



WATER RESOURCE MANAGEMENT PLAN 2024 (statement of response)

Albion Eco Limited

1 Background / Cefndir

The Water Industry Act 1991 (as amended by the Water Act 2003) underlines the importance of a water company's ability to meet the supply and demand requirements of their customers both currently and into the future. This document and associated tables outline Albion Eco's supply demand balance through to 2050 and is produced as required by the Water Act 2003, which established a statutory duty for a water company to produce a Water Resources Management Plan (WRMP). Albion Eco has taken into consideration relevant Directions and guidance documentation in compiling this Plan.

Mae Deddf y Diwydiant Dŵr 1991 (fel y'i diwygiwyd gan Ddeddf Dŵr 2003) yn tanlinellu pwysigrwydd gallu cwmni dŵr i fodloni gofynion cyflenwad a galw eu cwsmeriaid ar hyn o bryd ac yn y dyfodol. Mae'r ddogfen hon a'r tablau cysylltiedig yn amlinellu cydbwysedd galw cyflenwad Albion Eco hyd at 2050 ac fe'i cynhyrchir fel sy'n ofynnol gan Ddeddf Dŵr 2003, a sefydlodd ddyletswydd statudol i gwmni dŵr gynhyrchu Cynllun Rheoli Adnoddau Dŵr (WRMP). Mae Albion Eco wedi ystyried dogfennau Cyfarwyddiadau a chanllawiau perthnasol wrth lunio'r Cynllun hwn.

1.1 Albion Eco's Plan – Comments / Albion Eco's Cynllun - Sylwadau

Between 21 November 2022 and 24 February 2023, we consulted on our draft Water Resources Management Plan. In light of the responses received to this consultation we made various changes to the draft plan; these being set out in the table below. We worked closely with our stakeholders throughout the dWRMP24 process and we published details about the consultation and how to participate on our website.

Regular engagement with all of our customers took place during the dWRMP process and, indeed, continues to take place. We also hold regular liaison meetings with our bulk supplier and engage constructively with our regulators.

Rhwng 21 Tachwedd 2022 a 24 Chwefror 2023, buom yn ymgynghori ar ein Cynllun Rheoli Adnoddau Dŵr drafft. Yng ngoleuni'r ymatebion a gafwyd i'r ymgynghoriad hwn fe wnaethom wahanol newidiadau i'r cynllun drafft; mae'r rhain yn cael eu nodi yn y tabl isod. Buom yn cydweithio'n agos â'n rhanddeiliaid drwy gydol y broses DWRMP24 ac fe wnaethom gyhoeddi manylion am yr ymgynghoriad a sut i gymryd rhan ar ein gwefan.

Cynhaliwyd ymgysylltiad rheolaidd â'n holl gwsmeriaid yn ystod y broses dWRMP ac, yn wir, mae'n parhau i ddigwydd. Rydym hefyd yn cynnal cyfarfodydd cyswllt rheolaidd gyda'n cyflenwr swmp ac yn ymgysylltu'n adeiladol â'n rheoleiddwyr.

1.2 Albion Eco's Response to Consultee Submissions / Albion Eco's Ymateb i Gyflwyniadau Ymgynghorai e

Subject/Consultee	Consultation Comments	AEL Response	Final Plan Text Change
<p>Security of Supply (NRW & Ofwat)</p>	<p>If the non-potable bulk supply volume is reduced by 4 MI/d to 18 MI/d (as not guaranteed by Dŵr Cymru) and total demand forecast as 19.99 MI/d, this leads to a deficit of -1.91 MI/d for one year in 2025/26. We recommend the company clarifies if supply is reduced by 4MI/d and the demand of 19.99 MI/d in 2025/26 is correct whether there would be supply concern and if so, how they will address the deficit within its final plan.</p> <hr/> <p>Albion Eco should clarify how they intend to manage this risk.</p>	<p>Demand within the Shotton NAV is overwhelmingly driven by industrial processes and these have largely ceased during a major site redevelopment. The vast majority of site infrastructure will be renewed with leading edge efficient plant and processes. It is no secret that demand estimates will vary during the redevelopment process (lasting another 18-24 months).</p> <p>If there is a shortfall between demand and supply (in the unlikely event of non-potable supply being restricted to 18 MI/d during 2025/26), Albion Eco is confident that this can be met through a combination of approaches, including enhanced recycling, storage capacity and alternative potable supplies. The latter is within the scope of ongoing negotiations with our bulk supplier that will continue through to a conclusion and which will be incorporated into the final Plan or, otherwise, in a revised WRMP at the appropriate time.</p>	<p>Added to Section 5 'Supply Demand Balance':</p> <p>In the event that our bulk supplier is unable to provide the non-guaranteed non-potable water (up to 4MI/d), our modelling currently shows that in 2025/26 there is a potential shortfall of 1.91 MI/d. In the unlikely event of this shortfall, demand will be met through a combination of increased recycling and/or the use of alternative sources – either non-potable or potable (in the case of the latter, up to 2 MI/d – reflected in 3.1BL of the WRMP tables). Discussion with users and the bulk supplier are ongoing.</p>

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<p>Levels of Service (NRW & Ofwat)</p>	<p>Albion Eco has clarified that its Level of Service (LoS) is expected to be 1:48 Temporary Use Bans (TUBs) and exceeding 1:80 for Non-Essential Use Bans.</p> <p>The company also states that it will match the relevant LoS that Dŵr Cymru impose on their Alwen Dee resource zone customers. Within Dŵr Cymru's drought plan they stated that Alwen Dee's LoS for restrictions is around 1:200 TUBs and 1:500 NEUBs. In addition, note that Dŵr Cymru has informed us that the bulk supply to Albion Eco is from stand-alone non potable source independent to its Alwen Dee resource zone.</p> <p>We propose that the Albion Eco clarifies within its final plan whether it intends to change their proposed LoS and whether it should be linked to neighbouring Alwen Dee zone (through discussions with Dŵr Cymru).</p> <hr/> <p>Albion Eco should clarify its levels of service in its final WRMP</p>	<p>Albion Eco does not supply household customers. Given the useful feedback from stakeholders, further dialogue has been held with Dwr Cymru for both potable and non-potable supplies in order to reflect the different circumstances for each service.</p> <p>For potable supply serving domestic needs, it will match the LoS of Dwr Cymru's Alwen/Dee zone – that is 1:200 TUBs and 1:500 NEUBs.</p> <p>LoS for non-potable supply will not match that of the Alwen/Dee zone due to there being no infrastructure in common use – it is a stand-alone source.</p> <p>Confidential commercial arrangements cover the entirety of the non-potable supply, but clarification has been sought to establish, and then mirror, the appropriate LoS.</p>	<p>Amended Section 7 'Drought reliability and drought actions' from:</p> <p>Such restrictions are expected to comply with a level of service of 1 in 40 years for temporary use bans although Dŵr Cymru state a level of service of 1 in 48 years for the relevant water resource zone – a figure that we will match.</p> <p>To:</p> <p>Such restrictions to potable supplies are expected to comply with a level of service of 1 in 200 years for temporary use bans and 1 in 500 for non-essential use bans.</p>

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Demand Management (NRW & Ofwat)	<p>In the draft plan, the total demand is 19.99 MI/d by 2025/26, then remains static at 17.99 MI/d from 2026 onwards showing no demand reductions over whole planning period. Compared to its last plan (WRMP19) this equates to an average increase of circa 5 MI/d in demand due to its change in operations.</p> <p>We welcome Albion Eco’s commitment to help its customer achieve and maintain sustainable water use via water efficiency measures and leakage control. However, given that no demand savings presented in the plan, the company should continue to engage fully with its customer in advance of the factory been fully operational in order to understand its demand needs and revise its forecast accordingly. Further details of demand management measures discussed and when they will be implemented should also be include in the final plan.</p> <hr/> <p>Albion Eco should set out in its final WRMP how it proposes improving water efficiency at the Shotton site.</p>	<p>The new plant is being designed to the highest levels of water efficiency and current infrastructure is largely being replaced. The starting point, when the site is operational, is therefore very efficient, with no ageing or failing infrastructure. It is safe to assume that the starting point for water efficiency can not be bettered and therefore, unlike most other WRZs, no incremental efficiency gains are possible.</p> <p>Over the WRMP period, AEL will work with its customers to maintain efficiency and, when water assets require replacement, to use the most commercially cost-effective and sustainable option. Monitoring will also be a core component in ensuring efficient water use is maintained.</p>	<p>Added to section 4.4 ‘Changes in Non-Household Demand’:</p> <p>The latest and most efficient manufacturing infrastructure is to be installed on site, as such, it cannot be assumed that an arbitrary efficiency saving can be achieved year on year. However, with our focus on monitoring (see 4.3), establishing KPIs and zonal data (see 4.4) and engaging with customer when considering replacement infrastructure, we aim to keep future operations in line with leading edge efficiency.</p>

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Scenario testing (NRW)	<p>Although the 22 Ml/d non potable supply is not fully guaranteed and supplied from a standalone Dŵr Cymru source, Albion Eco states that is not anticipated during more extreme droughts that there will be restrictions on the non-potable bulk supply. However, no specific details have been provided within the draft plan on expected levels of drought resilience well as whether likely be any climate change impacts.</p> <p>Therefore, the company should demonstrate how it intend to test sensitivity of the non-potable supply to droughts/climate change (through these further discussions with DCWW) for its final plan</p>	<p>Drought and climate change scenarios are built into Dwr Cymru plans, including our bulk supplies, upon which LoS commitments are based. Therefore, no additional sensitivity testing on the non-potable supply is required beyond that contained in Section 6 'Headroom and sensitivity'.</p>	<p>No change to existing text, but dialogue with bulk supplier is on-going.</p>
Consultation (NRW)	<p>However, limited details of this engagement have been provided within the draft plan.</p> <p>The company should include within their final plan specific details of the feedback provided by each organisation during pre-consultation and how these have influenced the development of the plan. The final plan would also benefit from</p>	<p>A summary of pre-consultation responses (and consultees) was already set out in the consultation document, along with brief comments. Where possible, additional detail will be included in the final plan.</p>	<p>Section 2.5 'Pre-Consultation', additional text in Table:</p> <p>NRW:</p> <p>Water legislation – additional links provided for reference. SEA/HRA – comments on screening Drought reliability – ongoing review in Alwen/Dee zone. Water demand – discuss assumptions</p>

	<p>the inclusion of a list of organisations they directly contacted regarding public consultation.</p>		<p>and approach to efficiency. Headroom and sensitivity – link to common reference scenarios. GHG emissions – approach to net zero and climate and nature emergencies.</p> <p>Ofwat: WRMP Approach – provide evidence and ID changes between WRMP19 and WRMP 24. Add problem characterisation section. Supply forecast – discuss supply and quality issues, if any. Match LoS. Management and maintenance of assets. Demand forecast – consider all efficiency and leakage improvements. Set out demand assumptions. Supply-Demand Balance – include 25 year forecast, demand and supply options and comment on headroom risks. Customer engagement – demonstrate adequate customer engagement. Assurance – demonstrate Board level involvement.</p> <p>Section 2.5 final paragraph amended from:</p> <p>As a result of the feedback received to date, this consultation document incorporates additional detail relating to</p>
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<p>Compliance with relevant legislation (NRW)</p>	<p>Albion Eco is committed to promoting biodiversity resilience, carbon neutrality and helping to deliver the well-being goals. The company's final plan would benefit from specific details of how they are going achieve their commitment's.</p>	<p>Since production of the draft WRMP, Albion Eco has entered into a long-term agreement with North Wales Wildlife Trust to help improve access, wellbeing and biodiversity benefits to a nature reserve within close proximity to the Shotton site.</p> <p>Previously, a number of hectares of meadow, calcareous grassland, scrub, woodland and wetland were secured or improved (by Albion Eco's parent company) through site stewardship or ownership.</p>	<p>Text update (Section 8.3):</p> <p>We are delighted to be working as a long-term Natural Partner with the North Wales Wildlife Trust at a reserve close to our Shotton supply zone. This relationship aims to enhance local community facilities, to promote biodiversity and bioabundance, and to establish monitoring and educational resources.</p> <p>Further afield, we are working on new business opportunities that seek to promote landscape change leading to improved flood management and carbon sequestration.</p>

1.3 Next Steps / Y camau nesaf

We expect to publish our final plan later this year.