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Secretary of State for Environment, Food and Rural Affairs
Water Resources Management Plan Consultation
Area 3D, Nobel House
17 Smith Square
London
SW1P 3JR

12 April 2016

Dear Secretary of State

Albion Water– Draft Water Resources Management Plan

Albion Water published its draft Water Resources Management Plan (dWRMP) in January 2016 and this letter summarises our views of the draft plan. These views are based on a high-level review of the processes described in the plan against the requirements of the Water Resources Planning Guideline. As this plan is an extension of an existing one the focus of our review was on the details provided for the new Upper Rissington supply area.

We particularly welcome the efforts made by Albion Water in relation to promoting the efficient distribution and use of water.

Areas of the dWRMP that Albion should consider further in finalising its WRMP include:

- explaining more about its approach to consultation and ensuring that it has consulted customers on its demand forecast and the providers of its bulk water supplies; and
- reviewing the robustness of, and explaining better the assumptions underpinning its demand forecast.

1. Incorporation of stakeholder views

Albion Water states that it undertook pre-consultation by letter and in meetings with certain organisations. It should provide further information on these consultations in its final plan and explain how it has consulted with the providers of its bulk supplies and its customers.

2. Baseline supply-demand balance

For its Deeside site Albion Water envisages that its customer's water demand will remain flat over the planning period. While the draft plan mentions "likely outturn industrial demand" it is not completely clear from the draft plan whether Albion Water consulted its customer on this demand forecast.

For its Upper Rissington site, Albion assumed that per capita consumption (PCC) will remain constant over the planning horizon. Albion should explain the basis for this assumption. The total demand for Rissington is calculated by adding household and non-household demand with no allowance for other components such as network losses. If no leakage is assumed from the network over the planning horizon, Albion should explain clearly the basis to this assumption.

I am copying this letter to the Welsh Government and Albion Water. We will also publish this letter on our website.

Yours faithfully

A handwritten signature in blue ink that reads "pp. Peter Hetherington".

Andrew Walker

Delivery Director