



Response to consultation on Environmental incentives to support sustainable new homes

From Stormwater Shepherds UK; written by Jo Bradley, Director of Operations

June 30th 2023

Q1) Do you agree with our proposed aim for environmental incentives?

Yes. But they should go further to balance the development of new homes to the availability of water. Where new homes and businesses are being planned in water-scarce areas, the cost of connection should be significantly higher than that in areas with a water surplus. Although it is good to incentivise water efficiency, it should follow that we disincentivise the building of homes and businesses where there is inadequate water supply.

Why are these measures being incentivised and not mandated. The inclusion of water saving devices, SuDS and community rainwater harvesting facilities should be mandated on all new developments across England and Wales. Have you not seen the projections of the impacts of Climate Change?

Q2) Do you have comments on the characteristics of good environmental incentives?

There must be an element of long-term certainty, especially around water saving devices. How can the water company be certain that homeowners won't simply swap-out their water saving devices for more conventional devices? There should be a requirement for periodic checks. And when homes change hands, all the fitting should be checked again.

Q3) Do you have any comments on the extent to which any environmental incentives could or should be adapted for implementation in Wales?

No Comment

Q4) Do you have any comments on the case studies outlined?

Standards for new homes should be 100 l/p/d EVERYWHERE. The new Water Resource Management Plans go on about how all regions will be interconnected in future and water will move from the North to the South East, so all new homes should have to achieve the same level of water efficiency to protect water supplies nationally.

If we're going to favour the 'fittings-based approach', how will we ensure that homeowners don't simply swap-out their water efficient shower for a more water-using equivalent? And how do we make sure that the dual-flush toilets actually deliver 4/2.6 l flushing? And who will replace or fix them when they break and leak? A leaky loo is far more wasteful than a non-leaky single-flush loo. Without certainty that products work as they say they will, and reassurance that they won't simply be replaced, the whole concept collapses.

Your document states "*Thames Water says evidence from its smart water data from new builds shows that water consumption levels in homes built using the calculations approach*

do not achieve the consumption levels stipulated in Part G2. Whilst variability in behaviour explains some of this, Thames Water concludes that the calculation approach allows non-water efficient devices to be installed in new homes, leading to higher levels of actual consumption once the homes are occupied.” How do we stop this? If we don’t, the whole process is pointless.

Your document goes on to say that *“Thames Water acknowledges that the fittings approach requires the developer to specify devices and appliances within certain flow rates and volume limits, and that, in the absence of clear water labelling, this information can be difficult to locate.”* So, again, without some quality assurance for the products being selected and fitted, the whole process is pointless.

Your report shows that United Utilities found *“Of the 156 properties audited between January 2021 to present, 37% passed. The main cause of audit failure was the flow rates in taps and thermostatic showers, suggesting that flow limiters had not been inserted during installation.”* So, the final nail in the coffin for this approach is the plumbers and fitters. There is no certainty that the devices work; there is no certainty that they will continue to work in the future; there is no certainty that the homeowners won’t swap them out, and there is no certainty that the plumbers will install them in the first place.

The whole approach needs to be more robust. Water saving devices and fittings should be mandatory on all new-builds – there is no reason not to do this. All devices must have to comply with manufacturing standards. All properties must be inspected after occupancy to check that the devices are still in place, and again when any property changes hands.

The WRc case study found that *“no single property complied with the regulations”*. You cannot proceed with such a flimsy approach.

Q5) Do you have any comments on our proposed standardised incentive tiers?

This is a good idea – it will be better for developers and will encourage all plumbers to learn how to install the water saving devices correctly. However, it will only work if you apply the checks and constraints described in my answer to Question 4.

Q6) Do you have any comments on our proposal for a common methodology / technical standards to assess water efficiency?

No comment

Q7) Do you have any comments on the details of our proposal for companies to offer bespoke incentives?

No comment

Q8) Do you have any comments on the potential for reputational incentives?

That’s a good idea and I am confident that the Waterwise checkmark system is a good model to base it on. But how will you prevent developers from creating their own ‘checkmark’ system and how will that be policed? And how do you make sure that the homeowners don’t swap-out the water saving devices once they have moved in? Will the water efficiency rating be checked every time a home changes hands?

Q9) We seek views on how the process for agreeing and paying environmental incentives might best be organised in practice, and whether this is consistent with existing developer services processes.

Q10) Do you have any comments on how high levels of compliance with the incentive technical criteria might best be achieved?

I support the idea of auditing a sample of new homes and I also support the disqualification from applying for future environmental incentives for developers whose homes fail the audit. But I come back to the need for quality assurance on the products and fittings themselves. How can you be sure that dual flush toilets work as they should; who will check that water-efficient showers aren't replaced and who will check that leaky water butts aren't removed. These systems and devices are only as good as the care they receive, and they are no good at all if homeowners get rid of them.

Q11) Do you have views on whether environmental incentives are best funded as an environmental component of the infrastructure charge or as a separate charge?

No comment

Q12) Do you have any comments on our proposal for guidance issued under the charging rules and how they are developed and maintained?

No Comment

Q13) Do you have any comments on our approach for managing interactions with the regulatory framework?

No comment