



## Response Form for the consultation of Water Efficiency in New Buildings:

Respondent Details		Please return by 9 March 2007 to:
Name:	Joanna Worley	Water Efficiency Proposals
Organisation:	East of England Regional Assembly	WRc plc
Address:	Flempton House, Flempton,	Frankland Road
Town/City:	Bury St Edmunds,	Blagrove
County/Postcode:	IP28 6EG	Swindon
Telephone:	01284 729431	Wiltshire SN5 8YF
Fax:	01284729429	E-mail:
E-mail:	Joanna.worley@eera.gov.uk	<a href="mailto:waterefficiency@wrcplc.co.uk">waterefficiency@wrcplc.co.uk</a>
		Weblink:
		<a href="http://www.wrcplc.co.uk/waterefficiency">www.wrcplc.co.uk/waterefficiency</a>

Please use an × in answering the following questions.

If completing the questionnaire electronically (in MS Word®), please double click on box and change Default Value to 'Checked'.

### Organisation Type (× one box)

- |                                        |                          |                                      |                                     |
|----------------------------------------|--------------------------|--------------------------------------|-------------------------------------|
| Academic/Research                      | <input type="checkbox"/> | Lobby Group                          | <input type="checkbox"/>            |
| Architect/Architectural Technologist   | <input type="checkbox"/> | Local Authority – environment health | <input type="checkbox"/>            |
| Building Control Body                  | <input type="checkbox"/> | Local Authority – other              | <input type="checkbox"/>            |
| Charity                                | <input type="checkbox"/> | Manufacturer                         | <input type="checkbox"/>            |
| Consultant                             | <input type="checkbox"/> | Media                                | <input type="checkbox"/>            |
| Developer – commercial                 | <input type="checkbox"/> | Professional Body                    | <input type="checkbox"/>            |
| Developer – dwellings                  | <input type="checkbox"/> | Property Funder                      | <input type="checkbox"/>            |
| Engineer (civil/structural/mechanical) | <input type="checkbox"/> | Property Management                  | <input type="checkbox"/>            |
| Government Department/Agency           | <input type="checkbox"/> | Test Body/Association                | <input type="checkbox"/>            |
| Housing Association                    | <input type="checkbox"/> | Trade Association                    | <input type="checkbox"/>            |
| Individual – professional              | <input type="checkbox"/> | Warranty Provider                    | <input type="checkbox"/>            |
| Individual – member of the public      | <input type="checkbox"/> | Other                                | <input checked="" type="checkbox"/> |

Do you want your responses to be treated as confidential?

Yes:

No:

If yes, please give reasons

## New Homes

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

Yes:  No:  No View:

**Comments:**

The whole building performance standard approach to regulation is supported as this is considered to be the most easily monitored and readily understood. However, it must be recognised that in view of the decision not to set different minimum levels of consumption in different regions, the scope for regions to deliver performance significantly better than the national minimum standards (through measures such as working with water companies and promoting best practice) will be limited. Therefore it will be necessary to set the national standards at sufficiently close to the performance needed in the most pressured regions of the country.

2) If this was the approach chosen, which of the four target levels should be used (in the range 120 to 135 per head per day)? Please indicate with a cross.

120  125  130  135  None of these:

**Comments:**

The East of England not only has low levels of rainfall but also is proposed to take significant rates of development in the East of England Plan. Following considerable work to inform the preparation of the East of England Plan and debate at the Examination in Public it has been determined that water savings are needed in new development equivalent to at least 25% of current levels of domestic consumption. This equates roughly to a consumption of 110lpd and is in addition to savings needed to be delivered in the current stock.

As all the possible target levels being consulted on are significantly higher the level required for a sustainable level of water consumption in the East of England, EERA **objects** to the proposed target levels identified in the consultation. It requests that serious examination is given to the practicability of requiring minimum standards below 120lph. If it is considered that such standards cannot be required nationally at this time then it is requested that further consideration be given to allowing certain regions to set more challenging binding minimum requirements through their Regional Spatial Strategies where this can be justified through the RSS preparation process.

As Level 3 of the Sustainable Buildings Code relates to a target consumption of 105lpd (and will be applied to all publicly-funded new homes from April 2008) it would seem sensible to require all private sector new homes in the East of England to conform to at least level 3 of the Code (rather than introduce a marginally different target).

3) Are there any constraints on using the existing system of building control to ensure compliance?

Yes:  No:  No View:

**Comments:**

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

Yes:  No:  No View:

**Comments:**

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

A:  B:  No View:

**Comments:**

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

A:  B:  No View:

**Comments:**

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

Yes:  No:  No View:

**Comments:**

## **Water Use in the Workplace**

**8) Which is your preferred benchmark of options 1 to 4 set out on page 25?**

1  2  3  4  None of these:

**Comments:**

**No comment**

**9) If none of these, what alternative would you like to see?**

**Comments:**

**No comment**

## **Domestic Uses of Non-Household Buildings**

**10) Should we have separate standards for residential institutions e.g. hospitals?**

Yes:  No:  No View:

**Comments:**

**11) Are there any other factors we should take into account?**

Yes:  No:

**Comments:**

**No comment**

## **12) Other Comments:**

The consultation on Water Efficiency in New Buildings is welcome as this is a significant issue for the East of England. The intention to secure water efficiency by amendment to the building regulations is also supported as an appropriate way of introducing minimum requirements.

The decision not to consult on different standards being brought forward in different regions is considered reasonable. It is accepted that manufacturers of water fittings do not operate on a regional basis and national standards would help clarity.

It is a missed opportunity to exclude greywater recycling and rainwater harvesting from these proposals (stated in 4.3 of the consultation document). Potable water is currently wasted in large volumes for flushing toilets, washing, watering gardens etc, all of which could be carried out using rainwater or recycled water. A range of policy levers are needed to make people change how they use water, for example, encouraging the incorporation of these systems in the construction of new buildings, and establishing a grant system for householders to incorporate water efficiency systems in their homes, similar to those available through the Energy Savings Trust for improving energy efficiency.

Water Efficiency Proposals  
WRc plc  
Frankland Road  
Blagrove  
Swindon  
Wiltshire SN5 8YF

E-mail: [waterefficiency@wrcplc.co.uk](mailto:waterefficiency@wrcplc.co.uk)

Weblink: [www.wrcplc.co.uk/waterefficiency](http://www.wrcplc.co.uk/waterefficiency)