

Water Efficiency Team  
Area 3D  
Nobel House  
17 Smith Square  
London  
SW1P 3JR

3 July 2013

Dear Sir/Madam,

**RE: Consultation on the Future management of Private Water Supply Pipes**

The HBF welcomes the opportunity to respond to such an important consultation. As the main trade federation for the House Building Industry in England and Wales we have over 300 Members who in turn provide around 80% of all new homes in the UK. From the HBF's perspective and that of the purchaser of a new home, the proposal(s) contained in this consultation address a major issue for consumers in addition to making an effective contribution towards reduced leakage. In general many of the proposals are supported by house builders – this will be very evident when Defra considers the industry's response to each of the consultation questions.

**Question 1** - Is option 0 a suitable and sustainable option for future management of water supply pipes?

- In short, no – for many years the house building industry in England and Wales has long advocated that private water supply pipes should be an integral part of Water Companies wholly owned assets for which they have full responsibility.

**Question 2** - Have you any overall comments/evidence on Option 1?

- A voluntary 'Code of Practice' for maintenance and repair is neither a suitable or sustainable option. The growing importance of water conservation and the need to reduce leakage can only be effectively managed by a change towards greater control and responsibility on the part of Water Companies.

**Question 3** – Have you any overall comments/evidence on Option 2?

- Option 2, 'creating a power to regulate' that will provide the means for all service pipes to be adopted by Water Companies is by far the best option and one that is fully endorsed by the Home Builders Federation.

**Question 4** - Are there any potential alternative options not included here? For example, could more stringent options be placed on private owners to improve the quality of their supply pipes, or is there anything beyond the current work programmes and report and repair policies of water supply companies that would be deliverable?

- The HBF is firmly of the opinion that Option 2 is the best case scenario for all future needs and requirements.

Moreover, it has greater synergy with the transition to automated meter reading (AMR) and the need for all partner/stakeholder interests to better monitor and control water usage.

**Question 5** - What is your preferred option?

- Option 2

**Question 6** - Have you any comments/evidence about the impacts of the options on management and repair of water supply pipes?

- The HBF, working together with Water UK, has identified the need for installation training for water service pipes and meter housings. This initiative is being taken forward but it requires greater traction on the part of Water Sector for it to be successfully implemented and in a timely manner.

**Question 7** - Does this list of groups include everyone you think could be impacted by the options?

- Yes

**Question 8** - Have you any comments/evidence, both monetised and non-monetised, on the potential impact on customers and property owners from the options?

- The overwhelming advantages of option 2 eclipse all other considerations. Moreover, based on the cumulative statutory water leakage returns presented to the Regulator (Ofwat), if Water Companies were to reduce their leakage rates by a mere 1%, this would save enough potable water to service the needs of around 160,000 new homes. The initiatives outlined in this consultation therefore provide the means to make an effective contribution towards water conservation and reduced wastage.

**Question 9** - Have you any comments/evidence, both monetised and non-monetised, on the potential impact on water supply companies from the options?

- See response to question 8.

**Question 10** - Have you any comments/evidence, both monetised and non-monetised, on the potential impact on insurance companies from the options?

- The overwhelming advantages of option 2 eclipse all other considerations and above all, it presents a real net gain for those most seriously affected by present working practices, namely the consumer/customer.

**Question 11-** Have you any comments/evidence, both monetised and non-monetised, on the potential impact on businesses offering water services/advice from the options?

- The suggested methodology for new entrants whereby as part of their service they are obliged to notify the host water company of any leakage incidents makes eminent and practical sense. Moreover, it puts the responsibility for maintaining the integrity of the supply system where it belongs, namely the water companies.

**Question 12 -** Have you any comments/evidence, both monetised and non-monetised, on the potential impact on pipe repair businesses from the options?

- The overwhelming advantages of option 2 eclipse all other considerations.

**Question 13 -** Have you any comments/evidence, both monetised and non-monetised, on the potential impact on house builders/property developers from the options?

- To suggest that we could maintain the status quo regarding current building standards or practice covering pipe-laying, materials and water pipe fittings is not strictly correct. There is considerable evidence to the effect that there is a need for better best practice guidelines to be adopted regarding the installation of new service pipes and meter housing on new developments. However as mentioned in answer 6 the HBF is working together with Water UK to resolve this issue, which is progressing well. Moreover, there is a need for the WRAS accreditation system to be made far more robust and responsive in terms of 'fittings compliance' otherwise we run the risk of non-compliant/un-approved fittings being utilised. Again, HBF has recognised the importance of such and is already working with WRAS in this area.

**Question 14 -** Have you any comments/evidence, both monetised and non-monetised, on the potential impact on other business/sectors from the options?

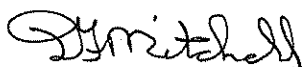
- None that are of intrinsic relevance and/or importance.

**Question 15 -** Would there be significant impact on business/non-household premises from the options?

- We can only see widespread improvements and benefits for all partner/stakeholder interests.

In summary, the HBF is wholly supportive of the proposals contained in this consultation. They represent a practical and sustainable way forward that has the dual benefit of making an effective contribution towards better potable water management and conservation. Not only are we willing to respond to any questions that may follow after close of the consultation, but HBF will be more than happy to work alongside Government to see the successful implementation of a change that is long overdue.

Yours faithfully



**Dave Mitchell**  
Technical Director

