derwent and whether abstraction reductions could be delivered at a greater pace to deliver environmental benefits as soon as practicable.

Another area of concern particularly for other / non-PWS sectors, was associated with future licence capping and licence reductions such as when, how and the underpinning data informing decision-making. Uncertainty around future water availability could compromise investments required for other drivers (such as decarbonisation) and could be detrimental to production and plant operation to present a security of supply risk (e.g. food and energy).

A number of comments were also made on specific environmental areas (such as biodiversity net gain and historic environment) and for particular options.

- Update the Regional Plan to align with revisions at water company level in relation to environmental destination (noting that the profile and pace of the proposed environmental destination has been reviewed at WRMP level and the associated Decision point and Trigger date have been brought forward to 2027 to 2040 respectively).
- Provide further detail in the final Regional Plan on the actions we will undertake to support other / non-PWS sectors in creating visibility of their needs and challenges (such as those associated with abstraction reduction) and to work collaboratively with regulators and other stakeholders on the steps required to address any barriers.

[2] New appointments and variations (NAVs) are limited companies which provide a water and/or sewerage service to customers in an area which was previously provided by the incumbent monopoly provider.

- Further detail of option assessment was provided in the Environmental Report which is available as supporting documentation with the draft Regional Plan. This will be updated for the final Regional Plan to reflect the latest assessment information along with clearer sign-posting to this document.

Non-public water supply

A key message from the feedback is that non-PWS sectors should be brought further into the regional planning process and that there are several barriers to this including funding and data requirements. Of particular concern is understanding needs, growth and the competing future demand for the same water sources in a joined-up way and facilitating the identification and development of joint solutions. The power sector for example, has significant future water demands associated with growth forecasts and decarbonisation ambitions (with low carbon power projects which require availability of water). Going forwards, we will reconfirm non-water company sector leads and will look for them to lead workstreams (e.g. demand forecasts) to feed into the future iterations of the WReN Regional Plan.

- Update the plan to provide more detail on the actions that we have and will undertake to incorporate non-PWS into future regional planning cycles including to:
  - understand needs and solutions
  - share and bring in wider knowledge and audiences
  - raise awareness of the challenges faced
  - support in overcoming barriers
  - establish the overall inter-region position for net zero ambition and the impact this may have through competing proposals for water
  - take a co-ordinated approach to develop the action plan further to support us in achieving where we would like to be in the future regional planning process.

Options detail

Feedback in this area related to the amount of information available on the some of the schemes which made it difficult to provide detailed comments on some of the proposals or assessments. At this stage, the options included in the plan are largely at an early stage of development.

- Site specific information may not be available in the published documents due to the sensitive nature and due to security issues. However, further detail of option detail and assessment was provided in the Environmental Report which is available as supporting documentation with the draft Regional Plan. This will be updated for the final Regional Plan to reflect the latest publishable option detail and assessment information along with clearer sign-posting to this document.

Options sufficiency

The main feedback in this area was that the options put forward in the plan were not as wide-ranging as expected to provide more flexibility to manage uncertainties through the adaptive planning process and with the loss of import from Severn Trent Water to Yorkshire Water. Stakeholders commented that they would have liked to have seen more nature-based, third party, non-PWS, catchment and reservoir solutions.

- Update the Regional Plan to explain our future commitment to increase the supply feasible option portfolio for meeting deficits in the Grid zone.
- Provide more detail in our Regional Plan to reflect updated narrative on nature-based solutions within the Yorkshire Water revised draft WRMP24.
- Provide further detail in the final Regional Plan on the actions that we have and will undertake to incorporate non-PWS into future regional planning cycles.

Regional transfers / SROs

The responses in this area generally emphasised the need for common narrative to be maintained in the final Regional Plan with other regions and companies on cross-boundary options positions, and the need to continue work on potential exports from WReN even though they may not be included in the current plans of other regions. WRW

welcomed the work undertaken with WReN to date, and stated their desire for ongoing collaboration in this area (including on options currently discounted). There was specific questioning regarding the absence of any exports to the Water Resources East (WRE) area, a question which interfaces with options sufficiency above.

Concern was also noted on the reservoir expansion element of the UDVRE SRO given its location in the Peak District National Park. Although this was included in Severn Trent Water's draft WRMP, it was potentially a candidate option to facilitate maintaining the existing Derwent Valley transfer to Yorkshire Water and so interfaced with the WReN plan; this option has now been removed from the Severn Trent Water / WRW preferred plan.

- Revision of the plan to reflect the latest position on the Derwent Valley transfer (now ceases under all scenarios in 2035) and Kielder water resource zone exports in line with Reconciliation 3.
- Update to narrative and position statement on SROs, consistent with that agreed with other regions and/or water companies.
- Specific detail to be added to provide further explanation of the WRE exports explored previously, and the future risks/opportunities/dependencies associated with them. Inclusion of commitment to further work with WRE to explore these further for the next planning round.
- Commitment to ongoing work with all adjacent regions and companies on options beyond this planning round.
- Inclusion of inter-regional Reconciliation 3 outcomes and summary position, with reference to the reports to be published on the WReN website.

Stakeholder engagement

Generally, comments were supportive of the work WReN has undertaken to bring about meaningful engagement with a range of stakeholders including the non-PWS sectors and that this should continue moving forward, particularly with key sectors (such as agriculture and energy) and at a local level. One stakeholder felt that the plan may be 'hard to digest' and would benefit from a change in some of the data presented to make it more digestible.

- Update the plan to provide further detail on how we will engage further with stakeholders.
- Review and update how some information is presented to make it easier to understand and more digestible e.g. using targeted graphics and call-out boxes.

Supply-demand forecasting

A number of comments raised flagged the need for more detail on the supply-demand scenarios included in the plan, within the main Regional Plan report, including the scenarios tested around the 'central' supply-demand balance. There was concern that a more precautionary approach was needed to climate change; however, our interpretation of this response was that greater detail was needed on the extensive testing of climate and drought risk in the plan process (beyond that held in appendices and/or company WRMP24s). A need to reflect the latest guideline updates was reiterated by regulators (these occurred following submission of the draft Regional Plan). Non-household forecasting uncertainties due to the energy sector were a key area of concern, as described under the decision-making section earlier.

- Make clearer in the final plan the definition and impacts of scenarios tested around the main/central supply-demand balance.
- Specific call-out to provide emphasis upon the climate change and drought testing process and impacts, and the resilience of the plan to different climate change scenarios (including high emissions).
- Reflect updates in supply-demand balance from revised draft WRMP24s, including summary of any changes in assumptions and reflecting latest guidance from regulators.
- Inclusion of position statement on the non-household demand uncertainty, how this is handled in the plan, and work ongoing to reduce this in future with the energy sector.

4. Next steps

The WReN member companies have reviewed the feedback on their draft WRMP24's and have published Statement of Responses to advise on how they have taken account of this feedback in their revised draft WRMPs and relevant documentation.

The Statement of Responses and revised draft WRMP24s can be found on the water company websites:

Yorkshire Water

Northumbrian Water

Anglian Water (HW)

Defra will review each revised draft WRMP24 (rdWRMP24) in Autumn 2023 and will either direct the water companies to publish it as a final plan or will direct them to make further changes. We envisage that publication of the final WRMP24s will be in late Autumn 2023.

We will prepare our final Regional Plan over the next few months to reflect:

- feedback on the draft Regional Plan and member companies WRMP24's
- updates to member companies rdWRMP24's if relevant to the Regional Plan
- outputs of the inter-regional Reconciliation 3 exercise (post draft Regional Plan consultation)[3]
- further changes that may be required following Defra review of the member companies rdWRMP24s if directed by Defra and if relevant to our Regional Plan
- ongoing discussions on future SRO projects and the future of regional planning (including the 2nd revision of the EA Water Resources National Framework, allowing us to outline the next steps as we move to the next planning round.

We will publish our final Regional Plan following publication of the member companies final WRMP24s which is envisaged to be in late Autumn 2023.

We will continue to work with non-PWS sectors through our regular WReN Stakeholder Steering Group meeting and targeted forums in order to further understand the challenges, opportunities and the actions required to refine the approach for integrating the non-PWS sectors into future regional planning cycles.

We will continue to consult and work closely with regional groups, water companies and other relevant parties in particular to engage and input into the workstreams associated with understanding future uncertainties to facilitate decision making along with our best value adaptive planning pathways.

[3] We have also published the relevant reports from this joint exercise with other regions on our website alongside this Statement of Response.

5. Appendix 1 – Detailed feedback

Listed in alphabetical order of the respondent's name.

Item	Respondent	Feedback	Response	Changes to be implemented into final plan
1	Birdsall Estate.	I appreciate Ofwat has regulated what water companies are and are not allowed to fund in respect to modelling future water deficits for certain sectors beyond the public water supply however, your current iteration of the plan really does not adequately deal with the non-pws sector. You accept this in the plan documents but also identify that there is a statutory need to consider the non-pws. To this extent I respectfully say that your current plan is inadequate and concerning. You suggest the necessary analysis/work is simply impractical but this is not a suitable reason for not carrying out the analysis and planning required to fulfil your obligations and enable the non-pws sector to adequately engage and consult upon your resourcing plan. I appreciate you have consulted with the NFU and CLA in respect to agriculture, and others in respect to power generation and navigation which will have some benefit to your planning process in respect to the non-pws sector. However, there seems either no or very little [of your] proprietary research, investigation, analysis beyond collecting and acknowledging other organisations' input. Therefore there seems either no or very little planning done by the plan authors into the non-pws sector water resourcing or even the effect of the plan's other resourcing proposals upon the non-pws sector. It is far from a holistic plan let alone therefore one that meets the requirements of its required scope. For example, there seems to be no or no adequate consideration within the plan to non-pws domestic water suppliers: therefore there is no plan material in respect to which one can consult with you on this matter. I appreciate licencing by the Environment Agency will most likely form a part of the resourcing equation but there needs to be a coherent resourcing plan with adequate input from your respective organisations.	This is the first planning round for regional planning under the Water Resources National Framework. The maturity of the non-PWS element of regional plans continues to develop towards the next round of regional plans (across all the regions, not just WReN). The Environment Agency are currently looking at the 2nd iteration of the National Framework, which we expect to include updated expectations and requirements for non-PWS in future regional planning. A key challenge has been in the lack of long-term planning and forecasting within the other sectors themselves to interface with our plan. It is acknowledged that there is further work in engaging and understanding the challenges that the non-public water supply sectors face to be able to participate in this regional planning processes (such as funding routes and data requirements). In this first round we have aimed to take a proportional approach and have targeted the biggest industry abstractors. In co-ordination with relevant stakeholders, we will be developing an action plan that will support us in enhancing and developing this aspect of the regional plan	We will set out actions to be undertaken ahead of the next regional planning round in co-ordination with relevant stakeholders to better represent and incorporate the non-public water supply sectors into the regional planning process.

Item	Respondent	Feedback	Response	Changes to be implemented into final plan
		This all makes considering our own company's water resourcing plans for the future virtually impossible. I urge you please to carry out the work needed to incorporate into the WReN Regional Plan the necessary analysis and planning for resourcing the non-PWS sector: being impractical is no adequate reason to exclude it.	(including how to meet the 2nd National Framework requirements, when published).	
2	Blueprint for Water	**Meeting the needs of the environment first**: We are pleased to see that the detail on environmental destination is clearer in this draft, compared to the emerging plan. We want to see the plans prioritising the delivery and maintenance of a healthy water environment before making additional water available to abstraction for PWS, energy or other sectors. Where there is uncertainty we should adopt the government's precautionary principle, ensuring the needs of the environment are being met until the evidence shows that any additional abstraction does not result in unacceptable impacts on it. We cannot allow investigations into meeting future environmental needs to drag on beyond the next investment period (2025-30). We want to see action on the ground before 2030 and decisions on further licence reductions to meet the needs of the environment need to be made by 2030.	The profile and pace of the proposed environmental destination has been reviewed at WRMP level for the revised draft WRMPs and water companies have been in active discussions with the Environment Agency and Natural England on the need for AMP8 WINEP investigation(s) and the practicalities of moving at greater pace (should investigations support reductions in abstraction). As part of AMP8 WINEP, Northumbrian Water, Yorkshire Water and WReN are committed on a joint options appraisal of Environmental Destination in the North East with the intention of confirming actions required within WRMP29 to move us along the required pathway. Following a review of the comments on the draft ***YW WRMP***, it is proposed to bring forward the Decision point associated with the Yorkshire River Derwent environmental destination to 2027 and the Trigger date to 2040. Following a review of the comments on the ***draft NWL WRMP, i***t has been agreed with the Environment Agency to undertake a wider assessment to confirm how increased abstraction at	We will update the Regional Plan to reflect the updated position on pace of environmental destination and provide more context.

Item	Respondent	Feedback	Response	Changes to be implemented into final plan
			existing locations, particularly for the transfer to Yorkshire Water and response to Teesside growth may impact river flows on both the North Tyne and River Tees and how actual flows could deviate from target flows. This assessment will be linked with a similar assessment for the NWL Drought Plan and if possible, with a new AMP8 WINEP investigation.	
3	Blueprint for Water	**Delivering 20% biodiversity net gain:** Whilst the plan identifies the importance of supporting Government objectives for biodiversity, and identifies that biodiversity optimisation was a consideration in decision-making, we are concerned that further investigations are required to establish how to achieve the legal minimum requirement of 10% biodiversity net gain (BNG) from new supply solutions. Further investigations and delay cannot be acceptable if WReN is to meet these legal requirements, and to make a contribution towards achieving the Environment Act target to halt the decline of nature by 2030. We would hope that WReN can show greater ambition in committing to deliver at least 20% BNG, and contributing to the recovery of nature wherever possible. For example, this could be achieved through supporting Local Nature Recovery Strategies, as set out in Water Resources East's plan.	We recognise that 10% biodiversity net gain is a minimum requirement for new supply options and as these options are developed further through the detailed design and planning phases including planning applications. We will undertake additional environmental impact studies and engage with local stakeholders, including responsible authorities for the Local Nature Recovery Strategies being developed, to consider further how biodiversity net gain can be maximised.	We will include further detail on how biodiversity net gain will be considered.
4	Blueprint for Water	**Supporting the Achievement of Net Zero as soon as possible:** We are disappointed that the plan does not offer greater detail about how ambitions within the Water Industry Routemap 2030 will be met. That the carbon impact of alternative options is clearly set out within the plan, and that 'minimising carbon' was one of the criteria for determining the 'best-value plan', is positive. However, that the plan states further investigation of new supply solutions is required to reduce operational carbon in line with net	The supply-side options identified in the Regional Plan have been developed to achieve carbon reductions including use of more energy efficient assets, renewable energy supplies, low carbon fuels and improving land use /management activities to increase carbon sequestration. As the options are developed through detailed design	We will provide additional narrative to further details how carbon impacts and reduction activities are delivered.

Item	Respondent	Feedback	Response	Changes to be implemented into final plan
		zero targets suggests that there is uncertainty about the assessed carbon impacts of the proposed options.	carbon impact and reduction activities will be refined further. PAS 2080 (a global standard for managing carbon in building/infrastructure and an industry-wide enabler for decarbonisation) is used to evaluate the whole life carbon emissions associated with our water companies' capital programme including works associated with the water resources management plan. This provides assurance that the schemes will be developed to deliver high quality carbon reduction activities. In addition, following the submission of PR24 in October 2023, a wider picture on the carbon emissions forecasts for each water company (incorporating other plans / strategies) will be available.	
5	Blueprint for Water	**Supporting the delivery of national water demand reduction targets**: We are pleased to see that the plan achieves the 110 lppd PCC and 50% leakage reduction targets without policy support, and that the plan can achieve lower than 110 lppd PCC with policy support such as mandatory labelling. It is also positive to see that the draft plan includes greater detail on demand reduction than the emerging plan. However, we are disappointed that the plan remains very weak on reducing non-household (NHH) PWS demand. Northumbrian Water forecasts a 33% increase in NHH demand, despite the Environment Agency's 9% reduction target and the NHH demand reduction performance commitment from Ofwat. This is an area that would benefit from improvement in the final plan.	The Northumbrian Water Non-Household (NHH) demand reduction strategy was not developed in time for inclusion in their dWRMP24 and hence our Regional Plan. However, Northumbrian Water have now formed a comprehensive strategy, having liaised with other water companies to learn from their experience and ensure regional alignment. The NHH demand reduction strategy is now outlined in Section 7.3.2 of the Northumbrian revised dWRMP24 and allowed for in their final plan supply-demand balance. The Northumbrian Water NHH water efficiency strategy will deliver a 9% reduction in the demand of existing	We will update the Regional Plan NHH demand forecasts to reflect the associated revisions in the Northumbrian Water revised dWRMP24.

Item	Respondent	Feedback	Response	Changes to be implemented into final plan
			NHHs by 2038 from a 2019/20 baseline. This has been included in the Northumbrian Water final plan demand forecast. Moving forward Northumbrian Water and WReN, will work collaboratively with retailers, local planning authorities and the Environment Agency to achieve this target as Northumbrian Water will not be able to deliver this alone. The water demand associated with growth (i.e. new NHHs) will not be accounted for as we do not have the confidence that this can be achieved with the high levels of NHH demand growth in this period. We suggest that Local Planning Authorities and the Environment Agency both have a role to play through development control and environmental permitting to ensure that new development / new permitted processes are water efficient from the start. Interventions associated with the Northumbrian Water NHH demand reduction strategy include Water Efficiency Solutions for Domestic and Mixed Use, Consultancy for Industry, Infrastructure and Leak Investigation, and Information Provision. Full details can be found in the Water Efficiency Technical Report.	
6	Blueprint for Water	**Ensuring all abstractors play their part in reducing demand:** We are pleased to see some improvements made in this area since the emerging plan, including some regional non-PWS abstractor consultation. However, demand reduction commitments are still limited. We want to see commitments from non-PWS sectors to reduce or optimise their demand through	This is the first planning round for the Regional Plan and is a developing process. It is acknowledged that there is further work to engage with non-PWS to understand the needs and challenges that they face in order to fully participate	We will provide further detail on our forward-looking activity plan on the steps we are taking together with non-water company sector groups

Item	Respondent	Feedback	Response	Changes to be implemented into final plan
		water use efficiency. We also have concerns that a huge increase in water use from the energy sector is predicted, and yet is not included in the core plan due to uncertainties.	in the regional planning process (e.g. such as the need for more data and funding). In this first round we have aimed to take a proportional approach. We will continue to work with relevant stakeholders (through WReN non-water company sector groups) and regulators to create visibility of the non-PWS abstractors' needs and challenges so that we can take a co-ordinated approach to further develop our action plan that supports us in achieving where we would like to be in the future regional planning process.	to collectively bring the non-PWS abstractors into the regional planning process.
7	Blueprint for Water	**Reducing the impact of new development on water resources:** We are disappointed to see that the draft plan includes very little on reducing the impact of new development on water resources, with just one passing reference to building regulations. This amounts to a step backwards from the emerging plan. Where new water-intensive development is proposed in areas with no surplus water, or in areas classified as seriously water stressed, we want to see the regional plan committing water companies to work with developers and local authorities to reduce additional water demand. This should be in addition to measures to manage increased sewerage and wastewater from new development, including and where possible prioritising the use of nature-based solutions. The feasibility of the new development being water neutral should also be explored. We also have concerns about the huge jump in water needs from the power sector. It is essential that, wherever possible, new water-hungry energy supply options should be sited in places where there is already water available, and they should not add to existing water availability problems. If they are progressed and new water supply solutions are needed, then	Water companies are working with developers and local authorities to reduce additional water demand arising from new developments. This is detailed in the WRMP level plans. For example: Yorkshire Water works with developers and provides an environmental incentive which reduces the infrastructure charges on each home based on evidence that it is built to specified water consumption targets. The aim of these incentives is to reduce their infrastructure charges and encourage more developers to operate to the Integrated Water Management (IWM) principles and reduce usage through step changes in water supply to homes. Northumbrian Water's NHH water efficiency strategy (revised from dWRMP24) now delivers a 9% reduction in the demand of existing NHHs by 2038 from a 2019/20 baseline.	We will provide further narrative on how we are working together with developers to reduce demand in alignment with the water companies WRMP24s. We will provide further detail on our forward-looking activity plan on the steps we are taking together with the non-PWS sector groups to collectively bring the non-PWS abstractors into the regional planning process.

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		appropriate financial contributions to shared solutions need to be provided by the private energy companies.	The NHH demand reduction strategy includes options supporting our largest water users including engagement with the new developments. We note your comment on the management of wastewater from new development which is not part the WRMP or Regional Plans but covered under the wastewater management and drainage plans. In this first cycle of the regional planning process, we have aimed to take a proportional approach and to work with other sectors and regulators through regular Stakeholder Steering Group meetings as well as via sector specific sub-groups which have been set-up with priority sectors including with Energy. We will continue to work with relevant stakeholders and regulators to create visibility of the other sector needs and challenges, share our knowledge and take a co-ordinated approach on the actions that are needed moving forward to bring Energy and other sectors into future regional planning rounds.	
8	Blueprint for Water	**Delivering multiple benefits through nature-based solutions:** Nature-based solutions (NBS) can cost-effectively deliver multiple benefits, for example, reducing pollution, flood risk, and providing environmental enhancement in addition to increasing the resilience of water supplies. The plan does assess options based on their ability to deliver multiple benefits. However, it does not identify the importance or prioritise the use of NBS. The plan should go further in	Supply side options in the WReN Regional Plan are focussed on addressing deficits in Yorkshire Water resource zones. The Yorkshire Water PR24 programme will include significant consideration of nature-based solutions and catchment programmes around many aspects of the water environment	We will provide more detail in our Regional Plan to reflect updated narrative on nature-based solutions in the Yorkshire Water revised draft WRMP24.

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		identifying opportunities for using NBS, investigating the benefits and possible funding mechanisms to enable this and thereby helping to build the evidence base. This would then allow WReN to be more ambitious, and preferentially choose these NBS options in future.	including catchment / NBS programmes in ***wastewater*** where appropriate. However, it is not possible to quantify the benefits of these schemes in a way that meets the requirements of the WRMP process, and in particular in terms of increased water availability and DO. We believe that the appropriate place for NBS and catchment solutions is within the broader PR24 and WINEP programmes where the cost benefit case will be made in accordance with the PR24 guidance. Taking the above into account the Yorkshire Water revised dWRMP will however include reference in the main technical plan narrative to these options with a specific focus on how these types of solutions benefit holistic whole catchment resilience as part of a wider best value plan for water resources. It is recognised that together with the potential benefits associated with abstraction reduction the plan will improve catchment resilience.	
9	Blueprint for Water	**Working in partnership and committing to keep engaging with stakeholders**: It is positive that a range of organisations have been engaged in the development of WReN's draft plan, and we would welcome further detail about how this stakeholder engagement and multisector working will continue once the plan has been published. However, we remain concerned that stakeholders may struggle to meaningfully engage with the full content of the plan, as the formatting and style means that much of the information is hard to digest. We suggest that the plan would benefit from substantial changes to the presentation and structure in order to	We thank you for the positive feedback on our engagement of stakeholders in the development of our plan and on how we will continue to do this moving forward. We have reviewed the presentation and structure of other regional groups' plans to consider how we could change the presentation and structure of our draft Regional Plan in order to make the	We will update how certain information is presented within the main document using targeted graphics and call-out boxes.

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		make the content more accessible to all stakeholders. For example, the plan would benefit from more engaging presentation of details that can currently only be found in raw data format.	content more accessible to stakeholders. In acknowledgement that different stakeholders have varying levels of understanding and require different levels of information, we have also informally sought other stakeholders' views on this specific topic and have reviewed how we can best accommodate for the range of different stakeholder needs.	
10	Blueprint for Water	Overall, we welcome the efforts and approach of the regional groups to date, and consider regional planning to be a significant and welcome step forward in addressing the abstraction pressures faced by our water environment. Currently nearly a fifth of our surface waters, and over a quarter of groundwaters, do not have enough water to protect the environment and to meet the needs of fish and other aquatic life, and this situation will only worsen with climate change and increases in demand. We therefore challenge Water Resources North to go further to address the aspects raised in the final plan.	Please see response to item 2 above.	Please see response to item 2 above.
11	Calder Rivers Trust	**Demand** a. We support the measures for demand reduction—tackling leakage and installing water meters, however we would like to see a more ambitious target to tackle leakage. b. We feel the reduction of leakage by 50% of 17/18 levels should be delivered by earlier than 2050. c. We'd like to see a greater ambition of 17/18 baseline reduction by 2050. d. We feel that the plans for demand reduction are under ambitious.	In developing our plans, we prioritised the inclusion of demand-side interventions over new supplies to meet the stretching government policy objective targets. Beyond this, we consider supply-demand options on an equitable basis to ensure the overall best-value plan. Northumbrian Water have updated the preferred plan for their revised draft WRMP24 to include a programme to reduce leakage by 55% by 2050, 5%	We will add more detail to explain the basis of our current leakage and demand management positions and provide evidence to explain why we are not going further than the policy targets. We will also update the final report with details of the latest Company

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		e. Furthermore we would like to see investment in education in grey-water harvesting and usage options for residential and commercial properties. f. Technical and financial support for the retrofitting of grey-water harvesting technology would also be of significant benefit. g. We think that prioritising leakage reduction before investing in new supply/transfer options should be the default position.	higher than the 50% reduction by 2050 in the dWRMP, which will mean the overall leakage reduction for the WReN final Regional Plan will be greater than 50%. However, recognising that both regional and water company plans are refreshed every 5-years, and so subject to refinement in future, we do not consider it appropriate in general to go beyond the government policy aspirations at this time. There are several reasons for this: • The targets are already ambitious and stretching, and in the context of PCC reductions, already highly dependent on government policy interventions to achieve them. Given the risks of delivering this scale of ambition, this is why we have included an adaptive pathway in the event that demand reductions do not meet the levels forecasted. • At this time we believe going beyond the targets would add material future supply-demand risk to the plans, hence our twin-track approach. • Affordability of the plan is also important, recognising that water resources is also one part of overall water company investment, and further expenditure must be weighed	delivery plans to achieve PCC reductions (with reference to annual review processes).

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			up within environmental and delivery requirements. In terms of specific options such as greywater recycling, all solution types have been considered to identify the most effective way to deliver the end desired outcome in terms of the PCC reductions within the plan; over time, companies will rebalance activities and option delivery if required. WReN will continue to monitor and review the progress in delivering demand reductions in the next planning round, to inform the pace and scale of future reductions. This will include engagement with other regions in future to share experience and lessons learnt.	
12	Calder Rivers Trust	**Natural process and Biodiversity** a. We support the option that provides the broadest coverage of environmental and social benefit metrics. b. We have concerns about new abstraction and water exploitation plans across the network from a natural processes and biodiversity perspective. c. The environmental destination ambitions should reach to other river systems outside the Yorkshire Derwent. d. Impact of degraded fresh and groundwater quality is an area of specific concern to us, as is the Impact of wastewater effluent on fresh and groundwater quality. e. We appreciate that the projected deficit between demand and supply will not be addressed by demand reduction alone, so new supply/transfer options will be needed. However, we are interested in minimising the environmental impact of new supply/transfer activities.	An environmental assessment of each feasible option has been undertaken according to the Water Resources Planning Guideline (England and Wales), associated environmental legislation and the UKWIR 2021 environmental assessment guidance for water resources planning. This includes Strategic Environmental Assessment (SEA), Habitats Regulation Assessment (HRA), Natural Capital Assessments, Water Framework Directive compliance assessment and assessment associated with invasive non-native species (INNS) and Biodiversity Net Gain (BNG). In addition, where necessary, cumulative and in-combination assessments are also undertaken to assess combined impacts	We will include further narrative and sign-posting on the environmental assessments undertaken as part of the decision-making process. We will also update the Regional Plan to reflect the updated position on the pace of environmental destination and provide more context (see Item 2 above).

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		f. Using existing regional water supplies more effectively seems smart. We are particularly interested in care taken around the input and output points on the Tees and Ouse. We are also concerned about potential biosecurity issues with water transfers between catchments. g. The environmental designations could go further to other destinations for greater environmental gain. h. We would prefer an assumption of greater environmental impact and loss of supply (expanding the Environmental Destination influence), effectively planning for the worst-case scenario.	of options both within the Plan and with other relevant water company / regional group plans. As the schemes develop through detailed design and planning phases including planning application, we will undertake further environmental impact assessment as necessary. The outputs of the environmental assessments are fed into the decision-making process at each stage including identification of mitigation in scheme design and construction methods where appropriate. Please also see response to Item 2 and Item 3 above.	
13	Calder Rivers Trust	**Resilience** a. Particularly interested in the timescale of achieving resilience for 1-in-500-year events. b. We would like to see this resilience in place earlier than planned. c. We consider that working towards 1-in-500 and 1-in-200 event resilience are not mutually exclusive. d. Investing in optimising seasonal compensation flows should ensure existing reservoir supply volumes	All zones except the Yorkshire Grid in WReN meet the 1:500 from very early in the planning horizon (end year 1) where this level of resilience is not already met, although appreciating the Grid is a prime area of interest for the Calder Trust. The scale of the supply-demand challenge in the Grid zone occurring from the start of the planning horizon means that we require significant demand and leakage options along with developing new supplies even under a 1:200-year resilience position. Whilst at this stage we have only committed to formally move to the 1:500-year service level by 2040, in the draft plan the near-term investment, followed by the medium-term demand reduction closed	We will update our plan with the latest position on when a 1:500-year supply-demand deficit would be closed, and on our testing of alternative scenarios around the 1:500-year scenario to justify our final best-value plan position.

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			the 1 in 500 deficit by the 2030s. Under such a situation, the 25effective operating resilience would therefore be higher than the stated level of service minimum; the formal service level will be subject to review in subsequent 5-yearly revisions of the regional and company WRMPs. As part of the revised draft updates, the change to the deficit to meet the long-term environmental destination sooner, could alter this position. We will test further scenarios to understand the options around the 1:500 scenario and justify our decision in the Best Value Planning section.	
14	Calder Rivers Trust	We consider the plan to be robust, considered, and appropriate in most areas. Our comments are intended to support and encourage greater ambition, which we are committed to delivering in partnership.	Thank you for your feedback and your commitment to delivering in partnership.	No change proposed.
15	Canal & River Trust	We believe the Trust can play a significant role supporting the water sector as it strives for resilience and affordability in delivering public water supply. Our waterway infrastructure already exists and with investment from the sector could unlock resilient and cost-effective water transfer schemes across England and Wales. Importantly for the water sector, the Trust has an extensive track record of managing raw water transfers for public water supply. For many decades, we have and continue to provide resilient water transfers for Bristol Water, Thames Water, United Utilities, Wessex Water and Yorkshire Water. Water transfers along our network can also support several other business sectors including the energy sector, agricultural sector, housing sector, construction sector, pharmaceutical sector and manufacturing sector. The water	In this first cycle of the regional planning process, we have aimed to take a proportional approach and to work with other sectors and regulators through regular Stakeholder Steering Group meetings as well as via sector specific sub-groups which have been set-up with priority sectors including with the Canal & River Trust (CRT). Yorkshire Water has also worked closely with CRT for many years managing an existing raw water abstraction where CRT are the Navigation Authority. WReN and Yorkshire Water will continue to work	No change proposed.

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		transfers can also support low carbon energy for heating and cooling.	with CRT on all aspects of water resources planning in our region where there are joint interests.	
16	Canal & River Trust	On page 14, the draft regional plan acknowledges that the Trust's licensed abstractions are consumptive but caveats this statement here by providing statistics excluding the Trust's abstractions and it appears that the percentage figures quoted do not correlate to Fig 3-2.	The narrative on page 14 of the draft Regional Plan under the section headed 'Other Sectors' is correct and does correctly relate to Figure 3.2.The text refers to the percentage of non-PWS sectors in relation to the total consumptive water use either including or excluding the CRT abstractions in the total. i.e. the non-PWS amounts to 6% if the CRT abstractions is included within the total amount for the region (as represented in Figure 3.2) or 8% of the total if CRT abstractions are not included within the total (Figure 3.2 is only represents the figures with CRT included as part of the total abstraction).	We will update the narrative so that the figures in the narrative and those associated with Figure 3.2 are clearer.
17	Canal & River Trust	The Trust would also wish to highlight that the data shown in the draft regional plan is based on the period 2011-17 (inclusive) as this was the best available information at the time of preparing the draft regional plan, but the Trust is working to collate abstraction datasets covering the period 2018-2022 (inclusive) to ensure the most accurate information is used going forwards.	Noted. We welcome CRTs work on updating the abstraction datasets.	We will incorporate the new datasets into the final Regional Plan (currently Table 4.4. in the draft Regional Plan), if available in time.
18	Canal & River Trust	The Trust would also suggest that the first bullet point in 'Challenges for the Sector' (Navigation) in Table 5-2, page 42, be amended as follows: 'Now the Water Act 2003 abstraction licences have been determined, it is clear that in some cases the abstractions that have previously been exempt are now subject to licence conditions that will result in reduced water availability'.	Noted.	We will amend Table 5.2 to reflect the updated position on CRT abstraction licences.

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19	Canal & River Trust	We recognise that the WReN draft regional plan is selecting **Option DV8(v)**, a new abstraction from the River Ouse and associated increased treatment works capacity, as a preferred option to meet their predicted supply demand balance in the Yorkshire Water area. The Trust understand that Yorkshire Water are stating that the new works would be constructed in AMP8 (starting in 2025/26) in advance of the Severn Trent Water transfer termination in 2035. The Trust, as Navigation Authority, will need to understand the impact of this new abstraction and any associated infrastructure requirements and look forward to developing this with Yorkshire Water.	The DV8(v) option does not require a new abstraction. It will make use of existing abstraction permissions. We will continue to work closely with CRT on all aspects of water resources planning in our region where there are joint interests, and this includes the potential for additional abstraction from the navigable River Ouse and any related implications for concerned parties.	No change proposed
20	CCW	The plan focusses on demand management and the core strategy includes adoption of smart meters, water efficiency initiatives/campaigns and significant reductions in the companies' leakage levels. The latter commitment is welcomed, as we know leakage is a matter of concern to customers and can act as a barrier to making changes to their own water use. The consultation document clearly sets out the challenges that the companies will have in reducing the amount of water people use, but there was very little detail on what approaches would be used other than through smart metering. We are therefore left wondering whether the customer facing activity planned will be sufficient to deliver the reduction in water use needed to achieve the ambitious targets contained in the Environmental Improvement Plan, published at the end of January 2023. Since the pandemic, there has been a general increase in water use at home and in response to the drought last year when we saw record-breaking spikes in demand as temperatures increased. We know from our research that people do not currently make the link between their water using behaviours at home and the natural environment the water comes from and climate change. There is therefore a collective role and challenge for the water sector to help people make that connection and to play their part by using less water. Simply doing more of the same, with companies working on relatively	It is recognised that a collaborative approach to water efficiency is needed in order to achieve behavioural change and demand reductions (Per Capita Consumption (PCC)). In delivering our water efficiency strategy, we will thus engage with our stakeholders including local authorities, NGOs, retailers, and regional groups to ensure messaging is aligned and to raise awareness of the need to reduce water use to ensure more water is left in the environment. In addition to smart metering, our water companies are undertaking a range of measures and activities to deliver reductions including: • Update of Northumbrian Water's website to include a monthly water resources report which for example, will help customers understand when reservoir stocks are below average and when they need to take action to reduce their use of water.	We will update our Regional Plan to provide more detail on the different approaches that are being undertaken in order to reduce the amount of water people use.

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		small-scale local initiatives, is not going to bring about the step change in attitudes and behaviours that is needed. There appears to be a heavy reliance on government interventions but these too will take some time to have an impact. We strongly believe that we will only deliver the changes in behaviour that are necessary through a more structured and coordinated approach to demand management that is overseen, and given direction, by a body of experts in the different specialisms required. In effect, an equivalent of RAPID but designed to accelerate the reduction in demand that is required. This would ensure that learnings from trials and different initiatives and campaigns were disseminated and this would build an evidence base that would allow successful interventions to be replicated at scale, possibly regionally or nationally. Given the scale of demand reduction that is required over the longer term we need to take the opportunity to rethink our approach to demand management or risk failing to achieve any meaningful public engagement and ultimately relying on companies building more expensive supply solutions to bridge the growing supply/demand gap. We would welcome the opportunity to discuss this proposal with you.	• Northumbrian Water have had a successful bid for a Water Literacy Programme receiving funding from the Catalyst Stream for a Water Literacy Toolkit. The Water Literacy programme is delivered through all aspects of the community with increased collaboration and network building. It is an accredited water environment learning experience that enhances individual consumer knowledge and will raise awareness of the value of water, educate people about water use and their local water environment and in turn empower positive behaviour change. • Commitment to contribute throughout AMP8 to a nationwide campaign to support and increase awareness of water saving with support from Waterwise and all water companies, following the success of the Water's Worth Saving campaign. • Yorkshire Water is offering household customers the option to be fitted with a flow regulation device, as stated in their draft WRMP24. • Yorkshire Water has developed process, system, and resource requirements to support customer side leakage resolution, leakage find efficiency and improved night use modelling capability which in turn will improve leakage targeting. This will be	

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			implemented dependent upon PR24 determination. We would welcome the opportunity to discuss approaches to meaningful public engagement with you to achieve behavioural change and demand reductions.	
21	CCW	Demand management, both household and non-household, should be an integral part of any strategy to address risks to future water supplies. While we welcome the commitment to work with retailers and their customers the draft plan lacks detail on how the wholesale companies will do this. The non-household retail market has so far failed to deliver a market for water efficiency assistance for non-household customers in England to the extent that was envisioned when the non-household retail market opened in 2017. While the introduction of a new business demand Performance Commitment by Ofwat in the PR24 final methodology means there will be greater transparency and an opportunity to set challenging targets, this is not a regulatory measure that can deliver demand reduction by itself. Wholesale companies' plans need to be clearer on how they will manage non-household demand, especially in areas more at risk of water deficit. We would like to see greater innovation and ambition in demand management, with the wholesale companies showing how they will engage with customers and retailers on joined up strategies to help reduce demand. While we welcome the intention to provide smart meters for non-household business customers from 2025, we would like to see company PR24 business plans include a targeted approach, prioritising: customers whose meters have been left unread for 12 months or longer; are in water stressed areas; or high water users.	WReN companies have all worked together to develop proposals based on research with Retailers and Non-Household (NHH) customers, identifying barriers, solutions, and deliverable options to achieve demand reductions. This includes: Yorkshire Water are continuing to work up their detailed strategy for NHH demand reduction and remain committed to working closely with retailers and NHH customers to deliver an effective plan. They are considering granular options on NHH water efficiency which will be assessed and prioritised. The detail will be provided in the demand section of the final WRMP. Northumbrian Water set out their strategy for reducing NHH water use in the revised dWRMP. To support this process, a SPRINT was held at Northumbrian Water's Innovation Festival in July 2023 sponsored by Wave, NWGs largest retailer, to further understand current constraints and to identify solutions. The wider learning from this sprint will be fed into the NHH demand reduction strategy. A key	We will update the WReN Regional Plan to reflect the updates made at WReN water company level and provide further detail on how we work together with retailers, non-household customers and other stakeholders in order to achieve demand reductions.

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			output was identifying and then utilising varying motivations for different stakeholders to prompt action.	
22	CCW	We welcomed the attention given to the phasing of investment in the draft Plan and the consideration of the impact on customers' bills. While the bill impacts resulting from this plan appear reasonably modest, we are conscious that there are many other investment drivers that will come into play at the next Price Review. CCW continues to promote the need for a single affordability scheme for the water industry in England and Wales that will provide those least able to afford their bills with the level of support they need. We welcome your support in this.	We thank CCW for their comments in this area, and we will continue to carefully consider the phasing and affordability of investment in subsequent plan decisions. The WReN plan will be aligned to those of our constituent companies, who will conduct affordability testing of Business Plans against broader areas of service delivery. WReN is supportive of the need for a single affordability scheme in England and Wales to eliminate water poverty.	No change proposed
23	CLA	The CLA is concerned that WReN's draft plan lacks detailed modelling of future agricultural water needs and deficits at a catchment scale. WReN should invest in research to determine how much more water will be needed by 2050 in individual catchments to (i) maintain current agricultural and horticultural production and (ii) to increase horticultural production in line with the government's Food Strategy (2022) goals.	We recognise that further work is required to understand the future water needs for the agricultural sector, particularly at a catchment scale. In this first cycle of the regional planning process, we have aimed to take a proportional approach and to work with other sectors and regulators through regular Stakeholder Steering Group meetings as well as via sector specific sub-groups which have been set-up with priority sectors including with the agricultural sector. A summary of the key challenges and potential opportunities provided by representatives from the agricultural sector are set out in Table 5.2. One of	No change proposed.

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			the issues faced was the lack of long-term planning and forecasting within non-PWS sectors as well as a lack of appropriate funding routes. Subsequently, WReN relied on the growth factors published as part of the Water Resources National Framework. These growth factors were largely validated through engagement with representatives from the agricultural sector whilst acknowledging it was the best information available to us at the time. The Environment Agency are currently looking at the 2nd iteration of the National Framework and we expect this to include updated expectations and requirements for non-PWS in future regional planning. We will continue to work with relevant stakeholders (through WReN non-water supply sector groups) to further incorporate them into future regional planning and to develop an action plan which will support us in enhancing and developing the non-PWS aspect of the Regional Plan, including how to meet the 2nd National Framework requirements, when published. One future area we are keen to explore alongside the agricultural sector is to understand the data gaps and what resources and funding would be required to address these.	

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24	CLA	Catchment-scale modelling of agricultural and horticultural demand would have numerous benefits within the WReN planning process. It would: • provide the evidence base for agricultural abstractors to make investment decisions in on-farm water storage schemes, like reservoirs; • provide an evidence base to coordinate collaborative infrastructure projects, such as pumping water inland from river mouths into farm reservoirs; • highlight future abstraction conflicts, to enable time for investment in on-farm water storage; • help government and other funders to target grant funding to the most water-stressed catchments.	We agree that there would be much benefit from catchment-scale modelling of agricultural and horticultural demand. However, this requires sector data and funding (please also see response to Item 23) and we will continue to work with agriculture and other non-PWS sectors to further incorporate them into future regional planning.	No change proposed
25	CLA	Adequate funding needs to be secured so that WReN can undertake this (catchment-scale modelling of agricultural and horticultural demand) modelling and incorporate it into its final plan. Modelling work has not yet been undertaken because of "various challenges such as data availability and a lack of funding". The CLA is aware that OfWAT ring-fences the spending of billpayer revenue, preventing water companies involved in WReN from modelling these deficits. However, land management is pivotal in determining how water moves through catchments to rivers and groundwater, and the overall availability of water for the public water supply. This means that understanding agriculture is fundamental to water companies effectively managing their water supplies. Consequently, the CLA believes there are grounds to permit funding from water companies to be used for modelling agricultural water needs, alongside other sources. The most resource-effective route for modelling agricultural water need is through the regional water resource planning process.	Please see response to Item 23.	No change proposed

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26	CLA	**Non-public water supply solutions must be included within the plan.** The CLA recognises that regional plans are not implementation documents, but has concerns that "there are no non-PWS [non-public water supply] solutions identified for this iteration of our regional plan", and that identifying them is considered "impractical". Consequently, the CLA judges that the current plan is not multisectoral, as envisaged by the Environment Agency's National Framework for Water Resources.	We acknowledge the concern over the lack of solutions for non-PWS in this iteration of the Regional Plan. As discussed in the draft Regional Plan, there are data limitations relating to non-PWS which makes it difficult to assess the future supply-demand balance and hence to understand their needs alongside PWS and facilitate creation of joint opportunities. As this is the first round of planning under the water resources regional planning process, we anticipate that this area will evolve through later planning cycles. We will continue to work with relevant stakeholders (to further incorporate them into the WReN) and regulators to create visibility of the non-PWS needs and challenges so that we can take a co-ordinated approach to further develop our action plan and look forwards as to how the regional planning process can facilitate the creation of opportunities for joint non-PWS / PWS solutions in the future.	We will provide further detail on the actions that we will undertake to incorporate non-PWS into future regional planning cycles.
27	CLA	"Various comments about the promotion of, construction of and benefits of on-farm water storage. Solutions to improve water security in agriculture and horticulture exist. The CLA believes that WReN should prioritise on-farm water storage. With the right support, on-farm water storage could become significantly more widespread and help ensure that sufficient water for food production is available to maintain national food security. For example, on-farm reservoirs have multiple benefits.	We would welcome support from CLA in promotion of joint water solutions and agree that on-farm reservoirs could be utilised as such. We acknowledge that there is further work to do to incorporate non-PWS into future regional planning cycles. We will continue to build on and work through our established stakeholder engagement routes such as the WReN	We will provide further detail on the actions that we will undertake to incorporate non-PWS into future regional planning cycles.

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		• They allow water for summer irrigation to be abstracted during high-flow periods, which means that more water can remain in the environment during low-flow conditions. • Abstraction during high-flow conditions to fill reservoirs reduces river discharges, providing important flooding mitigation for downstream communities. • They strengthen national food security by ensuring farmers have enough water for summer crop irrigation and watering livestock. • Water stored in on-farm reservoirs can be discharged into watercourses like chalk streams during low flow to improve their ecological health. Currently, their construction is impeded by (a) the lack of alignment between planning permission, abstraction licencing, and grant funding; (b) the uncertainties surrounding future abstraction licence reform, particularly with the incoming Environmental Permitting Regime; and (c) an insufficient grant funding rate to make on-farm reservoirs viable investments. The CLA has identified solutions to these problems, including increasing government grant funding for reservoir construction to 60%; fast-tracked planning and abstraction licence approval for grant applicants; and reformulating abstraction licencing in terms of high flow not seasonality. The CLA believes that if WReN properly acknowledged the value of on-farm reservoirs as supply-side infrastructure, and included them in cost-benefit analysis, this would make an important contribution to addressing barriers to their construction. The final plan should also recognise other on-farm water storage schemes beyond reservoirs, including water stored in: • well-managed ditches and swales; • wooded areas and woodland soils; • farmland soils, achieved via regenerative agriculture techniques like cover cropping and no-till cultivation, which	Stakeholder Steering Group and the sector specific sub-groups including agricultural to understand needs and solutions, bring in wider knowledge and audiences, raise awareness of the challenges faced and support in overcoming barriers in order to bring about a joined-up approach to regional planning.	

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		improve soil health, allowing a greater volume of water to infiltrate into soil and be stored in its structure."		
28	CLA	**Water companies should be more ambitious with respect to leakage reductions.** The draft plan notes that reducing leakage is top priority for customers. It is also a priority for CLA members. The CLA believes that that investments by water companies to reduce leakage should be as ambitious as possible, especially given that water infrastructure has seen underinvestment in recent years. The 50% leakage reduction target should be viewed as the minimum level of ambition.	Leakage reduction is a priority for us and since production of the draft plans, the WReN water companies have reviewed their leakage strategy and programmes including leakage reduction targets. Northumbrian Water have updated the preferred plan for their revised draft WRMP24 to include a programme to reduce leakage by 55% by 2050, 5% higher than the 50% reduction by 2050 in the dWRMP. Yorkshire Water will also be presenting an updated preferred leakage strategy within the revised draft WRMP. They have created 7 leakage programmes of differing leakage trajectories using a recognised best practice tool to optimise 15 intervention types within the plan to deliver leakage targets and the trajectory of leakage improvement. The scenarios will be used within the WRMP model in order to produce the preferred leakage strategy as well as setting the final leakage reduction requirement from the plan which may be between the increments of investment currently modelled, such as 53% leakage reduction, as opposed to 50% or 60%.	The Regional Plan will be updated to reflect the changes in the WReN water companies revised draft WRMP24's associated with the preferred leakage strategy and programme to manage and reduce leakage.
29	CLA	**The plan should recognise the value of Nature-based Solutions and include them within the final plan.**	WReN recognises the value of nature-based solutions. Supply side options in	We will provide more detail on nature-based

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			the WReN Regional Plan are focussed on addressing deficits in Yorkshire Water resource zones. The Yorkshire Water PR24 programme will include significant consideration of nature-based solutions and catchment programmes around many aspects of the water environment including catchment / NBS programmes in wastewater where appropriate. However, it is not possible to quantify the benefits of these schemes in a way that meets the requirements of the WRMP process, and in particular in terms of increased water availability and DO. We believe that the appropriate place for NBS and catchment solutions is within the broader PR24 and WINEP programmes where the cost benefit case will be made in accordance with the PR24 guidance. Taking the above into account the Yorkshire Water revised dWRMP will however include reference in the main technical plan narrative to these options with a specific focus on how these types of solutions benefit holistic whole catchment resilience as part of a wider best value plan for water resources. It is recognised that together with the potential benefits associated with abstraction reduction the plan will improve catchment resilience. For Northumbrian Water, peat restoration continues to be a focus too and they have a 2 year WINEP investigation in AMP8 (to inform	solutions in our final Regional Plan including to reflect updated narrative on nature-based solutions

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			targeting) followed by a 3 year delivery of peat restoration which will be delivered through existing peat restoration partnerships.	
30	CLA	It is disappointing that the current plan does not incorporate **Nature-based Solutions** like restoring peat as supply-side strategies. Whilst it may be hard to quantify the benefits of Nature-based Solutions in terms of water supply, the CLA does not believe this is a reason to exclude Nature-based Solutions from the plan. Beyond peatland restoration, other Nature-based Solutions for WReN to consider include: • restoring meanders on straightened rivers, which means they hold more water and flow more slowly, creating a mosaic of habitats; • leaky dams, which store more water in rivers and discharge water more slowly; • regenerative agriculture, which facilitates greater storage of water in soils and slows overland flow; • woodland planting and natural regeneration, to slow overland flow and increase infiltration; • well-managed swales and ditches, which can hold large quantities of water. These Nature-based Solutions dovetail with Natural Flood Management (NFM), which reduces the flashiness of catchments and slows river flows. WReN should consider flooding and drought more holistically in its plan. Solutions using nature can address both and deserve greater recognition. Nature-based Solutions offer substantial opportunities to sequester carbon. The CLA supports WReN's aim for its plan to be carbon neutral in order to meet the national 2050 net zero target. Therefore, WReN should consider how Nature-based Solutions for water security can also offset the carbon emitted	Please see response to Item 29 above.	We will provide more detail in our Regional Plan to reflect updated narrative on nature-based solutions in the Yorkshire Water revised draft WRMP24.

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		during the construction of new public water supply infrastructure and invest accordingly.		
31	CLA	**WReN should retain Temporary Use Bans (TUBs) within its final plan as a way to reduce the burden on abstractors with more inflexible water needs during drought.** The CLA regards TUBs as a valuable option that the public water supply can implement to ease the pressure on other abstractors with less flexibility in their water needs during drought situations. Crops have relatively small water needs overall, but if these are not met, production becomes no longer possible and will move elsewhere. To safeguard food security, the CLA would like to see TUBs applied to the public water supply ahead of Section 57 bans applied to spray irrigation during drought conditions. More generally, the CLA is clear that demand-side reductions should be borne by the public water supply not the agricultural sector, a sector in which even small reductions in abstraction licences could change production patterns in ways detrimental to national food security.	Temporary Use Bans (TUBs) are drought actions in the WReN water companies' 2022 drought plans which are published on each of the water company websites. TUBs are feasible drought actions and so necessarily must form part of the Drought Plan and WRMP24. The WReN water companies' 2022 Drought Plans are reviewed every 5 years and there will be opportunity to input as part of the consultation process for that review. Restrictions to spray irrigation are generally the remit of the Environment Agency and Natural Resources Wales as they are usually related to river levels, however, we would be happy to discuss any specific areas of concern prior to this. We do not agree demand-side reductions should be borne by the PWS and not non-PWS sectors such as agricultural sector. We should be working together to reduce demand in the common interest. It is intended that the regional planning process enables PWS and non-PWS sectors to work together to understand each other's needs and challenges, share our knowledge, identify joint solutions and take a co-ordinated approach on the actions that are needed moving forward to bring non-PWS sectors into future regional planning rounds. We have	No change proposed

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			specifically been engaging with the agriculture sector representatives through our WReN Stakeholder Steering Group and sector specific sub-group and we will continue to work with them in order that the full range of agriculture sector views are fed into the process.	
32	CLA	**WReN should ensure that new groundwater and surface-water abstraction sites for the public water supply do not negatively affect river flows or existing abstraction licences.** The CLA notes that WReN expects to meet a large fraction of future water deficits by exploiting new groundwater supplies. Careful, scientific cost-benefit analysis should be undertaken for each new groundwater and surface-water site to ensure existing abstraction licences owned by farms and other businesses downstream are not affected.	We will follow regulatory guidelines in the development of options for water resources planning including those associated with environmental assessment. However, the Environment Agency are responsible for Environmental Permitting and Abstraction Licensing and that other licence holders are not adversely impacted.	No change proposed
33	CLA	**Demand-side reductions need to be accessible to all households, particularly in rural areas on private water networks.** To reach the ambition on individual water consumption of 110 litres per person per day, there needs to be support for retrofitting homes and buildings in WReN's final plan, such as grant funding for water-efficient fixtures and fittings, and free issue and installation of smart meters. Grants or subsidies for retrofitting and metering should also extend to private water supplies. WReN should note that that private water suppliers have a legal duty to provide continuity of supply but have no means to compel demand-side water reductions. Reducing abstraction licences for private water supplies may be counter to	We will continue to work closely with non-PWS sectors to bring them into the regional planning process and create visibility of their needs and challenges including funding. However, PWS companies cannot cross subsidise the non-PWS sector. The appropriate funding mechanisms will need to be addressed by the Government and regulators.	No change proposed

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		landowners' duty to provide households with a right to a supply of water.		
34	CLA	**The final plan and associated website should make data easily accessible to land managers to guide investment decisions.** It is hard for individual farmers and other rural abstractors to make sense of what the plan means for them in its current format. The CLA would like to see the final plan and associated website highlight where land managers can access data and information to make investment decisions. This data should be digestible, relevant, and empower rural businesses to participate within the plan's goals.	We would welcome further engagement with CLA to understand your data and information needs. We acknowledge that there is further work to do to incorporate non-PWS into future regional planning cycles and we will continue to build on and work through our established stakeholder engagement routes such as the WReN Stakeholder Steering Group and the sector specific sub-groups including agriculture.	No change proposed.
35	CLA	**Reservoirs:** Water companies in WReN could consider dredging reservoirs to increase their capacity, and maintaining them better. Whilst the CLA does not want to see land unnecessarily flooded, reservoirs can contribute to flood mitigation and hydropower as well as water supply. The construction of new reservoirs in the North East could be further explored.	Reservoir de-silting has been considered but has not been selected in our preferred plan or the adaptive pathways following options appraisal and multicriteria analysis including any potential adverse environmental potential concerns. Northumbrian Water continue to monitor whether siltation is an issue through a rolling programme of bathymetric surveys . Currently they do not have any significant issues. Bankside storage on the Ouse was in the draft plan for delivery in 2060 and a tidal reservoir option on the Humber with a 20Ml benefit was also considered but has significant environment impact so requires further investigation. Yorkshire Water in their dWRMP24 Statement of Response has committed	We will update the final Regional Plan to include further detail on how we have considered reservoir options.

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			to a medium term options review in which they will look widely at all possible options to expand our selection.	
36	CLA	**Landowner engagement:** It is pivotal that genuine local engagement, especially with landowners, takes place for any infrastructure projects that may impact land. Agricultural land should be disturbed for the minimum duration possible whilst installing or upgrading infrastructure.	We recognise that meaningful and early stakeholder engagement is an important feed into the decision-making process. We will continue to undertake and build on our formal and informal stakeholder engagement activities and as the plan options are developed further through later design and implementation stages, we will further engage with local stakeholders at a project level and as appropriate according to the specific project requirements. However, we would also welcome discussions with you on how best to engage with landowners moving forward.	No change proposed.
37	CLA	**Grey water recycling:** Building regulations for new developments should mandate grey water recycling and re-use.	Building regulations updates are being proposed in the Roadmap to Water Efficiency included in the Government's April 2034 Plan for Water but as yet, we do not know what the proposed updates are.	No change proposed.
38	EA	**Recommendation 1 – Secure and deliver environmental destination for the region as soon as possible.** We acknowledge and welcome WReN's proposals to reduce abstraction pressure over time and the work that the region has undertaken to better understand this. The environmental destination for the region is primarily focused on Yorkshire Water's River Derwent (Yorkshire) abstraction. We appreciate that this site is complex and that discussions are ongoing between the Environment Agency, Yorkshire Water and Natural	Following the comments received on the plans, the timeline for Environmental Destination in relation to abstractions from the Yorkshire River Derwent has been revisited. We share Natural England and Environment Agency's ambition to identify a sustainable long-term objective for the Lower Derwent	We will update the Regional Plan to align with revisions at water company level in relation to environmental destination.

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		England to establish appropriate flow targets and/or abstraction reductions required for the site. However, as this location is designated under the Conservation of Habitats and Species Regulations 2017, we consider that delivery of abstraction reduction in 2050 is too late and not acceptable. PR24 guidance makes clear that interim progress goals identified in RBMP2 were intended to act as stepping-stones towards achieving the revised targets (referred to as long-term targets). WReN should further consider and demonstrate how it could deliver abstraction reduction at a greater pace to deliver environmental benefits as soon as practicable. WReN should use adaptive planning techniques to consider earlier delivery profiles of this abstraction reduction and demonstrate in its final regional plan that there are sufficient options available to provide WAFU benefits that can offset deployable output loss caused by abstraction reductions. We will be feeding back to individual water companies in due course on the contents of their draft WRMPs, but we expect the final regional plan to: • Continue to work with the Environment Agency and Natural England to facilitate and agree an acceptable and timely flow target for the River Derwent Special Area of Conservation (SAC). • Linked to recommendation 3, WReN should consider how it can accelerate meeting the agreed flow target and review the timings of its preferred options to ensure that environmental improvements are being delivered at sufficient pace to meet legislative requirements and deliver environmental benefits sooner. The Conservation of Habitats and Species Regulations 2017 requires protected sites that are in unfavourable condition to have solutions implemented “as soon as practicable”. Delivery in 2050 does not meet this requirement based on the information provided. • Work with other sectors to understand the implications for their supply needs.	protected areas, but we recognise this is a complex water resources, environmental and planning issue which can only be solved collaboratively and with sufficient input from relevant stakeholders. Following a review of the comments on the draft plan, we propose to bring forward the Decision point associated with the Yorkshire River Derwent environmental destination to 2027 and the Trigger date to 2040 . The proposed timescale for Environmental Destination, including how we will meet the requirements of the WFD and Habitats regulations, will be explained in greater detail in the Yorkshire Water revised dWRMP24 submission.	

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39	EA	**Recommendation 2 – Account for significant non-PWS demands in the regional plan.** As the plan focus is primarily focused on public water supply, we expect to see further work to incorporate the ongoing work with other sectors such as agriculture and energy. We are concerned that the water needs of energy generation and net-zero clusters in particular are not well reflected in the draft regional plan. These future needs could be substantial, estimated as high as 230 Ml/d for energy in WReN's draft regional plan, and significant to the short-term water security in the region. This is not currently taken account of adequately in the draft regional plan, posing an unacceptable risk for the region's water security. WReN's draft regional plan does not go far enough in planning for this large potential requirement for water to support the UK's net zero target by 2030. The final regional plan should consider in more detail the impact of this additional water use. The plan should demonstrate that it will support and enable growth in the region, the delivery of net-zero, as well as provide sufficient water supplies across the region.	We are highly supportive of the need to support the energy and agricultural sector and consider this a key area of focus for WReN given the potential impacts on water availability in future. WReN and our constituent companies are actively engaging with potential developments, particularly in Teesside and the Humber. The level of future water needs is highly uncertain, and regularly changing, however we are considering the latest position in our planning processes. This includes the inclusion of non-household demand forecasts where appropriate and exploring the asset/ infrastructure considerations to supply water to relevant developments. We will continue to collaborate with our constituent companies, other sectors, and regional groups to establish the overall inter-region position for net zero ambition and the impact this may have through competing proposals for water, particularly associated with the Tees as a resource. We recognise that the Humber industrial cluster is a significant player in the UK's net zero ambitions and are committed to supporting activity that helps to deliver on those ambitions. We note that in respect of the Humber Cluster specifically, there is currently more certainty in the volume of water required for the South bank of the Humber (Lincolnshire / Anglian Water) where the	We will include further detail in the final Regional Plan (in alignment with the Yorkshire Water rdWRMP24) on the forward-looking activity plan to incorporate non-PWS sectors into the regional planning process, including to establish the overall inter-region position for net zero ambition and the impact this may have through competing proposals for water. We will update the final plan with the latest position on energy sector developments in this area, the ongoing discussions and monitoring of needs, and the implications in terms of meeting future water supply needs.

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			majority of current known development is planned. We are in discussion through developer services with the Hydrogen-to-Humber (H2H) project at Saltend as well as other potential industrial users on the North bank. Their likely demands for water (volume both peak and average, quality requirements, location, and timing of need) remain uncertain at this point in time. As part of our discussions with potential industrial users, we are also exploring other options for their water supply, such as non-potable sources for use where appropriate. We will continue to collaborate with our constituent companies, other sectors and regional groups to establish the overall inter-region position for net zero ambition and the impact this may have through competing proposals for water.	
40	EA	**Recommendation 3 – Promote sufficient options to meet current and future water needs, reduce uncertainty over options and reduce resultant risk to public water supply-demand balance.** WReN's draft regional plan has reduced the uncertainty over the loss of import from Severn Trent Water to Yorkshire Water, and Yorkshire Water has incorporated this loss into its baseline WAFU assessment. This was the greatest source of uncertainty in the emerging regional plan and although we understand this may not have been a preferred outcome for WReN, we welcome the inclusion of the cessation as the most likely outcome. The introduction of a large raw water transfer from Northumbrian Water's non-potable supply area to Yorkshire Water's Grid has been a long-standing infrastructure option considered through	WRW confirmed that the Severn Trent Water to Yorkshire Water transfer will cease in 2035 under all scenarios (given a lack of alternatives for Severn Trent) post submission of draft Yorkshire Water and Regional Plans. The draft Plans recognised the uncertainty (through adaptive pathways) and the need to explore alternatives and included further options development as part of future work post WRMP24. However, for the Yorkshire Water rdWRMP24 submission (and hence the final Regional Plan) will not be in a position to have developed a wider	WReN will update the final plan to reflect the latest inter-regional reconciliation outcomes with WRW and WRE, and on the status of SRO schemes. We will also update the plan to explain our future commitment to work in these areas to, which takes place alongside work to further increase the supply feasible option portfolio for

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		the WRMP, but the likelihood of it being required is now higher. Whilst this transfer of 140 Ml/d is a water company option, non-delivery of this transfer would cause a public water supply deficit in large parts of the region. Should the Teesside cluster water requirement restrict the volumes available to transfer, this will also significantly impact on security of supply in the Yorkshire Grid. WReN should set out how Environment Agency response to WReN's draft regional plan consultation it will reduce the uncertainty over this transfer and what it will do to keep this under review whilst the option is developed. The draft regional plan also does not set out sufficient alternative options in its regional plan that could be utilised if the Tees transfer is not delivered at the expected volumes or timescale. Linked to recommendation four, there is also inconsistency in representation in this option that must be resolved for the final plan. The majority of regional plan options are pre-existing WRMP derived options, and the draft regional plan does not provide any further assurance that a fuller range of alternative options have been considered or scoped. This means that it is also not possible to conclude that WReN's draft regional plan is best value for the region as it has not yet undertaken a sufficiently detailed and broad options appraisal.	range of options that could be tested as part of the adaptive planning approach. We can confirm that the current range of supply options meet the large range of uncertainty presented by the late-stage changes, but we recognise that additional clarity on how these supply options will be developed (along with their alternatives) needs to be provided. The adaptive plan strategy still remains focused on the uncertainty and risks relating to the most likely triggers for new large-scale investment such as the River Derwent Environmental Destination output and the risk of not achieving the ambitious demand reduction. There is no longer a feasible pathway for the Severn Trent Water transfer to continue and this will be removed from the revised draft WRMP24 (Yorkshire Water) and final Regional Plan. We will continue to explore the phasing of schemes against all scenarios. We will re-evaluate to account for the removal of the pathway for continuing the Severn Trent Water transfer and any other changes that alter the no regrets solutions. We shall also update our monitoring plan to align with the adaptive pathway updates so that we have a monitoring programme with timely decision points and triggers. The supply-side strategy will be similar to that presented in the draft WRMP24 and Regional Plan. Near term surface and groundwater solutions remain key	meeting deficits in the Grid zone.

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			for the AMP8 strategy. These require early feasibility assessments which may result in some schemes lead times being adjusted to reflect the need to manage risk from early in the planning period. In the medium term we have committed to developing further options to allow more adaptive planning as part of our ongoing management of risk associated with the supply demand deficit. These options will be developed ahead of and for inclusion in our WRMP29 plan. The larger strategic supply solutions in the draft plan are likely to remain in the revised draft plan as they are key to replacing lost deployable output (DO), including the 'back-fill' options to offset the loss of the STW import and to address the uncertainty represented by the Environmental Destination requirements.	
41	EA	**Recommendation 3 – Promote sufficient options to meet current and future water needs, reduce uncertainty over options and reduce resultant risk to public water supply-demand balance.** Together with wider factors, including uncertainties outlined in recommendations one and two, there remains a risk that the region (specifically the Yorkshire Water Grid Resource Zone) could face public water supply deficits in the future which the draft regional plan does not demonstrate can be resolved with its current suite of options. There is also high potential for unmet non-PWS demands that may require public water supply derived water, further raising the risk of inadequate supplies in the medium term. We would welcome a clear presentation of these	Please see response to Item 39 and Item 40. This is the first planning round for the Regional Plan and is a developing process. It is acknowledged that there is further work to engage with non-PWS to understand the needs and challenges that they face in order to fully participate in the regional planning process (e.g. such as the need for more data and funding). In this first round we have aimed to take a proportional approach. We will continue to work with relevant	Please see Item 39 and Item 40. We will provide further detail on the actions that we will undertake to incorporate non-PWS into future regional planning cycles.

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		risks to ensure a fully adaptive plan, with suitable option pathways identified and specified trigger points for interventions. We raised this issue in our emerging regional plan feedback and are disappointed that it has not been fully resolved particularly in light of the short-term net zero expectations affecting WReN. We expect this to change. WReN's final regional plan needs to include additional options where these form part of a best value plan or, are needed as alternative options to manage risks to security of supply and the environment in its preferred pathway. These options should include a broader range of option types, including third party, non-PWS or catchment options. We would also like WReN to continue to work with neighbouring regional groups to explore and confirm the costs and benefits of trades between the regions and to keep this under review as the development of the next regional plan gets underway.	stakeholders and regulators to create visibility of the non-PWS abstractors' needs and challenges so that we can take a co-ordinated approach to further develop our action plan that supports us in achieving where we would like to be in the future regional planning process including how the regional planning process can facilitate the creation of opportunities for joint non-PWS / PWS solutions in the future.	
42	EA	**Recommendation 4 - Ensure consistency of the regional plan with water company WRMPs.** WReN's draft regional plan sets out a significantly different implementation profile of the proposed Tees transfer than the individual water company WRMPs do, with a discrepancy of 10 years between the two sets of plans and represented inconsistently in the water balance. This is the largest option set out in the draft regional plan and for it to presented so inconsistently does not provide assurance that this option has been thoroughly considered and appraised. Representation of options must be consistent between all relevant plans, and WReN's final regional plan must align with water company final WRMPs in both the plan narrative and supporting data tables. We expect WReN to provide leadership to address this issue and work with both Yorkshire Water and Northumbrian Water to ensure this is the case, ensuring that any further changes to WRMPs are represented consistently in WReN final regional plan.	WReN have supported dialogue between companies to ensure alignment in the final plan. Yorkshire Water has confirmed that the Tees transfer is needed by 2040 (following a review of the timeline for Environmental Destination in relation to abstractions from the Yorkshire River Derwent, a key driver for Yorkshire Water's need for the Tees Transfer). This date has been agreed by both member companies to be used in their respective preferred pathways for their WRMPs, and whilst an in-region transfer has this date has also been noted as part of Reconciliation 3. The apparent misalignment at the draft stage occurred because Yorkshire Water's plan at that time had selected the scheme in 2050, whereas	Update date of Tees transfer option selection, with explanation of driver for change. Addition of narrative on key decision points / timing.

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			Northumbrian Water's plan had referenced the earliest implementation date possible for the option. Northumbrian Water had intended to include an adaptive pathway in their revised draft WRMP to reflect the potential for an earlier delivery date than 2040. However, given Yorkshire Water are now selecting the scheme in 2040, there is no longer a need for Northumbrian Water to have an early adaptive pathway. We will continue to work closely with Yorkshire Water and Northumbrian Water on this transfer to ensure there is consistency among plans.	
43	EA	**Wider changes to take account of in your final regional plan** As WReN develops its final regional plan it will need to take account of responses to its member water company WRMP consultations, feedback from regulators and stakeholders on its draft regional plan as well wider changes affecting the water sector since the draft WReN plan was produced. This should include: * Environment Agency response to WReN's draft regional plan consultation • Learning from the 2022 dry weather event • Water company proposals for accelerated schemes and any regulator-agreed outcomes on those proposals • Targets related to the Environment Act and the Defra Environment Improvement Plan • Changes to Government approach in relation to targets for housebuilding	WReN has undertaken a cross-comparison and review of company level Statement of Responses following consultation on WRMPs to inform the WReN Statement of Response. This covers both Environment Agency and other common stakeholder / regulator responses across both plans. With regards the other areas noted: • Learning from the 2022 dry weather event will be summarised in the final plan, most likely within the 'current situation' section. • Draft decisions on the accelerated scheme were published by Ofwat in April	The final plan will include a brief commentary on the implications of lessons learnt from the 2022 drought as context for plan choices. Updated position following legislative, policy and guidance updates also to be applied.

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		• Changes to our Water Resources Planning Guideline, scheduled for late February 2022	2023; no WReN options were selected through this process. • The targets related to the Environment Act and the Defra Environment Improvement Plan will be addressed in the final plan. • Our member companies' plans are following the current guidance on the use of local authority projections for housing growth. We understand that the Government is considering changes to house building targets in the Levelling-up and Regeneration Bill, and will consider the materiality of new targets on our plan. • The final plan will account for WRMP revisions following updates to the Water Resources Planning Guideline in February 2022.	
44	EA	**Demonstrating progress** We consider a regional plan to be an active plan that monitors progress and is kept under review as options are delivered, uncertainties are reduced and better information becomes available. In addition to these specific recommendations, we recommend that all regional groups prepare a bi-annual 'checkpoint' report to describe progress and are prepared to present this at the Strategic Steering Group to demonstrate that timely progress is being made. This is especially important for WReN given the short-term nature of the supply deficits outlined	Noted. We are working with others through the Regional Coordination Group and National Framework Senior Steering Group to agree and deliver effective progress reporting.	We will reference this in the final Regional Plan.

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		in its regional plan and considerable uncertainties over non-PWS demands.		
45	EA	**Consistency of the draft regional plan with relevant plans and programmes** We have assessed the public water supply parts of WReN's regional plan data tables that were submitted as part of the regional plan against relevant water company draft WRMP data tables. We found that these were aligned for the majority of water balance components and option profiles. However, there are discrepancies in how the 140 Ml/d Tees transfer from Northumbrian Water non-potable supply area to Yorkshire Water's Grid is presented. This must be corrected for the final regional plan and will ensure transparency of water accounting and demonstrate consistency between WRMP and regional plan documentation. WReN should work with its water company members to ensure this discrepancy is resolved. As regional plans and WRMPs progress towards finalisation, please ensure that these datasets align and are consistent with each other as set out in recommendation 4.	Please see response to Item 42 above confirming our position on this matter.	Please see response to Item 42.
46	EA	**Consistency of the draft regional plan with relevant plans and programmes** We assessed WReN's regional plan against the outcomes of the second reconciliation performed by regional groups in Spring 20223. We found that WReN's regional plan was consistent with the nationally agreed position. Please ensure that your regional plan continues to be consistent with outcomes from any further regional plan reconciliations. WReN should also work with Water Resources West and Severn Trent Water to ensure that the cessation of the transfer from Severn Trent Water to Yorkshire Water is represented consistently in its final regional plan.	WReN has fully participated in the latest round of reconciliation. The latest position on transfers with both WRW and WRE has been affirmed for the final plan as part of the inter-regional Reconciliation 3 exercise. We have published the *Inter-regional Reconciliation 3: Summary report* alongside our Statement of Response as reference and for further context on the position explained below. We will continue to work closely with other regions and companies to ensure a consistent narrative in the final Regional Rlan.	Updates in narrative and plan position following inter-regional Reconciliation 3.

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47	EA	**Consistency of the draft regional plan with relevant plans and programmes** WReN is not developing any Strategic Resource Options itself, but the development of the Upper Derwent Reservoir Expansion (UDVRE) SRO scheme by Severn Trent Water and Water Resources West is linked to the security of supplies and water availability in Yorkshire Water's grid zone. Gate 2 for this scheme is in July 2023 so there is no official documentation for us to assess consistency with but the draft regional plan appears to be consistent with scheme development as we currently understand. As this scheme progresses through the SRO gated process, WReN should ensure that it reflects this scheme consistently and accurately in its final regional plan.	Following the outcomes of Reconciliation 3, the existing Derwent Valley transfer to Yorkshire Water / WReN ceases in all scenarios. As such, Yorkshire Water need to implement backfill options to offset the loss of this transfer, which is covered by the scope of the SRO project. We continue to work with WRW, Severn Trent and Yorkshire Water on the Upper Derwent Reservoir Expansion (UDVRE) SRO scheme, including to discuss the scope of SRO once the deferred Gate 2 outputs have been completed. We will update the final Regional Plan with the latest position on the SRO, and ensure consistent narrative with WRW.	Update to reflect latest position on the UDVRE SRO scheme.
48	EA	**Consistency of the draft regional plan with relevant plans and programmes** The draft regional plan states that exports of raw water from Kielder reservoir to United Utilities' supply area were explored but not selected by WRW. This option should continue to be appraised and developed through the gated process and we encourage WReN to continue working with WRW as the scheme progresses.	We refer the Environment Agency to response Item 64 for the full detail of the status of both Kielder export options (in-region to Yorkshire Water, and to WRW / United Utilities). Whilst the WRW export has not been selected, we will continue to explore both transfers as options (in case the position changes),and are in discussion these parties and RAPID about the role of Kielder as a future SRO.	See response to Item 64.
49	EA	**Our views on the proposed environmental destination** The NFWR called for improved understanding and consideration of the long-term water needs for the environment as a core aim of regional groups. Regional groups were expected to explore a number of scenarios to consider those needs, building on the work started by the NFWR, and for the regional plans to propose an environmental destination for each region that	Our approach to the Environment Agency's national modelled scenarios is set out in Appendix 6 of the draft Regional Plan. All management catchments with enhanced scenario environmental deficits in the national scenario >2Ml/d were prioritised for	We will update the final Regional Plan to reflect the latest position on environmental destination.

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		meets regulatory requirements and improves the environment. This section sets out our view on how WReN's draft regional plan has responded to the NFWR and our long-term guiding principles for the environment document, issued in Autumn 2020. We have worked with WReN in the development of its environmental destination scenarios, building on those that were presented in the NFWR. We welcome the group's continuing engagement with us on the environmental destination. The draft regional plan sets out a shared vision for the environment and has taken a holistic approach, which we welcome. WReN is probably the region where environmental destination was thought to be likely to have a less significant impact on the plan, and consequently the region developed a less detailed approach to environmental destination. During the development of the plan it became apparent that the environmental destination may have greater than expected impacts on Yorkshire Water and thereby the region as a whole. Consequently, the environmental destination should now become a higher priority for WReN and we expect more of the planning effort to be focussed on it for the final plan.	review (including with the Environment Agency); where this initial review identified potential long-term water resources implications these were included within the Environmental Destination scenarios of our adaptive plan (consistent with the Ofwat reference scenarios). We welcome the Environment Agency's continued engagement with WReN and our member water companies and environmental destination will continue to be a priority in the planning process. For the Yorkshire Water rdWRMP24 and final Regional Plan submission we will additionally consider the Environmental Destination implications arising from our adaptive plan (i.e. potential environmental flow deficits arising from the supply-side options selection within the best value plan).	
50	EA	**Our views on the proposed environmental destination** As detailed in recommendation one above, the most significant issue for WReN's environmental destination is finding an environmentally sustainable solution for the River Derwent SAC. Based on the ongoing discussions it should be possible to identify a small number of scenarios to cover the range of possible abstraction reduction volumes and timeframes. These scenarios should be built into an adaptive planning approach to inform WReN's environmental destination. A significant factor in the requirement of the Tees transfer is the potential loss of the River Derwent abstraction. The company has proposed the option to be online by 2050, to meet a proposed 2050 resolution date for the River Derwent SAC. As the River Derwent is a Protected Area under The Conservation	We are continuing to develop our Environmental Destination and are proactively working with the Environment Agency and Natural England to define an appropriate scope for our AMP8 Water Resources WINEP investigations in support of this (including asset and catchment specific investigations plus regional options development studies for Environmental Destination). In relation to the River Derwent, we share Natural England and Environment Agency's ambition to identify a sustainable long-term objective for the Lower Derwent	We will provide greater detail in our final Regional Plan (and Yorkshire Water rdWRMP24) on our proposed timescale for Environmental Destination, including how we will meet the requirements of the WFD and Habitats regulations.

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		of Habitats and Species Regulations (2017), which requires protected sites that are in unfavourable condition to have solutions implemented “as soon as practicable”. We interpret this to mean the lead in time for the option (for example,15 years for Tees transfer) plus a short window for decision making.	protected areas but we recognise this is a complex water resources, environmental and planning issue which can only be solved collaboratively and with sufficient input from relevant stakeholders. Following a review of the comments on the draft plans, we propose to bring forward the Decision point associated with the Yorkshire River Derwent environmental destination to 2027 and the Trigger date to 2040. Our proposed timescale for Environmental Destination, including how we will meet the requirements of the WFD and Habitats regulations, will be explained in greater detail in the final Regional Plan (and Yorkshire Water rdWRMP24).	
51	EA	**Our views on the proposed environmental destination** For the other rivers under the environmental destination, we expect WReN to provide more detail in the plan to demonstrate that the environmental destination delivery is planned quickly enough to meet statutory requirements. The Water Environment (Water Framework Directive) Regulations 2017 (WFD Regulations) require all water bodies to aim to achieve good ecological status or potential. The deadline is to achieve this by 2027 at the latest, with very limited exemptions allowing the date to be extended beyond 2027. If the statutory environmental objectives in the RBMPs cannot be met, we expect regional plans and WRMPs to justify why the solution cannot be delivered by the required deadline. Given these pressing statutory timescales we expect delivery of the solution to be planned for the earliest feasible and affordable delivery date (for example, the earliest delivery date that a local option or SRO can provide replacement water to enable an abstraction	Please see response to Item 50 above. It is acknowledged that there is further work to engage with non-PWS to understand the needs and challenges that they face in order to fully participate in the regional planning process (e.g. such as the need for more data and funding). In this first round we have aimed to take a proportional approach. We will continue to work with relevant stakeholders and regulators to create visibility of the non-PWS abstractors’ needs and challenges so that we can take a co-ordinated approach to further develop our action plan that supports us in achieving where we would like to be in the future regional planning process including how the regional planning	We will provide greater detail in our final Regional Plan (and Yorkshire Water rdWRMP24) on our proposed timescale for Environmental Destination, including how we will meet the requirements of the WFD and Habitats regulations. We will provide further detail on the actions that we will undertake to incorporate non-PWS into future regional planning cycles.

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		reduction to go ahead). We have provided additional detail on these expectations in the appendix to this letter. WReN's environmental destination has considered the impact on public water supply abstractions. We issued additional guidance in April 2022 on how water companies should prevent WFD deterioration that we expected to be taken account of within regional plans. WReN's plan includes an allowance for licence capping of public water supply licences. We encourage WReN to continue working with us to build preventing deterioration into all environmental destination scenarios. However, it is unclear how other abstractors have been considered. We expect WReN to provide further information on how it plans to work with other sectors to assess and support solutions for other sectors as they address the risks from unsustainable abstraction.	process can facilitate the creation of opportunities for joint non-PWS / PWS solutions in the future.	
52	EA	As the group prepares its final regional plan, we recommend that WReN clearly sets out the proposed programme of work to support decision making ahead of any major decision points in its adaptive plan. Due to the links with WRW's planning problem and scheme dependency as outlined in section seven, we recommend that WReN considers whether an in-combination assessment is required for the final regional plan should options from the plans impact on designated sites (in particular for the Humber).	An in-combination assessment will be undertaken as part of the final HRA and SEA and will be detailed in the Environmental Report. This will review potential impacts from the implementation of WReN's Regional Plan alongside other neighbouring region's plans, in particular where there is potential for effects on the same designated sites. We are engaging with the other water companies/regional groups to agree a way forward in regard to assessing in-combination effects on the Humber Estuary. However, this is a complex issue and the lack of available hydrological models and data mean this issue is unlikely to be solved before submission of the final Regional Plan.	We will update the WReN Regional Plan Environmental Reports to reflect the latest position on cumulative and in-combination assessment.

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			We will review the timing of the option implementation along with flow series data for the Humber Estuary to determine risk from the Yorkshire Water options. We will review this against the now-published draft WRMPs and Regional Plans to determine potential for in-combination effects. However, as noted above there are likely to be actions to continue after submission of the final Regional Plan with the other water companies/regional groups, and we will put proposals in place where this may not be possible in the timeframe for this plan.	
53	EA	WReN have engaged with a range of sectors in the development of the environmental destination. Future water needs from the WRNF have been considered, and further engagement is planned in catchments identified as higher priority. The draft plan isn't able to put forward solutions to potential deficits for other sectors. We recommend that WReN continue the planned multi-sector engagement to gain increased confidence in the environmental destination and work towards best value solutions for all. Catchment and nature-based solutions are recognised as having the potential to deliver multiple benefits they are usually low carbon and popular with the public. However, such schemes do not form a significant part of WReN's best value plan. WReN should include more catchment and nature-based solutions as part of their package to deliver a best value plan, or alternatively WReN should justify why they believe such schemes shouldn't be part of their best value plan. We see these schemes as a vital part of the environmental destination that are able delivering benefit in multiple ways for example:	In Section 7.4 we referred to a range of nature-based and catchment activities being undertaken by WReN companies. It is important to note that whilst these solution types may not be directly included as WRMP-type options to benefit DO, noting the challenges in quantifying any benefits for such schemes in terms of DO. The Company PR24 programmes include significant consideration of these solution types; the regional and Company water resources plans only reflect certain elements of water service provision and decision-making. PR24 programmes will include significant consideration of nature-based solutions and catchment programmes around many aspects of the water environment including upland restoration for reservoir water quality, engagement with the	We will expand our existing narrative in Section 7.4 to reflect the latest plans on wider solution types, and also to explain why these are not directly in the water resources options portfolio.

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		• To make the environment more resilient to low flows and to help reduce and mitigate the risk of environmental deterioration • To benefit supply (for example through improved aquifer recharge) • To mitigate the impact of the abstraction on the environment whilst long-term solution and being developed	agricultural sector to improve river and groundwater quality, and catchment / NBS programmes in wastewater where appropriate. As such, we believe the appropriate place for nature-based solutions and catchment solutions is within the wider PR24 and WINEP programmes. This is where the cost benefit case will be made in accordance with the PR24 guidance. We are continuing to develop our Environmental Destination and are proactively working with the Environment Agency and Natural England to define an appropriate scope for our AMP8 Water Resources WINEP investigations in support of this. However, we strongly support the general principle behind exploring the role of non-flow-based solutions to maximise overall benefit. Given the potential for high DO impacts (e.g. River Derwent abstraction) of flow-based solutions driving options development, it is essential to consider if benefits may be realised in other ways and/or are also needed to unlock the desired outcomes.	
54	EA	**Our views on the proposed environmental destination** In finalising the regional plan, WReN should ensure it takes account of the principles and requirements in the following documents that have been recently issued: • Draft environmental destination options appraisal principles, issued in September 2022	We have set out how we take account of the principles and requirements of environmental destination in Appendix 6 of our draft Regional Plan (including reference to the Draft Environmental Destination options appraisal principles' and Water resources planning guidelines). We will undertake further	We will update Appendix 6 to provide further detail on how we take account of the principles and requirements for environmental destination.

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		• Environmental destination narrative, issued in January 2023 • Water resources planning guideline supplementary guidance – actions required to prevent deterioration, issued in April 2022	review to check against the principles and requirements (including with the 'Environmental destination narrative' issued in January 2023).	
55	EA	**Our view of how wider water needs and users have been considered within the regional plan.** This set of regional plans mark a shift towards incorporating the needs of wider water users in long-term water planning. We acknowledge that this is a new way of working for many, with uncertainty, challenges and barriers. As indicated in our regional plan national summary issued in May 2022 and recent letter from Regulators to regional groups, effective integration of non-public water supply needs will be essential to the future success of regional planning. WReN should continue engagement and work to gather appropriate data and information on other water users now, to enable robust forecasting to build upon the initial assessment of needs for the next round of regional plans. We have assessed the extent to which WReN has taken a multi-sector approach and considered the needs of wider water users in its draft plan. We consider that whilst WReN has developed its regional plan using engagement from wider sectors, it has not adequately considered the needs of other sectors in its regional plan and that water availability in the future may limit growth without further work to better understand and plan for wider water use in the region.	This is the first planning round for Regional Plan and is a developing process. It is acknowledged that there is further work in engaging and understanding the needs and challenges of non-PWS sectors to enable them to participate effectively in this regional planning process (such as funding and data requirements). In this first round we have aimed to take a proportional approach and have targeted the top three biggest industry abstractors (agriculture, energy, and navigation) through creation of specific sub-groups. We will continue to build on and work through our established stakeholder engagement routes such as the WReN Stakeholder Steering Group and the sector specific sub-groups to bring about a joined-up approach to regional planning including to • understand needs and solutions, • share and bring in wider knowledge and audiences • raise awareness of the challenges faced • support in overcoming barriers • take a co-ordinated approach to develop the action plan further to support us in achieving where we would like to be in the future regional planning process.	We will provide further detail in the final Regional Plan on the actions that we will undertake to incorporate non-PWS into future regional planning cycles.

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56	EA	**Our view of how wider water needs and users have been considered within the regional plan.** WReN's regional plan states that it has engaged with non-PWS sectors via its Stakeholder Steering Group and sector sub-groups and has included non-PWS and multi-abstractor benefits within the best value metrics to ensure that such options can be assessed in the future. However, this inclusion appears to have had limited impact on the best value plan. Whilst WReN has considered some non-PWS and third-party options through its bid assessment framework, the regional plan does not appear to have selected any of these options in its regional plan. We think these smaller and/or non-PWS operated schemes may play a role in the future of regional planning and strongly encourage WReN to re-evaluate these schemes as part of its final regional plan and continue to scope non-PWS and third-party additional schemes for future rounds of regional plans.	The Multi-Criteria Analysis (MCA) approach is applied to options appraisal as it allows options to be assessed against multiple objectives to produce a solution based on both monetised and non-monetised criteria. Our process allows for consideration of "trade-offs" in selecting a best value plan. During the process of determining the best value plan multiple optimised solutions (using the optimiser tool) were produced. The range of supply options that could be tested as part of the adaptive planning approach meet the large range of uncertainty that have been presented (including late-stage changes such as on environmental destination and loss of Severn Trent Transfer). For the revised draft WRMP24 (Yorkshire Water) and final Regional Plan. the supply-side strategy will be similar to that presented in the draft plans. The adaptive plan strategy still remains focused on the uncertainty and risks relating to the most likely triggers for new large-scale investment and the risk of not achieving the ambitious demand reduction. We will re-evaluate to account for the removal of the pathway for continuing the Severn Trent Water transfer and any other changes that alter the no regrets solutions. For the Yorkshire Water rdWRMP24 and final Regional Plan we are not in a	We will provide further detail in the final Regional Plan on the actions that we have and will undertake to incorporate non-PWS further into future regional planning cycles.

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			position to develop a wider range of options that could be tested as part of the adaptive planning approach, but we recognise that additional clarity on how these supply options will be developed (along with their alternatives) needs to be provided. We will continue to work with relevant stakeholders and regulators to create visibility of the non-PWS sector needs and challenges so that we can take a co-ordinated approach to further develop our action plan that supports us in achieving where we would like to be in the future regional planning process including developing joint solutions.	
57	EA	**Our view of how wider water needs and users have been considered within the regional plan.** WReN has worked with wider stakeholders, including CaRT and the power sector, to update and validate the growth factors and wider water use forecasts set out in the National Framework. However, there is limited evidence that the industrial sector has been engaged with. This is concerning, given the importance of industry in the region, potential growth and the need to decarbonise in line with net zero objectives. WReN has also considered the use of its public water supply reservoirs for flood attenuation purposes, which may provide benefit to wider resilience. We encourage WReN to progress its work with Ofwat and WRE to commission a study into developing a commercial and legal model for a multi-sector reservoir system.	We acknowledge that there is further work in engaging and understanding the needs and challenges of other sectors to enable them to participate effectively in the regional planning process. As stated previously we have taken a proportional approach in this planning round and have targeted the top three biggest industry abstractors (agriculture, energy, and navigation). We will continue to work with relevant stakeholders and regulators to create visibility of the other sector needs and challenges so that we can take a co-ordinated approach to further develop our action plan that supports us in achieving where we would like to be in the future regional planning process. We recognise that the Humber industrial cluster is a significant player	We will provide further detail in the final Regional Plan on the actions that we have and will undertake to incorporate non-PWS into future regional planning cycles.

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			in the UK's net zero ambitions and are committed to supporting activity that helps to deliver on those ambitions. We note that in respect of the Humber Cluster specifically, there is currently more certainty in the volume of water required for the South bank of the Humber (Lincolnshire / Anglian Water) where the majority of current known development is planned. We are in discussion through developer services with the Hydrogen-to-Humber (H2H) project at Saltend as well as other potential industrial users on the North bank. Their likely demands for water (volume both peak and average, quality requirements, location, and timing of need) remain uncertain at this point in time. As part of our discussions with potential industrial users, we are also exploring other options for their water supply, such as non-potable sources for use where appropriate. We believe that key to engaging further with abstractors/Environment Agency customers, we need to work closely with the Environment Agency to develop and implement a communication plan with people and businesses that will be affected by changes in water availability in coming years so that it is effective at achieving the ambitions for future regional plans. Our constituent water companies will continue to sit on a wider water industry group looking at how impounding	

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			reservoirs can be managed to include freeboard for flood storage group and will consider recommendations with WReN.	
58	EA	**Our view of how wider water needs and users have been considered within the regional plan.** The draft regional plan has set out the further work that WReN feels is needed in the coming years to better understand wider water use across the planning horizon. This includes better consideration of the impact of climate change and environmental destination impacts for wider water users. We support and agree with many of the actions identified, but we consider that these areas require further work with more urgency than the regional draft plan sets out. In its draft regional plan, WReN has identified that water demands from energy generation will increase in the medium-term and that there may not be sufficient water supplies to meet demand. With 2030 net zero targets in place for the water industry in England, low carbon energy generation and carbon capture is of particular importance for the region with net-zero cluster sites at Teesside and the Humber. This is both a missed opportunity and an unmitigated risk that WReN has not incorporated this work fully into its draft regional plan.	We are highly supportive of the need to support the energy sector and consider this a key area of focus for WReN given the potential impacts on water availability in future. WReN and our constituent companies are actively engaging with potential developments, particularly in Teesside and the Humber. The level of future water needs is highly uncertain, and regularly changing, however we are considering the latest position in our planning processes. This includes the inclusion of non-household demand forecasts where appropriate and exploring the asset/infrastructure considerations to supply water to relevant developments. We will continue to collaborate with our constituent companies to establish the overall position for net zero ambition within our region.	Expansion of text to explain ongoing work to engage with energy sector development and shorter-term implications of different additional demands.
59	EA	**Our view of how wider water needs and users have been considered within the regional plan.** Linked to recommendation two, not considering this more thoroughly in the plan may present a risk that the regional plan does not support growth and/or net zero ambition and does not demonstrate that water availability for all water users has been	Please see response to Item 39, Item 41, Item 55, Item 56, Item 57 and Item 58. We recognised the importance of an effective communication plan and will work with the Environment Agency to	Please see response to Item 39, Item 41, Item 55, Item 56, Item 57 and Item 58.

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		adequately considered and planned for by the regional group. The inability to provide adequate water supplies for this emerging need could significantly impact public water supplies and we recommend that WReN does further sensitivity testing using its adaptive planning approach to explore what growth in this area could mean for the regions water security. We acknowledge that understanding and improving the needs of wider water sectors is challenging, but we are concerned that water availability may be a challenge in the medium-term in the region, from power generation in particular, and WReN must take action now to ensure that this is better understood for the next round of regional planning. In your next regional plan, we expect you to have fully considered the resilience needs of other sectors and identified clear options to address any water supply issues, subject to the appropriate funding arrangements being confirmed. WReN should do this through targeted engagement specific to the issues in the region. This should include the consideration of licence capping on non-PWS water users and its impact on water availability across the region. **We recommend that the final regional plan should also set out a detailed roadmap for wider water user engagement, to ensure improved data and information is available to inform its next regional plan. It is critical that this information and improved understanding is taken account of before any major decision point in the regional plan adaptive pathways.** **We also expect the final regional plan to demonstrate how WReN has taken account of non-PWS regional plan consultation responses. WReN should continue to work closely with other water users and ensure they have opportunity to have an active role in the finalisation of the regional plan.**	develop this particularly for other abstractors/Environment Agency customers. Our responses to the non-PWS consultation feedback we received on the draft Regional Plan and the changes to be implemented into our final plan is detailed in this document.	
60	EA	**Our views on the public water supply-demand balance and options presented.**	WReN companies have all worked together to develop proposals based on research with Retailers and Non-Household (NHH) customers,	We will update the WReN Regional Plan to reflect the updates made at WReN water company

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		Public water supply is at the heart of the NFWR, and it set out a challenging forecasted deficit in supplies in 2050 if no action was taken. Regional groups were asked to consider and improve drought resilience, reduce the use of damaging drought permits and orders, and clearly set out how they will ensure security of supply through to 2050 and beyond. To address this deficit, regional groups were tasked with developing a suite of environmentally appropriate, best value options that meet its regional needs as well as consider how they could meet the needs of neighbouring regions. This section sets out our view on how WReN's draft regional plan has considered these aspects and ensured the security of public water supplies throughout the region and across the planning period. Baseline deficits are explained, as is the challenge of meeting the 1 in 500-year level of resilience, and there is a clear line of sight between forecasts in the regional plan and the WRMPs. The regional plan delivers governments objectives for moving to 1:500 supply resilience as presented. WReN's regional plan sets out alignment with the core government objectives of 50% leakage reduction and achieving an average household per capita consumption of 110 l/h/d but is dependent on the delivery of government water efficiency labelling initiatives to achieve this. The draft regional plan provides a brief summary of consumption reduction activities but almost no content on how the 50% leakage reduction will be achieved. As outlined in recommendation two, **we strongly encourage WReN to include further information in its final regional plan to provide more detail to demonstrate to wider stakeholders that all aspects of demand management will be delivered.** This is particularly important for WReN as it is almost wholly reliant on demand reductions to maintain public water supplies in the first half of the planning horizon. Failure to deliver supply-side schemes that have been allocated as 'early delivery' schemes further increases the risk of deficits.	identifying barriers, solutions, and deliverable options to achieve demand reductions. Leakage reduction is also a priority for us and since production of the draft plans, the WReN water companies have reviewed their leakage strategy and programmes including leakage reduction targets. Yorkshire Water are continuing to work up their detailed strategy for NHH demand reduction and remain committed to working closely with retailers and NHH customers to deliver an effective plan. They are considering granular options on NHH water efficiency which will be assessed, prioritised and the detail will be provided in the demand section of the final WRMP. Yorkshire Water will also be presenting an updated preferred leakage strategy within the revised draft WRMP. They have created 7 leakage programmes of differing leakage trajectories using a recognised best practice tool to optimise 15 intervention types within the plan to deliver leakage targets and the trajectory of leakage improvement. The scenarios will be used within the WRMP model in order to produce the preferred leakage strategy as well as setting the final leakage reduction requirement from the plan which may be between the increments of investment currently modelled, such as	level to provide further justification of the demand reduction profile and targets including detail on how we intend to deliver all aspects of demand reduction through working together with retailers, household / non-household customers and other stakeholders.

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			53% leakage reduction, as opposed to 50% or 60%. Northumbrian Water set out their strategy for reducing NHH water use in the revised dWRMP. To support this process, a SPRINT was held at Northumbrian Water's Innovation Festival in July 2023 sponsored by Wave, NWGs largest retailer, to further understand current constraints and to identify solutions. The wider learning from this sprint will be fed into the NHH demand reduction strategy. A key output was identifying and then utilising varying motivations for different stakeholders to prompt action. Northumbrian Water have also updated the preferred plan for their revised draft WRMP24 to include a programme to reduce leakage by 55% by 2050, 5% higher than the 50% reduction by 2050 in the dWRMP. The leakage reduction interventions are similar to those employed in AMP7 although will be scaled up to deliver the leakage reduction savings. Additionally, we will be using new technology including acoustic loggers to help us find and fix leaks more quickly.	
61	EA	**Our views on the public water supply-demand balance and options presented.** In its final regional plan, we also expect WReN to take account of the latest government policies, signposted in the	As part of our work to revise the draft plan the adaptive plan monitoring and the measurability of the risks is being reviewed and updated at member company level so that the monitoring	We will update the final Regional Plan to reflect updates to the adaptive monitoring plan including

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		Environmental Improvement Plan, and the Environment Act water demand target of distribution input per head of population. As presented in draft WRMP preferred plans, leakage reductions contribute ~600 Ml/d and consumption reductions account for ~1325 Ml/d of demand savings by 2050 across England. Delivering these savings is vitally important providing security of water supplies amid the challenges of population growth, climate change, environmental improvement and improved resilience to drought. Water companies are responsible for delivering household demand and leakage reductions, but regional groups are expected to work closely with water companies to monitor and plan for demand reductions across the planning period. As a region, WReN will need coordinated, active monitoring of demand performance and defined decisions points to ensure this risk is managed appropriately. We encourage WReN to liaise closely with its water company members over the next few years to ensure that the regional plan reflects delivery.	plan and the links to the triggers are made clearer and the dates for decisions are supported by an explanation for how we are managing the key risks. For example, the adaptive monitoring plan in Section 10.3 of Yorkshire Water's WRMP is being updated to include for metrics that relate to in-AMP monitoring of the leakage program progress both in year and 3-year rolling, which will be linked to the wider longer term adaptive plan. We will continue to liaise closely with water company members to monitor the plan's delivery.	in relation to demand performance.
62	EA	**Our views on the public water supply-demand balance and options presented.** As raised in section six, we have serious concerns over the apparent growth attributed to non-PWS users. Work with the energy sector has suggested significant growth, but it is hard to see how the net-zero by 2030 ambition has been adequately reflected in the regional plan for the Teesside and Humber clusters. Figures seem to suggest only 3Ml/d extra from industrial users (own sources) with 230Ml/d for energy. To achieve net zero, it is likely industry will need new water (which might not be licensable) and could look to water companies to provide that. This represents a significant risk for Yorkshire Water who do not have the same non-potable infrastructure/support as Northumbrian Water. The inability to provide adequate water supplies for this emerging need could significantly impact public water supplies and we recommend that WReN does further sensitivity testing using its adaptive	We are highly supportive of the need to support the energy sector and consider this a key area of focus for WReN given the potential impacts on water availability in future. WReN and our constituent companies are actively engaging with potential developments, particularly in Teesside and the Humber. The level of future water needs is highly uncertain, and regularly changing, however we are considering the latest position in our planning processes. This includes the inclusion of non-household demand forecasts where appropriate and exploring the asset/infrastructure	Expansion of text to explain ongoing work to engage with energy sector development and shorter-term implications of different additional demands.

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		planning approach to explore what growth in this area could mean for the regions water security. The plan may not support growth and delivery of net zero objectives without further consideration of this work area.	considerations to supply water to relevant developments. We will continue to collaborate with our constituent companies to establish the overall position for net zero ambition within our region. Please also see response to Item 39.	
63	EA	**Our views on the public water supply-demand balance and options presented.** WReN's draft regional plan resolves public water supply deficits through to 2080. However, it is difficult to conclude that this plan is best value for the region because we consider that it has not identified a sufficient range of supply-side options to demonstrate that it has appraised all options available to resolve longer term water needs in the region. In its final regional plan, WReN should set out an ambitious timetable for scoping a much larger number and range of additional options, which should include third party, inter-regional and non-PWS derived options. This appraisal must be complete before its next major decision-making milestone. In addition to this, beyond the best value metrics developed with the input of wider stakeholders, it is difficult to see which outcomes of the regional plan provide benefit to wider water users.	The Multi-Criteria Analysis (MCA) approach is applied to options appraisal as it allows options to be assessed against multiple objectives to produce a solution based on both monetised and non-monetised criteria. Our process allows for consideration of "trade-offs" in selecting a best value plan. During the process of determining the best value plan multiple optimised solutions (using the optimiser tool) were produced. The range of supply options that could be tested as part of the adaptive planning approach meet the large range of uncertainty that have been presented (including late-stage changes such as on environmental destination and loss of Severn Trent Transfer). For the revised draft WRMP24 (Yorkshire Water) and final Regional Plan, the supply-side strategy will be similar to that presented in the draft plans. The adaptive plan strategy still remains focused on the uncertainty and risks relating to the most likely triggers for new large-scale investment and the risk of not achieving the ambitious demand reduction. We will re-evaluate	We will provide further detail in the final Regional Plan on the actions that we have and will undertake to incorporate non-PWS into future regional planning cycles.

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			to account for the removal of the pathway for continuing the Severn Trent Water transfer and any other changes that alter the no regrets solutions. For the Yorkshire Water rdWRMP24 and final Regional Plan we are not in a position to develop a wider range of options that could be tested as part of the adaptive planning approach, but we recognise that additional clarity on how these supply options will be developed (along with their alternatives) needs to be provided. We will continue to work with relevant stakeholders and regulators to create visibility of the non-PWS sector needs and challenges so that we can take a co-ordinated approach to further develop our action plan that supports us in achieving where we would like to be in the future regional planning process including developing joint solutions.	
64	EA	**Our views on the public water supply-demand balance and options presented.** WReN draft regional plan has multiple links and dependencies to the draft plan presented by WRW and we recommend that WReN sets these out more clearly in the final regional plan. Any changes to the size or shape of planning problem or development of options in either regional plan will likely have a significant impact to the preferred programmes for both regions. A significant factor in the requirement of the 140 Ml/d Tees transfer is the loss of Yorkshire Water's import from Severn Trent Water in 2035. The regional plan sets out that this transfer may be able to be reinstated but that is dependent on the volume of abstraction reductions required in the WRW supply	The latest position on transfers with both WRW and WRE has been affirmed for the final plan as part of the inter-regional Reconciliation 3 exercise. We have published the *Inter-regional Reconciliation 3: Summary report* alongside our Statement of Response as reference and for further context on the position explained below. Most importantly, WRW have now confirmed that the Derwent transfer will now cease in 2035 under *all scenarios* (given a lack of alternatives for Severn	WReN will update the final plan to reflect the latest inter-regional reconciliation outcomes with WRW and WRE, and on the status of SRO schemes. We will also update the plan to explain our future commitment to work in these areas to, which takes place alongside work to further increase the supply feasible

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		area and the successful development and final option for the UDVRE SRO scheme. The draft regional plan also states that exports of raw water from Kielder reservoir to United Utilities' supply area were explored but not selected by WRW. This option should continue to be appraised and developed through the gated process and we encourage WReN to continue working with WRW as the scheme progresses. We believe this option is mutually exclusive to the Tees to Yorkshire transfer and will have hydrological links with other SRO's. These dependencies and sensitivities should be more clearly explained in the final regional plan and we expect WReN to keep its preferred strategy under frequent review, working with neighbouring regional groups to do so. The final regional plan must continue to reflect the most recent SRO gated process information and decisions as SRO schemes are progressed. The draft regional plan has concluded that WReN cannot support, and has not promoted, additional transfers outside of the region. We encourage WReN to keep this under review as it develops its next regional plan.	Trent). The reservoir enlargement aspect of the UDVRE SRO is now excluded from Severn Trent's preferred plan following consultation feedback. As such, WReN and Yorkshire Water must implement backfill options (which are expected to continue under the SRO project) to address the loss of the transfer, and the alternative pathway has now been removed from our plans. There is potential for reinstatement of the Derwent transfer in the long-term post-2050, along with opportunities for intermittent non-dry year use; these aspects will be explored further as uncertainties reduce in the next planning round. We do not consider it viable to transfer water from Kielder to both WRW/UU and Yorkshire Water (i.e. within WReN). The position with WRW / United Utilities for Kielder remains unchanged, with no transfer from WReN on the basis of scheme costs under any plan pathway or scenario. Transfers from the Kielder zone to the Yorkshire Grid within WReN remain in our plan with an updated delivery date of 2040. We will continue to explore both transfers as options (in case the position changes),and are in discussion with RAPID about the role of Kielder as a future SRO. For this planning round, given the acute supply-demand challenges in the Yorkshire Grid, and until the outcome of WINEP investigations on groundwater in	option portfolio for meeting deficits in the Grid zone.

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			the Doncaster area are known, the final plan position in this planning round excludes transfers to WRE. However, given changes to the nature and location of deficits in WRE's area driven by environmental destination, WRE's preliminary modelling has now confirmed a transfer may be beneficial (particularly in offsetting desalination). WReN have committed to explore in greater detail its own supply options portfolio to meet the Grid deficit, and alongside this we will also consider transfer options to WRE further to the next planning round. By this time, various uncertainties will have been reduced to allow a suitable reassessment of the current WReN-WRE position.	
65	EA	**Our views on the public water supply-demand balance and options presented.** As part of our ongoing work on a National System Simulation Model (NSSM), we have assessed the early themes from phase 3 of this programme against draft regional plan outcomes. This work assesses drought resilience in England and the performance of preferred supply and demand options from the WRMP24 best value plan, including SROs, in meeting future public water supply needs. Early phase 3 results indicate that some SRO solutions and/or smaller/supporting supply options may be needed earlier than proposed in current regional plans/WRMPs, and that improving connectivity within regions and/or between SROs would benefit drought resilience. As well as improving drought resilience, bringing online supply side schemes earlier and/or improving connectivity may also enable environmental benefits to be delivered sooner where needed. We aim to publish phase 3 outcomes by August 2023 and	We will continue to support the NSSM team as their work progresses for aspects relevant to WReN. Recognising that national scale modelling work is useful to provide broader insights into potential risks and opportunities (but inherently has limitations with regard to regional and/or local level factors), we will consider whether the Phase 3 outcomes highlight any differences to our current plans for future consideration. If NSSM modelling flags such differences, we will consider these factors for more detailed investigation as part of our ongoing Regional Plan development work towards the next planning round.	Addition of brief narrative and update on opportunities / risks posed by Phase 3 NSSM work once published / available.

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		encourage regional groups to work with us in the interim to continue improving this model to refine data inputs and system representation.		
66	EA	**Our views on the public water supply-demand balance and options presented.** In the final regional plan, WReN should clearly set out the steps it has taken to consider the impact of environmental policies and positions in its appraisal of all supply-side schemes within the regional plan. The plans should demonstrate that preferred supply-side schemes within the regional plan align with developing abstraction licensing policies and positions and that any remaining uncertainties are understood, planned for and mitigated. In particular, we are keen to understand how the regional group has assessed the future risks and planned mitigation for managing competing demand for future water through licensing, and in managing future risks related to emerging substances. In the final regional plan, we expect the impacts of future policy uncertainties to be clearly stated and what alternative schemes or approach is proposed to overcome those associated risks. Not considering the implications of these uncertainties adequately within the regional plan may present a risk to option feasibility as well as a risk to the environment if a planned scheme cannot be delivered. As individual schemes approach gate 3 through RAPID's gated process and/or move toward finalisation through the business plans, regional groups and water companies are expected to have mitigated risks as far as possible. Our work to understand the impacts of policies on supply-side schemes is continuously evolving and we encourage WReN to continue engaging with the Environment Agency and RAPID as work progresses.	Policy and decision-making constraints were used in production of our Regional and member company plans in response to clearly stated regulatory requirements and expectations. These are being reviewed to consider latest requirements as set out in the Government's Environmental Improvement Plan. The Regional Plan recognises future uncertainty where appropriate through the adaptive pathway approach which is focused on the uncertainty and risks relating to the most likely triggers for new large-scale investment such as the River Derwent Environmental Destination output and the risk of not achieving the ambitious demand reduction. We will continue to work closely with water company members to understand post-draft Plan positions and to reflect any necessary updates within our final Regional Plan. Noting this is the first regional planning round for most regions, the planning horizons and abstraction licence risks for other sectors are much more visible to these sectors than ever before, including regulators working on regional planning. Whilst abstraction licence policy and processes remain the responsibility of the Environment Agency, we will continue to support the	We will update the Regional Plan to reflect the current agreed position on future uncertainties and in alignment with member company rdWRMP24s.

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			other sectors in engaging with regulators on licence reductions as part of our activities. As uncertainties and an understanding of long-term needs improves, we will increasingly be able to explore potential joint schemes or opportunities as we work to the next regional planning round. We note the availability of monetary impact and consequence values to feed into future appraisal and decision-making where appropriate. We will continue to engage with regulators, water companies / regional groups, other sectors, and stakeholders to understand the evolving positions and to inform decision-making.	
67	EA	**Annex: Further information to support our recommendations - Environmental destination scenarios and adaptive planning** We expect WReN's final plan to meet the requirements of: • The Water Environment (Water Framework Directive) Regulations 2017 (WFD Regulations) require all water bodies to aim to achieve good ecological status or potential. The deadline is to achieve this by 2027 at the latest, with very limited exemptions allowing the date to be extended beyond 2027. If the statutory environmental objectives in the RBMPs cannot be met, we expect regional plans and WRMPs to justify why the solution cannot be delivered by the required deadline. Given these pressing statutory timescales we expect delivery of the solution to be planned for the earliest feasible and affordable delivery date (for example the earliest delivery date for a scheme to provide replacement water and thereby enable an abstraction reduction to go ahead). We expect water companies	We are continuing to develop our Environmental Destination and are proactively working with the Environment Agency and Natural England to define an appropriate scope for our AMP8 Water Resources WINEP investigations in support of this (including asset and catchment specific investigations plus regional options development studies for Environmental Destination). In relation to the River Derwent, we share Natural England and Environment Agency's ambition to identify a sustainable long-term objective for the Lower Derwent protected areas but we recognise this is a complex water resources, environmental and planning issue which	We will provide greater detail in the final Regional Plan (and Yorkshire Water rdWRMP24) on our proposed timescale for Environmental Destination, including how we will meet the requirements of the WFD and Habitats regulations.

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		to use the adaptive planning approach to deal with uncertainty in delivery of these objectives. • Conservation of Habitats and Species Regulations 2017 (Habitats Regulations): Wherever abstraction reductions are planned to meet the requirements of failing sites under the Habitats Directive these changes must be made as soon as practicable. We interpret this to mean that WRMP options to provide replacement water should be progressed for the earliest feasible delivery date. WREN should review the timings of their options to ensure that environmental improvements are being delivered at sufficient pace to meet the legislation listed above. Alternatively, where WReN believe that meeting the requirements set out above are not feasible or affordable they should provide justification in their plan for the chosen environmental destination delivery timescale and option timings. If this approach is chosen the logic behind the choices should clearly justify how the plan meets statutory requirements and delivers best value outcomes for customers and the environment. The draft WREN plan doesn't sufficiently address the points above.	can only be solved collaboratively and with sufficient input from relevant stakeholders. Following a review of the comments on the draft plans, we propose to bring forward the Decision point associated with the River Derwent environmental destination to 2027 and the Trigger date to 2040. Our proposed timescale for Environmental Destination, including how we will meet the requirements of the WFD and Habitats regulations, will be explained in greater detail in the final Regional Plan (and Yorkshire Water rdWRMP24).	
68	EA	**Environmental destination scenarios and adaptive planning** It's important that the longer-term elements of the environmental destination are not confused with must do actions under current legislation (outlined above). Planning to meet future impacts of climate change or possible future changes to environmental legislation are a future requirement, which may be appropriate to leave until later in the planning period based on predictions for when changes would be required. However, as explained above any current issues that need resolution under current legislation should be resolved as soon as practicable. Most of the abstraction reductions required under environmental destination scenarios are must do actions under current legislation. In this context, strategic solutions won't become stranded assets because they should quickly be used to resolve	The adaptive plan strategy still remains focused on the uncertainty and risks relating to the most likely triggers for new large-scale investment such as the River Derwent Environmental Destination output and the risk of not achieving the ambitious demand reduction. We are continuing to develop our Environmental Destination and are proactively working with the Environment Agency and Natural England to define an appropriate scope for our AMP8 Water Resources WINEP investigations in support of this	The final Regional Plan will be updated to reflect the proposed timescale for Environmental Destination.

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		an environmental deficit where the resolution would otherwise have been delayed.	(including asset and catchment specific investigations plus regional options development studies for Environmental Destination). In relation to the River Derwent, we share Natural England and Environment Agency's ambition to identify a sustainable long-term objective for the Lower Derwent protected areas but we recognise this is a complex water resources, environmental and planning issue which can only be solved collaboratively and with sufficient input from relevant stakeholders. Following a review of the comments on the draft plan, we propose to bring forward the Decision date to 2027 and the Trigger date to 2040. The supply-side strategy will be similar to that presented in the draft WRMP24 and Regional Plan. Near term surface and groundwater solutions remain key for the AMP8 strategy. These require early feasibility assessments which may result in some schemes lead times being adjusted to reflect the need to manage risk from early in the planning period. In the medium term we have committed to developing further options to allow more adaptive planning as part of our ongoing management of risk associated with the supply demand deficit. These options will be developed ahead of and for inclusion in our WRMP29 plan.	

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			The larger strategic supply solutions in the draft plan are likely to remain in the revised draft plan as they are key to replacing lost deployable output (DO). Including the 'back-fill' options to offset the loss of the STW import and to address the uncertainty represented by the Environmental Destination requirements.	
69	EA	**Environmental Flow Indicator** We note concerns raised by water companies around the level of certainty in environmental destination data. Our view is that environmental destination scenarios have similar levels of uncertainty to other data that is used in Water Resources Planning, for example population and housing growth scenarios. The Environmental flow Indicator (EFI) and local flow targets play a crucial role in our management of water resources in England. We use them to identify where abstraction (and flow regulation) may be causing (or could cause) an undesirable effect on river habitats and species and if flow may not support Good Ecological Status (GES) under the Water Framework Directive (WFD). We expect the EFI to be used as the principal planning assumption for identifying long term environmental needs in regional plans. Regional groups can also use locally agreed flow targets and locally available evidence such as catchment specific groundwater modelling to also understand likely long term environmental requirements. Where sustainability reductions relate to current problems (deterioration risk or environmental improvement need), this will be informed by outcomes from investigations already completed as part of river basin planning. We expect regional plans to include sustainability changes required to meet to current environmental issues and risks and reflect the need to deliver these as soon as possible in AMP8 and AMP9.	We acknowledge that the Environmental Flow Indicator (EFI) data and the Water Resources National Framework (WRNF) scenarios have been a useful input into the planning process alongside regional and local review. We understand that there is uncertainty, and we will continue to work with the Environment Agency and other stakeholders on how we can reduce the uncertainty such as through the investigation programme, non-PWS engagement and further options development as we move towards the next planning process. Please also see response to Item 68.	The final Regional Plan will reflect the latest agreed position on environmental data assumptions and align with those set out it in the member water companies' plans.

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70	EA	**Improving and enhancing the environment** We note concerns from water companies over the affordability of investing in the environmental destination. Below we set out two additional reasons (in addition to the legislative requirement outlined above) why we believe it is right to invest in the environmental destination now and why delaying investment won't lead to the best value solution: **Public Support** – Water company customers support delivering environmental improvements and the societal expectations are increasing for rapid resolution. The case for delaying whilst further investigations happen is only a sound argument where there is genuine uncertainty that any actions is required. If scenarios indicate that some sustainability reductions are likely to be needed in a water resource zone, then we expect to see action to resolve at least the lower bounds of the likely water need. These ambitions are also supported by the government's 25 Year Environment Plan goal of clean and plentiful water.	Noting that a large proportion of environmental destination impact falls on a single source in the River Derwent, and there are various non-flow aspects to be considered, we fully believe that our current approach to investigations is justifiable relates to genuine uncertainty as opposed to unwarranted delay. Whilst water company customers generally support delivering environmental improvements, there will still be tolerable limits to affordability especially noting that water resources driven improvements need to be weighed up against broader environmental improvements in other areas of water company service. As such, it is critical that all investment is based on sound evidence to overall environmental benefit. We are continuing to develop our Environmental Destination and are proactively working with the Environment Agency and Natural England to define an appropriate scope for our AMP8 Water Resources WINEP investigations in support of this (including asset and catchment specific investigations plus regional options development studies for Environmental Destination). In relation to the River Derwent, we share Natural England and Environment Agency's ambition to identify a sustainable long-term objective for the Lower Derwent protected areas but we	Updates to the proposed investigation and scope definition for environmental improvements, including timeline and trigger points.

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			recognise this is a complex water resources, environmental and planning issue which can only be solved collaboratively and with sufficient input from relevant stakeholders. Following a review of the comments on the draft plan, we propose to bring forward the Decision date to 2027 and the Trigger date to 2040. Our proposed timescale for Environmental Destination, including how we will meet the requirements of the WFD and Habitats regulations, will be updated in the final plan.	
71	EA	**Well planned investment** - A 2018 report by the National Infrastructure Commission (NIC) demonstrated that the cost of inaction (£40bn) would be much greater than the cost of building resilience (£21bn). Therefore, taking a proactive approach to long term environmental planning now, will be much more cost effective in the long run. Relying on potentially environmentally unsustainable sources is a significant risk to the security of supplies. Even where some uncertainty exists on the level of need, it still makes economic sense to invest in improving supply and environmental resilience because the NIC report demonstrated that the cost of inaction will be greater than the economic damage caused by water restrictions in a severe drought. A more resilient environment will also enhance public water supply drought resilience. The NIC report also concluded that action to increase resilience can be considered low regrets because increased resilience will be required in the not-too-distant future under all scenarios (the uncertainty is over when, not if). Delaying action to improve environmental resilience can therefore be considered a high-risk strategy that will: • limit the opportunity to improve the environment and means that any benefits will not be realised until later.	Our plan includes significant interventions to address drought resilience over time, along with improvements to the environment, and including significant demand management and leakage reductions. WReN must also address the significant consequential impacts of environmental improvements in other regions (WRW) resulting in the loss of the Derwent Valley transfer. Significant action is therefore being taken in our plan, and as described in the previous response, the nature of the environmental destination impacts in the Yorkshire Grid in particular warrants specific attention prior to implementation. WReN commits to delivering environmental improvements as early as possible once appropriate interventions are determined to achieve the desired	As above.

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		• diminishes the ability to spread the cost of implementation over a longer period, leading to potential significant future hikes in customer bills. • facilitate the continuation of an approach that requires short term interventions that increases the risk to the security and cost of supply.	outcomes with reasonable levels of certainty / risk.	
72	Energy UK	As a general principle we support science led decision making and would suggest that the degree of investigation is commensurate to the impact of the potential measures on the environment and existing abstractors. We support the prioritisation on those catchments with the greatest environmental risks and opportunities.	We thank Energy UK in their support of our approach in this area.	No change proposed.
73	Energy UK	Note that options are focused on meeting PWS need as well as allowing for environmental destination. The focus on PWS is understandable given the magnitude of the PWS need compared to non PWS abstraction. However for the plans to be truly multisector they would need to reflect the potential changes in non-PWS need over the planning horizon.	This is the first planning round for regional planning under the Water Resources National Framework. The maturity of the non-PWS element of Regional Plans continues to develop towards the next round of Regional Plans. A key challenge faced within the planning process has been in the lack of long-term planning and forecasting within the non-PWS sector. We understand there is a need for further work in engaging and understanding the challenges that the non-PWS sectors face to be able to participate in the regional planning process (such as funding and data requirements). We will be developing an action plan, in co-ordination with relevant stakeholders and through WReN non-PWS sector groups that will support us in enhancing and developing the non-PWS element	The final Regional Plan will provide further narrative on the steps we are undertaking together with non-PWS sector groups to support us in enhancing and developing non-PWS elements within the regional planning process.

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			within the Regional Plan. We look forward to continuing to work with the power sector in the future.	
74	Energy UK	**The west bank of the lower reaches of the tidal part of the River Trent falls within WReN.** We note that to date there has been good engagement between WReN and the energy sector and that the need for ongoing reliable access to water for use in power production has been acknowledged (Table 5.2 and Appendix 8). As is discussed within the draft plan our sector differs from PSW in that there is no central plan for power. Water companies operate on a Regulated Asset Based model and can start recovering from customers the cost of new infrastructure development as part of their regulatory settlement. Energy companies will need to finance asset development and can only begin to recover these costs once generation begins. There are also potential differences because PWS infrastructure can be planned for longer lifetimes than is typical for the power sector. We note that on page 8 the WReN draft plan specifically mentions power and hydrogen in relation to the country's net zero ambitions and water resources. We also note that one of the high-level WReN objectives is to "meet the future PWS and non-PWS needs in our region". As already mentioned, we believe an objective of regional planning should be that hydrogen projects and low carbon flexible power projects have access to the water needed in order to achieve decarbonisation of the sector by 2035 and to contribute to decarbonising the UK, while providing vital flexible backup to renewable generation and electricity system security. The sector is keen to continue to engage further and ensure that the water needed to allow a reliable, affordable energy supply and decarbonisation can be satisfied. The west bank of the lower reaches of the tidal part of the River Trent falls within WReN. It is important to note that this is a potential location for future power/hydrogen developments.	We are highly supportive of the need to support the energy sector and consider this a key area of focus for WReN given the potential impacts on water availability in future. WReN and our constituent companies are actively engaging with potential developments, e.g. in Teesside and the Humber. The level of future water needs is highly uncertain, and regularly changing, however we are considering the latest position in our planning processes. This includes the inclusion of non-household demand forecasts where appropriate and exploring the asset/ infrastructure considerations to supply water to relevant developments. We recognise that the Humber industrial cluster is a significant player in the UK's net zero ambitions and are committed to supporting activity that helps to deliver on those ambitions. We note that in respect of the Humber Cluster specifically, there is currently more certainty in the volume of water required for the South bank of the Humber (Lincolnshire / Anglian Water) where the majority of current known development is planned. We are in discussion through developer services with the Hydrogen-to-Humber (H2H) project at Saltend as well as other potential industrial users on the North	No change proposed.

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		Parts of the River Trent fall in WRW, WRE and WReN and there are several operational power stations that abstract water from the Trent. Therefore, there may need to be some consideration of the Trent as a whole in the context of operational and future power/hydrogen production, rather than consideration in isolation in reach region.	bank. Their likely demands for water (volume both peak and average, quality requirements, location, and timing of need) remain uncertain at this point in time. As part of our discussions with potential industrial users, we are also exploring other options for their water supply, such as non-potable sources for use where appropriate. We will continue to collaborate with our constituent companies, other sectors, and regional groups to establish the overall inter-region position for net zero ambition and the impact this may have through competing proposals for water, particularly associated with the Tees as a resource.	
75	Energy UK	We think the baseline data for power in Figure 4.1 of 60 Ml/d is taken from EA data for consumptive abstraction based on data from 2010-2015. Whilst many power sites are potential locations of future plant requiring water and very much want to maintain their abstraction licences, power companies will surrender abstraction licences they do not anticipate needing in the future. Within WReN the abstraction licence for Ferrybridge has been returned to the EA since 2015.	We welcome the power sectors positive engagement and contribution to the Regional Planning process and look forward to continuing to work with them in future regional planning cycles. The baseline data of 60Ml/d for the power sector in Figure 4.1 of the draft Regional Plan is based on 2010-2015 data taken from 'Understanding Future Water Demand Outside of the Water Industry', Defra (2020).	We will provide a clearer reference to 2010-2015 for the baseline data.
76	Energy UK	**We support the multi-sector approach and believe funding should be made available by central government to facilitate multi-sector inclusion and assessment. It is unrealistic for funding to come from the abstraction licensing regime.**	We thank the power sector for their support in the current Regional Planning cycle and for creating visibility of the challenges and barriers the power sector faces as detailed Table 5.2 of our	The final Regional Plan will provide further narrative on the action plan to support us in enhancing and developing non-PWS elements within the

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		We fully support the multi-sector approach to regional planning. We do ask that there is proper funding for multi-sector inclusion and assessment. Ideally this should come from central government to demonstrate that they are committed to multi-sector regional planning. Funding the work of regional water resources groups by a surcharge on existing abstraction licenses would be difficult to justify. Charges have recently risen significantly with some abstractors seeing a doubling of annual charges. It would also result in existing non PWS abstractors, who might not be the abstractors of the future, paying for regional planning which would benefit future non PWS abstractors who are not active today. We understand that water companies are limited in the way they can spend customer money and cannot cross-subsidise other sectors. We agree with WReN that it is crucial than non-PWS sectors are included in the regional planning process. We understand that water company research and assessments can only be used to fund work that benefits water company customers. However, this does close down some opportunities to collaborate or simply consider the inputs from and impacts on non-PWS sectors, such as power. Other sectors do not have easy access to some of the information required to undertake assessments themselves, such as Environmental Flow Indicators on rivers of interest.	draft Regional Plan (e.g. funding and data access and requirements). We look forward to continuing to work with the power sector and the regulators/other stakeholders to help address these challenges and barriers to further incorporate the non-PWS element within the Regional Plan.	regional planning process.
77	Energy UK	**An objective of regional planning should be that hydrogen projects and low carbon flexible power projects have access to the water needed in order to achieve decarbonisation of the sector by 2035 and to contribute to decarbonising the UK, while providing vital flexible backup to renewable generation and electricity system security.** The power sector is aiming to decarbonise by 2035 and is expected to be a significant contributor to the country achieving net-zero by 2050. Many other sectors and organisations are relying on the power sector to decarbonise to achieve their own decarbonisation objectives. The pathway to net zero is uncertain, but the deployment of carbon capture and storage	Noted. We thank the power sector for their continued support in this first Regional Plan cycle and the information provided in the JEP report which has been very useful. We are highly supportive of the need to support the energy sector to understand data associated with water use projections for the power sector under the different technological futures and potential plant locations/water sources in our region and how this can	No change proposed.

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		(CCS) technology and the development of hydrogen production and use is a significant part of achieving net-zero. These technologies need access to reliable sources of water for the duration of the asset life. The transition to net-zero, with significant CCS and hydrogen developments, is likely to increase water demand with increasing uncertainty out to 2050 and beyond. The JEP (Joint Environmental Programme, funded by seven of the leading electricity producers in the UK) has produced a report on Water Use in Biomass and Combined Cycle Gas Turbine Plant with Carbon Capture and Storage and another on Water Use for Hydrogen Production (full references below), in addition to providing regional groups with projections of water use by power and hydrogen production out to 2050.	be broken down accordingly and incorporated into the decision-making for future regional planning cycles. We consider this a key area of focus for WReN given the potential impacts on water availability in future. However, noting that as far as possible, we are factoring in the latest position into our planning processes; this includes inclusion in non-household demand forecasts where appropriate and exploring the asset / infrastructure considerations to supply water to relevant developments.	
78	Energy UK	**Energy UK acknowledges the effort that WReN has made in engaging with non-PWS sectors and thereby improving the forecasts for non-PWS water need. However, it is unclear in the draft plan whether or not data supplied by Energy UK has been incorporated into the WReN plan yet.** Demand for water for power/hydrogen production is likely to increase in the future, with increasing uncertainty. We have provided ranges of projections of water use by power and hydrogen under FES21 (the four different Future Energy Scenarios produced by National Grid). WRSE has included this information in the Draft Plan. We again acknowledge the engagement of the WReN team with our sector and the use of future water need modelling undertaken by JEP. The draft plan references a JEP report that uses the FES21 scenarios. However, the projected numbers have been taken from an earlier JEP report that uses the FES20 scenarios. Figure 4.1, Table 4.4 and page 26 quote the power sector projected water use as 296 Ml/d, which comes from the FES20 modelling, although the references point to the FES21 modelling. The FES21 equivalent, 238 Ml/d, is lower; the difference is due to evolving energy scenarios. We suggest	Noted. We will update the relevant figure / table to reflect the power sectors latest information. We thank the power sector for their support and look forward to further working with them and regulators/other stakeholders to understand how we can incorporate the non-PWS element within the Regional Plan e.g. to understand how to increase the level of certainty and granularity of data associated with potential geographical / abstraction locations of new power plants and different technological futures in order to meaningfully incorporate this within the planning process. However, noting that as far as possible, we are factoring in the latest position into our planning processes; this includes inclusion in non-household demand forecasts where appropriate	We will update the final Regional Plan to reflect the power sectors latest information and provide further detail in the action plan on how to incorporate the power sector and non-PWS sectors into future planning cycles.

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		updating the projected water use by power/hydrogen to the latest information supplied by Energy UK using the FES21 scenarios. We are NOT planning produce further updates to our projections for the final version of this plan.	and exploring the asset / infrastructure considerations to supply water to relevant developments. Northumbrian Water has incorporated the latest raw water and potable demand forecasts for industrial Teesside into its revised draft WRMP24 demand forecasts. Please also see response to Item 77 above.	
79	Energy UK	**Where and what type of future power/hydrogen plant will be developed and by whom are unknown** The development and operation of new and existing power facilities is fully competitive and therefore Energy UK has no control over where future power and hydrogen projects will be developed. However, part of the feasibility assessment for a new project includes the availability of water. Sites that have previously been used for power generation are often suitable for new power/hydrogen projects as much of the infrastructure already exists e.g. grid connections, transport connections, water abstraction and discharge infrastructure. Accordingly, water abstraction rights at existing locations associated with the existing power stations are highly likely to be required as the site is redeveloped for future generation assets.	Please see response to Item 77 and Item 78 above.	We will update the final Regional Plan to reflect the power sectors latest information and provide further detail in the action plan on how to incorporate the power sector and non-PWS sectors into future planning cycles.
80	Energy UK	**The strategic choices that we have made.** Energy UK supports the focus on leakage reduction and demand management within the draft plan as a means of balancing demand and resource availability. Regarding the question “how far should we pursue evidence of flow based improvements before adopting into our core plan?”	We thank Energy UK in their general support of our approach in these areas.	No change proposed.

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		as a general principle we support science led decision making and would suggest that the degree of investigation is commensurate to the impact of the potential measures on the environment and existing abstractors. We support the prioritisation on those catchments with the greatest environmental risks and opportunities. We have no comment on the proposal for Yorkshire Water to adopt a lower 1 in 200-year target at the outset start of the plan to avoid starting in deficit.		
81	Energy UK	**Our selection of options included in the plan, compared to potential alternatives.** The selected options appear to be pragmatic choices and we have no alternatives to suggest. Regarding the use of inter-regional transfers we note that none are planned. In general we support transfers where appropriate as long as the rights of abstractors downstream of diversions are not degraded. We are not necessarily against transfers, should they be proposed in future, but as a general principle we would want to understand the impact on existing abstractors from transfers. An example of where we envisage a potential concern to arise is when water, from say a sewage treatment plant, is diverted to a new location as this could reduce the flow available to existing abstractors downstream of the original discharge point. We note that there is a £467 million budget for the Strategic Resource Options (SRO) assessment, but none of this is to look at impacts on non-PWS abstractors, which could either be positive or negative. Neither does assessment of SROs appear to consider the possibility of provision of water for sectors other than PWS. A truly multi-sector plan would include consideration of where non-PWS will obtain the water required for other sectors to operate.	Thank you for your feedback on the current options position. The full impacts of transfer options, whether in-region or inter-regional would be assessed as part of the planning process. The potential for the impacts of downstream abstractors is included as part of the process, including as part of the environmental assessments. Where future options have multi-abstractor benefits for WReN, our best-value planning process is able to reflect this benefit as part of decision-making on future plans (i.e. this is a specific metric area in our regional plan processes linked to WReN's objectives). Whilst it is not our place to comment formally on the RAPID SRO process, we would fully anticipate that impact assessments would consider any non-PWS abstractors for a given scheme caused by changes in river flows, for example. The Environment Agency are currently reviewing the Water Resources National Framework, and we expect this to clarify	No change proposed.

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			the bounds and approach for non-PWS aspects of the Regional Plans in future. We look forward to working with Energy UK to review this upon publication, and determine the required next steps for WReN to increase the maturity of non-PWS planning aspects towards the next round of regional plans.	
82	Energy UK	**Our selection of options included in the plan, compared to potential alternatives.** The selected options appear to be pragmatic choices and we have no alternatives to suggest..... Note that options are focused on meeting PWS need as well as allowing for environmental destination. The focus on PWS is understandable given the magnitude of the PWS need compared to non PWS abstraction. However for the plans to be truly multisector they would need to reflect the potential changes in non-PWS need over the planning horizon. We therefore welcome the statement that the WReN group will "continue to explore potential multi-sectoral opportunities as we continue to engage with other sectors to understand non-public water supply needs". The draft plan quotes the Environment Agency's Best Value Plan supplementary guidelines as specifically defining a best value plan as 'one that considers factors alongside economic cost and seeks to achieve an outcome that increases the overall net benefit to customers, the wider environment and overall society'. We note that the use of water for power generation opens up decarbonisation pathways and so provides a wider societal benefit. Whilst not currently a requirement of regional planning, we believe an objective of regional planning should be that hydrogen projects and low carbon flexible power projects have access to the water needed in order to achieve decarbonisation of the sector by 2035 and to contribute to	Thank you for your feedback and we look forward to continuing working with Energy UK as we move to the next round of regional planning. This will allow us to reduce uncertainty on non-PWS aspects of the plans and increase our understanding of needs to be addressed. We are highly supportive of the need to support and/or remove any barriers to the development of hydrogen and green energy projects, and consider this is a key area of focus for WReN given the potential impacts on water availability in future. WReN and/or our constituent companies are actively engaging with potential developments in particular in Teesside and the Humber. The level of future water needs is highly uncertain, and regularly changing. However, we are factoring in the latest position into our planning processes as far as possible; this includes inclusion in non-household demand forecasts where appropriate and exploring the asset /	In our final plan we will update on the latest position to support future hydrogen and green energy developments (particularly Teesside and the Humber) and explain the potential impact on our future plans.

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		decarbonising the UK, while providing vital flexible backup to renewable generation and electricity system security.	infrastructure considerations to supply water to relevant developments. We will include detail on the latest position and how future hydrogen and green energy needs are being accommodated in our final plan (with work then ongoing to reduce uncertainty into the next planning round).	
83	Energy UK	**Our adaptive planning approach to address future uncertainties including loss of STW transfer and environmental destination.** We support the use of an adaptive plan that can help address future uncertainties in demand and supply of water.	We will continue to use adaptive pathways in our member company WRMP's and Regional Plan to address future uncertainties. Over time the adaptive plan pathways may evolve as key uncertainties change; this is now the case for the final plan as Severn Trent have now confirmed loss of the Derwent Valley transfer in 2035 for all scenarios (hence we have removed it from the pathway framework).	No change proposed.
84	Energy UK	**Our approach to delivering environmental destination and improvements.** We support the use of the enhanced business as usual (BAU+) as the basis for the plan. This is in line with the approach taken by other regional groups and appears to be a pragmatic choice, in terms of balancing environmental benefits and costs to consumers, given the stated uncertainty in the abstraction reductions necessary to deliver environmental improvements. Whilst the regional plans have environmental destination objectives, these are related to water quality and ecology, there is no mention of contributing to the country meeting net-zero. Meeting the environmental destination objectives, if it prevents power production, has the potential to detract from, and even prevent, the country achieving net-zero 2050. Energy UK therefore believes that in order to determine an appropriate	We thank you for your positive feedback on our approach to environmental destination. Noting this is the first regional planning round for most regions, the planning horizons and abstraction licence risks for other sectors are much more visible to these sectors than ever before, including regulators working on regional planning. Whilst abstraction licence policy and processes remain the responsibility of the Environment Agency, we will continue to support the other sectors in engaging with regulators on licence reductions as part of our activities. As uncertainties and an	We will update the final Regional Plan to provide further detail in the action plan on how to incorporate the power sector and non-PWS sectors into future planning cycles.

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		environmental destination objective, the regional plans must consider wider impacts associated with achieving net-zero obligations, including lack of access or reduced access to water for power/hydrogen production.	understanding of long-term needs improves, we will increasingly be able to explore potential joint schemes or opportunities as we work to the next regional planning round. We note the availability of monetary impact and consequence values to feed into future appraisal and decision-making where appropriate. We will continue to collaborate with our constituent companies, other sectors, regulators, and regional groups to establish the overall inter-region position for net zero ambition and the impact this may have through competing proposals for water, particularly associated with the Tees as a resource. Please also see response to Item 74.	
85	Energy UK	**The competitive nature of power production and competition law prevent power companies from collaborating and there can be no power sector plan.** As noted within the draft plan the power sector is a fully competitive market with companies making investment decisions independently. Competition law prevents there being any central planning of where and when plant will be developed although regulatory policy will have a strong influence on companies' decisions. There is therefore uncertainty in what, when and where new power projects will be developed. Reuse of previously used generation sites may be advantageous due to existing infrastructure such as grid connections, gas pipelines and water intakes and outfall structures. The uncertainty in the location of future power does mean that any headroom in existing licenses may not be available for new power because they are on a different water body. The need for reliable access	Noted. We are highly supportive of the need to support and/or remove any barriers to understanding the power sector water use projections and working together to develop solutions. We consider this is a key area of focus for WReN given the potential impacts on water availability in future.	No change proposed.

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		to water over a range of timescales is also important for power generation. Whilst a water company may have several sources and can plan on a long term average supply basis, a power plant typically has a single source which needs to be available at all times should that plant be required to generate.		
86	Energy UK	**Individual power companies can discuss water trading/sharing options with third parties, but this cannot be discussed at a sector level.** Whilst we understand the adaptive planning approach is designed to deal with uncertainty in population growth, the level of environmental improvement and climate change, it is also appropriate for the power sector as the competitive market arrangements for power prevent a national power sector plan. The adaptive planning approach can take account of this uncertainty and switch to an alternative plan in the future. Whilst the current freshwater use by power is a relatively small fraction of total freshwater use in the WReN region, we expect more freshwater to be required by power and/or hydrogen production in the future, as the country transitions to net-zero. Net Zero Teesside is within the region and some of Zero Carbon Humber is within WReN. Both Net Zero Teesside and Zero Carbon Humber are part of the East Coast Cluster, which has been selected as a track 1 cluster by the Government. Therefore it is likely that some of the early low carbon power and hydrogen developments, will be in the WReN region. This implies that there could be new demand for industrial water supplies in these areas, for which there may not be sufficient water supply infrastructure and resource. The relevant water companies should be informed of the Energy UK response to this consultation. In summary we support the approach taken in addressing uncertainty within the WReN adaptive plan and for the plan to take into account the uncertainty in future non-PWS sector needs.	We thank you for your support and look forward to continuing to engage with the power sector in future planning rounds. Please also see responses to Item 74.	No change proposed.

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87	Energy UK	Operational power plant require access to water now and in the future for electricity system security. As well as having access to an annual volume, this also means having access to the daily maximum volume every day.	Noted. We are highly supportive of the need to support the power sector in understanding water use projections and working together to develop solutions. We consider this is a key area of focus for WReN given the potential impacts on water availability in future.	No change proposed.
88	Energy UK	**Future plant will require reliable access to water and water rights to allow investment in new plant and to ensure electricity system security and decarbonisation in a resilient, efficient and affordable way.** Both power and hydrogen production need long-term certainty that the water needed to operate plant will be available. Without long-term certainty, the necessary investment to build the plant is unlikely to take place, without an option for adequate government compensation to cover losses from early closure of new plant. It is equally important that water abstraction licences have certainty for the duration of a plant's lifetime in order for them to continue to contribute to decarbonisation once they have been commissioned. Licence capping and reduction, if applied to power sector abstraction licences, present real threats to security of electricity supply and the ability of the country to achieve net zero 2050. Under the current abstraction licensing regime, if a variation to an abstraction licence is required for a low carbon project, failure to update the common end date (as defined by the Catchment Abstraction). An objective of regional planning should be that hydrogen projects and low carbon flexible power projects have access to the water needed in order to achieve decarbonisation of the sector by 2035 and to contribute to decarbonising the UK, while providing vital flexible backup to renewable generation and electricity system security. In this context, it is important to understand that gaining planning permission for a new power station under the current Development Consent Order (DCO) process does not guarantee that an abstraction licence with	Noting this is the first regional planning round for most regions, the planning horizons and abstraction licence risks for other sectors are much more visible to these sectors than ever before, including regulators working on regional planning. Whilst abstraction licence policy and processes remain the responsibility of the Environment Agency, we will continue to support the other sectors in engaging with regulators on licence reductions as part of our activities. As uncertainties and an understanding of long-term needs improves, we will increasingly be able to explore potential joint schemes or opportunities as we work to the next regional planning round. We note the availability of monetary impact and consequence values to feed into future appraisal and decision-making where appropriate. It is important that developers engage early with water companies with regard to their raw water (Northumbrian Water) and potable water needs as infrastructure investment may be	No change proposed.

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		requisite rights will be available for a project, whether coastal or inland if/when that project is then developed. Whilst initial hydrogen production developments are likely to be near the industrial clusters identified by the government, and therefore the coast, it is expected that there will be inland hydrogen production close to demand centres in the future. It is not realistic to expect that all future power and hydrogen will be at coastal. Moreover, there is no guarantee that abstraction licences will be granted at seawater sites. Although there is not a water resource issue at coastal sites, experience over the last 10-20 years is that it can be difficult to secure an abstraction licence at the coast due to ecological impacts. A pragmatic approach to abstraction licensing for hydrogen and low carbon power projects at non-freshwater sites should therefore be taken to facilitate the transition to net zero.	needed even where water resources is not a constraint.	
89	Energy UK	These rights need to reflect the lifetimes of power projects and that power plant need to be able to operate at any time of the day.	Noted. We are highly supportive of the need to support the power sector in understanding water use projections and working together to develop solutions. We consider this is a key area of focus for WReN given the potential impacts on water availability in future.	No change proposed.
90	Energy UK	**Licence capping and reduction, if applied to power sector abstraction licences, present real threats to security of electricity supply and the ability of the country to achieve net zero 2050.** It is essential that licence capping and licence reduction does not compromise investment in low carbon power and hydrogen production to meet the UK's net-zero commitment. It is equally important that licence capping and licence reduction does not compromise the ability of operational plant to generate. If a power station cannot generate because its water supply is unavailable, this either means an alternative, less efficient/cost effective power station must be used, or if this is not possible, there could be a security of supply situation and/or black out.	Noted. Thank you for the JEP reports which have been really useful and continued engagement. Whilst abstraction licence policy and processes remain the responsibility of the Environment Agency, we will continue to support the power sector in engaging with regulators on licence reductions as part of our activities. As uncertainties and an understanding of long-term needs improves, we will increasingly be able to explore potential joint schemes or opportunities as we	We will update the final Regional Plan to reflect the power sectors latest information and provide further detail in the action plan on how to incorporate the power sector and non-PWS sectors into future planning cycles.

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		This would affect public services and many businesses as well as domestic electricity supply. Furthermore, if a power station has a capacity market contract or an ancillary services contract, it is contractually obliged to generate when asked, and there would be financial penalties for not doing so. An overview of the different markets power stations participate in is provided in the JEP Costs of Water Abstraction Measures report (full reference below). In the UK we are already aware of the precarious balance in energy supply/demand due to many external factors with rota disconnections and supply interruptions realistic scenarios being managed by the System Operator. Uncertainty of water availability to the power sector going forward would significantly exacerbate these issues. If an operational power plant were to have an abstraction licence change imposed on it, it is extremely unlikely that another source of water could be found and deliver sufficient water to the plant, neither can the type of cooling be readily changed for an operational plant. Historically, inland water-cooled plant was specifically located next to rivers to provide a direct and flowing supply of water to the plant. The large volumes involved in cooling water abstraction, much of which is returned to the same water course, infer that it is not possible for power plant to develop their own new sources of water supply nor to construct storage options. Energy UK member companies are engaging with regional groups to explore how the two sectors, which have very different funding models, can potentially collaborate on water supply related projects. JEP Costs of Water Abstraction Measures report (full reference below). In the UK we are already aware of the precarious balance in energy supply/demand due to many external factors with rota disconnections and supply interruptions realistic scenarios being managed by the System Operator. Uncertainty of water availability to the power sector going forward would significantly exacerbate these issues. If an operational power plant were to have an abstraction licence change imposed on it, it is extremely unlikely that another source of water could be	work to the next regional planning round. We note the availability of monetary impact and consequence values to feed into future appraisal and decision-making where appropriate.	

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		found and deliver sufficient water to the plant, neither can the type of cooling be readily changed for an operational plant. Historically, inland water-cooled plant was specifically located next to rivers to provide a direct and flowing supply of water to the plant. The large volumes involved in cooling water abstraction, much of which is returned to the same water course, infer that it is not possible for power plant to develop their own new sources of water supply nor to construct storage options. Energy UK member companies are engaging with regional groups to explore how the two sectors, which have very different funding models, can potentially collaborate on water supply related projects.
		
		Three JEP reports have been released on the Energy UK website recently that have been referenced above:
		• Title: JEP20WT07 Water Use in Biomass and Combined Cycle Gas Turbine Power Plant with Carbon Capture and Storage
		  ○ Authors: George Pickens & Roger Brandwood
		  ○ Report Number: UTG/21/PMP/119/R
		• Title: JEP21WT07 A Review Of Water Use For Hydrogen Production
		  ○ Author: Océane Mbaguta
		  ○ Report Number: ENG/22/PSP/EC/2957/R
		• Title: JEP21WT08 Costs of Water Abstraction Measures at Combustion Power Plant
		  ○ Authors: Neil Edwards & Andrew Moores
		  ○ Report Number: ENV/697/2021		

91	Energy UK	**Under the current abstraction licensing regime, if a variation to an abstraction licence is required for a low carbon project, failure to update the common end date (as defined by the Catchment Abstraction Management Strategy, CAMS) of the licence being varied, presents a significant risk to the project.** There is also considerable uncertainty regarding the frequency of review once abstraction licensing transitions to the Environmental Permitting Regulations (EPR), which is expected in 2024. Typical power project	Noting this is the first regional planning round for most regions, the planning horizons and abstraction licence risks for the energy sector are much more visible to other sectors than ever before, including regulators working on regional planning. Whilst abstraction licence policy and processes remain the responsibility of the Environment	No change proposed

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		lifetimes are around 25 years and license reliability needs to reflect these lifetimes. The JEP has produced a report on the Costs of Water Abstraction Measures at flexible combustion plant (full reference below). Whilst this was requested by the EA as part of the third round of River Basin Management Plans consultation, the potential monetary impacts and consequences that would occur, should restrictions be imposed on an abstraction licence of an operational power plant, can also be used for considering trade-offs in Regional Water Resource Planning.	Agency, we will continue to support the power sector in engaging with regulators on licence reductions as part of our activities. As uncertainties and an understanding of long-term needs improves, we will increasingly be able to explore potential joint schemes or opportunities as we work to the next regional planning round. We note the availability of monetary impact and consequence values to feed into future appraisal and decision-making where appropriate.	
92	Energy UK	There is lack of clarity and uncertainty on the frequency of review once abstraction licensing moves into the Environmental Permitting Regulations; this presents a risk to investment and a threat to operational plant.	Noted. Please see response to Item 91 above.	No changes proposed.
93	Energy UK	At present there is no long term solution to ensuring that the power and hydrogen sectors have access to the water they are expected to need in the future to decarbonise and provide electricity system security.	Noted. Please see response to Item 74 above.	No changes proposed.
94	ESP	We are very pleased to see that the draft WRMP for both Northumbrian Water and Yorkshire Water includes the bulk supplies to NAVs in their plans, but I couldn't see that the role that NAVs play in this region is considered in the WReN regional plan.	We thank you for your positive comments on inclusion of the bulk supplies to NAVs in our member water companies' plans. These plans inform and feed into the Regional Plan as relevant. However, we agree that there is benefit in identifying how we can further bring NAVs into the regional planning process to inform the decision-making at a regional level e.g. influencing customers, sharing knowledge, understanding wider stakeholders.	We will update the final Regional Plan to incorporate actions to bring NAVs into the future planning cycles.

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95	ESP	We are very supportive of this regional plan and the collaboration you have undertaken with many stakeholders in the region but as the NAV market is growing rapidly and the size of the sites is increasing, we believe it would be worth working with NAVs in the region, particularly as we will also need to influence our consumers in reducing demand and control leakage to help incumbent companies meet their targets.	We thank you for your comments. Whilst there is a feed into the Regional Plan through working with member water companies', we agree that there is much benefit in engaging with you at a regional level and will work with you to understand how best we can do this moving forward.	We will update the final Regional Plan to incorporate actions to bring NAVs into the future planning cycles.
96	ESP	We are also in a unique position to work with developers, which may be of interest. Also you may like to work with the INA - Independent Networks Association, which represents all of the NAV companies.	Noted. We thank you for your comments and will work with you moving forward to understand how we can better bring you into the Regional Plan process and other relevant parties.	We will update the final Regional Plan to incorporate actions to bring NAVs into the future planning cycles.
97	Historic England	**General Comments** Why is the historic environment relevant and why should it be referenced in the Draft Regional Water Resources Plan? The Plan is of particular interest to Historic England for the following reasons: 1. The vulnerability of most heritage assets (designated and non-designated) to flooding, including occasional flooding, and the potential harm to, or loss of, significance as a result of changes to water catchment areas; 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 palaeoenvironmental remains: where ground water levels are lowered as a result of measures to reduce flood risk, this may result in the possible degradation of remains through de-watering, whilst increasing groundwater levels and the effects of re-wetting/ changes in salinity brought about by coastline modification could also be harmful;	We thank you for your comments and note your reasons for interest. We recognise that there is limited reference to the historic environment in the draft Regional Plan. The historic environment is an important aspect of the plan and has been considered throughout the environmental assessment of the Regional Plan and further detail is provided in the SEA Environmental Report. However, at this stage, the options included in the plan are largely at an early stage of development and the SEA is undertaken at the appropriate level of assessment to highlight potential environmental concerns associated with options, plans and programmes at a strategic level. As options are developed further through later design and implementation stages including	No changes proposed.

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		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 palaeoenvironmental remains; 5. The potential for unrecorded deeply buried and waterlogged archaeology within the 'natural' floodplain/estuarine/coastal deposit sequence; 6. The potential implications of flood risk on securing a sustainable use for heritage assets, including their repair and maintenance; 7. The opportunities for conserving and enhancing heritage assets as part of an integrated approach to flood risk management and river basin and catchmentbased initiatives, this includes sustaining and enhancing the local character and distinctiveness of historic townscapes and landscapes; 8. The opportunity for increasing public awareness and understanding of appropriate responses for heritage assets in dealing with the effects of flooding as well as the design of measures for managing flood risk and improving resilience; and 9. The opportunities for improving access, understanding or enjoyment of the historic environment and heritage assets as part of the design and implementation of water management measures. Historic England advises Water Resource North to consider each of the above to inform an appropriate and positive response to the conservation and enhancement of historic environment within the Regional Plan, and in the design and implementation of individual projects and proposals.	planning applications, we would undertake additional environmental impact studies and engagement with local stakeholders at a project specific level and as appropriate to the specific project. It would be at these later stages that we would consult further with the Conservation Sections and archaeological staff of the various planning authorities, as part of a much wider consultation process. However, should you wish to discuss any specific concerns prior to this we would be more than happy to oblige.	
98	Historic England	Evidence gathering Historic England recommends the collection and assessment of specific baseline information which could include identifying the potential for buried, waterlogged archaeological and palaeoenvironmental remains of significant interest and fragility that can be associated with river valleys, floodplains, estuaries, coastal and wetland areas, including	We thank you for your information which will be considered through subsequent stages of options development. Please also see response to Item 97.	No changes proposed.

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		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 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; archaeological potential of 'natural' sediment accumulations, principally peat and organic-rich alluvium, which due to their high-water content and anoxic conditions can contain organic artefacts and palaeoenvironmental evidence (waterlogged macroscopic plant remains, pollen, etc.). 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 be cause harm in order to conserve its significance. Although it may be appropriate for this evidence gathering and assessment to take place at the ore 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		

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		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 (in particular waterlogged) remains can be found in our guidance Preserving Archaeological Remains. Guidance for deposit modelling can be found in our guidance Deposit Modelling and Archaeology.		
99	Historic England	**Lack of reference to historic environment throughout Plan:** In view of the relevance of the historic environment in Plan making for water as outlined above, we are disappointed to see that there is almost no reference to the historic environment in the Draft Regional Plan. Our overall impression of the Plan is that it is very focused on the natural environment with almost no reference to the historic environment. It is essential that the Plan provides an integrated approach and specifically considers the historic environment. In the final draft of the Plan we would recommend the addition of some paragraphs relating to the historic environment. For example: **Page 11** Reference to Defra's Environment Plan but without reference to the historic environment.	We recognise that there is limited reference to the historic environment in the draft Regional Plan. The historic environment is an important aspect of the plan and has been considered throughout the environmental assessment of the Regional Plan and further detail is provided in the SEA Environmental Report.	Where appropriate, we will add the references suggested to the final plan.

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		Page 13 The summary references the natural environment but not the historic environment. **Page 15** (Section 3.2) This section provides reference to the state of the natural environment but there is no reference, or similar section, on the state of the historic environment. **Page 18** There is no reference to the work of Northumbrian Water or Yorkshire Water through AMP7 on the historic environment such as through the reference to peat restoration. We know that peatlands are very important in relation to archaeological preservation. Under the bullet point on Peat Life Programme you could add that healthy peatlands are also beneficial forarchaeology (add link to peatland guidance). **Page 36** Decision making metrics – there is no specific metric to the historic environment here, whilst we do appreciate that human and social well-being covers this topic (under SEA Objective 7.1 linked to the metric), we are concerned that it may not have been given equal status alongside the natural environment. **Page 63** There is no mention of wider environmental improvements for the historic environment here, such as the importance of a maintained water supply which helps secure the long-term sustainability of heritage assets. The Plan should also include a few paragraphs summarising why the historic environment is important in the context of water resource planning and management, what steps have been taken so far to consider the historic environment and how proposals will need to take the historic environment into account going forward.		
100	Historic England	**Comments on projects and proposals identified in the Plan:** The plan outlines several proposals for the period to 2050. There is very little information about some of the other schemes at this stage. The plan is also quite vague about the location of some of these schemes making it difficult for us to provide	At this stage, the options included in the plan are largely at an early stage of development. Site specific information may not be available in the published documents due to the sensitive nature and due to security issues.	No change proposed.

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		detailed comments on some of the proposals or to verify the assessments.	We have assessed potential impacts of these proposals on the historic environment through the SEA process. The methodology used in the assessment was proposed during the scoping stage where statutory consultees, including Historic England, were invited to provide comment. Any responses received during this process were used to inform the environmental assessment of the Regional Plan.	
101	Historic England	**Section 4.1. Sustainable abstractions and wider environmental work:** Fish passes are mentioned as part of the ongoing WINEP work in AMP7. It should be recognised that the installation of these can damage historic water management features. For further information please refer to ECUS Ltd. 2017. South Yorkshire's Historic Water Management Assets in Relation to Water Framework Directive Requirements. Swindon: Historic England, Research Report Series 71/2016.	The impact of fish passes, should they form part of a scheme would be assessed as part of a plan option i.e. through the SEA framework at early stages of option development which takes account of potential effects on the historic environment; and if progressed to detailed design, planning and implementation stages, then the usual planning route would be followed and potential impacts on the historic environment would be assessed in more detail including through an EIA (if required).	No change proposed.
102	Historic England	**Site Selection:** Any site-specific proposals require an appropriate level of historic environment evidence to inform site selection. Many of the proposals outlined in the Plan will require a degree of site selection. It is important that the historic environment is an early consideration in this process, not an afterthought simply to be mitigated after the selection of a site. To inform site selection generally, we would draw attention to Historic England's guidance 'The Historic Environment and Site	At this stage, the options included in the plan are largely at an early stage of development. Site specific information may not be available in the published documents due to the sensitive nature and due to security issues.	No change proposed.

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		Allocations in Local Plans', which has high-level site selection advice which can be of assistance in relation to site selection of all developments. This sets out a suggested approach to assessing sites and their impact on heritage assets, known as heritage impact assessment. It advocates a number of steps (see page 5 of the Site Allocations advice note), including understanding what contribution a site, in its current form, makes to the significance of the heritage assets, and identifying what impact the development might have on their significance. However, we recommend radius-based methodology for assessment is not used. This approach is not supported by Historic England, because it is important to understand the significance of any heritage assets, and their settings where they are in the landscape not specifically within a given distance from the development. This requires a more holistic process which seeks to understand the contribution that setting makes to the significance of an asset. Our advice on 'Managing Significance in Decision-Taking in the Historic Environment' may be of assistance in this regard, as may the information contained in 'The Setting of Heritage Assets'. It is important that a degree of heritage impact assessment is undertaken at Plan making stage, (i.e. now) in line with the advice in our site allocations document referenced above. Please ensure that there is sufficient heritage impact assessment and an appropriate evidence base to inform the site selections including the selection of broad locations. Historic England has also produced a range of technical advice in relation to lakes and water features which you may also find useful.	We have assessed potential impacts of these proposals on the historic environment through the SEA process. The methodology used in the assessment was proposed during the scoping stage where statutory consultees, including Historic England, were invited to provide comment. Any responses received during this process were used to inform the environmental assessment of the regional plan.	
103	Historic England	**R13 East Yorkshire borehole:** We do not have details over the siting of this proposal it is therefore difficult to make an assessment on significance of the historic environment.	At this early stage of option development, the SEA aims at highlighting potential environmental	No change proposed.

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			concerns associated with options, plans and programmes at a strategic level. As options are developed further through later design and implementation stages, additional environmental impact studies and engagement with local stakeholders would be undertaken at a project level and as appropriate to the specific project. If appropriate, it would be at these later stages that we would consult further with the Conservation Sections and archaeological staff of the various planning authorities, as part of a much wider consultation process. However, should you wish to discuss any specific concerns prior to this we would be more than happy to oblige.	
104	Historic England	**R37b(ii) River Aire Abstraction** - Without knowing the exact location of this scheme it is difficult to comment on potential impact on significance. However, the SEA for the WRMP24 for Yorkshire Water identifies that there are four Grade II listed Buildings nearby where the setting may be impacted. The asset may also be a non-designated heritage asset.	At this early stage of option development, the SEA aims at highlighting potential environmental concerns associated with options, plans and programmes at a strategic level. As options are developed further through later design and implementation stages, additional environmental impact studies and engagement with local stakeholders would be undertaken at a project level and as appropriate to the specific project. If appropriate, it would be at these later stages that we would consult further with the Conservation Sections and archaeological staff of the various planning authorities, as part of a much wider consultation process. However, should you wish to discuss any specific	No change proposed.

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			concerns prior to this we would be more than happy to oblige.	
105	Historic England	**DV3 Magnesium Limestone new GW supply South Yorkshire:** No map has been provided for this site. However, the SEA for the WRMP24 for Yorkshire Water identifies that the pipeline will be in close proximity to the Roman Ridge Scheduled Monument and that construction work has the potential to disturb unknown buried assets. Without further detail it is difficult to assess the impact of this project, the appropriate level of investigation, evaluation and mitigation required and the necessary timing of this work (i.e. in advance or during construction).	At this early stage of option development, the SEA aims at highlighting potential environmental concerns associated with options, plans and programmes at a strategic level. As options are developed further through later design and implementation stages, additional environmental impact studies and engagement with local stakeholders would be undertaken at a project level and as appropriate to the specific project. If appropriate, it would be at these later stages that we would consult further with the Conservation Sections and archaeological staff of the various planning authorities, as part of a much wider consultation process. However, should you wish to discuss any specific concerns prior to this we would be more than happy to oblige.	No change proposed.
106	Historic England	**R8b Sherwood Sandstone SRE:** We are not aware of the exact siting for this project. The SEA for the WRMP24 for Yorkshire Water identifies that there are a 'number' of Grade II Listed Buildings within 2km of the proposed construction which are anticipated to experience a reduction in the quality of their setting. We would need further detail to be able to assess the impact of this project.	At this early stage of option development, the SEA aims at highlighting potential environmental concerns associated with options, plans and programmes at a strategic level. As options are developed further through later design and implementation stages, additional environmental impact studies and engagement with local stakeholders would be undertaken at a project level and as appropriate to the specific project. If appropriate, it would be at these later stages that we would consult further with the Conservation Sections	No change proposed.

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			and archaeological staff of the various planning authorities, as part of a much wider consultation process. However, should you wish to discuss any specific concerns prior to this we would be more than happy to oblige.	
107	Historic England	**R8g Sherwood Sandstone abstraction support to North Yorkshire:** Again, we do not have detail over the exact siting of this project. However, the SEA for the WRMP24 for Yorkshire Water identifies that the pipeline route is within 1km of three Scheduled Monuments, as well as 120 listed buildings (three of which are Grade I listed) and that all of these assets are anticipated to experience reductions in the quality of their setting. We would need further details for us to assess the impact of this project.	At this early stage of option development, the SEA aims at highlighting potential environmental concerns associated with options, plans and programmes at a strategic level. As options are developed further through later design and implementation stages, additional environmental impact studies and engagement with local stakeholders would be undertaken at a project level and as appropriate to the specific project. If appropriate, it would be at these later stages that we would consult further with the Conservation Sections and archaeological staff of the various planning authorities, as part of a much wider consultation process. However, should you wish to discuss any specific concerns prior to this we would be more than happy to oblige.	No change proposed.
108	Historic England	**DV8 (v) Increase York WTW capacity to existing site footprint capacity:** We do not have detail over the extent, and design specifications of this proposal. The SEA states there are two scheduled monuments and 11 listed buildings within 1 km of the scheme construction, one of which (Grade II* listed building) is in close proximity to the land adjacent to the south of the existing WTW site. We would need confirmation of the location of the project to confirm this. We would need further details for us to assess the impact of this project.	At this early stage of option development, the SEA aims at highlighting potential environmental concerns associated with options, plans and programmes at a strategic level. As options are developed further through later design and implementation stages, additional environmental impact studies and engagement with local stakeholders would be undertaken at a project level	No change proposed.

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			and as appropriate to the specific project. If appropriate, it would be at these later stages that we would consult further with the Conservation Sections and archaeological staff of the various planning authorities, as part of a much wider consultation process. However, should you wish to discuss any specific concerns prior to this we would be more than happy to oblige.	
109	Historic England	**DV8 (iv) New York WTW to South Yorkshire treated water transfer:** 50 Ml/d capacity 0 Ml/d benefit. We do not have details at this stage over the siting of this proposal. However, the SEA states there are three registered park and gardens, 20 scheduled monuments and numerous listed buildings within 1 km of the scheme construction, of which four scheduled monuments and 10 listed buildings (Grade II) are located in close proximity (~100m) to the scheme construction. We would need further details for us to assess the impact of this project.	At this early stage of option development, the SEA aims at highlighting potential environmental concerns associated with options, plans and programmes at a strategic level. As options are developed further through later design and implementation stages, additional environmental impact studies and engagement with local stakeholders would be undertaken at a project level and as appropriate to the specific project. If appropriate, it would be at these later stages that we would consult further with the Conservation Sections and archaeological staff of the various planning authorities, as part of a much wider consultation process. However, should you wish to discuss any specific concerns prior to this we would be more than happy to oblige.	No change proposed.
110	Historic England	**DV7a(vi) Tees to WTW SR – 140 Ml/d – transfer from Northumbrian Water supported by Kielder Water:** We do not have details at this stage in relation to the siting of this project. However, the SEA for the dWRMP 24 states there are 15 scheduled monuments and numerous listed buildings within 1km of the scheme construction, of which two listed buildings	At this early stage of option development, the SEA aims at highlighting potential environmental concerns associated with options, plans and programmes at a strategic level. As options are developed further through	No change proposed.

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		are located in close proximity (~100m) to the scheme construction. We would need further details for us to assess the impact of this project. Under the SEA in the dWRMP24 the report for this proposal currently identifies potential residual effect on sensitive receptors (assuming good practice construction methods)' refers to a 'watching brief' as mitigation for (currently) unknown archaeology. This should be modified to make clear that mitigation might involve set-piece excavation through to monitoring and recording, and that a staged approach is taken to assess the presence and importance of unknown archaeology, including borehole surveys / deposit modelling, geophysical survey and trial excavation (trenching).	later design and implementation stages, additional environmental impact studies and engagement with local stakeholders would be undertaken at a project level and as appropriate to the specific project. If appropriate, it would be at these later stages that we would consult further with the Conservation Sections and archaeological staff of the various planning authorities, as part of a much wider consultation process. However, should you wish to discuss any specific concerns prior to this we would be more than happy to oblige.	
111	Historic England	**R31a Additional bankside storage at York WTW:** we do not have details over the siting of this proposal it is therefore difficult to make an assessment on significance of the historic environment.	The SEA is intended to be a high-level assessment aimed at highlighting potential environmental concerns, associated with plans and programmes at a strategic level. At a later stage, during the implementation of WRMP options, any major schemes would be subject to a more detailed Environmental Impact Assessment at a project level prior to implementation. It would be at this stage that we would consult further with the Conservation Sections and archaeological staff of the various planning authorities, as part of a much wider consultation process. However, should you wish to discuss any specific concerns prior to this we would be more than happy to oblige.	No change proposed.
112	Historic England	**R85 Rebuild Kirklees WTW – new WTW:** we do not have details on the scale, siting etc. of this proposal it is therefore difficult to make an assessment of significance. However, the SEA for the WRMP24 for Yorkshire Water identifies that the	At this early stage of option development, the SEA aims at highlighting potential environmental concerns associated with options, plans	No change proposed.

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		WTW is within 1km of two Grade II Listed Buildings which may experience some small reduction in the quality of their setting as a result of the construction.	and programmes at a strategic level. As options are developed further through later design and implementation stages, additional environmental impact studies and engagement with local stakeholders would be undertaken at a project level and as appropriate to the specific project. If appropriate, it would be at these later stages that we would consult further with the Conservation Sections and archaeological staff of the various planning authorities, as part of a much wider consultation process. However, should you wish to discuss any specific concerns prior to this we would be more than happy to oblige.	
113	Historic England	**Integrated Environmental Assessment:** Unfortunately, as set out above, many of the locations for proposals are not clear making it difficult for us to verify the assessment and consider whether the appropriate heritage assets have been taken into account as part of the assessment. Reference is made to Natural Capital Assessment. However, currently the historic environment is poorly represented within these approaches and the material role the historic environment plays in shaping the natural world is not considered. The lack of inclusion of the historic environment within ecosystem services means that opportunities for integrated historic and natural environment solutions could be missed. It could also lead to a disjointed view of the landscape that could hinder, rather than encourage the integrated management of an area that considers the past, present and future of a place. It is important to note the role of the historic environment in making up the fabric of the 'natural' environment: England's environment as it exists today is the result of human activity over millennia, which has shaped the landscapes and which forms the foundation of regional and local	Specific option assessment information, including any potential effects on the historic environment, is available in the SEA Environmental Report. Consultees, including Historic England, were invited to comment on the proposed methodology during the scoping stage, including on the environmental information and literature used to inform the baseline for assessment. Any responses received during this process were used to inform the environmental assessment of the regional plan.	No change proposed.

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		identity. We would recommend that the following Historic England documents are referred to: Fluck, H., and Holyoak, V. (2017) Ecosystem Services, Natural Capital and the Historic Environment. Historic England Research Department Report No. 19/2017 (https://historicengland.org.uk/research/results/reports/19-2017). Historic England (2020) Heritage Counts: Heritage and the Environment (https://historicengland.org.uk/research/heritage-counts/heritage-and-environment/).		
114	Historic England	Table 4.2 SEA objective interaction matrix (p.29): The following interactions should also be added to 7.1 (To conserve and enhance the historic environment, heritage assets and their settings and protect archaeologically important sites): 1.4 (To provide opportunities for habitat creation or restoration and a net benefit/gain for biodiversity) – habitat creation offers both opportunities and threats, especially regarding organic-rich sediment and palaeoenvironmental potential on wetland restoration and creation projects. 4.1 (To maintain or improve the quality of rivers, lakes, groundwater, estuarine and coastal waterbodies) – any such works have the potential to impact archaeology and heritage. 8.1 (To protect and enhance designated and undesignated landscapes, townscapes and the countryside) – Registered Parks and Gardens, Conservation Areas, etc.	We acknowledge the additional interactions with the historic environment and will revise Table 4.2 to reflect this.	Table 4.2 of the SEA Environmental Report will be updated to reflect the additional interactions highlighted by Historic England.
115	Historic England	To summarise, it is our view that the impacts on the historic environment are not currently properly reflected in the Plan and supporting documents. The Water Resources Regional Plan includes few references to the historic environment. Whilst we welcome the focus on the environment in the Plan, we consider this should be widened beyond the natural environment to also include the historic environment. The lack of site-specific information regarding individual projects and proposals has made this difficult for us to	We acknowledge Historic England's views around the lack of references to the historic environment throughout the plan documentation. We want to reassure Historic England that the historic environment is an important factor in any future decision making and the SEA has reviewed all proposals for any potential effects on heritage assets.	Further references to the historic environment will be added to the main plan documentation.

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		have clarity in relation to any heritage assets that may be affected by proposals and the impact upon them. It has therefore been difficult to offer any advice as to how potential impacts should be assessed and managed. Historic England strongly advises that the local authority conservation teams and archaeological advisors are closely involved throughout the preparation of the assessment of this Plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER- formerly Sites and Monuments Record); how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. This opinion is based on the information provided by you and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the strategy which is the subject to consultation, and which may, despite the assessment, have adverse effects on the historic environment.	The plan will be reviewed in light of these comments and revised, where appropriate, to add further references to the historic environment.	
116	HTA	The WReN Draft Regional Water Resources Plan refers to the need for greater efficiency, which the horticulture industry can achieve through use of water harvesting via rainwater or grey water recycling, however, to be able to do this, investment in equipment and technology is needed. Lack of funding or high capital costs, plus difficulty in gaining planning permission for larger reservoirs, are the greatest barriers to horticultural businesses being able to increase their water storage capacity and reduce reliance on mains water. Many also rely on boreholes for abstraction and face these licences being changed or revoked. Businesses need more forewarning of changes or revocation of abstraction licences to afford them time for advanced planning.	We understand the need for businesses to have forewarning of any changes to abstraction licences, albeit abstraction licences are the responsibility of the Environment Agency. However, we expect that the regional planning process will continue to provide a suitable forum to raise awareness of the challenges faced at a sector-level and also to be alert to potential cross-sector opportunities. The water efficiency interventions and options included in our plans have been selected as the most effective way to	No change proposed.

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			achieve the end desired outcomes; we will update on our latest plans in the final version.	
117	HTA	In order to meet the governments tree planting targets, and continue to contribute to human health and wellbeing, mitigate against climate change and improve local biodiversity, the industry needs to grow sustainably. Additionally, the Environmental Improvement Plan sets out the government aim to increase the percentage of water storage used by the agriculture and horticulture sectors by 66% by 2050.	Noted.	No change proposed.
118	HTA	Horticulture must be consistently recognised as an industry separate to “agriculture” – water use and outputs vary significantly between the two. This recognition of the horticulture industry will help to differentiate funding specific to horticulture and allow the unique needs of, and demands on, the sector to be better supported.	WReN recognises that water use and outputs vary between horticulture and agriculture. Table 4-4 of our draft Regional Plan, regarding abstraction for non-PWS sectors, presents horticulture separately. However, we acknowledge that there is further work in engaging and understanding the needs and challenges of other sectors to enable them to participate effectively in the regional planning process (including funding). As stated previously we have taken a proportional approach in this planning round and have targeted the top three biggest industry abstractors and we would welcome your input to your specific sector needs and challenges so that we can help to create visibility of your needs and take a co-ordinated approach to further develop our action plan that supports us in	We will provide further detail in the final Regional Plan on the actions that we have and will undertake to incorporate horticulture into future regional planning cycles.

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			achieving where we would like to be in the future regional planning process.	
119	HTA	Horticulture businesses must be given greater forewarning of, and be consulted on, changes to abstraction licences and support for alternative water sources to ensure business continuity.	Please see response to Item 116 above.	No change proposed.
120	HTA	There must be consistent water provisions for growing plants to ensure the sector can continue to contribute towards the governments tree planting, biodiversity and net zero ambitions. The provisions for businesses growing/selling pants for commercial purposes under a Temporary Use Ban and Non-essential use ban was critical. The industry will continue to increase its use of rainwater capture, but in the event of sustained drought periods before the necessary funding for investment is made available, it is imperative that we are able to continue to operate.	Noted. This is the first planning round for regional planning under the Water Resources National Framework. The maturity of the non-PWS element of Regional Plans continues to develop towards the next round of Regional Plans. We recognise there is a need for further work in engaging, understanding, and creating visibility of the challenges and barriers that the non-PWS sectors face (such as funding and data requirements) to enable participation in the regional planning process. We will be developing further our action plan, in co-ordination with relevant stakeholders, that will support in creating visibility of the non-PWS barriers and challenges and enhancing and developing the non-PWS element within the Regional Plan.	We will provide further detail in the Regional Plan on the actions to bring the non-PWS sectors further into the regional planning process including working with regulators and other stakeholders to create visibility and work through the barriers and challenges.
121	HTA	Water companies and the Environment Agency work together with the garden centre sector to encourage consumers to reduce water use in the garden and increase rainwater capture/water reuse at home. The combined area of the UK's domestic gardens is roughly the same as the whole of	We agree that a joined up approach to encouraging consumers to reduce water use / reuse water in the garden is very important and we would welcome the opportunity to work with you and other	We will provide further detail in the final Regional Plan on the actions that we have and will undertake to

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		Somerset, highlighting the necessity to educate domestic gardeners on their role in protecting water security.	organisations to create joined-up messaging for customers too.	incorporate horticulture into future regional planning cycles.
122	HTA	Water companies and the Environment Agency provide, or advocate for a funding pot that horticultural businesses can apply for to increase their rainwater capture, reservoir construction, run-off recapture, and grey water use to reduce the capital costs facing these businesses. This will ultimately help to achieve the joint aim of reducing demand on mains water.	Our demand reduction programme draws upon on those of the constituent water companies in WReN (Yorkshire Water's and Northumbrian Water's non-household Demand Reduction Strategies will support a 9% reduction in non-household demand by 2038), and has been defined as the most efficient way to achieve the current desired outcomes. However, we note this suggestion and consider this is something to take forward into the next planning round in the consideration of future water resources options given significant thought would be required to implement and administer a general scheme of this nature. This would also require engagement with regulators, companies, and other regions into the next planning. The 'bid assessment framework' for water companies to promote water resources options in the shorter-term may represent a better route for organisations to flag potential supply-demand options where these have a perceived benefit to public water supply-demand. This is a formal route for specific options to be fed into water companies, and a process owned by each water company.	Include stronger reference and link to water company Bid Assessment Framework for third-party options in final plan.

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123	HTA	The WReN Draft Regional Water Resources Plan provides a unique opportunity for the government, industry and water companies to collaborate on the planning and delivery of long-term water resilience. Environmental horticulture has a pivotal role to play in meeting the government's environmental targets and the importance of water security has long been recognised by the sector. In order to deliver other Environmental services and further reduce stress on local water networks, the value and specific needs of the sector need to be recognised and funding pots made available accordingly.	See response Item 122 above. In addition, we note that as the first regional planning cycle, the current plan represents an important step in the journey to ongoing and progressively increasing collaboration between sectors. Upon completion of the final plan this time, our attentions will turn to the next step in activity to build upon the progress this time, supported by the Environment Agency's updated Water Resources National Framework 2 once published.	Update on next steps for regional planning.
124	IWA	IWA supports the use of restored canals and new waterways for open water transfer. We encourage water resources planners to consider the much broader, long-term environmental, societal and economic benefits waterways can provide. These benefits include: - Increased spend in the local economy: A 2011 report for Defra found that each mile of inland waterway contributes between £175,000 and £1,175,000 a year to the local economy. - Improved health and wellbeing - they can open up multiple opportunities for outdoor activities such as walking, running, cycling, fishing, sailing, canoeing, paddleboarding and volunteering. - Protecting and improving the natural environment. They are blue-green corridors that allow opportunities for reconnecting disparate habitats, biodiversity net gain and improvements for wildlife. - Connecting communities. Access to the paths that run alongside our waterways is free. These inclusive, flat, linear routes can be used as active travel corridors to connect communities and provide passage between urban and rural areas.	We recognise the potential of canals and waterways to support water resources needs in ways which could enhance the benefits listed. Our member water companies have worked closely with Canal & River Trust (CRT) for many years managing an existing raw water abstraction where CRT are the Navigation Authority. In this first cycle of the regional planning process, we have aimed to take a proportional approach and to work with other sectors and regulators through regular Stakeholder Steering Group meetings as well as via sector specific sub-groups which have been set-up with priority sectors including with CRT. We would welcome the opportunity to engage with you and other stakeholders to work on all aspects of water resources planning in our region where there are joint interests.	No changes proposed.

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125	IWA	However, there are a number of issues which do need to be considered when combining water transfer with navigation. These also apply to schemes using existing navigations. - Flow rates. Increased flow could cause some issues in tunnels and narrows such as aqueducts and bridges. Needs to be monitored and controlled. - Airdraft/ level changes. This could impact navigation in tunnels and other structures such as bridges, leading to craft and infrastructure damage. Needs to be monitored and controlled. - Priorities during times of high demand – would priority be for water transfer or navigation, it is not clear from the plans. - Responsibilities for operation and maintenance of both new and existing structures. eg if the flow causes a bridge abutment to erode who is liable for the rebuild cost? - Bywash positioning. Will there be room to build bywashes around all the locks that will need them? They need to be positioned in such a way as to avoid making navigation unsafe due to flow rates. - Pump failure. This could have negative impact on levels unless tightly controlled with failsafes built in.	Noted. Any potential options that maybe considered would go through a number of stages of design and appraisal to understand feasibility both in terms of construction, operations and maintenance as well as other factors such as resilience and impact on the environment. The factors you have listed would be considered in this process.	No changes proposed.
126	Natural England	The **options that have been put forward in the WReN regional plan are not as wide-ranging as expected**, which limits the options available to pursue adaptive plans and pathways, particularly for Northumbrian Waters dWRMP, which would provide more flexibility to manage uncertainties.	The draft Regional Plan recognised future uncertainties through adaptive pathways and also the need to explore alternatives including the need for further options development as part of future work post WRMP24. However, for the Yorkshire Water revised draft WRMP24 submission, Yorkshire Water will not be in a position to have developed a wider range of options that could be tested as part of the adaptive planning approach.	The Regional Plan will be updated to reflect the current agreed position on adaptive plans and options development and will align with related water company WRMPs.

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			We can confirm that the current range of supply options meet the large range of uncertainty presented by late-stage changes (such as loss of Severn Trent Water transfer), but we recognise that additional clarity on how these supply options will be developed (along with their alternatives) needs to be provided. Northumbrian Water have not needed to consider any supply options in their preferred plan because demand management options required to meet the national targets maintained a supply surplus in the Berwick & Fowberry zone and restored a supply surplus in the Kielder zone across the full planning period. Raw water export options were described in Northumbrian Water's dWRMP24 and since consulting on their dWRMP24, the position on exporting raw water to neighbouring water companies (United Utilities and Yorkshire Water) has been confirmed. Yorkshire Water confirmed that the Tees to York Transfer is still in its preferred final plan and United Utilities and WRW have confirmed that the Kielder Reservoir to UU Transfer has not been included in either preferred plans or any adaptive pathways or to support security of supply / increase resilience for other water companies. However, in Northumbrian Water's revised dWRMP24 a scenario is presented that illustrates the changes to the preferred final plan that would be	

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			required to allow the Kielder reservoir to UU transfer to proceed. Northumbrian Water, Yorkshire Water and United Utilities will continue to work together on investigating the Kielder reservoir to UU transfer after submission of rdWRMPs. The adaptive plan strategy still remains focused on the uncertainty and risks relating to the most likely triggers for new large-scale investment such as the River Derwent Environmental Destination output and the risk of not achieving the ambitious demand reductions. In the medium term we have committed to developing further options to allow more adaptive planning as part of our ongoing management of risk associated with the supply demand deficit. These options will be developed ahead of and for inclusion in the Yorkshire Water WRMP29 plan and next Regional Plan.	
127	Natural England	There are some **inconsistencies in Northumbrian Waters dWRMP with Yorkshire Water's dWRMP**, and subsequently the WReN regional plan. Natural England advises that this is reviewed and clarified in the final submission. For example, Northumbrian Water refers to the timescales for the proposed Tees – York pipeline transfer as 2040, whereas Yorkshire Water propose 2049/50.	The Environment Agency has provided similar feedback and as such Natural England are also referred to Response Item 42 above. Yorkshire Water has now confirmed that the Tees transfer is needed by 2040 (following a review of the timeline for Environmental Destination in relation to abstractions from the Yorkshire River Derwent, a key driver for Yorkshire Water's need for the Tees Transfer). This date has been agreed by both member companies to be used in their	As response to Item 42.

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			respective preferred pathways for their WRMPs, and whilst an in-region transfer has this date has also been noted as part of Reconciliation 3. We will continue to work closely with Yorkshire Water and Northumbrian Water on this transfer to ensure there is consistency among plans.	
128	Natural England	Natural England has concerns that the **proposed 140Ml/d raw water export** to Yorkshire Water from the River Tees, which is included in both the WReN and Yorkshire Water Best Value Plans, has **not been fully represented in Northumbrian Waters dWRMP**. Natural England recommends that Northumbrian Water carries out its own assessment and the details of the proposal and assessments within all plans are fully aligned.	Both Northumbrian Water and Yorkshire Water have been working together to explore this option, and this work will continue given inclusion in the current plan to increase the detailed understanding of the scheme. Ongoing dialogue is occurring between relevant parties to also understand the role of Kielder as a future RAPID SRO scheme. Whilst the option is included in the Yorkshire Water's plan, Northumbrian Water has undertaken water resources modelling in their detailed company Aquator model on the Kielder Water Resource Zone to inform the available water and impacts on this system. This has informed the option definition and infrastructure requirements to facilitate a transfer. As a collaborative option, the proposed water export is detailed in Yorkshire Water's Environmental Report while the outcomes of the Environmental Assessments are summarised in Northumbrian Water's Environmental Report.	In alignment with company plans, expand narrative on the timeline and future development work for the Tees to Yorkshire option. Addition of commentary and cross-reference to Northumbrian Water's own assessments of the scheme, and representation in their updated plan.

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			We will continue to work collaboratively with Yorkshire Water and Northumbrian Water to ensure our plans are fully aligned regarding transfer options.	
129	Natural England	**The regional plan scenario BAU+ may not be sufficiently robust or ambitious to ensure non-European sites which are water dependant**, such as SSSIs, priority habitat and protected species are protected and meet targets to achieve and maintain favourable condition by 2030 as set out in the Environment Act. Water companies should review and work towards targets in place under the Government's Environmental Improvement Plan, now published under the Environment Act 2021. Natural England is of the opinion that the Environmental Destination as defined in the Regional Plan modelling does not go far enough, fast enough nor it is prioritised in the correct locations to meet the nature recovery obligations.	The adaptive plan strategy still remains focused on the uncertainty and risks relating to the most likely triggers for new large-scale investment such as the River Derwent Environmental Destination output and the risk of not achieving the ambitious demand reduction. We are continuing to develop our Environmental Destination and are proactively working with the Environment Agency and Natural England to define an appropriate scope for our AMP8 Water Resources WINEP investigations in support of this (including asset and catchment specific investigations plus regional options development studies for Environmental Destination). In relation to the River Derwent, we share Natural England and Environment Agency's ambition to identify a sustainable long-term objective for the Lower Derwent protected areas but we recognise this is a complex water resources, environmental and planning issue which can only be solved collaboratively and with sufficient input from relevant stakeholders. Following a review of the comments on the draft plan, we propose to bring forward the	The final Regional Plan will be updated to reflect the proposed timescale for Environmental Destination.

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			Decision date to 2027 and the Trigger date to 2040. Our proposed timescale for Environmental Destination, including how we will meet the requirements of the WFD and Habitats regulations, will be updated in the final plan. Please also see Item 68 and Item 70.	
130	Natural England	Natural England recommends **review of the calculations and assumptions regarding non-household demand** to demonstrate that they are robust, and therefore reduce uncertainty in demand.	Water companies have produced their forecasts following the relevant planning guidelines and supporting UKWIR methodologies. All forecasts are subject to inherent uncertainties, and these should not be seen to undermine the robustness of forecasts as such; rather our plans are designed to be suitably adaptive to change, whilst noting the inclusion of target headroom in the supply-demand balance to allow for forecasting uncertainties in the round. We will update our final Regional Plan to reflect the latest water company positions in their revised draft WRMP24s. We recognise that there are material uncertainties in the non-household forecasts, particularly around future energy sector use. However, we are actively engaged with the relevant parties to track, monitor and consider their future expected needs as far as they can be defined at this time. This inherent and unavoidable uncertainty, given dependence on many external factors and those of third parties can only be mitigated through this ongoing	Update with latest supply-demand forecasts by water companies, and update narrative on ongoing dialogue with relevant sectors to reduce non-household demand uncertainty.

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			dialogue, and we expect this to be a key theme in future annual reviews of plans.	
131	Natural England	Natural England would like to see the WReN regional plan, and subsequently the dWRMPs, take a **more precautionary approach to climate change**. It is critical that there is high confidence in the modelling and that a range of scenarios which include worst case emissions scenarios and multi-year droughts are examined to provide greater reassurance and therefore resilience of supply.	The WReN companies have completed extensive modelling of climate change scenarios and drought types. Both Kielder and Yorkshire Grid have been modelled using stochastic hydrology (incorporating drought events more severe or extreme than on the historic record), and to estimate DO under different return-periods of drought. This in effect means we are planning and working to a greater level of drought severity than in previous plan rounds. With regards to climate change, WReN has used the RCP 6.0 scenarios as the basis of the supply-demand balance; this is the same as most regions, as evidenced in the *Inter-regional Reconciliation 3 – Commonality of Approaches Summary.* All companies have undertaken stress testing of the plan using the Ofwat common scenarios to define a suitably adaptive, best-value plan; this includes the high emissions RCP 8.5 scenario. Appendix 5 details how our plan performs under higher climate futures. We therefore believe we have fully met Natural England's requirements in this area, as detailed mainly within Appendix 3 and 5, however, we will serve to draw	Inclusion of call out box to note low / high scenarios tested, and implications on preferred plan. Clearer cross-reference to further detail in Appendix 3 and 5 for interested parties.

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			out this aspect at high-level in the document more prominently.	
132	Natural England	Natural England acknowledges that the WReN regional plan assesses and integrates **natural capital assessments (NCA) and biodiversity net gain (BNG)** into the options appraisals to inform decision making within the dWRMPs and WReN regional plan. Where possible, Natural England would encourage water companies to go **beyond statutory 10% net gain obligations**.	We recognise that 10% biodiversity net gain is a minimum requirement for new supply options and as these options are developed further through the detailed design and planning phases including planning applications, we will undertake additional environmental impact studies and engage with local stakeholders, including responsible authorities for the Local Nature Recovery Strategies being developed, to consider further how biodiversity net gain can be maximised. We will include further detail on how biodiversity net gain will be considered.	We will include further detail on how biodiversity net gain will be considered.
133	Natural England	Natural England understands that Northumbrian Waters dWRMP and the WReN regional plan have discounted United Utilities proposals for a regional transfer, as United Utilities have not included this as a preferred option in their own plan. However, Natural England is of the opinion that it **would be prudent to consider the potential impact of this proposal in their overall modelling**, to establish the potential pressures on supply should this proposal be reconsidered.	As Natural England have stated, United Utilities / WRW have not selected the Kielder export from Northumbrian Water. Beyond the preferred plan, this position is also the case under *any scenario.* Despite this, whilst it does not form part of the current plans, Northumbrian Water and WReN have not discounted the option in totality, but rather continue work with United Utilities / WRW to explore this option should it be required in future. Joint collaborative modelling has also been completed to explore the impact of an export to United Utilities. However, our current position following modelling is that both exports (i.e. including Yorkshire Water) cannot be supported at the same time. All parties are in	No changes proposed.

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			discussion about the scope of a future RAPID SRO project to build on work completed to date.	
134	NFU	The NFU is a members of the (WReN) Stakeholder Steering Group and in addition to the water companies, its includes priority sectors (energy, agriculture and navigation) with the aim to understand the current and future water needs of non- public water supply (PWS) abstractors in the region; the challenges individual sectors are facing; and look forwards as to how the regional planning process can facilitate the creation of opportunities for joint solutions moving forwards. Table 5-2 includes feedback the NFU have provided to WReN on the challenges and opportunities provided by non-public water supply sectors. Whilst it has been useful to participate in the Stakeholder Steering Group for this plan, we have not been able to maximise our input due to the limitations on funding to resource the collection and collation of relevant sectoral data for the region. We therefore would welcome a second round of plans that formal fund regional groups and collection of data to support the plan.	A key challenge faced within the planning process has been in the lack of long-term planning and forecasting within the non-PWS sector. We understand there is a need for further work in engaging and understanding the challenges and barriers, that the non-PWS sectors face to be able to participate in the regional planning process (such as funding and data requirements). We believe regulators also have a role to play in this, given it is not feasible for public water supply to fund all water resources planning activities across all sectors, and we look forward to the Environment Agency's 2nd iteration of the Water Resources National Framework to help define the roles of different parties following this planning round. We will be developing an action plan, in co-ordination with relevant stakeholders, that will support us in enhancing and developing the non-PWS element within the Regional Plan. We are also reviewing the resourcing, governance and structure of WReN for the planning round.	Update Section 8 (Next steps) to reflect activities, reviews and considerations for the next planning round, beyond the final plan
135	NFU	Farming has a key role to play across several platforms within the WReN Regional Plan, namely:	Noted. We are highly supportive of the need to work with the agriculture sector to understand water use projections and	We will provide further detail in the Regional Plan on the actions to

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		• water management • food security • providing environmental benefits and ecosystem services The NFU Integrated Water Management Strategy states that farmers have much to offer in the development of an integrated water management strategy. Farming plays a key role in flood management and has a role to play in protecting and enhancing our water environment along with providing substantial environmental benefits and ecosystem services. A secure supply of water is essential for food security. The North makes a significant contribution to the nation's production of high value, high quality food and therefore makes a significant contribution to our national food security. Iconic landscapes across this area are attributes for it being seen as a big powerhouse of UK agriculture and food industry. To meet this required demand for food production, farms rely on a combination of water from abstracted sources, public water supplies and rainfall. Irrigation demand is highly variable depending on seasonal peaks and weather conditions. Agriculture is a modest user of the region's overall water resources, but our use of water for crop irrigation is relatively significant.	to develop solutions. We thank the agricultural sector for their inputs into the current regional planning process and look forward to continuing working with them as we move to the next round of regional planning. This will allow us to reduce uncertainty on non-PWS aspects of the plans and increase our understanding of needs to be addressed.	bring agriculture further into the regional planning process including working with regulators and other stakeholders to create visibility and work through the barriers and challenges.
136	NFU	The NFU asks that were set out in response to the Emerging Regional Plan, continue to remain relevant. The NFU asks that the WReN Regional Plan looks to: • provide a detailed understanding of the deficits that the agricultural sector face across the North • provide a timeline for working with the agricultural sector to understand the options and how they support the short, medium and long term risks of water shortages	We thank the agricultural sector for their inputs into the current regional planning process and look forward to continuing working with them as we move to the next round of regional planning. This will allow us to reduce uncertainty on non-PWS aspects of the plans and increase our understanding of needs to be addressed. This is the first planning round for the Regional Plan and is a developing process. It is acknowledged that there	We will provide further detail in the Regional Plan on the actions to bring agriculture further into the regional planning process including working with regulators and other stakeholders to create visibility and work through the barriers and challenges.

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		• provide assurance that regulation will work alongside the proposed options to secure water resources for a sustainable future for agriculture • work at a sub-regional / catchment level to fully understand the implications of water resources within those catchments and ensure solutions are focused and specific • ensure fair access, for agri-food abstractors, to the available water resources • fully explore the financial implications (capital and operational costs) of the options available to the agricultural sector and to explore funding opportunities • ensure rural communities who rely on boreholes or springs are protected when developing new plans or options **In order to achieve the above, a proper and secure funding mechanism must be established for the agricultural sector.**	is further work in engaging and understanding the needs and challenges of non-PWS sectors to enable them to participate effectively in this regional planning process (such as funding and data requirements). In this first round we have aimed to take a proportional approach and have targeted the top three biggest industry abstractors (agriculture, energy, and navigation) through creation of specific sub-groups. We will continue to build on and work through our established stakeholder engagement routes such as the WReN Stakeholder Steering Group and the sector specific sub-groups to bring about a joined up approach to regional planning including to • understand needs and solutions, • share and bring in wider knowledge and audiences • raise awareness of the challenges faced • support in overcoming barriers • take a co-ordinated approach to develop the action plan further to supports us in achieving where we would like to be in the future regional planning process.	
137	NFU	The NFU supports the ten WReN objectives within the Draft Regional Plan.	Thank you, we acknowledge your support on the WReN objectives.	No change proposed.
138	NFU	**Environmental Destination** Whilst there is agreement that we need to take steps to address environmental pressures, we still need get an accurate	We will continue to provide support to agriculture as part of the WReN regional planning process to understand and create visibility of needs, challenges and	We will provide further detail in the final Regional Plan on the actions to bring

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		understand of the long-term need and then to fully understand and prioritise changes required to water abstraction. Key considerations include the accuracy of a chosen environmental destination; the ability to change plans if climate predictions or designated status change; the governance around environmental destination and 'fair share' for all parties.	barriers and to engage with the Environment Agency on abstraction reductions.	agriculture further into the regional planning process including working with regulators and other stakeholders.
139	NFU	**Communication / Engagement** - It is essential that the **agriculture sector is engaged with throughout the process** of both regional planning and the discussions with regard to potential implications on abstraction licences and water availability overall. It is not acceptable to advise abstractors at the time of licence renewal that changes are to be made to the volume available. This does not encourage investment in solution options and will drive disparity. This could have significant wider effects on food security, employment and economies as previously mentioned. Abstractors need to be engaged with at the start of any programme looking to change/vary abstraction licences. The discussion is required to ensure all implications of the changes/variations are understood by all parties involved. The agriculture sector must be afforded time to understand the impact and implications of any proposed licence changes and time to put the solution in place. We have highlighted the need to work at a catchment level and the communication and engagement needs to be focused, from all, at catchment sale to ensure solutions are specific. It is important that the agriculture sector has the time to respond and react to any proposed water availability reductions.	Noting this is the first regional planning round for most regions, the planning horizons and abstraction licence risks for the energy sector are much more visible to other sectors than ever before, including regulators working on regional planning. Whilst abstraction licence policy and processes remain the responsibility of the Environment Agency, we will continue to support the agriculture sector in engaging with regulators on licence reductions as part of our activities. As uncertainties and an understanding of long-term needs improves, we will increasingly be able to explore potential joint schemes or opportunities as we work to the next regional planning round. We note the availability of monetary impact and consequence values to feed into future appraisal and decision-making where appropriate.	We will provide further detail in the final Regional Plan on the actions to bring agriculture further into the regional planning process including working with regulators and other stakeholders
140	NFU	**Planning for the future** - The regions water companies have taken the lead in WReN and funded the research and activities for PWS, therefore the work undertaken for the non-PWS sectors has been limited. This has **limited the ability of the plan to fully understand the reflect these sectors and limits the multi sector approach** that gives accurate predictions of water needs for the agriculture, food and drink sectors.	This is the first planning round for the Regional Plan and is a developing process. It is acknowledged that there is further work in engaging and understanding the needs, challenges and barriers (such as funding and data	We will provide further detail in the final Regional Plan on the actions to bring agriculture further into the regional planning process including working with regulators

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		Current planning has also missed the opportunity to fully consider wider sector issues, e.g., abstraction restrictions (HoF's, section 57's etc) and wider abstraction reform. It is acknowledged that the sector does not currently have a water resources management plan or drought plan. Work is being undertaken by the Water for Food Group to address this, starting with a protocol for individual users. This work is currently being carried out through members of the group on a voluntary basis. This work must be replicated and undertaken at a catchment level and national level. For catchment scale planning to be successful, the sector must be able to be brought into the conversations fully. Funding is needed for this work to be undertaken. We continue to question, what data is being used to underpin the agriculture sector message within the regional plans and within the regulatory process for abstraction licences? It is important that the sector understands data source and modelling undertaken and accepts the information being presented for its sector. In order to progress data collection / research and analysis funding must be made available to the agriculture sector in the WReN area, in order to undertake this work, but detail on who will fund this work is unclear. In addition, the ask for funding extends to support for infrastructure and solutions that would be required to build resilience and sustainability.	requirements) of non-PWS sectors to enable them to participate effectively. We thank the agriculture sector for their inputs into the current Regional Plan and we will continue to provide support to agriculture as part of the WReN regional planning process to understand and create visibility of their needs, challenges and barriers. The Water for Food Groups agri-demand forecasts will be an import input into the next iteration of WReN's Regional Plan.	and other to create visibility of needs, challenges and barriers.
141	NFU	**Funding** - A major barrier is the availability of funding for the sector. There are a number of initial requirements mentioned above; planning (water resource management plans and drought plans) and the development and support of abstractor groups, which will support the catchment scale working and the regional groups and the national framework. In order to gather data and evidence work is required which needs to be funded. It has taken 6 months and various sources to collate the funding for the Cranfield work in East Anglia. A proper and secure funding mechanism must be established.	Please see response to Item 140.	Please see response to Item 140

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142	NFU	**Balancing supply and demand** - The agricultural sector continuous to take steps to manage the use of water they need for growing crops, adopting technology and techniques that reduces the volumes of water needed or better timing of applications. However, there are economic and practical limitations to how quickly solutions can be implemented when reductions are demanded. Critical to balancing future demand is having a clear understanding of future water demands. Current estimates set out below need further work to refine and improve their accuracy. This can be achieved through a funded program of engagement and collation of data. Once a clear understanding of future demand is known, we are keen to see the adoption of a multi sector approach that see all sectors and PWS managing both demand and new supply options.	Noted. We are highly supportive of the need to work with the agricultural sector to remove any barriers to understanding their water use projections and to develop solutions. We consider this is a key area of focus for WReN given the potential impacts on water availability in future.	We will provide further detail in the final Regional Plan on the actions to bring agriculture further into the regional planning process including working with regulators and other stakeholders to create visibility of needs, challenges and barriers.
143	NFU	**Potential solutions** - Whilst many of the proposals are focused upon PWS, these may also impact the agricultural sector, both directly and indirectly. For example, the cost sharing of transferring water from Kielder system into the Yorkshire Water network via a transfer system that includes a multiplier. Furthermore, we would need to understand the challenges (e.g. transfer of INNS or cost to extract) and opportunities (e.g. new abstraction benefits) of such proposals. The NFU would welcome the opportunity for wider sectors to explore the potential co-benefits at an early planning stage.	We will continue to work with relevant stakeholders and regulators to create visibility of the non-PWS needs and challenges so that we can take a co-ordinated approach to further develop our action plan and look forwards as to how the regional planning process can facilitate the creation of opportunities for joint non-PWS / PWS solutions in the future. We confirm that the Tees to York Transfer has been costed to cover both	We will provide further detail in the Regional Plan on the actions that we will undertake together with non-PWS sector groups and regulators to bring agriculture further into the regional planning process including working other non-PWS

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			capital and operational expenditure associated of the Tyne Tees Transfer.	sectors and stakeholders to facilitate deration of joint opportunities.
144	Ofwat	**Drought resilience** – WReN should explore the costs and benefits of flexing the 1 in 500 year drought resilience target year further. While this has been done to an extent, it currently focuses on impacts on water needs rather than outcomes. WReN should explore the costs and benefits of flexing the 1 in 500 year drought resilience target year further using sensitivity testing.	The Yorkshire Water WRMP is being reviewed and updated in relation to drought resilience. The Regional Plan will be updated to reflect the outcomes of this when the revised draft WRMP has been completed.	The Regional Plan will be updated to align with the outcomes of the relevant revisions to the Yorkshire Water WRMP.
145	Ofwat	**Abstraction** - Planned reductions in abstraction are significantly larger than previously estimated. WReN needs to demonstrate that its plan does not introduce abortive investment should this level of abstraction reduction not happen and should plan investigations to find the best value options to adapt to future uncertainty. Our feedback on the WReN emerging plan was that the region should continue to work with environmental regulators locally to agree a way forward based on current evidence and a sufficiently long-term view of future pressures. WReN has accepted this and is proposing a period of investigation and analysis to reduce the uncertainty associated with the nature, scale and timing of changes required. Since the local evidence and understanding will not be available immediately, WReN should focus on how that uncertainty will be managed in its final plan. To support this we want WReN to: • Explain how its final plan considers the full range of potential abstraction changes without unnecessarily bringing forward investment that may not be needed. • Carefully scope its planned investigations to better understand the links between abstraction and the local environment (e.g. surface water and ground water interactions) and the type of option that may be most beneficial in that context.	The adaptive plan strategy is focused on uncertainty and reduces risk of unnecessary investment with triggers and decision-making points relating to for example, new large-scale investment such as the River Derwent Environmental Destination output and the risk of not achieving the ambitious demand reduction. We are continuing to develop our Environmental Destination and are proactively working with the Environment Agency and Natural England to define an appropriate scope for our AMP8 Water Resources WINEP investigations in support of this (including asset and catchment specific investigations plus regional options development studies for Environmental Destination). In relation to the River Derwent, we share Natural England and Environment Agency's ambition to identify a sustainable long-term objective for the Lower Derwent protected areas, but we	We will update the Regional Plan to align with revisions at water company level in relation to environmental destination. Revisions to the final plan to further set out abstraction reduction scenarios (along with the impact of other common reference scenarios), drawing on the further work being completed by companies on the rdWRMP.

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		The proposed investigations are important because solutions could include reductions in overall abstraction, changes in how abstractions operate (such as changing river flow related conditions or seasonal variations) or moving where abstractions or discharges are in the catchment or waterbody. We are keen that this sort of thinking informs regional and company plans as we want to see local water management solutions thoroughly considered before companies select replacement water from the list of feasible supply options. Local water management solutions have the potential to be lower cost and to bring greater benefits than simply replacing the water lost with another supply option that is likely to bring its own environmental impacts. While WReN has included a low environmental destination scenario focused on current legal requirements up to 2050 it is not clear whether this is in line with the approach agreed between Ofwat, the Environment Agency and the regional water resources planning groups to test the Ofwat common reference scenarios for abstraction reductions at PR24. WReN should make sure its final plan has a scenario in line with that applied in the regional reconciliation process as follows: • include agreed Water Industry National Environment Plan (WINEP) changes and licence capping; and • use the agreed BAU+ scenario to form a long-term view, but use local reviews to remove licence reductions with significant uncertainty, to form a plausible 'extreme low' scenario.	recognise this is a complex water resources, environmental and planning issue which can only be solved collaboratively and with sufficient input from relevant stakeholders. Following a review of the comments on the draft plan, we propose to bring forward the Decision date to 2027 and the Trigger date to 2040. We note similar feedback at a company level, particularly for Yorkshire Water. The draft plan considered the low abstraction reductions scenario in forming the core pathway. This pathway assumed no known legal requirements for abstraction reductions as the reductions included in the WRMP preferred plan are not confirmed. This resulted in a plausible low scenario of zero abstraction reductions. We will reassess the scenarios in view of Ofwat's above comments and our final plan will clearly set out how we have considered abstraction reduction scenarios, drawing on the further work being completed at water company level.	
146	Ofwat	**Options sufficiency** - WReN should develop a wider range of options for its final plan to reflect its changing water needs. While WReN has roughly average preferred option net present cost (NPC) of £11.57 m/Mld (national average is 10.96m/Mld), some feasible option costs are very high which can constrain the scope for choice between options when optimised. Assumptions and methods applied to the cost calculations should be clearly explained to demonstrate that options are not excluded from selection due to artificially high costs.	It is not feasible to identify and develop new supply options between dWRMP and rdWRMPs (and hence final Regional Plan), due to the work required to identify, scope, cost, and carry out environmental assessments, etc. We have agreed with the Environment Agency that we will submit to them a clear programme showing our forward	We will update the final Regional Plan to reflect the revised cost (including the regional plan data tables).

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			plan of options development through the remainder of AMP7 and into early AMP8. Yorkshire Water have reviewed the cost data used for their preferred and feasible options (including commissioning a third party to review demand reduction options and provide cost benefit information that will be used in our revised draft plan). The review did identify some errors in opex figures for some groundwater schemes but these have now been corrected and we are confident that the rdWRMP and final Regional Plan will present data that is reliable, efficient and appropriately allocated.	
147	Ofwat	**Consideration of transfers and third-party options** – there are no transfers from WReN to Water Resources East (WRE) selected and the plan lacks evidence that the potential for transfers to other regions has been fully explored. WReN needs to provide evidence in its final plan that it has explored the potential for transfers, and third-party options, thoroughly.	Earlier in the regional planning process, strategic work to explore options with neighbouring regions was completed (Phase 1 in 2019, Phase 2 in 2020/21). This process identified several potential transfer options with WRE and WRW as presented in our Draft Regional Plan report (Figure 6-1 in Section 6) and detailed further in Appendix 5. It is important to recognise that this was done at the time against a backdrop of assumed supply-demand surplus in the WReN region, and for Yorkshire Water in particular as the adjacent WReN company to WRE and for WRW relating to transfers to Severn Trent. We have also been open to third-party or non-PWS options (including via Company Market Information platforms), but no	Expansion of the final plan text to explain the position of transfers with WRE in more detail, and the changing WRE position on the benefits of an export from WReN (in line with Inter-regional Reconciliation 3). Inclusion of commitment to undertake further work with WRE to the next planning round.

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			feasible options relevant to the WReN plan have been identified. We will draw out these aspects further in the final plan. **WRW options** Several export options to Severn Trent are currently constrained out (either due to WINEP investigations and/or due to the resource availability in the WReN / Yorkshire Water area. However, it should be noted that the regional plans include cessation of the Derwent Valley transfer to WReN to meet WFD drivers in the WRW area; in essence, this constitutes a 'reverse trade' in the context that transfers are stopped to meet drivers elsewhere. This situation also impacts the availability therefore of resources and/or options to provide further export to Severn Trent. In the case of Kielder and Cow Green exports to UU, these were included in the Regional Plan as feasible options but were not selected by WRW on the basis of the costs primarily. **WRE options** A series of meetings and discussions were held between Yorkshire Water and Anglian Water Services for WRMP24 exploring the potential for bidirectional links of raw and/or treated water transfers between the two companies, with a de-minimis of 10Mld. These exploratory discussions considered the following options:	

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			- Raw water transfer from the Doncaster Wellfield - Raw water transfer from Elvington WTW, as an onward transfer based on raw water transfers from the River Tees as part of a separate option - Treated water transfer from AWS' Elsham WTW to the Yorkshire WaterS Hoober SRE - Treated water transfer from Nutwell WTW into the AWS supply area, fed by water from the Yorkshire WaterS Grid via a transfer from Frickley. The viability of schemes from North Lincs in Anglian Water's area was discounted due to resource availability in WRE's area. The Tees / Elvington options are now used to address in-region needs at this time for WReN. The Bi-directional Doncaster to Anglian Water transfer is reflected as option WReNB1 in our plan, but is currently screened out. WReN's position on the WReNB1 option (Bi-directional Doncaster to Anglian Water transfer) remains unchanged from that published in Appendix 5 of our draft Regional Plan submission (contained within Table 5.10). Whilst in theory it could be a viable option in future, at this time the specific option is screened out due to dependence upon the resources that are is subject to WINEP investigations on the contributing sources.	

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			It should be noted that the above position reflects the WReN side component of the transfer option, and matching option(s) would be needed on the WRE side to ensure an end-to-end viable scheme. WRE's previous position on the viability of the transfer also precluded further work to investigate the option in this planning round. As stated in Reconciliation 2, this was due to the location of the supply-demand deficits in the Anglian area and the economic viability of adding required new connectivity to route any WReN export to areas of deficit. It is understood that this situation may have evolved due largely to changes in the environmental destination position, and so if (following further review) WRE consider a transfer from WReN now to be viable, the option could be developed and costed further. This would require further detailed work with WRE to develop the different components of the option, which would need to occur towards the next regional planning round given time constraints for the current round of plans. The feasibility of the option would still be dependent upon the WINEP investigations in WReN's area. Preliminary modelling by WRE in Reconciliation 3 has now shown that an export from WReN would be hypothetically beneficial, and have the potential to offset desalination options. As such, we commit to further work with WRE towards the next planning round	

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			to continue to explore transfer options (supported by having a plan foundation to build upon from this planning round to address YW's fundamental supply-demand needs, and supported by the outcome of WINEP investigations). **Future exploration of transfers and third-party options** A further detailed review of plan options will be completed by WReN towards the next planning round (aligned to work at Company level for Yorkshire Water), including inter-regional transfers. This will allow us to reconsider all transfer options, whilst taking into account the latest supply-demand position in both regions.	
148	Ofwat	**Decision making and prioritisation** – WReN needs to be clearer about what is driving the differences and the relative benefits between the best value and least cost plans and what this means for customers. WReN should also explain how it will avoid abortive costs if the Severn Trent Water transfer to Yorkshire Water is maintained.	We have a BVP based on current information – it is an Adaptive plan so will be reviewed and likely to change. We note the need to draw out the differences between plan types in the Final Plan. Severn Trent Water have now confirmed that the transfer will cease in all scenarios, and we will update on this change of risk position (linked to abortive cost risks) in the final plan.	We will draw out the difference between core, least-cost and best-value plans further in the final plan.
149	Ofwat	**Links with WRMPs** – WReN needs to be explicit about how the final plan informs final WRMPs.	The main element of the final Regional Plan that informs the WRMP is around the alignment of the inter-regional transfer position defined by Reconciliation 3. This sets the bounds for the Regional Plan and the	No change proposed.

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			underpinning company plans. The final Regional Plan is most likely to be influenced by the changes and alignment with Company WRMPs, where there are detailed changes following consultation, rather than the other way round. Activity as a WReN planning group towards the final plans will help to facilitate the alignment of transfer options between companies in our region, but it is anticipated that most changes are driven at a WRMP level to close this planning round.	
150	Ofwat	**Ambition** – despite setting a high level of ambition on demand (110 litres per person per day (l/p/d) personal consumption and 50% leakage reduction), WReN has not optimised different approaches to achieving these targets and needs to explore this, and the scope for non-household water efficiency, for the final plan.	Further work has been completed at Company level to review, refine and optimise demand management and leakage programmes. Our final plan will summarise the latest position following this work, and briefly update on the extra work undertaken. At the time of the draft Regional Plan the non-household delivery strategies were still being developed towards the final WRMP24s and in conjunction with PR24 submissions. The final Regional Plan will provide further details at summary level in alignment with the Company level strategies produced.	Add update to the final plan to reflect further optimisation and approach to demand management (including non-household water efficiency strategies) and leakage. Justification and explanation of delivery profiles, with full detail held in Company WRMPs.
151	Ofwat	**Assessment of water needs** An appropriate assessment of need is the foundation of a successful plan. We have identified a range of areas that require further focus in relation to this, which are set out below. WReN is facing a planning challenge of low risk with medium strategic needs and complexity factors driven primarily by environmental need, climate change, demand growth and changes to existing	The Grid SWZ for Yorkshire Water in the WRMP24 is in deficit from the start of planning period and therefore the preferred plan is a 1:200 scenario until 2040. To meet the near term 1:200 deficit Yorkshire Water plan to implement supply and demand options	Update justification for the timing of meeting the 1 in 500-year drought resilience target.

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		water imports. Our comments take this assessment into account. WReN has undertaken its deployable output assessment in line with government expectations to be resilient to a 1 in 500 year drought event. Northumbrian Water states that it can maintain a surplus in both its water resource zones across the planning period under this resilience standard once demand management and leakage reductions have been included. Meanwhile, Yorkshire Water has made a choice to implement the 1 in 200 year drought resilience standard at the beginning of the planning period and then switch to a 1 in 500 year drought resilience standard in 2039/2040. WReN should explore the costs and benefits of flexing the 1 in 500 year drought resilience target year further using sensitivity testing.	and meet the demand reduction policy requirements. To reduce the 1:500 deficit by the 2030s in the draft plan meant near-term investment followed by medium-term demand reduction. The changes to deficits to meet the long-term environmental destination sooner for the revised draft updates could alter this position. We will further test scenarios to understand the sensitivity to the target date of achieving the 1 in 1:500-year resilience level in the Yorkshire Grid and justify our final decision in the final Regional Plan.	
152	Ofwat	**Exploring transfers:** WReN has referenced our emerging plan feedback on transfers and described the work undertaken across regional groups to develop this area. However, there are still no export options from WReN selected by other regions. WReN point to cost and environmental implications as the reason for this. Eight inter-regional transfers have been explored and out of these, only one is to WRE. WReN state that the reason for not exploring more transfers to WRE is because WRE zones in surplus are geographically much closer to the WRE zones in deficit than the WReN zones, and therefore are not justified or included within any plans. However, we note that WRE is very low on options to meet longer term water needs, currently relying on desalination, and therefore question whether the potential to use transfers that could cascade through the network has been sufficiently explored. WReN should work with WRE to provide further analysis of this in its final plan.	We have partly covered the position with WRE in Item 54. For Reconciliation 3 additional meetings and dialogue between both regions has occurred, also noting the consultation feedback. WRE's position has now changed since the draft plan in terms of the hypothetical benefit of an export to their area, given increased deficits in the north of the Anglian operating area (driven by environmental considerations) and the availability of in-region interconnectivity that was considered previously to be fully utilised (and cost prohibitive to enhance). Ultimately at this time, whilst in theory transfers may be possible, uncertainties around WINEP investigations and also the high scale of the in-region needs for WReN now require further wider WReN / Yorkshire Water options to also be	No change proposed

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			explored to support the next planning round. This may bring opportunity for limited exports to WRE, but at this time we do not consider these can be viable parts of the plan. Significant work would be needed to further develop the identified options, in concert with WRE, which is not practical in the current planning round. We do not consider that a transfer to WRE is viable at this time as part of the core plan. It is also important to note that whilst WReN have included an option (currently constrained out) to WRE in their plan, equivalent components of the transfer would also need to be designed and costed on the WRE side to allow a full appraisal of the relative cost-benefit even if water from WReN was available.	
153	Ofwat	**Data consistency:** We have aimed to reconcile the data published in regional plans with the data provided by companies in support of their WRMPs. In doing this we have identified some differences which we have not been able to reconcile. Companies and regional groups should ensure there is consistency in information (such as distribution input (DI) and final plan leakage) in the final plans, and if differences do occur, these should be identified and explained.	The WReN regional planning tables are directly developed from the underpinning company WRMP24 submissions, minimising the risks of misalignment. However, final Regional Plan datasets will be subject to full QA to identify and avoid any misalignments.	No change proposed.
154	Ofwat	WReN has updated its **demand forecasts** since the emerging plan consultation to align with the best available forecasts from each company WRMP. While this is a welcome improvement, WReN needs to be clear in its final plan where the supply demand balance presented has been altered by changing assumptions, so it is comparable across the iterations of the plan.	We thank Ofwat for this suggestion. In response we will add a summary of plan changes from the draft Regional Plan to our final Regional Plan summary document, with further information on the key assumption changes within our *Appendix 2 – Data input assumptions and commentary supporting* report.	Add section summarising key plan changes from draft Regional Plan, with further detail on assumption changes Appendix 2.

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155	Ofwat	WReN should make sure the final plan and all appendices are submitted in a timely manner to help make sure the plan is transparent and all stakeholders can fully understand what is proposed.	Noted.	No change proposed.
156	Ofwat	**Options sufficiency:** Identifying the right range of options to address needs within region and more broadly is a critical part of the regional planning process. We set out below a range of areas that require further focus in this area. Firstly, we note that appendix 5 "option identification and appraisal" was submitted significantly later than the rest of the report. WReN should make sure the final plan and all appendices are submitted in a timely manner to help make sure the plan is transparent and all stakeholders can fully understand what is proposed. As part of our feedback on the emerging plan we highlighted that WReN should develop a broader range of options. Not enough progress has been made in this area. WReN is now facing potentially greater water needs than it has done in the past which makes it even more important to have a sufficiently broad range of options available to meet those needs and develop optimal programmes. These needs are driven by the proposed cessation of a transfer from Severn Trent Water and potential abstraction changes. WReN notes in its plan that it will continue to develop options in future iterations of its plan. WReN should accelerate this work particularly focusing on options to meet needs in the Yorkshire Grid resulting from the proposed cessation of the Severn Trent Water transfer in 2035. WReN should also develop further options to better understand the potential for exports from the region. WReN should also set out how the opportunities for the expansion of existing reservoirs, which our analysis confirms is typically significantly lower cost than developing new resources, have been explored.	WRW confirmed that the Severn Trent Water to Yorkshire Water transfer will cease in 2035 under all scenarios (given a lack of alternatives for Severn Trent) post submission of draft Yorkshire Water and Regional Plans. The draft Plans recognised the uncertainty (through adaptive pathways) and the need to explore alternatives and included further options development as part of future work post WRMP24. However, for the Yorkshire Water rdWRMP24 submission (and hence the final Regional Plan) will not be in a position to have developed a wider range of options that could be tested as part of the adaptive planning approach. We can confirm that the current range of supply options meet the large range of uncertainty presented by the late-stage changes, but we recognise that additional clarity on how these supply options will be developed (along with their alternatives) needs to be provided. The adaptive plan strategy still remains focused on the uncertainty and risks relating to the most likely triggers for new large-scale investment such as the River Derwent Environmental Destination output and the risk of not	WReN will update the final plan to reflect the latest inter-regional reconciliation outcomes with WRW and WRE, and on the status of SRO schemes. We will also update the plan to explain our future commitment to work in these areas to, which takes place alongside work to further increase the supply feasible option portfolio for meeting deficits in the Grid zone.

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			achieving the ambitious demand reduction. There is no longer a feasible pathway for the Severn Trent Water transfer to continue and this will be removed from the revised draft WRMP24 (Yorkshire Water) and final Regional Plan. We will continue to explore the phasing of schemes against all scenarios. We will re-evaluate to account for the removal of the pathway for continuing the Severn Trent Water transfer and any other changes that alter the no regrets solutions. We shall also update our monitoring plan to align with the adaptive pathway updates so that we have monitoring programme with timely decision points and triggers. The supply-side strategy will be similar to that presented in the draft WRMP24 and Regional Plan. Near term surface and groundwater solutions remain key for the AMP8 strategy. These require early feasibility assessments which may result in some schemes lead times being adjusted to reflect the need to manage risk from early in the planning period. In the medium term we have committed to developing further options to allow more adaptive planning as part of our ongoing management of risk associated with the supply demand deficit. These options will be developed ahead of and for inclusion in our WRMP29 plan. The larger strategic supply solutions in the draft plan are likely to remain in the	

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			revised draft plan as they are key to replacing lost deployable output (DO). Including the 'back-fill' options to offset the loss of the STW import and to address the uncertainty represented by the Environmental Destination requirements.	
157	Ofwat	**Third party options:** WReN has continued its engagement across sectors. However, this does not seem to have yielded third party options. WReN should seek these options out particularly with the power and navigation sectors as they may offer more attractive options than the companies are able to develop independently.	We acknowledge the concern over the lack of solutions for non-PWS in this iteration of the Regional Plan. As discussed in the draft Regional Plan, there are data limitations relating to non-PWS which makes it difficult to assess the future supply-demand balance and hence to understand their needs alongside PWS and facilitate creation of joint opportunities. As this is the first round of planning under the water resources regional planning process, we anticipate that this area will evolve through later planning cycles. We will continue to work with relevant stakeholders and regulators to create visibility of the non-PWS needs and challenges so that we can take a co-ordinated approach to further develop our action plan and look forwards how the regional planning process can facilitate the creation of opportunities for joint non-PWS / PWS solutions in the future.	We will provide further detail on the actions that we will undertake to incorporate non-PWS into future regional planning cycles.
158	Ofwat	**Cost data:** WReN has presented the costs of options appropriately within its planning tables. There are, however, no details in the plan to clearly identify the assumptions and methods applied to the cost calculations. WReN should provide	We will provide a clear narrative in the final plan on the assumptions and methods applied to the cost calculations. We expect to add this	Addition of further detail on assumptions and methods for cost calculations for options in

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		a clear narrative on this in its final plan, accompanied by worked examples for preferred demand and supply side options showing the profile of annual costs. Furthermore, we have identified some inconsistencies between the regional planning Table 4 and Northumbrian Water's draft WRMP Table 4 and we would like WReN to ensure these are consistent in its final plan.	detail to Appendix 5 (Option Identification and Appraisal). The inconsistencies you have identified in Table 4 will be addressed in Northumbrian Water's rdWRMP, and the WReN tables fully refreshed in alignment.	Appendix 5, with examples.
159	Ofwat	**Decision making and prioritisation** Plans must compare options appropriately to arrive at the right outcomes. We welcome many aspects of the approach WReN has taken to decision making and prioritisation. These include that: • The approach described to identifying and using best value metrics is in line with guidance and includes a wide range of customer-informed metrics based on regulatory and policy drivers, customer preferences and stakeholder engagement. • Total carbon emissions in the reconciliation baseline and the final best value plan were compared, along with a clear discussion of the trade-offs between whole life carbon emissions and other considerations, to agree the final best value plan. • The decision-making approach and decision support tools used are appropriate to the scale of the problem faced in the region. The region selected a Multi-Criteria Analysis (MCA) based on a set of metrics corresponding to pre-defined objectives, to select options and produce plans. With respect to the selected preferred plan, WReN has created five alternative pathways with reference to the Ofwat common reference scenarios, where appropriate, in the context of material supply-demand risk. • WReN has used adaptive planning to identify and manage risk and uncertainty. WReN accounts for risk and uncertainty through headroom calculation and five alternative pathways.	We are pleased that Ofwat has recognised the benefits of our decision-making framework to the challenges faced by WReN. As we continue through this planning round and into the next, we will continue to review the key uncertainties and position against the pathway areas as part of monitoring and reviewing plans on an ongoing basis.	No change proposed

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		Alternative pathways are well explained and clearly presented in Figure 7.2 of the main report. • WReN has presented a single strategic plan, centered around the Yorkshire Grid zone where key supply demand balance challenges arise, along with the preferred adaptive solution. The options selected under each pathway are clearly presented.		
160	Ofwat	**Least cost and best value comparison:** The least cost plan is provided as a benchmark for the best value plan and comparison of the two is presented using normalised metrics in the main report and actual values in appendix 5. WReN should discuss in more detail the difference in activities between the two plans and cost comparison, setting out what the benefits are, how much it is going to cost and how it is going to be delivered. Cost comparison with WRMP19 should be provided in the final plan where relevant.	We will expand this comparison in the final Regional Plan, most likely as a specific call-out box in the main report, supporting by an additional section of the relevant Technical Report. This narrative will account for the regional position, but in particular will be closely linked to the Yorkshire Water rdWRMP24 narrative, upon which most of the plan choices and supply-demand driven investment needs are based. It is important to recognise that the best-value position will be reviewed over time, including following further review of feasible options towards the next planning round by Yorkshire Water and WReN (to reflect the step up in supply-demand needs since the start of the current planning round).	Expand this comparison in the final Regional Plan
161	Ofwat	**Artificial constraints:** WReN should demonstrate in its final plan that decision making has not been influenced by artificial constraints. This includes presenting the implications of sensitivity testing of different profiles of 1 in 500 year drought resilience, flexing the use of drought permits and orders, testing different glide paths on water efficiency and leakage as well as use of temporary use bans and non-essential use bans.	We will expand the narrative in this area and also in terms of scenario sensitivity following further work completed at a water company level as part of WRMP24 updates.	Further detail of scenario and sensitivity testing to be added to main report and Appendix 5.
162	Ofwat	**Sensitivity testing:** In our emerging plan feedback, we requested that WReN robustly evidence why a date for a	This aspect has also been raised by some other stakeholders, and we will	As above.

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		pathway to diverge should be selected and the likely sensitivity to the investment programme of changing this date. The draft plan is not clear on this, and WReN should evidence this clearly in its final plan. The approach WReN has presented to sensitivity testing is broadly appropriate to the uncertainties it faces. Beyond the Ofwat common reference scenarios, WReN developed additional scenarios and clearly explained the results and consequences of testing on the plan. However, it is not clear how or whether the low climate change or growth scenarios have been used to inform identification and justification of low regret investment. The final plan needs to set out how the common reference scenarios affect the supply demand balance given the solutions in the preferred pathway, and clearly demonstrate that the core pathway supply options are optimal under a wide range of likely futures, including the common reference scenarios.	now include more detail on the scenario testing completed within the final Regional Plan.	
163	Ofwat	**Clarity on some underlying assumptions:** WReN should set out more clearly what data is used for each of the scenarios in its final plan. These include the data used for growth forecasts in the low and high demand scenarios as well as explaining whether Representative Concentration Pathway (RCP) 2.6 and RCP 8.5 were used for the low and high climate change scenarios, respectively.	As above, we will now include more detail on our scenario testing and associated assumptions in the final Regional Plan.	As above.
164	Ofwat	**Links with WRMPs:** Overall, WReN's decision making is transparent. There is discussion on reconciliation between the regional process and outcomes, as well as where individual company WRMPs contribute to the regional WRMP. However, discussion on how the regional plan is informing individual company WRMP24 plans, as requested in emerging plan feedback, was insufficient and should be included in the final plan. Our review suggests that the WReN plan adheres to most of the Ofwat public value principles, although it does not directly reference them. WReN should reference Ofwat's public value	The outcomes from the reconciliation process will inform regional plans and subsequently individual company WRMP24 plans. This will primarily relate to inter-regional transfers. However, we are continuing to collaborate with our constituent members to ensure that the Regional Plan aligns with individual company plans.	Addition of detail on how WReN plan adheres to the Ofwat public value principles.

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		principles in its final plan and provide narrative on how the principles are followed in the plan.	We will also provide narrative on how the Ofwat public value principles have been followed in the final Regional Plan.	
165	Ofwat	**Cost efficiency:** When considering the whole life cost NPV, the unit costs of preferred options in WReN (average of around £11.6m/ml/day) tend to compare well against the costs from other regions. WReN has some competitively costed large projects that are driving this from both Northumbrian Water and Yorkshire Water. Leakage control, new groundwater and metering and water efficiency generally offer low unit costs in this region. Surface water enhancement options tend to be higher cost when compared across the industry. Overall, the region has a relatively small number of large, preferred options presented with a total NPC for preferred options of around £3,631m. As we said earlier WReN should accelerate its options development, particularly focusing on options to meet needs in the Yorkshire Grid resulting from the proposed cessation of the Severn Trent Water transfer in 2035. WReN should also confirm whether its costs are in line with Water Resource Planning Guidelines requirements in its final plan.	We will explicitly state our compliance to the planning guidelines in our final Regional Plan, in line with company WRMP24s. Backfill options to address the loss of the existing Severn Trent Water transfer to the Yorkshire Grid zone are part of the scope of the UDVRE SRO and we consider this RAPID project to be the best mechanism to progress this priority area. We will also be working to expand and enhance our feasible options portfolio for the next planning round in support of wider zonal supply-demand deficits.	Explicit options costing statement of compliance to planning guidance.
166	Ofwat	**Ambition and outcomes** It is important that the plans are sufficiently ambitious and are in line to achieve agreed outcomes. As we said above, Ofwat expects companies to use these regional plans to adhere to demand targets including personal consumption, leakage and overall water use. The WReN plan is broadly in line with the expectations from the national framework which characterised the North as facing modest water resources pressures. However, these pressures are increasing as environmental water needs, drought resilience and demands from outside the public water supply are better understood. We set out our view on this in the assessment of water needs section of this letter.	Noted with thanks.	No change proposed.

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167	Ofwat	**Leakage and water efficiency:** WReN notes that there is a high reliance on future innovation beyond existing leakage techniques and methods and needs to work on this further to reduce the uncertainty in its final plan. WReN should set out in its final plan how it will align with the government target to reduce the use of public water supply in England per head of population by 20% from the 2019 to 2020 baseline reporting figures, by 31 March 2038, with interim targets of 9% by 31 March 2027 and 14% by 31 March 2032, and to reduce leakage by 20% by 31 March 2027 and 30% by 31 March 2032.	Since publishing our draft plan, Yorkshire Water have commissioned RPS consulting to review leakage and water efficiency options. For leakage options, detailed forward plan has been submitted to the Environment Agency which ensures that the legal requirement is met in relation to WRMP Direction 3(k). The Yorkshire Water rdWRMP24 will include 8 leakage scenarios with multiple options instead of the 6 leakage profiles included in the draft WRMP24.	The final Regional Plan will be updated to reflect the changes in demand management options.
168	Ofwat	**Profiling activity across the planning period:** In response to WReN's emerging plan we requested that they set out how they are profiling changes in personal consumption, reductions in non-household consumption, and leakage across the planning period to optimise outcomes. This has not been addressed and WReN needs to prioritise this for its final plan.	Yorkshire Water is determining the demand side target performance levels and trajectory to the long-term target using a 2-phase optimisation process. This process has changed since draft submission and for revised draft will utilise individual intervention unit cost and benefits. The optimisation is happening within the Yorkshire Water WRMP optimiser. This optimisation will set the long-term target for leakage reduction and any incremental requirements along that glidepath. Yorkshire Water has used the RPS Strategic Optimisation of Leakage Options for Water resources (Solow) tool. This tool is recognised as best practice across the industry and is used to optimise the interventions within the plan to deliver the leakage targets and the trajectory of leakage improvement. Yorkshire Water will include the expected 25-year leakage trajectory within the draft WRMP. Additionally, we	The final Regional Plan will be updated to reflect the changes in demand management activity profiling across the planning period and how outcomes are optimised (and to align with member water companies revised draft WRMP24s).

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			will submit the individual cost and MLD benefit of each intervention type within the plan. Yorkshire Water has run multiple scenario options with fine optimisation occurring. As such we will evidence our best value trajectory to achieving our long-term leakage target within the revised draft plan. The multiple scenarios modelled have been optimised to create the lowest cost/ best value glide path to achieving the long-term target. This considers the sustainability of the service improvement, the lifetime of the asset & subsequent investment cycles. The optimised pathway will therefore not be flatline and be optimised based on cost and risk. Within the optimisation we have input all known and emerging leakage interventions and determined the optimum blend of solutions. This includes: Active Leakage, Control Smart Network solutions, Pressure Management, Trunk Main/Upstream initiatives, Smart Metering, Customer side interventions, DMA splitting & optimisation and Asset renewal policies.	
169	Ofwat	**Stakeholder engagement** must be meaningful, have sufficient reach and be appropriately targeted. WReN has demonstrated this by presenting the views and needs of stakeholders well, as well as giving a good overview of customer concerns found in their research. WReN's description of the workshops undertaken, particularly regarding their content and the subsequent customer concerns highlighted is good.	Noted with thanks. We will continue to build on our stakeholder engagement activities moving forward into the next regional planning cycle.	No change proposed.

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170	Ofwat	**Highlighting policy choices:** WReN should continue to liaise with stakeholders on how the consultation responses will affect the final plan. WReN should now consider the responses to its draft regional plan consultation, and any additional stakeholder engagement carried out, and explain how these have influenced its final plan. Planning to meet water resources needs over the coming 25 years and beyond is of the utmost importance and these plans will have important implications for customers, society, and the environment. This is why we have pulled together this detailed feedback and why we expect to see the necessary improvements for the final plans. Once you have had a chance to consider these comments in detail, we would like to hear how you plan to address them and will be in touch to arrange a date for this in mid-March 2023.	A meeting was held between Ofwat and WReN on 21 March 2023to discuss specific items of feedback. This document states our responses on the comments received and how these will be addressed. We have engaged and will continue to engage with stakeholders.	No change proposed (see all other items).
171	Peak District National Park	The Peak District National Park is located at the heart of England and its uplands act as a catchment for three water companies with reservoirs contained within the National Park. These are Severn Trent Water, United Utilities and Yorkshire Water, the former of which form part of the Water Resources West Group. The Peak District National Park was the first of the UK's National Parks to be designated in 1951 after the completion of the many reservoirs located within the National Park. As well as acting as water collection and distribution facilities, many of the National Park's reservoirs are visitor attractions with opportunities for a range of recreational activities. The activities of the Peak District National Park Authority are undertaken in pursuance of two statutory purposes, which were established under the National Parks and Access to the Countryside Act (1949) and restated in the Environment Act (1995). These purposes are: - 1) The conservation and enhancement of the landscape, cultural heritage and wildlife of the National Park, and	We thank you for your information regarding the Peak District National Park (PDNP) and concern in relation to effects on the PDNP arising from water company / regional plans. The potential impact on the PDNP is an important aspect of the plan and has been considered throughout the environmental assessment of the Regional Plan and further detail is provided in the SEA Environmental Report. At this stage, the options included in the plan are largely at an early stage of development and the SEA is undertaken at the appropriate level of assessment to highlight potential environmental concerns associated with options, plans and programmes at a strategic level. As options are developed further through	No change proposed.

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		2) The provision of opportunities for the enjoyment and understanding of the National Park by the public In the event of a conflict of interest, the first purpose takes precedence. Section 62 of the Environment Act (1995) sets out a statutory duty on certain bodies undertaking works affecting land within a National Park to have regard to those purposes. The section 62 duty applies to water companies. In relation to the Draft Water Resources West Regional Plan; and the Water Resource Management Plans of our constituent water companies, the National Park Authority's prime concern is in relation to the effect of actions resulting from the Plan's on the Peak District National Park. This relates to the reservoirs themselves, the methods used to distribute water around the area and beyond, and any effects on the landscape, cultural heritage and wildlife of the National Park.	later design and implementation stages including planning applications, we would undertake additional environmental impact studies and engagement with local stakeholders at a project specific level and as appropriate to the specific project.	
172	Peak District National Park	**The Upper Derwent Valley reservoir expansion (UDVRE)** The Upper Derwent Valley is located towards the north of the National Park and is surrounded by land that falls under high level environmental designations (Site of Special Scientific Interest, Special Protection Area, Special Area of Conservation). Whilst the proposals might not directly affect the designated areas, any potential for indirect effects would need to be assessed. The delivery of a the UDVRE proposals would constitute major development within the National Park. There is an underlying National Presumption against major development within a National Park. Such development should only take place where strict criteria have been met, as set out within the National Planning Policy Framework (2021). The delivery of such a scheme would be dependent on the developer demonstrating that the scheme: - i) Was in the National Interest	We are engaging directly, alongside Severn Trent, with the Peak District National Park Authority and other stakeholders around the development of this SRO scheme. We recognise the need to avoid major development within a National Park unless it can be demonstrated to meet the criteria outlined. Reservoir expansion is now excluded from Severn Trent's preferred plans. We will continue to complete the necessary environmental assessment of options within the Regional Plan to inform future decision making and we are committed to continually engaging with the National Park as appropriate.	Update Regional Plan to reflect changes associated with exclusion of Upper Derwent Valley Reservoir Expansion Scheme.

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		ii) Could not be delivered elsewhere (outside of the National Park) iii) Showing consideration of the negative effects of the scheme on the National Park and ways in which these could be mitigated. The measures suggested range from the raising of existing dam walls to increase capacity, through to the creation of a new reservoir. In all cases, there will be an extremely large negative impact on the Special Qualities of the National Park.		
173	Peak District National Park	**DV8(iv) New York WTW to South Yorkshire treated water transfer** It is unclear what the route of this proposed scheme will be. However, reference is made within the Yorkshire Water Draft Water Resources Management Plan to there being a need during the design to consider risks to the Peak District National Park. We note that the delivery of this scheme may be interlinked with delivery or not of the Upper Derwent Valley reservoir expansion (UDVRE) scheme. The DV8(iv) proposal seeks to address any shortfall in supply should the transfer of water from Severn Trent Water cease. Given the potential impact of the pipeline on the National Park, we would welcome early engagement in relation to this scheme as the design progresses.	This scheme is used to directly offset the loss of the existing Derwent Valley transfer in 2035, which now occurs in all scenarios / pathways as described earlier in this document. Reservoir expansion is now excluded from Severn Trent's preferred plans. The original route for DV8(iv) had an 800m proposed pipeline that intersected the Peak District National Park to the west of Sheffield. The construction of the pipeline could have caused temporary adverse effects on the National Park and therefore would have been subjected to further consultation regarding design and mitigating impacts. Yorkshire Water are, however, including a new option, DV8(iv)A, that avoids the National Park and details of this option will be included in their rdWRMP, and in summary within the final WReN plan. We are committed to continually engaging with the National Park on this matter.	Update to Appendix 5 to reference a new lower impact option variant to DV8(iv) now included in the plan.

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174	Water Resources West	**Collaborative Working between Regions** We wish to thank WReN for working collaboratively with us and the other regions, through the Regional Coordination Group and the reconciliation process. The publication of the draft plans is a substantial achievement which should be recognised. Much work has gone into the draft plans, which required close collaboration between the regions through two rounds of reconciliation in 2021 and again in 2022. We want this close collaboration to continue through the next year as we develop our final regional plans and beyond. Together we have an opportunity to build on the lessons learned so far through the process and implement these to improve our approach in future regional planning rounds. We therefore encourage WReN to continue working collaboratively with us.	WReN likewise welcomes the collaborative approach to forward planning taken by Water Resources West and other planning partners/stakeholders and look to continuing this in future.	No change proposed.
175	Water Resources West	**Transfers between WRW and WReN** The regulatory timetable for producing the final plans is relatively tight, especially given that a third round of reconciliation between regions must also be accommodated. Both our draft regional plans include the **cessation of the existing Derwent Valley transfer in 2035**, with a decision point in 2030. You have therefore included an adaptive pathway in your draft regional plan which sets out the options needed in your region on the basis of this transfer ceasing. Assuming the need for and feasibility of options remains similar to the second reconciliation, the position regarding the cessation of the current bulk water export from Severn Trent to Yorkshire Water is likely to remain unchanged. **Only a light-touch reconciliation exercise should therefore be required between WRW and WReN**. This will seek to reconfirm the position on the transfer and ensure a consistent narrative on this transfer is included in the final versions of both regional plans. WRW is engaging with WReN to establish a mutually agreeable timeframe to conduct the third reconciliation exercise. In addition, Severn Trent Water is preparing the Gate 2 submission for the Upper Derwent Valley Reservoir Expansion	We have continued to work closely with WRW as part of the inter-regional Reconciliation 3 exercise, particularly around the Derwent Valley transfer. A revised reconciliation has been reached, as described earlier in this report and as documented in the *Inter-regional Reconciliation 3: Summary report,* which we have published alongside our Statement of Response. We will ensure a consistent narrative is represented in our final Regional Plan, to ensure alignment of messaging with that of WRW (noting their earlier submission timetable). We will continue to work with WRW and Severn Trent as the SRO project evolves, with WReN member Yorkshire Water working closely with Severn Trent Water on the deferred Gate 2	No change proposed.

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		SRO, which is currently scheduled for April 2023. WRW remains committed to working with WReN to progress the development of the SRO for the mutual supply resilience benefits it could bring to both regions.	submission for UDVRE SRO, including the Yorkshire Water backfill option.	
176	Water Resources West	United Utilities and Northumbrian Water as still conducting work to appraise the **Kielder to UU transfer**, to evidence its benefits and drawbacks. This information will be used for further discussion with RAPID, to decide whether this option will become an SRO or not. Hence, we would ask WReN to **ensure this further work is mentioned in the final regional plan and that the narrative is consistent with that included in the WRW final regional plan**. The scale of these options and the benefits they may bring are of wider interest to our stakeholders.	The surplus water in Kielder reservoir is only considered sufficient to support either the Tees (Northumbrian Water) to York (Yorkshire Water) transfer, or the Kielder to United Utilities transfer at current volumes; the Tees transfer is currently included in Yorkshire Water's preferred plan. However, whilst the inter-regional reconciliation exercise affirmed the non-selection of a Kielder export from WReN (Northumbrian Water) to WRW (United Utilities), largely on cost grounds, both schemes remain feasible future options. This is important given the potential for future changes in planning positions. WReN and our constituent companies are therefore committed to continuing to work with WRW, UU and RAPID to determine Kielder's status as a potential future SRO, and to define the scope of this work. We will update our plan to reference the ongoing work and latest position with RAPID on SRO status, and will engage with WRW to ensure a consistent narrative as part of completing our final Regional Plan.	Updated narrative and position statement on Kielder's future status as a transfer and candidate SRO option, consistent with position agreed with WRW.

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177	Water Resources West	There are also several potential transfer options from WReN to WRW (Severn Trent Water) that have been explored and identified on a map in the WReN draft regional plan. These were not included as feasible options in the WReN and WRW draft plans put forward in our consultations. However, **if WReN changes its view and include these transfers into its regional tables as feasible options, we would like to be informed so we can do the same**, assess them in our plan, and maintain consistency across the plans.	We note WRW's request and can confirm that there is no change in position on these potential transfer options. WReN would like to work closely with WRW towards the next regional planning round to reconsider the position on these transfer options, once further WINEP investigations and/or options work (in the WReN / Yorkshire Water area) are completed. It is possible that as planning uncertainties reduce and/or plans are refreshed that transfers between the regions may become viable in future.	No change proposed.
178	Waterwise	We are pleased to see WReN is actively engaging **with non-PWS abstractors** to try to better understand their current and future needs and that there has been more engagement with regional abstractors since the emerging plan was published. It is evident that there is a lot of **uncertainty in most of the predictions of future needs**, including uncertainty over interregional transfers, and this is an area that definitely needs ongoing attention. In light of these uncertainties the approach of looking at scenarios and of developing **an adaptive plan** makes a lot of sense, providing the uncertainties are kept under review.	We thank Waterwise for their comments in this area. This first regional planning round has highlighted the limitations of data and information on long-term non-PWS needs; building the maturity of this aspect of the plans will be key towards the next planning round in reducing uncertainty. We will also in future be actively monitoring for any changes in position against the final plan position, which may trigger specific activities in advance of the next planning round.	No change proposed.
179	Waterwise	There is a general need in water resource planning to improve the understanding of **future non-household PWS needs** and the opportunities for **NHH demand reduction**. This area was weak in WRMP19 and has been challenging since retail market separation. We would therefore still like to see the WReN plan more clearly set out those NHH PWS sectors with high water use in the region, including mapping where they intersect with areas of current or future water deficits. The plan should also include a commitment to collaborate with water retailers, NHH	The publicly available MOSL water efficiency dashboard provides detail of the NHH PWS sectors with high water use by water resource zone. Non-Household (NHH) demand reduction strategy is now presented in the Northumbrian Water revised dWRMP24 and allowed for in their final plan supply demand balance (see response to Item	The final Regional Plan will be updated to reflect the updated demand reductions strategies.

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		users, their "trade" bodies and Waterwise to help encourage and support them in reducing demand and improving resilience. There is a **lack of any demand reduction information or options for NHH PWS usage**. Looking at the dWRMP data-sets Yorkshire Water are predicting no change in NHH demand by 2050 whilst Northumbrian Water are predicting the NHH PWS demand will actually increase by 33%. This is very surprising given the likely Environment Act 9% NHH demand reduction target and Ofwat's anticipated performance commitment. We believe it is an area where significant savings can be made. Thames Water's smart metering indicates as much as 26% of the supply to NHH sites is continuous flow and may be leaking and their Smarter Business Visits have yielded significant savings from NHH sites.	168 for specific details on updates to Yorkshire Water demand reductions). Ofwat requires collaboration with water retailers as part of the performance commitment and we have committed to working with all stakeholders to reduce NHH demand. The member water companies new demand reduction strategies are comprehensive and have been developed through liaison with other water companies, regional water resources groups, retailers and business to learn from their experience, ensure regional alignment and that the strategy includes options that will deliver the demand reductions required. The Northumbrian Water Non-Household (NHH) demand reduction strategy was not developed in time for inclusion in the dWRMP24. However, they have now formed a comprehensive strategy having liaised with other water companies to learn from their experience and ensure regional alignment. The NHH demand reduction strategy is outlined in their revised dWRMP24 and allowed for in our final plan supply demand balance. The NHH water efficiency strategy delivers a 9% reduction in the demand of existing NHHs by 2038 from a 2019/20 baseline. This is included in the final plan demand forecast. The water demand associated growth (new NHHs) has not been accounted for as there is not the confidence that this can be achieved	

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			with the high levels of NHH demand growth in this period. Northumbrian Water are now also including NHH smart metering (which is set out in the rdWRMP24) and proposing to meter the remaining NHH premises that are still unmeasured and plan to replace all existing basic/AMR NHH meters with smart ones over AMP8 & AMP9. The smart network will be established across the Northumbrian Water region over AMP8 and our strategy will be to install/replace NHH meters to smart, in areas where the smart network is switched on first.	
180	Waterwise	A significant potential jump in **water demand for the energy sector is included in the plan from 60 Mld to 296 Mld**. This is similar to increases presented in other plans such as WRE. Given the level of uncertainty on this estimate we agree with WReN that this should not be included in the core preferred plan and that it should be considered as a sensitivity test to see how the core plan performs if that level of additional demand from the energy sector did materialise in the region. If that additional demand does emerge then the water supply solutions for it should be funded by the energy sector and not water company bill payers.	Waterwise have picked up on this key uncertainty in our plan, and we welcome their support to our approach at this stage in how we have reflected this into our planning framework. We have been actively engaging with specific energy sector developments, and this re-emphasises the uncertainty in future demand requirements. We will update our commentary in the final plan on the latest position, and as to the impacts on the plan should demand requirements change in future. We agree that water company customers should not be financially disadvantaged, and we would seek to recover costs through the relevant regulatory processes for doing so. In particular, NWL has confirmed that over and above base investment in its existing raw water intakes and pumping	Updates to narrative on specific energy sector growth following further (but ongoing) engagement with the sector. We will outline the impact of this uncertainty area (i.e. increased demand) upon our plans, should this materialise.

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			stations, any additional infrastructure (for example new pipelines within the Teesside Industrial Zone) will not be funded by household water company bill payers.	
181	Waterwise	In terms of the needs of the environment we are pleased that WReN has **modelled the Enhance environmental destination scenarios alongside BAU and BAU+** and that more information on this has been included in the main plan document. However, we note on p21 that the plan targets "meeting the BAU+ for the River Derwent abstraction at York linked to achievement of Common Standards Monitoring Guidance (CSMG) targets for the River Derwent, effective from 2050 in line with regulatory expectations". However, the regulators expectations set out here in May 2022 refer to "applying CSMG flow targets at European designated riverine sites by 2050 at the latest". **Greater clarity is needed** in the plan of the proposed date when the target will be met and we would like to see options explored that can meet it before 2050.	We are continuing to develop our Environmental Destination and are proactively working with the Environment Agency and Natural England to define an appropriate scope for our AMP8 Water Resources WINEP investigations in support of this (including asset and catchment specific investigations plus regional options development studies for Environmental Destination). In relation to the River Derwent, we share Natural England and Environment Agency's ambition to identify a sustainable long-term objective for the Lower Derwent protected areas but we recognise this is a complex water resources, environmental and planning issue which can only be solved collaboratively and with sufficient input from relevant stakeholders. Following a review of the comments on the draft plans, we propose to bring forward the Decision point associated with the Yorkshire River Derwent environmental destination to 2027 and the Trigger date to 2040. Our proposed timescale for Environmental Destination, including how we will meet the requirements of the WFD and Habitats regulations, will be explained in greater detail in the final	We will provide greater detail in our final Regional Plan (and Yorkshire Water rdWRMP24) on our proposed timescale for Environmental Destination, including further explanation on how we will meet requirements.

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			Regional Plan (and Yorkshire Water rdWRMP24).	
182	Waterwise	The new **UK Water Efficiency Strategy** was published in September 2022 and should be referenced in the plan.	We will add a reference to the UK Water Efficiency Strategy in our final Regional Plan.	Addition of UK Water Efficiency Strategy reference and brief commentary on implications.
183	Waterwise	We criticised the emerging plan in February 2022 for a lack of detail on how these demand reductions will be met. We are pleased to see **additional information on the demand management plans has been added** to the main document particularly in respect of HH demand and leakage. Although the plan signposts the two water companies for delivery of demand reductions, we do believe there is an ongoing delivery role for regional groups in helping share good practice and, in particular, in encouraging demand management in other non-PWS sectors.	We are pleased that Waterwise have recognised our further development on this key area of the plans. Whilst the water companies own and have responsibility for relevant demand management delivery, given links to relevant performance commitments etc., we agree that WReN has an important role in sharing good practice, ensuring lessons learnt, and promoting / advising on demand management when there is opportunity to do so as part of our non-PWS activities. In terms of PWS delivery, we believe the regular review of regional plans (expected to be at least annually) will provide a key forum for this across WReN companies, and to share experience with other regions too.	Add reference to future regular review cycles for regional plans, in the context of demand management delivery progress, lessons learnt, good practice etc.
184	Waterwise	We are pleased to see the plan clearly reference the potential contribution that **supportive policy** can play with demand management including water labelling. The plan refers to work undertaken by WRSE that highlights the potential for minimum standards to double the level of savings achieved from the **mandatory water label** and this is something that WReN should continue to advocate for. The Plan on a Page should be amended to remove the reference to white goods as the label is intended to cover a wider product range.	Noted and thanks for this observation. The reference to white goods on the Plan on a Page will be removed in the final Regional Plan to reflect this position.	Update to plan on a page to remove reference to white goods with respect water labelling, to reflect the broader product range expected to be covered.

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185	Waterwise	We would also suggest the final plan more clearly highlights the need for future development to be more water efficient. Current Building Regulation has only one passing reference. The plan should reference the government **Roadmap for more water efficient buildings** which will be published in early 2023 and will include plans for more ambitious Building Regulations and standards.	We agree that the importance of future changes to building regulations (along with water labelling) should be given more prominent attention in the plan narrative. For WReN, like all regions, the achievement of demand management policy targets included in our plans goes beyond our own activities and requires government interventions to achieve them. We will reference the roadmap as part of this update.	We will put more emphasis upon the role of future building regulations and water labelling in the final plan, given the criticality of these to meeting future demand management targets. This will also include specific reference to the future roadmap for water efficient buildings.
186	Waterwise	We are pleased to see both Yorkshire Water and Northumbrian Water including for HH and NHH **smart metering**. However, the pace of this is too slow relying on installation in new homes and optants. Given the significant deficit in the Yorkshire Grid part of the region and the reliance on demand management as a solution we want to see the regional group and Yorkshire Water request that the government/ Environment Agency allows **universal metering with charging based on usage** in this area. Alternatively, Yorkshire Water could consider fitting smart meters to all properties in the Yorkshire Grid area but without automatically switching people to charging based on usage. Severn Trent Water considered this for AMP6 and found a positive financial case could be made even without the automatic link to charging.	Yorkshire Water has considered 8 scenarios regarding our metering strategy. The optimisation process has considered customer support and a multi performance commitment contribution to service. The WRMP optimisation will deliver our final strategy for metering. The preferred strategy will be included in our revised draft WRMP. Yorkshire Water has already moved to Smart metering as our standard technology solution, with New Developments and Domestic Metered Optants being installed with a Smart meter. However, the speed of transition to "full" Smart metering will be confirmed in the revised draft plan. About 90% of Yorkshire Water's non-household customers are already metered and we are aiming for 90% highest priority users of those metered to be metered by 2035. This will be	No changes proposed.

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			under on-going review as the smart programme is rolled out.	
187	Waterwise	At Waterwise, we're committed to driving equity and preventing discrimination at work and in the work we do. A great deal of our impact is delivered through challenging others through consultations such as this to ensure equity, diversity and inclusion has been considered in all policy and planning decisions. We are pleased to see that you have committed to an objective to produce a plan "is not detrimental to social wellbeing" however that objective could be reframed to commit to making a positive contribution to **improving social wellbeing**. We encourage as you develop the final plan to consider the impacts on social justice and how you will understand impacts of decisions, including in the long-term following trade-offs, on the diverse members of the WReN community.	We note this response and will consider whether a change to objective wording to better emphasise social wellbeing is appropriate. We will also be mindful of how decisions in the final plan may impact the WReN community and the diverse members within it. We would also like to flag that water companies in the WReN area have specific policies and strategies in this area that are relevant at a detailed delivery or operational level. For example, Northumbrian Water works to offer alternative meter placement to increase accessibility for the elderly or those with both visible and non-visible disabilities.	WReN will consider alteration of the objective wording to reference improving (rather than avoiding detrimental impacts on) social wellbeing and note this feedback in Appendix 4.

How to find out more

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