



Water Efficiency Proposals
WRc plc
Frankland Road
Blagrove
SWINDON
Wilts.
SN5 8YE

T/6/DM

7 March 2007

Dear Sir/Madam

Water Efficiency in New Buildings.

HBF is the principal trade organisation representing the interests of house builders in England and Wales. Our members include companies of all sizes, ranging from multi-national household names through regionally based businesses and small local companies. They are responsible for more than 80% of the new homes built every year.

We attach our response to the questions in the above consultation.

Yours faithfully

D F Mitchell
Technical Director

CONSULTATION RESPONSE



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Water Efficiency in New Buildings

Many of the proposed measures (dual flush toilets, maximum flow rates etc are readily available already and, while HBF has some reservations, most of the proposed standards are achievable with current technology, although customer “buy in” would be a prerequisite.

Our main concern is how this proposed new Building Regulation will fit in with the Code for Sustainable Homes, which is currently worded to require a greater level of water efficiency than Building Regulations (but there is no such target in the existing regulations).

Our response to the questions is as follows:

1. What is your view of the whole building performance standard approach for water efficiency? Can it be made to work?

A whole building performance approach would be seen to enable an element of flexibility in designing the water supply and fittings for new homes.

As an Industry it is encouraging to see that Water and Sewerage Companies are being asked to provide incentives to Developers where there is shown to be water efficiencies made in properties. Such incentives are welcomed and should be focused on both water and sewerage savings for these Companies.

Although there are advantages to the fittings approach we are concerned about how consistently these could be applied. A rate per person would be a clearer and more measurable standard.

Another issue which needs to be considered outside of making new buildings water efficient is the present levels of water supply leakage and its effect on water conservation – figures supplied by the Regulator indicate that reducing current leakage rates by 0.5% would save sufficient water for more than 160,000 new homes. This takes into account that at present new build is on 72% of Brownfield sites where a majority of these sites did have a previous demand on the existing water network.

2. If this were the approach chosen, which of the four target levels should be used (in the range 120-135 per head per day)?

Given that the Levels of the Code for Sustainable Homes set increasingly higher targets, which are stated to be higher than those in Building Regulations, a new rate

within Building Regulations should not be set below 130 litres per head per day so that Code Level 1 could demand less.

3. Are there any constraints on using the existing building control to ensure compliance?

Yes. For instance we would not wish to see duplication in the Water Fitting Regulations. There is also the problem with the Code mentioned in reply to Q2.

4. Should we regulate separately for very high water use items? If so, how?

If the rate is set for the dwelling as a per person usage there seems little point in additional regulations. Apart from setting a two-tier water tariff (all properties being metered) there seems little scope for differentiating between high and low water usage items, as the lower per person rate should affect consumer choice.

5. Which of the regulatory options (A or B) will give house builders most flexibility and be most cost-effective and practical?

Option A. This option would give maximum flexibility. In theory (see reply to question 7) it could probably be achieved with devices produced for the mass market given appropriate regulatory incentives, and providing manufacturers have changed their production methods by the time the regulations are in force.

6. Which option (A or B) would provide the better incentives for driving innovation in the marketplace?

Option A. Specifying water usage or flow rates for fittings would not encourage innovation as developers would fit the standard basic items but could still install higher water usage items such as spa baths. There would be no incentive for the manufacturers to consider alternatives.

7. Will the market be able to supply compliant fittings in sufficient quantities within the timescale proposed i.e. from 2008 onwards?

The bathroom manufacturers may be better placed to answer this but we do have serious concerns that they might not be able to do this. There is a perception that cheaper imports are adversely affecting innovation in the UK domestic manufacturing industry and this is unlikely to change. Again, consumer demand might have an impact but the evidence is that this does not yet exist.

In relation to Questions 8 to 11 the HBF feel it is inappropriate to submit a reply as these questions fall outside of our remit.

In conclusion HBF sees no reason why such measures should not be implemented. However, the requirement in the Code for Sustainable Homes for a level above a Building Regulation standard that does not yet exist does give cause for concern that, once again, short term political expediency has led to confusion and perplexity. A clear and transparent strategy for increasing housing supply should not include such anomalies.

D F Mitchell
Technical Director