



ALBION ECO LTD
Revised Draft Drought Plan 2025

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When printing this document please consider which parts you require and only print the necessary pages.

1 Executive summary / Crynodeb gweithredol

This draft Drought Plan sets out how Albion Eco will respond to a drought and how we will manage supplies to our customers in line with our Water Resources Management Plan 2024 (WRMP).

Albion Eco has one supply area located in Wales and relies solely on bulk supplies of water from Dŵr Cymru. We do not have our own abstraction licences and therefore will rely on demand side actions, communications with our bulk supplier and customers along with water efficiency measures, during drought conditions. Supply side actions will be carried out by Dŵr Cymru and are set out in their plan.

Our plan has been produced taking into account the nature and significance of our customers' operations to the Welsh economy. It also reflects that the majority of water delivered is not of drinking water quality (it is non-potable), used in industrial processes and specifically not the primary focus of Section 39(B)1 of the Water Industry Act 1991. Unlike other water undertakers, area demand includes no household users and is almost solely dependent on production, little influenced by weather.

Our plan includes an overview of Albion Eco and our water resources and drought risk, how we identify our drought triggers, the drought management actions we will employ, the environmental impacts of our plan, our communication plan and how we will review the plan once a drought ends.

If you would like a Welsh translation of the full plan, please email:

customerservices@albioneco.co.uk

Mae'r Cynllun Sychder drafft hwn yn nodi sut y bydd Albion Eco yn ymateb i sychder a sut y byddwn yn rheoli cyflenwadau i'n cwsmeriaid yn unol â'n Cynllun Rheoli Adnoddau Dŵr 2024 (WRMP).

Mae gan Albion Eco un ardal gyflenwi yng Nghymru ac mae'n dibynnu'n llwyr ar gyflenwadau swmp o ddŵr gan Dŵr Cymru. Nid oes gennym ein trwyddedau tynnu dŵr ein hunain ac felly byddwn yn dibynnu ar gamau gweithredu ar ochr y galw, cyfathrebu â'n cyflenwr swmp a chwsmeriaid ynghyd â mesurau effeithlonrwydd dŵr, yn ystod amodau sychder. Bydd camau gweithredu ar yr ochr gyflenwi yn cael eu cyflawni gan Dŵr Cymru ac maent wedi'u nodi yn eu cynllun.

Cynhyrchwyd ein cynllun gan ystyried natur ac arwyddocâd gweithrediadau ein cwsmeriaid i economi Cymru. Mae hefyd yn adlewyrchu nad yw'r rhan fwyaf o'r dŵr a gyflenwir o ansawdd dŵr yfed (nid yw'n yfadwy), a ddefnyddir mewn prosesau diwydiannol ac yn benodol nad yw'n brif ffocws Adran 39(B)1 o Ddeddf y Diwydiant Dŵr 1991. Yn wahanol i ymgwymerwyr dŵr eraill, nid yw'r galw mewn ardal yn cynnwys unrhyw ddefnyddwyr cartref ac mae'n dibynnu bron yn gyfan gwbl ar gynhyrchiant, heb fawr o ddylanwad gan y tywydd.

Mae ein cynllun yn cynnwys trosolwg o Albion Eco a'n hadnoddau dŵr a'n risg o sychder, sut rydym yn nodi ein sbardunau sychder, y camau rheoli sychder y byddwn yn eu cymryd, effeithiau amgylcheddol ein cynllun, ein cynllun cyfathrebu a sut y byddwn yn adolygu'r cynllun unwaith y y bydd achos o sychder yn dod i ben.

Os hoffech gael cyfieithiad Cymraeg o'r cynllun llawn, anfonwch e-bost at:

customerservices@albioneco.co.uk

2 Introduction

Section 39(B)1 of the Water Industry Act 1991 places a statutory duty on all water companies to prepare and maintain a Drought Management Plan. It defines a drought plan as ‘a plan for how the water undertaker will continue, during a period of drought, to discharge its duties to supply adequate quantities of wholesome water, with as little recourse as reasonably possible to drought orders or drought permits’.

This draft Drought Plan (dDP) identifies how Albion Eco intends to provide a sustainable, efficient, secure and affordable supply of wholesome water to its customers in the event of drought conditions. Whilst not relevant for the purpose of Section 39(B), non-potable supplies are also considered in this document.

Albion Eco is a regulated water undertaker operating under Ofwat’s New Appointments and Variations (NAV) regime introduced by the Water Industry Act 1991. This enables a NAV to replace the appointed water or sewerage undertaker for a specific area within the appointed undertaker’s licence area (in this case Dŵr Cymru). NAVs have the same duties and responsibilities as other undertakers to produce drought plans.

Where a NAV operates under a bulk supply agreement with another undertaker, the Welsh Government has provided guidance that some parts of the plan may be proportionate to reflect the water resource situation (i.e. no source of abstraction). Drought plans should demonstrate that all the statutory requirements have been met, but the level of detail within the plan should be relative to the customer base and on how water supplies are obtained. In the case of Albion Eco, its water supply area serves industrial customers only in a single geographical region and, having no water resources of its own, it relies entirely on water delivered by Dŵr Cymru.

There are currently no Water Supply Licensees operating in the Shotton NAV area.

This plan has been produced with regard to guidance from the Welsh Government, Drought Plan Regulations and Directions (Wales), the Environment (Wales) Act 2016, the Well-being of Future Generations (Wales) Act 2015, the Welsh Government’s priorities, principles and policy commitments set out in the guiding principles and the Water Strategy for Wales, UKWIR’s Drought Code of Practice and the Review of 2022 Drought Demand Management Measures – Summary Report.

Along with detailed technical guidance, Natural Resources Wales (NRW) has produced a helpful checklist (our completed checklist is in Appendix C) to accommodate proportionality and ensure that drought plans incorporate relevant levels of detail.

In preparing this draft Drought Plan Albion Eco followed published guidance and communicated with:

- customers
- bulk supply provider (Dŵr Cymru)
- Welsh Government
- NRW
- Ofwat
- CCW
- CADW
- Welsh Drought Liaison Group

- local authority
- neighbouring water companies

We received feedback from NRW during our pre-consultation exercise which suggested some additions to our existing plan to include:

- Incorporating best practice and outputs from UKWIR (2023)
- Information on experience gained in recent dry weather

We held a pre-consultation meeting with our bulk supplier, Dŵr Cymru, the main points covered were:

- Communication flows (particularly given learnings from recent dry weather events which are incorporated into the UKWIR's drought code of practice – updated in 2023)
- Alignment of drought stages and triggers
- Levels of service
- No foreseen risks to supply, but long-term sustainability as a key concern

A draft of this plan was approved by the Board of Albion Eco prior to consultation.

We will review the contents of this plan as part of our WRMP annual review.

2.1 Consultation

January 2024 - The Board gave its approval to develop this draft plan and carry out an appropriate pre-consultation exercise.

July 2024 – Board approval received to issue the Draft Drought Plan Consultation.

January 2025 - An 8-week consultation period was run from 15 January 2025 to 12 March 2025. Responses to the consultation were considered and addressed in our statement of response document (available on our website and a link provided in Appendix D) and our draft plan was revised.

April 2025 – Board approval received to publish the statement of response and revised Drought Plan.

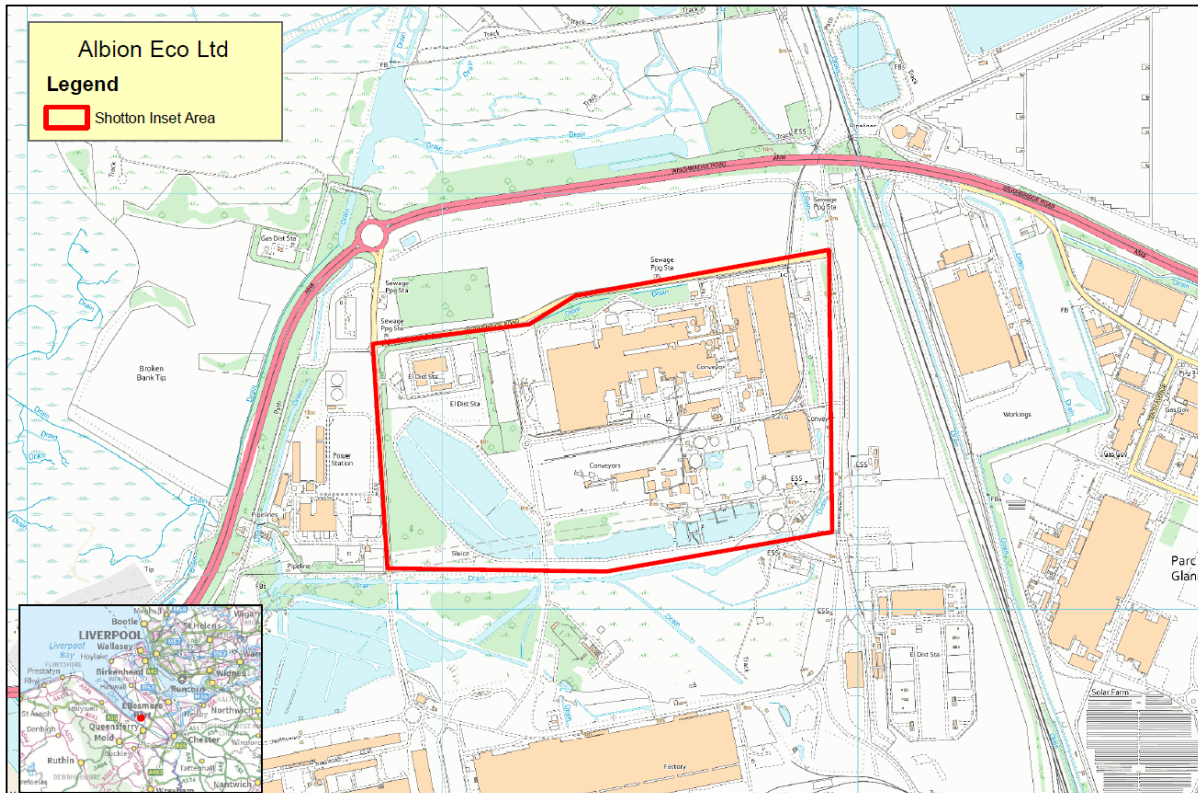
2.2 Security statement

This plan does not contain any information that would compromise national security interests, nor does it contain any commercially sensitive information.

2.3 Albion Eco's inset appointments

Shotton

Albion Eco's NAV licence, covering an area north of the River Dee in Flintshire, was originally granted to Albion Water in 1999 and subsequently varied following a split between Albion's English and Welsh operations in 2016. It covers the provision of industrial water services, including both potable and non-potable supplies.



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The Shotton inset area is restricted in extent to the boundaries of industrial customers. Following a change of ownership, much of the site is currently being redeveloped and, when re-commissioned, demand will be entirely dependent on industrial output. Water, as an important manufacturing resource, will be carefully managed to control input costs in an extremely competitive market. Efficient networks are planned to serve the site.

Manufacturing runs continuously, 24/7 for 365 days every year. There are no household customers in the area, and none are planned. Therefore Albion Eco's water resource plan - Water Resource Management Plan 2025-2030 (final plan), which can be found on our website, in the Document Library [Document Library – Albion Eco Limited](#), is based on estimated industrial demand rising during construction and commissioning followed by stable usage throughout the planning period from 2026 through to 2050.

2.4 Recent dry weather/drought experience

The Drought Liaison Group (Wales) confirms that drought conditions last occurred in Wales in 2022, during which Wales received 56.7% of expected rainfall between March and August. This resulted in low reservoir storage for Dŵr Cymru who put a Temporary Use Ban in place in their Pembrokeshire Water Resources Zone (WRZ), this was the first time TUBs had been enforced in Wales since 1989¹.

There were no restrictions imposed on our bulk supply and no operational issues occurred. Our supply was unaffected by peaks in demand.

There were no specific drought management actions introduced by our bulk supplier in our WRZ. Effective communication was maintained between Albion Eco and our bulk supplier and customers. The communication plan in this document includes learnings from this event.

Dŵr Cymru carried out a review of the drought event in 2022 and the findings are included in their Final Water Resources Management Plan 2024². The Alwen/Dee zone was not one that had any restrictions placed on water use and is not included in the asset investments presented in their plan.

¹ From section 1.1.2 of [Update to the Drought Code of Practice 2013 \(ukwir.org\)](https://www.ukwir.org)

² Section B of the Final Water Resources Management Plan 2024 [Final Water Resources Management Plan 2024 | Dŵr Cymru Welsh Water](#)

3 Water resources and drought risk

Albion Eco does not operate its own water resource, rather demand for water in Shotton is supplied by:

- metered bulk potable supplies (see section 3.1)
- metered bulk non-potable supplies (see section 3.2)

These supplies come from, or are located within, Dŵr Cymru's Alwen/Dee Water Resources Zone. Non-potable water is abstracted at Heronbridge Pumping Station and partially treated at Ashgrove Water Treatment Works (WTW) whilst potable water is abstracted upstream and, following treatment at Bretton WTW, is supplied within the Flint/Connah's Quay water quality zone.

Our drought plan is based on Dŵr Cymru's plan and their drought testing and scenarios which are set out in their plan.

As a result of significant inward investment and redevelopment of the site, historical usage data does not provide any significant guidance to estimate future demand. Albion Eco monitors capacity and usage patterns on a regular basis, including during routine liaison meetings with end customers and Dŵr Cymru.

All supply entering Albion Eco's NAV area is measured, and data will be integrated into a whole site operational management system. Once commissioned, the vast majority of this water will be used in industrial processes. Unlike most water undertakers, demand on our services is not significantly influenced by weather, instead, when commissioned, it will be almost wholly production dependent.

Industrial water use is driven by sustainability targets and the commercial desire to increase margins by reducing input costs. As with any well-run production business regular performance reporting will be undertaken and site personnel encouraged to work towards Best-in-Class performance. Albion Eco is investigating, through the use of a smart network, the best use of infrastructure within its NAV zones that will provide operational information as well as welfare benefits for site personnel.

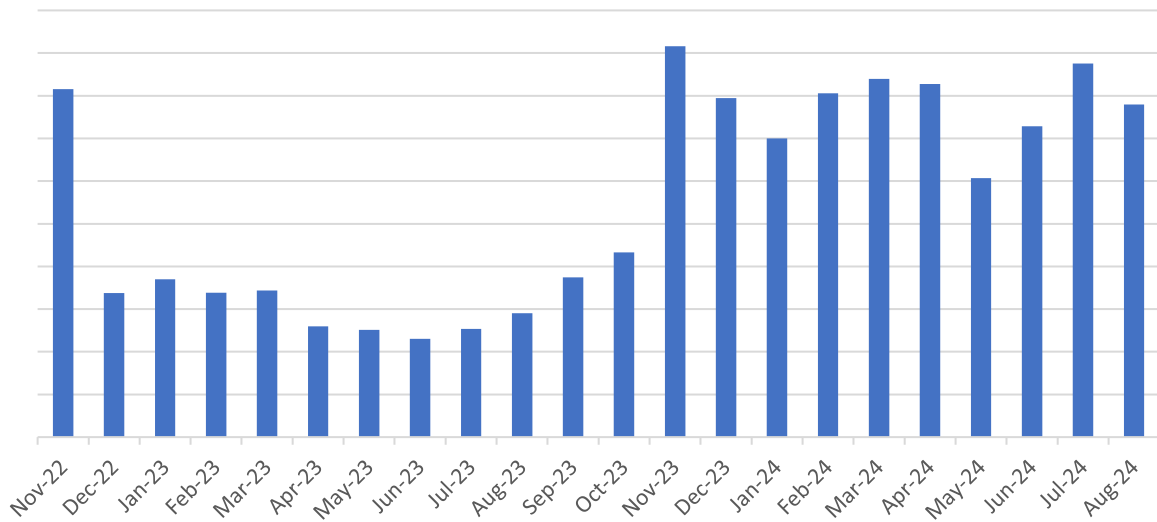
In the drought event of 2022, the Alwen/Dee zone was not one that had any restrictions placed on water use and is not included in the asset investments presented in Dŵr Cymru's plan. Our discussions with Dŵr Cymru have not highlighted any other risks to our bulk supplies. Therefore, whilst it is important to continue monitoring climate change and environment ambitions, goals and policies, we are confident that there is low risk to both our drinking water and non-potable supplies.

3.1 Potable water

Domestic potable daily use, whilst atypical due to construction activities, averages between 30 and 140 cubic metres (0.03-0.14 MI/d).

Monthly domestic potable water use is plotted in Figure 1 below. For commercial confidentiality, this graph is intentionally unlabelled, the variability is linked to decommissioning and construction phases and, at this stage, does not provide the basis for future usage estimations. Once the site is fully commissioned (expected 2026), the growing data set is expected to provide evidence of stable usage throughout the year.

Figure 1 Potable Water Use



We also have a potable supply from Dŵr Cymru, dedicated for use in processing at the site (up to 2MI/d guaranteed).

3.2 Non-potable water

The bulk supply agreement with Dŵr Cymru allows for a daily non-potable supply of 18,000 cubic metres (18 MI/d) plus 4,000 cubic meters (4 MI/d) subject to availability.

Once commissioned, non-potable usage is expected to remain consistent throughout the year, this being due to demand being production driven and not exhibiting pronounced seasonal variation. Figure 2 indicates recent non-potable water use which will increase significantly during commissioning (see Figure 3 below comparing current resource assumptions with past usage).

Figure 2 Non-potable Use (3 months rolling average) – Shotton NAV

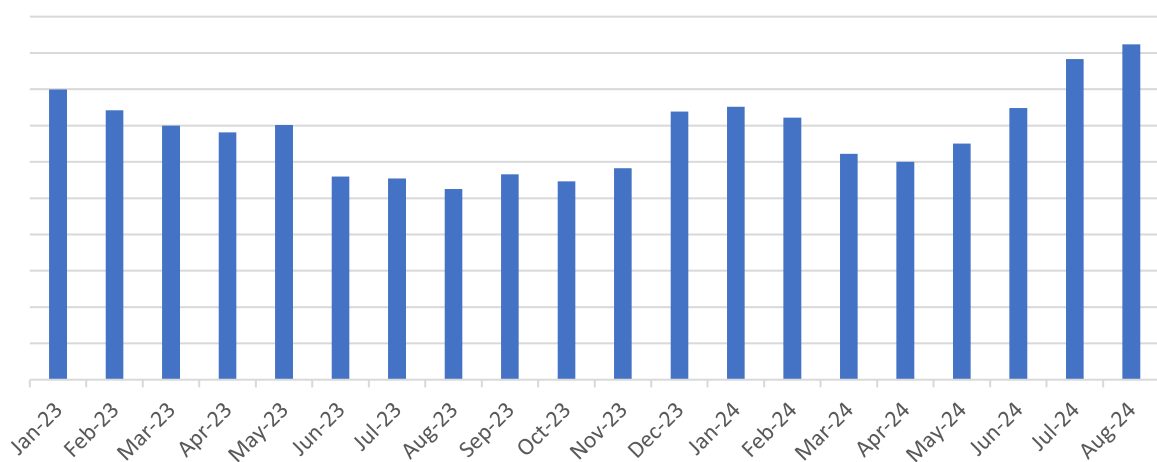
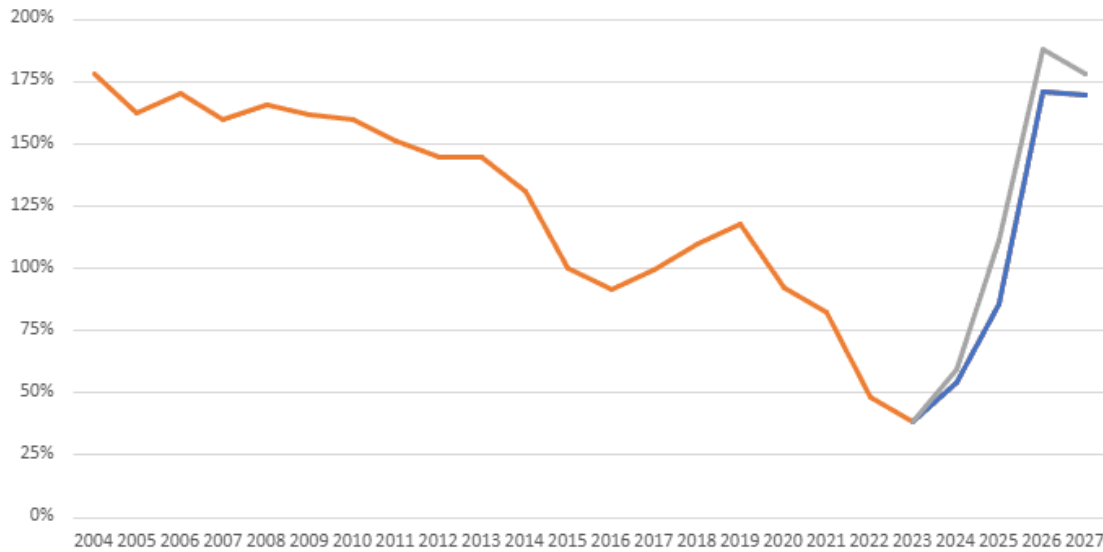
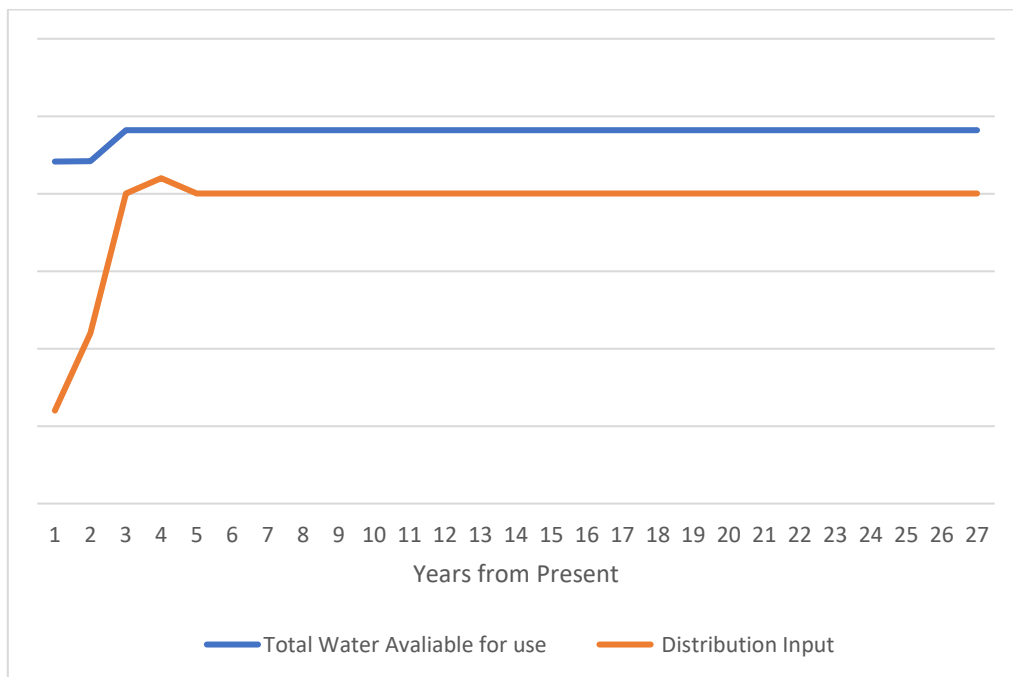


Figure 3 Historic (orange), Predicted (blue) and Risk (grey) NP Water Usage – 2015 base year



The predicted supply demand balance is illustrated in the graph below. This shows demand for water rising through to 2026, after which usage plateaus to reflect stable industrial output.

Figure 4 - Extract of data from Water Resource Management Plan 2025 tables – Updated Headroom from WRMP 2025



4 Drought stages, triggers and testing

Our drought stages are linked to the River Dee for non-potable water and Dŵr Cymru's drought plan for potable water (we have combined the stages to simplify planning and communication as shown in Table 1 below). The River Dee is a heavily regulated resource that has enabled the granting of significantly higher abstraction licences than would have been the case had the river remained unmanaged. Natural Resources Wales is responsible for managing the River Dee Regulation System and is facilitated in this task by the Dee Consultative Committee. Operational management rules are established for both normal and drought conditions and Dŵr Cymru operate their assets in accordance with these.

Dŵr Cymru's triggers for the Alwen/Dee zone are based on the storage position in the reservoirs serving the zone (with a high correlation to the Dee drought stages). For further information see Dŵr Cymru's 'Draft drought plan 2025 - Appendix 7c Water Resource Zonal (WRZ) Summary Alwen Dee'. The drought stages are defined as:

- Stage 1 - Normal operation
- Stage 2 - Developing drought
- Stage 3 - Drought
- Stage 4 - Severe drought
- Stage 5 - Emergency Measures
- Stage 6 – End of Drought

Albion Eco understands that there is a three-stage response to drought for the River Dee (see Table 1). These stages, linked to water levels at various gauging stations on the River Dee, are progressively reached depending on a drought's severity.

Dŵr Cymru has informed Albion Eco that no action would be taken that would have an impact on our bulk supply agreement during stages 1-4 / Dee stage 1 or 2 and there was no current plan to restrict supply under Stage 5 / Dee stage 3 (an event that has not occurred in over 100 years).

Temporary use bans for domestic potable supplies will comply with a 1 in 34-year level of service. In respect of non-potable water (originally abstracted by United Utilities before being supplied to Dŵr Cymru), there will be no temporary use ban and imposition of a non-essential use ban is not expected to exceed a 1 in 40-year event. This action will be in line with the approach taken by United Utilities for non-potable water supplied to their customers from the same abstraction point.

Drought plans are required to specify drought triggers, however the timing of the key drought actions will be governed by the bulk supplier's drought triggers and decisions - these are laid out in their drought plans (found in the Water Resources section of their website):

<https://www.dwrcymru.com/en/our-services/water/water-resources>

In addition to regular liaison meetings, during dry weather (which may develop into a drought) Albion Eco would keep in regular contact with Dŵr Cymru in regard to:

- The state of their water resources
- Prospects for them taking drought actions that we are required to match (where relevant)
- Ensuring that the timescales and administrative procedure for implementing any drought measures closely match with them.

As each drought stage is triggered, Albion Eco would respond as follows:

Table 1 Drought stages

Stage (and Dŵr Cymru's stage)	Dee Storage stage	Action	Team responsible	Dŵr Cymru's actions ³
1 - Normal (Dŵr Cymru stage 1)		Publicity and promotion of careful water use as described in the <i>Drought communications and management structure</i> section, and Albion Eco would review its drought plan and incident contacts.	Customer services, PR, Operations team	Weekly monitoring of rainfall, reservoir and river levels. Optimise sources.
2 - Developing Drought (Dŵr Cymru stage 2)	Dee Stage 1	As stage 1	Customer services, PR, Operations team, Managing Director	Convene 'Gold incident' command centre. Reduce Alwen supply to preserve resource and increase abstraction from River Dee.
3 - Drought (Dŵr Cymru stage 3)	Dee Stage 2	As stages 1 & 2 and additionally, communication with mill operators, domestic water use site audit, minimum night flows and action planning.	Customer services, PR, Operations team, Managing Director	As above
4 - Severe Drought (Dŵr Cymru stage 4)	Dee Stage 2	As stage 3	Customer services, PR, Operations team, Managing Director	As above
5 - Extreme Measures (Dŵr Cymru stage 5)	Dee Stage 3	As stages 3 & 4 and further promotion of voluntary restrictions and the facilitation of communication between regulatory, industrial, supplier and economic stakeholders.	Customer services, PR, Operations team, Managing Director	As above
6 - End of drought		As stage 1, and review of drought actions	Customer services, PR, Operations team, Managing Director	Careful removal of the supply side actions that are in place. Post drought review

³ Actions detailed in section Table 1 of Dŵr Cymru's Draft Drought Plan 2025 - Main Technical Report and section 3.3 of Appendix 2 – Drought Risk Assessment. Both available here: <https://www.dwrcymru.com/en/our-services/water/water-resources/draft-drought-plan-2025>

Albion Eco estimates that measures implemented at stages 1-5 will deliver potable water savings of:

- 4 m³/d in stage 2,
- 8 m³/d in stages 3 & 4 combined,
- and 10 m³/d in stage 5 but this is expected to rise once the site is fully commissioned.

These savings are based on estimated percentage potable usage reductions informed by Albion Eco's understanding of typical demand patterns in its NAV area and expected behavioural changes during an escalating drought.

Regular communications, backed by contractual obligations, will be planned with Dŵr Cymru during the period of any drought stage and during any follow up assessment. Albion Eco would engage directly with the Dee Consultative Committee (or any relevant subgroup) if requested.

Waterlevel, Albion Eco's parent company, is supportive of catchment-based initiatives to 'slow the flow' in the uplands, thereby promoting a more resilient water supply, including during periods of drought.

5 Drought management actions

The table below shows the actions we would undertake when the triggers detailed in Table 1 are reached.

Table 2 Drought actions

Stage of drought (increasing severity)	Actions	Approximate lead in times
1 - Normal	Business as usual, water efficiency messaging, standard liaison with bulk supplier and customers	N/a
2 - Developing drought	Enhanced water efficiency messaging, focus on leak repairs, enhanced liaison with bulk supplier and customers	2 weeks
3 - Drought	Temporary use bans (to be implemented by Dŵr Cymru), and continue actions described in stage 2	N/a to our non-household customers
4 - Severe drought	Non-essential use bans (to be implemented by Dŵr Cymru), liaison with customers focussing on activities covered by Ordinary Drought Orders to ensure water use that is not required for health and safety purposes is compliant and continue actions described in stage 2	Up to 3 months (in conjunction with Dŵr Cymru)
5 - Extreme measures	Emergency Drought Orders (standpipes and rota cuts), use of alternative sources (as detailed below), and continue actions described in stage 2	Up to 3 months (in conjunction with Dŵr Cymru)
6 - End of drought	Communicate return to normal water use, water efficiency messaging, internal review, reviews with stakeholders	6 weeks (communications for return to normal water use and water efficiency messaging) 3-6 months (internal review and reviews with stakeholders)

When considering restrictions in our area we will adhere to the principles and actions outlined in the UKWIR publication 'Managing Through Drought: Code of practice and guidance for water companies on water use restrictions – 2023' which are:

Principles

Principle 1: Ensure a consistent and transparent approach

Principle 2: Ensure that water use restrictions are proportionate

Principle 3: Communicate clearly with customers and the wider public/users

Principle 4: Consider representations in a fair way

Actions

Action 1: Water companies, retailers, regulators, NAVs and government to work together

Action 2: Coordinate communications

Action 3: Adopt a common phased approach, considering socio-economic factors

Action 4: Adopt a common approach to exceptions

Action 5: Promote understanding and good practice

Scope for reducing domestic use is perhaps more limited than for most water undertakers because of Albion Eco's regular site presence, limited peak demand due to 24hr working and there being limited potable water use that is not for Health & Safety purposes. However, Albion Eco recognises the benefits of developing pipe network understanding and publicising the need for water conservation, especially during periods of drought. The use of customer intranet and information dissemination through production centres and notices are the primary tools for promoting careful water consumption. Additionally, leaking taps, WCs and urinals are the main contributors to domestic use wastage and site's response to these would be reviewed and further encouraged during periods of drought.

During drought events regular water group meetings will be introduced with representatives from production, utilities and Albion Eco, tasked to identify water use efficiency measures. Albion Eco's existing monitoring of water use for both domestic and process streams will increase during drought periods and any unexpected patterns of use will be reviewed. Should significant leakage be suspected Albion Eco would arrange a detection survey and following a review of the results, could arrange for leaking pipes to be repaired or replaced, through section 73 WIA powers if necessary.

Albion Eco works closely with its supplier, Dŵr Cymru, and would implement an incident response plan in the event of a developing drought. We would appoint an Incident Manager to liaise with Dŵr Cymru's Wholesale Team and co-ordinate any actions needed at site level and to keep updated as a drought develops.

Due to the nature of our inset and customers we do not believe that introducing a Temporary Usage Ban (TUB) would result in significant water savings. As we have set out in this plan, the vast majority of water (non-potable) used is for the industrial process with the potable water used to supplement the non-potable supply and to provide essential welfare services to staff and for health and safety purposes and these supplies are covered in the exceptions for commercial water use as set out in the UKWIR guidance. Some rules do affect businesses⁴ and we would ensure that these activities are clearly set out for our customers:

- Not using hoses and sprinklers on gardens and green spaces.
- Not using a hosepipe for non-essential needs, like cleaning a path outside your business property (unless it's for health and safety reasons).

The process of applying for a TUB would not be appropriate to our situation, however we understand that we have an obligation to ensure that water use on the site is as efficient as possible,

⁴ Extract from the FAQs section in Appendix J of the UKWIR document [Update to the Drought Code of Practice 2013 \(ukwir.org\)](#)

leaks are repaired quickly, and our customers are provided with information on the wider situation to inform their business decisions.

Similarly, we do not believe that a Non-Essential Use Ban (NEUB) would deliver water savings in our area and the application process would be a disproportionate response, instead we will continue with the actions as detailed in Table 2. If we did decide to apply for a NEUB we would need to apply to the Welsh Ministers who are responsible for determining drought orders.

Under all drought conditions we would re-iterate the importance of water conservation, and we would support the messaging of our bulk supplier.

Should we decide to apply for a drought order we would follow the process set out and managed by NRW and we would consult the UKWIR report 'Code of practice and guidance on water use restrictions – 2023'.

There are no public fire hydrants in our water supply zone, therefore we have not included any information on how we will mitigate any reductions in supply for firefighting.

5.1 Alternative water supplies

In the exceptional event that drought led to restrictions in water supplied to Albion Eco by Dŵr Cymru (in the form of an Emergency Drought Order) and notwithstanding the fact that this supply is considered an essential facility, Albion Eco would consider the following options as part of our emergency plan:

- a) obtain authorisations and provide suitable treatment and infrastructure to run down local holding lagoons in order to meet the shortfall (providing <10 days industrial use)
- b) obtain authorisations and provide suitable treatment and infrastructure to take borehole water (insufficient to provide a standalone supply and uncertain sustainable yield)
- c) switch to alternative Dŵr Cymru source (although this would be within the same resource zone)
- d) increased recycling within site with the provision of suitable treatment and infrastructure

Most of these options would require agreement with third parties and the implementation of major infrastructure projects that would escalate process water input costs significantly and would therefore only be actioned if ongoing economic production was possible on site.

Albion Eco and Dŵr Cymru, as the bulk supplier, will work closely in order to maintain supplies should there be a problem arising due to drought. Actions could include but are not limited to the provision of an alternative back up potable connection or a supply of water by bowser, temporary mains or bottled water.

The efficiency benefits designed into the NAVs water networks, along with Albion Eco's ongoing and developing activities, and the limited drought measures that can be taken in the particular circumstances of this NAV (no resource or land holdings) are consistent with the goals of the Environment (Wales) Act 2016 and the Well-Being of Future Generations Act (Wales) 2015.

5.2 Compensation

Details of our compensation arrangements are set out in our Code of Practice in the GSS section (available on the following page of our website: [Document Library – Albion Eco Limited](#)). We will compensate customers whose potable supply is interrupted as a result of restrictions authorised by emergency drought orders.

For ease we have reproduced the relevant section below (section 11.8 of the Albion Eco Code of Practice):

We will compensate you if your water supply is interrupted as a result of restrictions authorised by emergency drought orders (this includes water supplies for cooking, washing, drinking and flushing the toilet, but does not include uses such as watering the garden, car washing or filling a pool)

We will give household customers £10 per day or part day (up to the limit of last year's average household bill) and business customers £50 per day or part day (up to the limit of last year's water charges for the premises or £500 whichever is lower).

6 Environmental impacts

Albion Eco is not aware of any environmentally sensitive sites in or near its area of supply that would be affected by any drought action available to it or otherwise referred to in this document. However, water companies in Wales are required to ensure their Drought Plans meet the requirements of the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Directives to assess potentially significant environmental effects of their plans.

The 2022 Screening Assessment for SEA and HRA has been reviewed and updated to cover our current operations in Wales. In the absence of impact pathways resulting from actions covered by this Plan, no further steps are required.

Our approach to the Strategic Environmental Assessment (SEA) is consistent with European Directive 2001/42/EC, associated Environmental Assessment of Plans and Programmes Regulation 2004 and with the Welsh Government's ambitions for biodiversity, resilient economy and wellbeing as set out in legislation and guidance. Our Habitats Regulations Assessment (HRA) is produced in accordance with the European Directive 1992/43/EEC and associated Habitats Regulations [The Conservation (Natural Habitats & c.)(Amendment)(England and Wales)) Regulations 2007].

7 Drought communications and management structure

Drought management actions and communications will be managed via the Albion Eco management team. This team would meet regularly to consider operational, commercial and strategic issues. The team structure would remain the same throughout the drought event.

Within the management team core responsibilities will be as follows:

- Managing Director – overall responsibility and for environmental impacts
- Operations team – operational resilience and liaison on bulk supplies
- Customer services team - customer information and contacts, ensuring consistency with bulk supply companies
- Public relations – PR materials
- Water quality team – water quality issues

Triggers for communication activities are outlined in table 3 below.

Table 3 Drought communications

Drought stage	Customer communications	Team	Stakeholder communications	Team
1 - Normal	<ul style="list-style-type: none"> Water efficiency messaging 	Customer services team Public relations	<ul style="list-style-type: none"> Standard liaison meetings with bulk supplier (inc. water resource situation) 	Operations team Water Quality team
			<ul style="list-style-type: none"> Standard liaison meetings with regulators (inc. data on bulk supply, quality and resource planning) 	
			<ul style="list-style-type: none"> Standard attendance of industry groups e.g. Wales Drought Liaison Group and Water Resources West (inc. water resource situation and planning) 	Operations team
2 - Developing Drought	<ul style="list-style-type: none"> Enhanced water efficiency messaging Focus on leak repairs or operational efficiencies and voluntary restraint Joint messaging with bulk supplier/regional groups regarding supply status if appropriate 	Customer services team Public relations	<ul style="list-style-type: none"> Enhanced liaison with bulk supplier (inc. water resource situation, planned drought actions and timescales) 	Managing Director Operations team Water Quality team
			<ul style="list-style-type: none"> Enhanced liaison with industry groups e.g. Wales Drought Liaison Group and Water Resources West (inc. water resource situation and joint working) 	
			<ul style="list-style-type: none"> Enhanced liaison with NRW (inc. water resource situation, planned drought actions and timescales) 	
3 - Drought	<ul style="list-style-type: none"> As in stage 2 Joint messaging with bulk supplier/regional groups regarding supply status if appropriate (to include information on any TUBs in the local area) 	Customer services team Public relations	<ul style="list-style-type: none"> Enhanced liaison with bulk supplier (inc. water resource situation, planned drought actions and timescales) 	Managing Director Operations team Water Quality team
			<ul style="list-style-type: none"> Enhanced liaison with industry groups e.g. Wales Drought Liaison Group and Water Resources West (inc. water resource situation and joint working) 	
			<ul style="list-style-type: none"> Enhanced liaison with NRW (inc. water resource situation, planned drought actions and timescales) 	
4 - Severe Drought	<ul style="list-style-type: none"> As in stage 3 NEUB communications 	Customer services team Public relations	<ul style="list-style-type: none"> Enhanced liaison with bulk supplier (inc. water resource situation, planned drought actions and timescales) 	Managing Director Operations team Water Quality team

			<ul style="list-style-type: none"> Enhanced liaison with industry groups e.g. Wales Drought Liaison Group and Water Resources West (inc. water resource situation and joint working) Enhanced liaison with NRW (inc. water resource situation, planned drought actions and timescales) 	Managing Director Operations team
5 - Extreme Measures	<ul style="list-style-type: none"> As in stage 4 Consider alternative supply options 	Customer services team Public relations	<ul style="list-style-type: none"> Enhanced liaison with bulk supplier (inc. water resource situation, planned drought actions and timescales) 	Managing Director Operations team Water Quality team
			<ul style="list-style-type: none"> Enhanced liaison with industry groups e.g. Wales Drought Liaison Group and Water Resources West (inc. water resource situation and joint working) 	Managing Director Operations team
			<ul style="list-style-type: none"> Enhanced liaison with NRW (inc. water resource situation, planned drought actions and timescales) 	
6 - End of drought	<ul style="list-style-type: none"> Communications for lifting of any restrictions Joint messaging with bulk supplier/regional groups regarding supply status if appropriate Review of drought measures 	Customer services team Public relations	<ul style="list-style-type: none"> Standard liaison meetings with bulk supplier (inc. water resource situation, review of drought measures) 	Operations team Water Quality team
			<ul style="list-style-type: none"> Standard liaison meetings with regulators (inc. data on bulk supply, quality and review of drought measures) 	
			<ul style="list-style-type: none"> Standard attendance of industry groups e.g. Wales Drought Liaison Group and Water Resources West (inc. review of drought measures) 	Managing Director Operations team
			<ul style="list-style-type: none"> Review of drought measures (drought management actions, drought triggers, effectiveness of monitoring, communication and joint working, accuracy of water demand reduction estimates) 	Managing Director Operations team Water Quality team Customer services team Public relations

Communication with our customers will be managed by the customer services and operations teams with support from the wider team. Due to the nature of our close relationship with our customers we are able to respond quickly, tailor messaging to their needs and advise on their response to any restrictions. Our communication will take place over the phone, by email and in person and will be backed up by advice and notices published on our website and delivered directly to customers as well as publishing notices in newspapers if required. If we are required to publish any notices, we will use the format set out in Appendix D of the UKWIR 'Update to the drought code of practice 2013' or the version agreed by members of Water Resources West.

We will encourage our customers to use water wisely, particularly during water restrictions, by⁵:

- Using a low water usage technology, such as a low water use pressure washer is encouraged wherever possible.
- Reducing the total volume of water used wherever possible – for example, through activities such as washing vehicles – particularly in peak periods between 7-9am and 6-8pm.
- Checking for leaks on their site – even in a small constant dribble can waste around 400 litres per day – as much as a family of 4 uses over the same time.
- Stopping urinals from flushing overnight – even if they don't have sensors fitted, turning off the flow to the urinals could save thousands of litres of water.
- Reminding staff about the importance of saving water – everyone can do their bit.

Communication with our bulk supplier, regulators and other stakeholders will be managed by our operations and water quality teams with support from our Managing Director. Communication with our bulk supplier will be key to ensure that we match messaging and key timings for any restrictions. The frequency of communication will be adjusted according to the severity of the drought.

Although we have no household customers, we will carry out communications in accordance with the Ofwat 'Service for all vulnerability guidance'.

Albion Eco already engages with or participates in the Welsh Government's Drought Liaison and Emerging Threats to Water Working Groups as well as Water Resources West; this allows us to communicate and share information with colleagues across the industry as drought conditions develop. We support the 'WRW Drought Statement of Intent' which sets out how members will work together to benefit abstractors, water company customers and the environment during dry weather or drought conditions. The suggested areas of joint working include resource sharing and coordination, demand management, communications and post drought review, acknowledging that droughts can be an intense period for those working in affected areas so WRW will not add to the pressure by creating additional, unnecessary coordination activity.

Our communication strategy has been produced following review of the publications listed in the introduction and CCW's publication 'Understanding Drought Resilience' and the UKWIR publication 'Drought Demand: potential for improving management of future drought'.

⁵ Extract from the FAQs section in Appendix J of the UKWIR document [Update to the Drought Code of Practice 2013 \(ukwir.org\)](https://www.ukwir.org/updates-to-the-drought-code-of-practice-2013)

8 Post-drought (recovery)

The lifting of any restrictions would be coordinated with Dŵr Cymru. They will notify us once triggers that identify the end of a drought are reached through our liaison meetings. We will continue to communicate regularly with Dŵr Cymru throughout the recovery phase and will ensure that our restrictions are lifted in line with their timings. We will return to the normal phase of operations with ongoing water efficiency messaging. During the post-drought recovery phase, we will continue to communicate with our customers, regulators and industry groups as required.

In the event of any drought triggers being met or actions being undertaken, a post incident review would be undertaken to establish best practice or areas that could be improved and, to the extent necessary, implement revised procedures. We will also participate in reviews organised by Dŵr Cymru, WDLG or regulators as required. Outputs from these reviews will feed into our internal review to highlight any areas for improvement.

The post incident review will take the form of a meeting approximately 3-6 months after the end of the drought, with a report being produced and shared with relevant stakeholders. Albion Eco will review the impact of any drought measures imposed by monitoring the potable bulk supply volumes imported. This monitoring will help us to assess the impact of water saving measures and ensure that we minimise bulk import volumes. The review will also look at the effectiveness of our monitoring, communication and joint working, and the accuracy of water demand reduction estimates.

A review would also include input from stakeholders, an internal review of actions and communications, and an assessment of the effectiveness of any actions taken along with any other topics that may be useful. Following a review, we may update this plan or other associated policies and procedures.

Appendices

Appendix A- Glossary

Bulk supply	A legal agreement for exporting and importing water between a donor and recipient operator.
CCW	Organisation representing the interests of water customers
Dee Consultative Committee	A committee which comprises NRW, EA, United Utilities, Dŵr Cymru Welsh Water, Hafren Dyfrdwy, Severn Trent Water and Canals and Rivers Trust. The committee supports Natural Resources Wales in the establishment and the implementation of operational control rules known as the Dee General Directions.
Drought	A general term covering prolonged periods of below average rainfall resulting in low river flows and/or low recharge to groundwater, imposing significant strain on water resources and potentially the environment.
Drought Order	An Ordinary Drought Order is an authorisation granted by the Welsh Ministers (for sites in Wales) or Secretary of State (for sites in England) under drought conditions which imposes restrictions upon the use of water (as defined in Drought Plan (Wales) Directions) and/or allows for abstraction/impoundment outside the schedule of existing licences on a temporary basis.
Drought trigger	A specific event/incident which triggers a drought action to occur.
Emergency Drought Order	A means by which a Water Company can restrict the supply of water to its customers through the imposition of rota cuts and/or the introduction of standpipes to deal with the very remote possibility of an extreme drought.
Habitats Regulations Assessment (HRA)	Habitats Regulations Assessment - Process for identifying the implications of the drought plan options for European designated sites (SAC, SPA and RAMSAR).
Leakage	Water lost from a supply network between the point of supply and the point of demand.
New Appointments and Variations (NAV)	<p>New appointments and variations allow companies to offer water, sewerage or water and sewerage services to a specific geographic area instead of the existing appointee.</p> <ul style="list-style-type: none"> • A new appointment occurs when Ofwat appoint a company for the first time to provide water and sewerage services, water only or sewerage only services for a specific geographic area • A variation occurs when an existing appointed company asks Ofwat to vary its existing appointment so that it can extend the areas to which it provides services.
Non-Essential Use Ban (NEUB)	A means by which a water company can restrict water use as provided for in Sections 73 to 81 and Schedules 8 and 9 of the Water Resources Act 1991 and detailed in the Drought Direction 2011, also known as an Ordinary Drought Order.
NRW	Natural Resources Wales
Ofwat	Office of Water Services (the economic regulator of the water industry in England and Wales).

Ordinary Drought Orders	See Non-Essential Use Ban (NEUB)
Ramsar	Ramsar sites are wetlands of international importance designated under the Ramsar Convention. More formally known as "The Convention of Wetlands of International Importance especially as Waterfowl Habitat" it is an intergovernmental treaty signed in Ramsar, Iran in 1971.
SAC	Special Area of Conservation - Designated under the EU Habitats Directive. Together with SPAs these form the Natura 2000 network of protected sites.
SPA	Special Protection Area - Designated under the EU Directive on the conservation of wild birds. Together with SACs these form the Natura 2000 network of protected sites.
SSSI	Site of Special Scientific Interest - Designated under the Countryside and Rights of Way (CROW) Act 2000.
Strategic Environmental Assessment (SEA)	The Strategic Environmental Assessment ensures significant environmental effects arising from proposed plans and programmes are identified, assessed, subjected to public participation, taken into account by decision-makers and monitored.
Temporary Use Ban (TUB)	A means by which a water company can restrict water use as provided by Section 36 of the Flood and Water Management Act 2010.
Wales Drought Liaison Group (WDLG)	The Wales Drought Liaison Group covers Wales. It is convened and chaired by the Welsh Government and consists of representatives in Wales from Natural Resources Wales, Water Companies, NAVs, Farming Unions, Public Health Wales, Local Authorities, CCW, Ofwat, Met Office and eNGOs.
Water efficiency measure	Water efficiency is the practice of reducing water consumption (reducing water wastage, rather than restricting it). Specific measures can be taken to help customers to reduce their daily water use. Examples of water efficiency including installing water efficient appliances and using water wisely in the home and in businesses.
Water Framework Directive Regulations (WFD Regulations 2017)	The Water Environment (Water Framework Directive) (England & Wales) Regulations 2017 (referred to as the WFD Regulations 2017) provide a framework for managing the water environment in England and Wales
Water Resource Management Plan (WRMP)	A water company long-term strategic plan for water supply and demand for at least 25 years.
Water Resource Zone (WRZ)	The largest possible zone in which all resources, including external transfers, can be shared and hence the zone in which all customers experience the same risk of supply failure from a resource shortfall.

Appendix B - References

Legislation and government policies

Developing drought plans: guidance for water companies - [Developing drought plans: guidance for water companies | GOV.WALES](#)

Drought Plan Direction (Wales) 2017: available from the Welsh Government

Drought Plan Regulations 2005 - [The Drought Plan Regulations 2005 \(legislation.gov.uk\)](#)

Strategic Environmental Assessment (SEA) - [The Environmental Assessment of Plans and Programmes \(Wales\) Regulations 2004 \(legislation.gov.uk\)](#)

Habitats Regulations Assessment (HRA) - [The Conservation of Habitats and Species Regulations 2017 \(legislation.gov.uk\)](#) & [Habitats regulations assessments: protecting a European site \[HTML\] | GOV.WALES](#)

The Drought Direction 2011 - [The Drought Direction 2011 - GOV.UK \(www.gov.uk\)](#)

The Environment (Wales) Act 2016 - [Environment \(Wales\) Act 2016 \(legislation.gov.uk\)](#)

The Well-being of Future Generations (Wales) Act 2015 - [Well-being of Future Generations \(Wales\) Act 2015 \(legislation.gov.uk\)](#)

Water Industry Act 1991 - [Water Industry Act 1991 \(legislation.gov.uk\)](#)

Water Strategy for Wales - [Water strategy | GOV.WALES](#)

Guidance

CCW's 'Understanding drought and resilience' - [Consumer Council for Water - Understanding drought and resilience - May 2013 - CCW](#)

Drought Risk and You (DRY) publication - [aboutdrought-handbook FINAL 2020-1.pdf](#)

Environment Agency's Chief Scientist's Group - [Review of the research and scientific understanding of drought - GOV.UK \(www.gov.uk\)](#)

NRW's 'Water Company Drought Plan Technical Guideline' - [Water company drought plan technical guideline \(naturalresourceswales.gov.uk\)](#)

Ofwat's 'Service for all vulnerability guidance' - [Service for all vulnerability guidance - Ofwat](#)

Reviewing Approaches for communicating Drought status And Risk - [Reviewing Approaches for communicating Drought status And Risk \(RADAR\) | UK Centre for Ecology & Hydrology \(ceh.ac.uk\)](#)

UKWIR's 'Drought Demand: potential for improving the management of future drought' - [Drought and Demand: Potential for Improving the Management of Future Droughts \(ukwir.org\)](#)

UKWIR's 'Managing Through Drought: Code of practice and guidance for water companies on water use restrictions – 2023' - [Update to the Drought Code of Practice 2013 \(ukwir.org\)](#)

UKWIR's 'Review of 2022 Drought Demand Management Measures – Summary Report' - [Review of 2022 Drought Demand Management Measures - Summary Report \(ukwir.org\)](#)

Water Company documentation

Dŵr Cymru's Draft Drought Plan 2025 - Appendix 7c – Water Resource Zonal (WRZ) Summary Alwen Dee – copies available from Dŵr Cymru - Water.Resources@dwrwymru.com

Dŵr Cymru's Draft Drought Plan 2025 - [Draft Drought Plan 2025 | Dŵr Cymru Welsh Water](#)

Dŵr Cymru's Final Water Resources Management Plan 2024 - [Final Water Resources Management Plan 2024 | Dŵr Cymru Welsh Water](#)

Appendix C - WCDP Checklist

Columns J, K, L & M removed as they relate to water companies with their own supplies or NAVs with household customers

Points to check	Is this a legislative requirement (Must)? Note if its blank then it will be an expectation (Should)	Applicable to a NAV wholly reliant on bulk supply agreements (e.g., do not have own supplies) wholly with non household customers base (no households). Expected that there will be demand-side actions, including temporary restrictions and no supply-side actions.	Included Yes/No/N/A	Location within the plan (if relevant)
Section 2: What to include in your drought plan				
Have you followed the Drought Plan Regulations 2005, Drought Plan Direction 2017 you receive from the Welsh Ministers previously and any legislative requirements set out in guiding principles about the content of your drought plan?	Yes	Yes	Yes	Section 2: Introduction
Have you set out how you plan to meet your obligations in relation to	Yes	Yes	Yes	Section 2: Introduction

the Environment (Wales) Act 2016 where you operate within or affect Wales?				Section 5.1: Alternative water supplies
Have you set out how you contribute to the Well-being of Future Generation (Wales) Act 2015 requirements by considering the well-being goals where you operate within or affect Wales?	Yes	Yes	Yes	Section 2: Introduction Section 5.1: Alternative water supplies
Have you set out how you have taken into account the Welsh Government's priorities, principles and policy commitments set out in the guiding principles and the Water Strategy for Wales?		Yes	Yes	Section 2: Introduction
Have you provided information on how you'll mitigate any reductions in supply for firefighting as a result of your actions as required by Part 5 of the Fire and Rescue Services Act 2004?	Yes	Yes	Yes	Section 5: Drought management actions
Have you considered whether any information is commercially confidential or a risk to national security before including it in your plan. If it does, you will need to submit a	Yes	Yes	Yes	Section 2.2: Security statement

statement to the Welsh Ministers?				
Have you discussed with the statutory consultees their expectations for the content of your drought plan?	Yes	Yes	Yes	Section 2: Introduction
Have you included any pre-consultation discussions you have carried out with statutory consultees, your customers and other interested parties along with a statement of how you have taken these into account (or justify why you may not have) when preparing your plan?		Yes	Yes	Section 2: Introduction
If you are a NAV, have you discussed with Natural Resources Wales and/or the Environment Agency their expectations of the level of detail you should provide within your plan proportionate to your customer base and on how you obtain your water supplies?		Yes	Yes	Section 2: Introduction
Have you considered the structure and recommendations for this and additional information		Yes	Yes	

to include set out in Appendix C?				
<p>Have you included a non-technical summary of your drought plan?</p> <p>Note that if you have produced a shorter proportionate plan e.g. likely in the case of a NAV - its unlikely that a non-technical summary is required.</p>		N/A	N/A	N/A
<p>Have you included information on your water supply area, water resource zones (WRZ) or drought management areas you are using in your plan (including maps). If you are planning for an area smaller than a water resource zone such as sub zonal have you explained the reasons for this?</p>		Yes	Yes	Section 2.3: Albion Eco's inset appointments
<p>Have you included any agreements with other water companies and organisations about bulk supplies, transfers or division of shared resources?</p>		Yes	Yes	Section 3: Water resources and drought risk

<p>If you are bulk supplier to NAVs or providing wholesaler services to water retailers or self-suppliers, have you set out how you have engaged with them on preparation of your draft plan and what information you needed to inform your plan?</p>		N/A	N/A	N/A
<p>Is your drought plan consistent with your WRMP?</p>		Yes	Yes	<p>Section 2.3 Albion Eco's inset appointments</p> <p>Section 3: Water resources and drought risk</p>
<p>If relevant, have you considered regional alignment with appropriate regional plan on?;</p> <ul style="list-style-type: none"> - how you will share water resources with neighbouring water undertakers - how you will operate sources to benefit other water users during dry weather or a drought while minimising the risk to your supplies - any joint communications including water efficiency 		N/A	N/A	N/A

campaigns and customer restrictions such as temporary use bans				
Have you considered links to other relevant plans or strategies?		Yes	Yes	<p>Section 2: Introduction</p> <p>Section 2.3: Albion Eco's inset appointments</p> <p>Section 2.4 Recent dry weather/drought experience</p> <p>Section 4: Drought stages, triggers and testing</p>
Section 3: Drought risk, triggers and scenarios				
Have you set out how you have undertaken an assessment of the drought risk (drought vulnerability) of your supply system to different drought events and the probability of such events occurring?		N/A	N/A	N/A
Have you included your key outputs on the drought risk within your drought plan?		N/A	N/A	N/A

<p>Did you engage early with Natural Resources Wales and/or the Environment Agency to discuss your assessment of drought risk and at what scale this has been undertaken within your operating area?</p>		N/A	N/A	N/A
<p>If you operate under any bulk supply agreements for part or all of your supply, have you consulted with your supplier to understand drought risk as relevant?;</p> <ul style="list-style-type: none"> -any key concerns associated with the bulk supply -planned level of service -taken account of any relevant data/information in respect to drought risk of the supply -understand any shared triggers for drought management actions 		Yes	Yes	<p>Section 3 Water resources and drought risk</p> <p>Section 4: Drought stages, triggers and testing</p> <p>Section 5: Drought Management actions</p>
<p>Have you set out how you have defined the stages of drought (drought status)?</p>		Yes	Yes	<p>Section 4: Drought stages, triggers and testing</p>

<p>Have you set out your chosen drought triggers for all stages of drought from its onset to its end, explained why you've chosen your triggers and demonstrated the triggers are consistent with your WRMP?</p>		N/A	N/A	N/A
<p>Have you presented your chosen triggers in relevant graphs, such as control diagrams (control curves) for each of your water resource zones? These diagrams should annotate where your drought trigger points are crossed and when you will carry out the associated actions (including the trigger point for emergency drought orders)</p>		N/A	N/A	N/A
<p>Have you considered whether any trigger is required before you cross into the next stage to enable early warning of potential public water supply concerns and likelihood of taking specific actions to regulators, Government,</p>		N/A	N/A	N/A

WDLG, NDG and other relevant groups?				
In developing your drought triggers, have you allowed enough time to both prepare for and to implement the actions associated with each trigger?		N/A	N/A	N/A
If you are wholly reliant on bulk supply agreement(s) with another water company, have you defined whether you have chosen to use drought triggers defined by your bulk supplier(s) or your own. Have you set out the drought triggers and the actions associated with them within your drought plan?		Yes	Yes	Section 4: Drought stages, triggers and testing
Have you set out the magnitude and duration of droughts for which your drought plan has been tested (e.g., testing against an appropriate range of drought scenarios)?	Yes	Yes	Yes	Section 3: Water resources and drought risk
Have you as a minimum tested your triggers to the same severity of drought used in your WRMP for equivalent planning years		N/A	N/A	N/A

for the life cycle of your drought plan and consider more challenging but plausible drought scenarios?				
Have you discussed your preferred approach to test your triggers with Natural Resources Wales and/or the Environment Agency?		Yes	Yes	
Have you also provided the following within your plan?; - describe the timeline leading up to your scenarios - provide details of the scenario used including of different magnitude and duration - justify why you chose these scenarios -what actions you will take in different droughts and when prepare for / implement these - considered any actions taken by others – such as environmental drought orders that may affect your triggers and may change the actions you take.		N/A	N/A	N/A

<p>If you are a NAV with bulk supply agreement, have you worked with your supplier to understand any risk to your supply during a drought under different droughts (scenarios)? E.g. whether the amount of supply agreed is likely to be affected by different droughts.</p>		Yes	Yes	Section 3: Water resources and drought risk
<p>Section 4: Drought Management Actions</p>				
<p>Have you clearly and concisely set out everything that you plan to do from the onset, during and after a drought?</p>		Yes	Yes	<p>Section 4: Drought stages, triggers and testing</p> <p>Section 5: Drought management actions</p>
<p>Have you considered a suite of drought management actions that are appropriate to your supply network and customer base?</p>		Yes	Yes	Section 5: Drought management actions
<p>Have you considered following the likely sequencing for initially taking actions in line with regulator expectations (as set out in Section 4 Table 1)?</p>		N/A	N/A	N/A

<p>If you are a NAV, have you explained in your plan whether you have aligned taking your actions with timings of your supplier or considered your own sequencing (in line with Table 1)?</p>		Yes	Yes	<p>Section 4: Drought stages, triggers and testing</p> <p>Section 5: Drought management actions</p>
<p>Section 4.1: Demand side actions including temporary restrictions</p>				
<p>Have you set out what you will do to reduce the demand for water from the onset and during a drought?</p>		Yes	Yes	<p>Section 4: Drought stages, triggers and testing</p> <p>Section 5: Drought management actions</p>
<p>Does your drought plan include the following information (link to Appendix F) for each of your actions to reduce demand as follows?;</p> <ul style="list-style-type: none"> - description of the action - the trigger(s) and/or details of preceding actions to show the relative priority of taking your actions - the location – the area affected, for example at a company, WRZ or sub-zonal area - the time it will take to 		Yes	No	

<p>prepare for and implement the action</p> <ul style="list-style-type: none"> - the duration that the action is expected to be in place - who the action applies to e.g., whether there are any exceptions - the period or time of year during which the action would be most effective - an assessment of the risks associated with the implementation of an action, social, economic factors, health and well-being including any wider impacts to the public e.g., access to recreational activities - whether there are uncertainties associated with timings and effectiveness of implementing the action - how you will evaluate the effectiveness of implementing the action and where possible provide estimates of demand savings 				
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<p>Have you explained how you will temporarily restrict water use using temporary use bans (TUBs)? This includes how you have considered the relevant water use restriction legislation such as Water Use (Temporary Bans) Order 2010</p>	<p>Yes</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>Regarding temporary restrictions under a Temporary Use Ban (TUB) have you explained in your plan?;</p> <ul style="list-style-type: none"> - the geographical areas where these will be carried out - how household and/or non household customers (as relevant) will be affected by a TUB - what water use activities will be affected by a TUB - what are the statutory and non-statutory exceptions - how you will balance expected water savings against adverse impacts on customers and businesses (including economic and wellbeing) - how much time you will 		<p>N/A</p>	<p>N/A</p>	<p>N/A</p>

<p>set aside for comment during the consultation period before using a restriction and how you'll deal with an unexpectedly large response</p> <ul style="list-style-type: none"> - how you will tell customers, Government, Regulators, WDLG and/or NDG and other relevant groups about the introduction, phasing in and lifting of TUB restrictions - how you will prove to customers, partners and the government that you have acted in a proportionate and reasonable way - the compensation arrangements, if any, that may occur if you implement any temporary restrictions 				
<p>Have you explained how you will temporarily restrict water use using drought orders to restrict water use via non-essential use bans (NEUBs)? This includes how you have considered the relevant water use</p>	<p>Yes</p>	<p>Yes</p>	<p>Yes</p>	<p>Section 5: Drought management actions</p>

restriction legislation such as Drought Direction 2011				
Have you included the arrangements for discussions with yourselves and those bodies responsible for granting drought orders to restrict non-essential use from the onset and during a drought?	Yes	Yes	Yes	Section 5: Drought management actions
Regarding temporary restrictions under a non essential use ban (NEUB) have you explained in your plan?; - the geographical areas where these will be carried out - how non household customers - businesses, commercial, industrial etc (as relevant) will be affected by a NEUB - what water use activities will be affected by a NEUB - what are the statutory and non-statutory exceptions - how you will balance expected water savings against adverse impacts		Yes	No	

<p>on customers and businesses (including economic and wellbeing)</p> <ul style="list-style-type: none"> - how much time you will set aside for comment during the consultation period before using a restriction and how you'll deal with an unexpectedly large response - how you will tell customers, Regulators, Government, WDLG and/or NDG and other relevant groups about the introduction, phasing in and lifting of NEUB restrictions - how you will prove to customers, partners and the government that you have acted in a proportionate and reasonable way - the compensation arrangements, if any, that may occur if you implement any temporary restrictions 				
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<p>Have you consulted the UKWIR report 'Code of Practice and Guidance on Water Use Restrictions' when considering how to impose temporary restrictions?</p>		<p>Yes</p>	<p>Yes</p>	<p>Section 5: Drought management actions</p>
<p>Does your drought plan demonstrate that you will seek to implement actions (as relevant) in order of the likely sequencing as set out in Table 1 (Section 4) before applying for drought order for a NEUB?</p>		<p>Yes</p>	<p>Yes</p>	<p>Section 5: Drought Management Actions</p>
<p>Have you set out in your plan the compensation you may need to make in the event of losses/damages to affected parties as a result of implementing temporary restrictions under TUB and/or NEUB?</p>	<p>Yes</p>	<p>Yes</p>	<p>Yes</p>	<p>Section 5.2: Compensation</p>

<p>Have you set out how you will engage with relevant NAVs and/or Water Retailers operating in the location where action is required including temporary restrictions? In addition, have you defined who is responsible for preparing for, implementing and enforcing these?</p>		N/A	N/A	N/A
<p>If you are a NAV, have you set out how you will engage with relevant supplier regarding preparing for, implementing and enforcing these actions to reduce demand including temporary restrictions for household and/or non-household customers (as relevant)?</p>		Yes	Yes	Section 5: Drought management actions
<p>Have you set out in your plan any demand management actions that your will take as consequence of peak demands linked to dry hot weather (heatwaves) that may exasperate your supply position from onset and during a drought?</p>		Yes	Yes	Section 5: Drought management actions

Section 4.2: Supply-side actions

<p>Have you set out what you will do to maintain water supply from the onset and during a drought through supply-side actions?</p>		N/A	N/A	N/A
<p>Does the plan make full use of all your available licensed sources of water (as set out in your WRMP)? However, where an abstraction is identified as unfeasible and/or increasing volumes above recent actual abstraction during a drought is likely to cause an environmental impact, you should consider whether alternative options may be a better option to minimise the impact on the environment.</p>		N/A	N/A	N/A
<p>In order to demonstrate that each of your actions are appropriate have you?; - estimated how much your actions will contribute to maintaining water supply and said how you arrived at this</p>		N/A	N/A	N/A

<p>estimate</p> <ul style="list-style-type: none"> - made sure your actions align with other water companies or regulators drought plans / agreements that may affect you - set out the limits to the amount of water you can transfer via bulk supply agreement and/or shared resource from and to other companies and how this will change under different stages of a drought - carried out required environmental assessments including any monitoring, avoidance, mitigation and compensation measures and where possible completed as much of the work at planning stage (see section 5 for specific checklist items) 				
<p>Does your plan include the following information for each supply-side action (link to Appendix G) as follows?;</p> <ul style="list-style-type: none"> - the trigger for this action and/or the preceding action that leads to it 		N/A	N/A	N/A

<ul style="list-style-type: none"> - the deployable output or yield of the action (in megalitres per day), plus how you calculated it and any uncertainty in the estimate - the location (area affected or the whole supply zone) - the implementation timetable (time to prepare for, implementation and duration expected to be in place) - justify the time of year during which the action will be effective and uncertainties associated with timings and water provided - other risks associated with this action, for instance, social, economic or to other water users 				
Section 4.3: Drought Permit and Orders (Supply-side actions)				
<p>Have you included details (linked row 61 and 62) of all possible supply-side drought permits and drought orders you might apply for under the range of droughts ?</p>	<p>Yes</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>

<p>Have you set out any additional permits and approvals you may require such as land/planning permissions when applying for supply-side drought permit or orders?</p>	<p>Yes</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>Have you included discussions that have occurred between you and bodies responsible for granting these and the arrangements for discussions with yourselves and those bodies from the onset, during and post drought for all droughts covered by your plan?</p>	<p>Yes</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>Does your drought plan demonstrate that you will seek to implement actions in order of the likely sequencing as set out in Table 1 (Section 4) before applying for a supply-side drought permit orders? E.g. Have you prioritised specific demand measures such as enhanced water efficiency/ leakage management and your existing feasible supply</p>		<p>N/A</p>	<p>N/A</p>	<p>N/A</p>

actions that have the least environmental impact first.				
Have you carried out as much preparation work as possible to be application ready in advance of a drought event? In majority of cases these will be supply-side actions that most likely to be required and/or those that impact the environment the most (also linked to section 5).		N/A	N/A	N/A
Have you discussed with NRW and/or the Environment Agency which drought permit or order sites you need to be application ready?		N/A	N/A	N/A
Have you set out in your plan the compensation you may need to make in the event of losses/damages to source owners/affected parties as a result of implementing a supply-side drought permit or order?	Yes	N/A	N/A	N/A
Section 4.3: Emergency Drought Orders (Rota Cuts and Stand Pipes)				

<p>Have you set out in your plan summary information in relation to emergency drought orders (recognising that the full details will be provided within your emergency plan? Have you included:</p> <ul style="list-style-type: none"> - a brief explanation of the difference between your drought plan and your emergency plan - a brief description of what emergency drought orders are - the likelihood of these emergency orders being required - at what trigger point emergency drought orders will be planned for and implemented 		Yes?	Yes	<p>Section 5: Drought management actions</p> <p>Section 5.1 Alternative water supplies</p>
<p>Section 5: Environmental assessment, monitoring and mitigation</p>				
<p>We expect you carry out an environmental assessment in line with advice set out by NRW (link Appendix I) and/or the Environment Agency for each of your supply side actions in your drought plan – have you done this? This includes</p>		N/A	N/A	N/A

<p>outlining:</p> <ul style="list-style-type: none"> - assessing the baseline conditions - identifying any knowledge gaps - your strategy and timetable for filling these knowledge gaps and completing any baseline data collection - assess the environmental sensitivity, considered ecosystem resilience and the likely impacts on the environment (key environmental receptors) of your action - assigning a confidence level for your assessment outcomes 				
<p>As part of your environmental assessment, have you considered using Diversity, Extent, Condition, Connectivity and other Aspects of ecosystem resilience (DECCA) framework as a measure of 'ecosystem resilience'. Further information is available here: Ecosystem Resilience in a Nutshell 1:</p>		N/A	N/A	N/A

what is ecosystem resilience? (cyfoethnaturiol.cymru).				
Have you considered 'alone' and 'in-combination' likely impacts that each action and other actions in your plan and/or those taken by other water companies have on the environment, and where relevant, the combination effects of your action(s) with those of neighbouring water companies, regulators and other abstractors during a drought?	Yes	N/A	N/A	N/A
You must ensure that your environmental assessments meet all the expectations set out in the relevant legislation (link to Appendix I) – have you done this?	Yes	N/A	N/A	N/A
Have you set out any environmental monitoring required (link Appendix J) to collect baseline data, fill knowledge gaps and improve your understanding of likely and actual impacts during drought and post drought (recovery)?		N/A	N/A	N/A

<p>Have you set out how you will plan to avoid, reduce or mitigate for adverse effects that your actions have on the environment? This includes</p> <ul style="list-style-type: none"> - how you have considered avoiding and reducing impacts in the first instance - mitigation measures you will implement before or whilst drought is developing, during drought and following a drought (post-drought) to minimise the environmental impact of implementing your actions - clarify the potential duration of mitigation measures and how their end would be determined - provide evidence that the mitigation measures you are proposing will be effective for the receptors that could be at risk from your actions - set out how you will monitor the effectiveness of implementing any mitigation measures 	Yes	N/A	N/A	N/A
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<p>Have you included the permits and approvals you may need to implement measures to mitigate against adverse environmental damage. This might include permits to allow for compensation flows or alternative supplies to protect the environment or other water interests?</p>	<p>Yes</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>Where legally required, have you set out how you may compensate for the adverse impacts where it's not possible to avoid, reduce or mitigate for them?</p>	<p>Yes</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>Have you discussed your environmental assessment requirements, monitoring plans, mitigation and compensation measures as part of your pre-consultation with NRW and/or the Environment Agency/Natural England (if affects England)?</p>	<p>Yes</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>

<p>We expect you to complete as much work as possible on your environmental assessments, monitoring and mitigation plans at planning stage. Have you considered the recommended levels of effort or reporting for environmental assessment set out in Appendix L1.4?</p>		N/A	N/A	N/A
<p>Have you included your environmental assessments (including mitigation measures) and monitoring plans as technical appendices or signposted where this information is available from? In addition, have you included a high level summary of your environmental assessments (link to Appendix G) in your main drought plan?</p>		N/A	N/A	N/A
<p>Section 6: Strategic Environmental Assessment and Habitats Regulations Assessment</p>				

Have you carried out a screening to determine if an Strategic Environmental Assessment is required? An SEA will be required if it is determined that the plan is likely to have a significant effect on the environment.	Yes	Yes	Yes	Section 6: Environmental impacts
Have you consulted with NRW, Cadw and other relevant bodies as to whether they consider that a SEA will be required of your plan?		Yes		
If you have determined that SEA is not required, e.g., not likely to have a significant effect on the environment - have you prepared a statement of your reasons for this determination within your plan?	Yes	Yes	Yes	Section 6: Environmental impacts
If you have determined that an SEA is required, have you consulted Natural Resources Wales and Cadw where you plan affects Wales and if it affects England also Natural England, Historic England and the Environment Agency at	Yes	N/A	N/A	N/A

the scoping and environmental report stages of the process?				
The environmental report is specific to the SEA requirements and is separate to the environmental assessment's reports produced for each of the supply-side actions – although outcomes from the latter reports informs the SEA. Therefore, when completing the stages of SEA - have you considered specific assessment requirements and other criteria discussed with statutory consultee's (link Appendix L)?	Yes	N/A	N/A	N/A
Have you carried out a screening and included outcomes from this within your plan to determine if an Appropriate Assessment under HRA is required? AA is likely required when your plan or proposals within it risks having a significant effect on a European site(s), alone or in combination	Yes	Yes	Yes	Section 6: Environmental impacts

with other plans or projects				
Have you consulted Natural Resources Wales and/or Natural England on your screening and whether AA is required?	Yes	Yes	Yes	
If you have determined that an AA is required, have you consulted Natural Resources Wales and/or Natural England on a draft version ahead of public consultation and considered any advice you get back?	Yes	N/A	N/A	N/A
The AA is specific to the HRA requirements and is separate to the environmental assessment's reports produced for each of the supply-side actions – although outcomes from the latter reports informs the HRA. Therefore, when completing the stages of HRA - have you considered specific assessment requirements and other criteria discussed with statutory	Yes	N/A	N/A	N/A

consultee's (link Appendix L)?				
If you can not rule out any adverse effect on site integrity. The plan/proposal can not be enacted or adopted unless you pass 3 legal derogation tests. If this is the case, have you set out how and when you plan to meet these requirements in order to adopt the relevant proposal?	Yes	N/A	N/A	N/A
Section 7: Communication during a drought				
Have you included a communications plan that identifies how you will keep your specific customers, neighbouring water companies, regulators, Government, WDLG and NDG and other relevant groups informed of?; - how a drought is developing - how it might affect their supply (shape and contextualise the risks and impacts) - what you're doing to manage it		Yes	Yes	Section 7: Drought communications and management structure

<p>- the actions they can take to help including becoming more water efficient</p>				
<p>Does your communications plan also set out?;</p> <ul style="list-style-type: none"> - how your proposed communications activities are linked to drought triggers to cover all stages of drought - how you identify if you will need a flexible and adaptable approach (agile communications) to maintain communications throughout or sooner than planned - what geographical area (scale) these communications cover ensuring relevant to the audience you need to reach - how you will allow for an appropriate lead-in time for any communication activities that are directly linked to the drought management action(s) - the different audiences (if any) that specific 	<p>Yes</p>	<p>Yes</p>		<p>Section 7: Drought communications and management structure</p>

<p>communications apply to, the main messages and information you are sharing as well as how you will communicate including ensuring accessibility to the messaging</p> <ul style="list-style-type: none"> - how you will ensure your communications are inclusive by design as set out in Ofwat's guidance Service for all vulnerability guidance - examples of the information and messaging you are likely to issue - how you will make sure these activities are cost efficient for your customers 				
<p>Does your communications plan identify how you will scale up your specific household and/or non-household customer campaigns such as water efficiency appropriately as dry weather takes hold. You should plan pre-emptive campaigns and plan to engage as early</p>		<p>Yes</p>	<p>Yes</p>	<p>Section 7: Drought communications and management structure</p>

as possible with your customer base				
Have you considered what behaviour change tactics such as education and awareness, social influence or nudges you may take to encourage both individual and community customer response (as relevant) to take actions to voluntarily reduce their water use?		Yes	Yes	Section 7: Drought communications and management structure
Have you encompassed a flexible and adaptive communications plan (agile communications) that promotes using varied and innovative communications channels to help household and/or non household customers reduce water use?		Yes	Yes	Section 7: Drought communications and management structure
Have you set out how you will communicate and consult in advance with household and/or non household customers about your intention to reduce demand and to apply for drought permits and orders (as relevant)		Yes	Yes	Section 7: Drought communications and management structure

<p>Have you included any joint communications plans with other water companies and/or regional groups (as relevant)?</p>		N/A	Yes	Section 7: Drought communications and management structure
<p>Have you set out how you will work with regulators, WDLG and/or NDG, wider interest groups and partners including Consumer Council for water (CCW) to co-ordinate and timetable communication activities. This should include taking part in joint media briefings such as messaging on reducing water use including understanding cross border and other sector views on emerging drought issues?</p>		N/A	N/A	N/A
<p>Have you included proactive communications with customers to help inform them of the impacts of drought on people including health and well-being, the environment and provide advice on what they can do to help avoid or mitigate the impact?</p>		Yes	Yes	Section 7: Drought communications and management structure

Does your plan consider the different data, information and reporting requirements of your customer base?		Yes	Yes	Section 7: Drought communications and management structure
<p>Have you included any agreed data/information and reporting you have agreed to exchange and at what frequency with regulators, Government, WDLG and/or NDG as well as other relevant groups and frequency for this reporting from the onset, during and after a drought? Has this included;</p> <ul style="list-style-type: none"> - water situation reports (e.g., reservoir storage levels) - current water supply position (drought status) - forecasting of potential near future water supply position - information on actions you are taking and timings for when may have to escalate these (e.g., pre-consultation of drought permit or orders) - information that you may require from regulators or 		N/A	N/A	N/A

others to aid with your decision making				
<p>If you are a bulk supplier to a NAV or wholesaler to a water retailer, have you included within your plan?:</p> <ul style="list-style-type: none"> - the data/reporting sharing arrangements including information on current and future water supply position - ensuring consistency with the timings for preparing for and implementing demand management actions - sharing of key messaging / information with NAV to enable them to communicate with their customers if linked to your triggers – including water savings messaging and information regarding restrictions on water use 		N/A	N/A	N/A

<p>If you are a NAV, have you engaged with your supplier and set out within your plan</p> <ul style="list-style-type: none"> - the data/ reporting sharing arrangements especially regarding their current and future water situation with your supplier - how they will inform you if need prepare for and implement demand management measures linked to the suppliers triggers - how you will communicate with your customer base (and ensure consistency where required with that of your supplier e.g. regarding water efficiency campaigns or restrictions of water use) 		Yes	Yes	Section 7: Drought communications and management structure
<p>If you are a wholesaler, have you considered the steps set in the market-codes by MOSL on how communications should take place from the onset and during a drought between you (as the wholesaler) and any water</p>		N/A	N/A	N/A

retailers with eligible customers in Wales?				
Have you considered best practice examples of communicating and the recommendations from RADAR project 'Reviewing Approaches for communicating Drought status And Risk', the Consumer Council for Water's report 'Understanding drought and resilience' as well as the findings of the UKWIR report 'Drought and demand: potential for improving the management of future drought' and other relevant reports when developing your communications plan?		Yes	Yes	Section 7: Drought communications and management structure
Have you included how you monitor and evaluate the effectiveness of your communications activities delivered to a range of audiences from the onset, during and after a drought?		Yes	Yes	Section 8: Post-drought (recovery)

Section 8: Management Structure

Have you set out the management structure you will put in place from the onset and during a drought showing who has responsibility for what (the decision making hierarchy and roles within that structure)?	Yes		Yes	Section 7: Drought communications and management structure
Have you included details of the individual roles and responsibilities and any changes to the structure as a result of a worsening drought?			Yes	Section 7: Drought communications and management structure
Have you included a description of your management structure actions that are linked to drought triggers, such as how often the drought management team meets?			Yes	Section 7: Drought communications and management structure

Section 9: End of a drought

Have you included a process for stopping your drought management actions?		Yes	Yes	Section 8: Post-drought (recovery)
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<p>Has your plan also set out:</p> <ul style="list-style-type: none"> - the triggers you will use to identify the end of a drought - the actions you will take as drought pressures are reducing - the timings for the removal of your drought management actions and show how you will communicate this to regulators, Government, WDLG and/or NDG, your customers and other relevant groups 		Yes	Yes	<p>Section 5: Drought management actions</p> <p>Section 7: Drought communications and management structure</p> <p>Section 8: Post-drought (recovery)</p>
<p>Have you used several indicators to determine the end of a drought?</p>		N/A	N/A	N/A
<p>If you are a NAV reliant on a bulk supply agreement – have you included whether your decision to declare the end of drought is linked to your supplier or your own assessment of indicators?</p>		Yes	Yes	<p>Section 8: Post-drought (recovery)</p>

<p>Have you set out in your plan how you will review the actions taken and your communications from the onset, during and after the drought.</p>		Yes	Yes	Section 8: Post-drought (recovery)
<p>Does your review allow you to understand the following:</p> <ul style="list-style-type: none"> - how effective your drought management actions are and whether you should have taken any different actions - whether the drought triggers were effective at identifying when to prepare for and implement drought management actions - the actual environmental impacts of your actions including the use any monitoring results and appropriate analytical techniques - the actual impacts of your actions including health and well-being - how effective your monitoring was and if you would do anything differently in the future - how effective any avoidance, mitigation or 		Yes	Yes	<p>Section 7: Drought communications and management structure</p> <p>Section 8: Post-drought (recovery)</p>

<p>compensation measures you carried out were and whether you need to implement any changes in the future</p> <ul style="list-style-type: none"> - whether your estimates of reductions in water demand matched actual reductions (if available) - how effective were your communications across a range of audiences - how well you worked with other neighbouring water companies, NAVs and water retailers to implement drought management actions where required - how effective was your data and information sharing agreements with regulators, WDLG and/or NDG along with other relevant groups - how you will inform any reviews being carried out by the regulators, government, WDLG and/or NDG as well as other relevant groups and whether anything to consider for your own review - any information you 				
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learned that may have changed your understanding of your drought risk – any longer term improvements to resilience may be needed and to reflect this in your next WRMP and/or business plan.				
Have you set out how you will work with other water companies, regulators, Government, WDLG and/or NDG as well as other relevant groups at an early stage to help shape your review?.		Yes	Yes	Section 8: Post-drought (recovery)
Have you set out in your plan how you will report the learning from it and timescales for completion?		Yes	Yes	Section 5: Drought management actions Section 8: Post-drought (recovery)
Have you set out in your plan how you will inform reviews being carried out by others such as regulators, WDLG and/or NDG (where relevant)?		Yes	Yes	Section 8: Post-drought (recovery)
If you have implemented a supply-side drought management action, have you set out in your plan any relevant post drought monitoring for a sufficient		N/A	N/A	N/A

<p>period of time to understand how the environment is recovering? Have you discussed your post drought monitoring and how you will report any outcomes from it to Natural Resources Wales and/or the Environment Agency and Natural England.</p>				
<p>Have you set out how you will make changes to your WRMP, drought plan (including environmental assessments) and operational response (via action/delivery plan) after a review?. You should set out expected timescales for delivery, whether any of these require input from others such as regulators and how you will monitor progress of the change implementation.</p>		<p>Yes</p>	<p>Yes</p>	<p>Section 5: Drought management actions</p> <p>Section 8: Post-drought (recovery)</p>

Appendix D - Statement of response

The Statement of Response to the consultation is available on our website: [Drought Plan – Albion Eco Limited](#)

If you require a copy of the Statement of Response or any other document, please contact us on drought@albioneco.co.uk