

**Draft Water Resources Management Plan – Representations received from Welsh Assembly Government (May 2009)**

<b>Ref No.</b>	<b>Representation / Comment / Suggestion</b>	<b>Who from</b>	<b>Response</b>	<b>Category</b>
1	The Plan should include more detail of the measures and targets that are to be reached in terms of reduced consumption.	CCWater	Accepted. Expectations clarified and the Final Plan amended accordingly.	Water efficiency and metering
2	All DVW customers within the identified resource zone should suffer no water supply deficit at all.	CCWater	This is an aspiration of the Company but increasing levels of service has cost implications. In addition, there was no support from customers to increase the levels of service.	Demand forecasts
3	A contingency plan with all cost efficient measures, which could delay or prevent a supply deficit occurring be put in place.	CCWater	The Company notes the concerns of CCWater. The central estimate taking account of all known factors shows no problems within the 25 year planning horizon. In view of this, the Company feels it is appropriate to keep forecast under review and assess in detail the options as soon as a deficit is forecast.	Demand forecasts
4	As headroom is declining towards the end of the period close monitoring will be required.	CCWater	The Company notes CCWater's comments regarding the reducing available headroom and will, as business-as-usual, continually monitor and review the available headroom.	Demand forecasts
5	The final WRMP should clarify whether the drop in non-household demand is a general trend or a temporary downturn, which could require review at regular intervals to ensure that water supply could be sustained.	CCWater	At this stage it is difficult for the Company to confirm whether the drop in non-household demand is temporary or permanent. Non-household demand will continue to be reviewed on a regular basis. There is certainly more interest in water efficiency but there is no clear indication of impact and timescale.	Demand forecasts
6	DVW should clarify whether the reduced figure of £5million for investment that would increase ( <i>decrease [sic]</i> ) the rate of its mains renewal would still deliver the WRMP targets.	CCWater	In between the draft and final business plan submissions the Company carried out a re-assessment of the mains renewal rate to ensure no deterioration in the serviceability indicators. Based on better information the Company was able to confirm that the revised investment plan ensured no deterioration.	Investment

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7	Suggest that the annual average rate of housing of 417 in Chester is treated as a minimum figure for the purposes of demand forecasting	NWRDA	The Company has reviewed the latest Growth Point housing trajectory and believes the Company's housing connections is a reasonable central estimate, particularly in the short-term and therefore proposes no change.	Demand forecasts
8	In July 2008, the Housing Minister approved the establishment of the West Cheshire Growth Point. The Growth Point proposals aim to deliver housing growth at a rate of 23% above the Regional Spatial Strategy figures. In the West Cheshire Growth Housing Point Programme of Development this is translated into a potential annual housing delivery rate of 517 homes in the Chester area, further suggesting that Dee Valley Water should make allowances for higher levels of growth in their demand forecasts.	NWRDA	At the time of the announcement by the Housing Minister the Company reviewed the West Cheshire Growth Point Programme and it appeared that most of the new housing was planned for the Ellesmere Port area. As noted in 7. above the Company remains to be convinced that the Growth Point aspirations will be achieved, especially in the short term.	Demand forecasts
9	The proposed WRMP will <b>not</b> (alone or in combination with other plans and projects) lead to measures that will increase the present risk to European sites within the Plan area only if entrainment issues at (other) large abstraction points are addressed.	CCWales	The Company has been informed by United Utilities that they have submitted fish screening projects in their Final Business Plan.	Environment
10	The company should improve its approach to forecasting non-household demand.	EA (Wales)	The Company notes the recommendations for improving the non-household demand forecasts and undertakes to improve by the next WRMP.	Demand forecasts
11	The company should provide additional evidence to supports its demand forecasts for Per Capita Consumption (PCC) and occupancy rate.	EA (Wales)	The Company notes the Agency's comment regarding their expectations that they would expect to see unmeasured occupancy rates being higher than measured. In general the Company would agree with this comment if nobody moved but the Company's forecasts take account of movers. It is worth noting that as meter penetration increases the probability of a large family moving into a property that is metered increases. It therefore seems reasonable to assume that the occupancy rates will eventually converge.	Demand forecasts

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12	The company should make more progress on reducing PCC.	EA (Wales)	The Company notes that customers that are supplied through a meter already have a very low PCC. The unmeasured PCC figure is relatively high but there is little incentive for these customers to reduce their consumption. Given the healthy supply demand balance it is difficult to justify major water efficiency schemes. Continuing with education and better targeting of water efficiency activity should have an effect.	Demand forecasts
13	The company should explain how it proposes to maintain current rate of optants.	EA (Wales)	The Company believes it has explained how it will maintain the current rate of optants in the plan, eg additional promotion of the scheme or by replacing meters on change of occupancy. It should be noted that the forecast annual number of optants will decrease as the number is based on 3.2% of unmeasured customers switching (i.e. 3.2% of a reducing number)	Water efficiency and metering
14	Provide information on how the company complies with Sections 3(a) – (c) of Water Resources Management Plan Direction 2007.	EA (Wales)	The Company notes the omission regarding the inclusion of greenhouse gases from the draft WRMP. This has been updated for the Final WRMP.	Compliance with the Act
15	Climate Change. The company should redo its assessment of climate change using outputs from UKCIP09 once available.	EA (Wales)	Noted. In view of the late publication of the UKCIP09 climate change scenarios the Company will compare the factors with those already assessed for the Company owned resources. The Company will work with the other stakeholders on the River Dee to assess the impact of climate change on the River.	Environment
16	Leakage. The company should present its leakage forecast over the whole planning period.	EA (Wales)	The Company will assess whether this is achievable or sensible given the variability in the other supply demand factors. Long term forecasts for leakage are less reliable as technological developments can render future forecasts redundant.	Demand forecasts

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17	Data accuracy. The company must ensure that its final plan is consistent with its data tables.	EA (Wales)	Noted.	Demand forecasts
18	Reconciliation of supply demand balance. The company should set out the adjustments it has made to components of demand to reconcile the water balance using the Maximum Likelihood Estimation for both of its resource zones in its final plan.	EA (Wales)	Noted. The Company will assess how this can be done for the Final WRMP.	Demand forecasts