

CMA special reference group  
Competition and Markets Authority  
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Ed Shaw, Director  
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Dear CMA Special Reference Group,

I am writing to lend the Don Catchment River Trust's (DCRT) support to Yorkshire Water's (YW) referral of Ofwat's final determination to the CMA.

The DCRT was established in 2008 with the objective of improving the ecological condition of the rivers and streams of the Don Catchment, an area that covers most of South Yorkshire. Over the last decade we have delivered numerous projects to further the ecological recovery of our catchment. We are about to complete our sixth fish pass on the River Don, and salmon are now reaching Sheffield for the first time for over two centuries. Through two major Heritage Lottery funded projects we have engaged with communities by running volunteer days which have collecting thousands of bin bags of rubbish, celebrated river wildlife, and advocated for positive change. The support YW has provided over this period has been of great importance, and without it our achievements would be far less.

Despite our successes, we realise that we need to do much more to create resilience in our recovering river ecosystems so that that they can cope and adapt to the challenges posed by climate change, protect biodiversity and contribute to human wellbeing. To have more impact, community-facing charity-sector organisations like ourselves must work in synergy with the water utilities, combining our complementary abilities and resources. We feel that our 'counterparts' within YW's Environment Assessment Team feel much the same, and this is reflected in the progressiveness and ambition of YW's Business Plan. This is why we are disappointed by Ofwat's final determination that favours short-term price reductions over long-term sustainability and environmental and social gain.

Short-termism inhibits innovation, yet this is what is required if we want promising approaches like Nature-based Solutions and catchment-scale thinking to be adopted alongside



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traditional hard engineering and decision making approaches. The benefits that Nature-based Solutions could offer in terms of energy savings, habitat improvements, water quality gains and as blue-green infrastructure are immense. However, YW are now being pushed by Ofwat's final determination towards short term fixes.

While it is right for Ofwat to seek value for money, YW's own surveys show that customers do not want this at any cost. People increasingly expect more from their rivers, and are becoming less tolerant of the pollution caused by failing or sub-optimal infrastructure. For example, this has recently been demonstrated by the grass-roots Ilkley Clean River campaign. The people of Yorkshire want clean rivers and they deserve them.

Like YW we hope for a redetermination that better serves rivers, people and wildlife.

Yours faithfully



Ed Shaw  
Director