

**From:** [REDACTED]  
**To:** [Charging](#)  
**Subject:** Environmental Incentive consultation  
**Date:** 10 July 2023 12:26:59

---

Please see below my responses to your currently consultation on Environmental Incentives

Q1 Yes.

Q2 A good environmental incentive would be clear how the water efficiency target to be achieved is defined. There appears to be some discrepancy in whether the 110l/p/d is within the new home (i.e. less ambitious than building regs for new homes in water stressed areas without external green space) or a total water demand, which is more difficult to assess, but would represent an actual reduction from current water demands. This would need to be translated into a suitably lower water demand for new homes in the building regulations.

Q3 Common incentives would be useful.

Q4 Clearly, more joined up of capacity to check and enforce building regulations compliance at design and specification stage as well as post installation is needed and this needs to be consolidated by actual water consumption figures in the properties.

Q5 Silver tier needs to set the extent to which water saving is achieved by substitution measure. Currently water companies describe this per unit, but it would be better per person.

It is also worth considering whether tiers for non-residential facilities should be developed, like leisure facilities including those in schools, which don't aim for BREEAM certification in the way offices often do and have a high water demand.

Bronze tier needs to set the extent to which SuDS reduce peak discharges and discharge volumes.

If I understand this correctly this would mean that all water companies set a the Bronze tier for 100l/p/d. Water company X is in a water scarce area, so only gives an incentive of £Z, because it wants their developers to meet lower targets, but water company Y is not in a water scarce area and happy to offer an incentive of £3Z for this efficiency level. Water company X sets an additional tier, say Bronze Star, to meet their local requirement of 85l/p/d and offers the incentive £3Z for achieving this?

Q6 It may be suitable to set a common framework document, however, Building Regulations are not suitable for this as they are by nature never ambitious and only set upper limits, not what is aimed to be achieved. It may be suitable to adapt the Building Regulations water consumption method for evidence, but it would benefit from the inclusion of actual fitments as used in the Unified Water Label. This may be forthcoming with the mandatory water label and could then be focussed on the UK market.

Agree that installation checks need to be included. I also agree that resident's behaviour needs to be checked and feel that it needs to be done with quite a fine grain, to allow addressing shortfalls, while maintaining privacy.

Q7 See last paragraph of my comment on Q5. I think this is very important to clarify how standardised tiers adapt to local need.

I agree that additional bespoke incentives on further technologies can be set by companies to tackle specific issues, but adaptation of the standardised tiers needs to be included in the first instance.

Q8 It would be good if this could align with/ feed into the Future Homes Standard. I would not invent another badge. Overall, a development water efficiency label, similar to EPC and DECS might be a useful approach, but would not be driven by water companies.

Q9 No opinion

Q10 I agree that random sample audits will be needed and that deterrents of temporary

disqualification might work. How is this intended? Developer can't receive environmental incentive for other schemes for a while? Would not work so well for small/ infrequent developers. Alternatively a reduced payment for the failed scheme might be considered, i.e. 20% reduction at first failed visit, a further 40% reduction at second visit and no payment if development fails again at third visit as it is unlikely by that suitable remediation measures will be taken. This would require a transition period or the option for the developers to pay for "test visits".

Further research into "decay rates" of water efficient installation would be useful, I understand their half-life is currently around 8.5 years. This needs to be extended significantly.

Q11 I thought the Environmental incentive payments would be made out of reduced Infrastructure charge investments, i.e. water company does not have to upgrade water main and therefore needs to invest less in infrastructure.

Q12 No comment

Q13 No comment

Regards,

Dorothee

[REDACTED]

Utility Coordinator  
Growth & Infrastructure Team  
London Borough of Tower Hamlets  
Tower Hamlets Town Hall  
160 Whitechapel Road  
London E1 1BJ

[REDACTED]

[www.towerhamlets.gov.uk](http://www.towerhamlets.gov.uk)

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---