

From: [REDACTED]
Sent: 24 July 2023 13:25
To: Charging
Subject: UKRMA Input to OFWAT Incentives Consultation

Follow Up Flag: Follow up
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Dear Consultation Team,

This input to the OFWAT consultation on the incentivising of environmental improvements beyond the requirements of Building Regulations is submitted by the UK Rainwater Management Association (UKRMA) on behalf of its member-companies. The UKRMA represents the water re-use sector which encompasses the manufacturers and suppliers of rainwater harvesting (RWH) systems and greywater recycling (GWR) systems. Although we provide comments on the text of the consultative document below the signature block, this response is made more broadly from the perspective of the sector which the Association represents.

Whilst the Association naturally supports in principle any initiative that helps to improve the environmental performance of new houses, and also encourages the take-up of the goods and services provided by its Members, it is felt that the proposed initiative is too narrow in its scope to respond proportionately to the increased risks of floods and droughts predicted to be caused by climate change. From both an industry and national perspective the Association believes that a more comprehensive approach is needed urgently.

In England, for example, there are thought to be around 25M dwellings, 4M of which were built in the last two decades. Given a similar rate of build over the next 3 decades would result in the housing stock reaching around 30M by 2050, of which only around 20% would be to any new build standards introduced now. In the Association's view, to respond effectively to future heightened flood and drought risks there needs to be a national strategy that covers the whole of the existing and new-build housing stock, and the whole of the new build and existing stock of commercial/public buildings.

In formulating such a strategy, the delivery mechanism of incentivising third-party actions might have a role to play, but the case-studies outlined in the consultation document would indicate that, where aimed by the water companies at Developers, the approach has been relatively ineffective and bureaucratically cumbersome. These flaws would be amplified in a comprehensive national programme that would need to carry a variety of action calls to a range of audiences, around the central message of the need better to manage rainwater.

Moreover, studies undertaken by one of the water companies, we are informed, have revealed that the majority of its customers are already responsible in their use of mains water, but that irresponsible use of mains water by a significant minority boost the overall average consumption to well above the levels in current and proposed Building Regulations. In other words, consumer behaviour is a very important factor to be considered when advocating investment in the take-up of associated technologies, and better water-use habits.

To that end the overall strategy and associated action-plan the Association would suggest would include elements such as:

1. Any new-build environmental performance improvements required be achieved through updated Building Regulations, rather than incentives; in relation to mains-water consumption, economising should be achieved by a fittings and labelling approach, rather than consumption targets
2. Where new-build requirements relate to Sustainable Drainage (SuDS), these should be achieved through new SuDS Regulations that the proposed SuDS Adoption Boards will need to underpin their function.

3. Developers be incentivised to go beyond regulation requirements by market demand, excited by better informed and motivated consumers, rather than marginal, relatively ineffective and bureaucratic financial incentives
4. The retrofitting of existing structures in the light of the above regulations be driven primarily by owner and public demand via customised programmes that might, in the case of existing private homes for example, include an element of financial incentivisation
5. The above be backed by increased public awareness and market-demand, delivered through education on water issues in schools, and public awareness campaigns delivered by an “honest broker” organisation, such as Waterwise

From the specific perspective of the take-up of water re-use technologies, whilst financial incentives for its products would always be welcome, in isolation these would not enable systems such as RWH and GWR to play fully their potential role in helping to reduce future flood and drought risks. This could only be achieved by much wider actions that the UKRMA would therefore advocate, such as:

1. A clearer government position on water re-use, possibly achieved by the introduction of water re-use specific legislation
2. A review of existing water-related legislation to avoid unintended obstacles to the take-up of water re-use technology, likely caused by their overlooking of the specific water re-use case
3. Introduction of SuDS Legislation, to include considerations relating to water re-use, to underpin the function of the proposed SuDS Adoption Boards
4. Effective education and promotion of responsible water management/use, to increase the general public support for a suggested national strategy, and the role of water re-use within it

Kind regards,

Terry Nash
 Director – UK Rainwater Management Association

DETAILED TEXTURAL COMMENTS ON THE CONSULTATION DOCUMENT

2.0 Motivation and Background.

Page 9 BNG and many LPA’s are requiring BNG less 10% becomes law in England November 2023 great opportunity to link, stack BNG, SuDS and schedule 3 together.

Page 9 include Blue with green roofs as green roofs offer limited attenuation capacity and seldom used in water volume run off capacities due to limited storage capacity and variable infiltration rates as it’s a natural solution and various substrate depths and planting species.

2.3

Page 11. S142 will this be affected by the Cils and Section 106 consultation from MP M Goves office?

3.1

Page 14. With the 105 L/PP applying to new build dwellings, will there be similar requirements for other new buildings (noting also that the Association recommends a fittings-based approach, rather than consumption targets such as these that depend heavily on consumer behaviours)?

3.3

Page 16. Fig 3 table 2.1 this change is for housing only and not commercial when WC’s are linked in cubicles and reduced flow rates and old standard pipe sizing 110mm (based on 12/s flow) leads to increased blockages or more water used to remove blockages.

3.5.1

Page 18 Case study the DWI/ Defra/BSI need to be joined up on this with regards to RWH/GWH usage for WC’s.

3.8

Page 22 The Future Homes Hub are not thought to be commenting on this document at present.

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