Title: Environmental incentives to support sustainable new homes

Consultation questions

Number	Question
Q1	Do you agree with our proposed aim for environmental incentives?
Response	While we agree and support the idea of incentives, more attention should be directed to the legislation as this would accelerate the utilisation of those solutions and bring forward the results of water efficiency.
Q2	Do you have any comments on the characteristics of good environmental incentives?
Response	We support the presented principles
Q3	Do you have any comments on the extent to which any environmental incentives could or should be adapted for implementation in Wales?
Response	n/a
Q4	Do you have any comments on the case studies outlined?
Response	The case studies suggest that the currently operating schemes require improvement as the current rate of uptake is low (e.g. under 10 cases for the UK largest water company operating in multiple areas with new developments) It needs to be recognised that the system requires simplification and extension to accept multiple solutions/fittings to suit various applications. It is also important to recognise and reward proportionally those schemes which achieve better than the set minimum target.
Q5	Do you have any comments on our proposed standardised incentive tiers?
Response	The standardised incentive tiers system seems to be the right vehicle to provide more systematic approach going forward and to allow for the adoption of the scheme faster and by other water/wastewater companies. However, as it is currently proposed to base the scheme on the tier systems developed by Thames Water/Southern Water, thus repeating the complexity and limitations of those initial programmes, the risking of low market penetration could be similar as that achieved in the past, therefore defeating the object. The current schemes' inability to accommodate diverse technologies/appliances/fittings severely limits the potential for achieving optimal water savings through effective selection. Additionally, the current tier ONE does not clearly recognise achievements in water efficiency levels below the baseline target and does not clearly distinguish or reward results scoring better than the set target. Tier TWO could be considered as some form of recognition of improved water efficiency however is limited only to Rainwater Harvesting (RWH) and Greywater Recycling (GWR) systems. Those RWH and GWR systems are subsidised equally while their contribution in addressing of water scarcity is different (in practice RWH can collect more in the winter than in the summer when the strain on water resources will be more prominent) Tiers/subsidies should be more open to include and recognise other technologies which can improve water efficiency and sustainable drainage and allow to achieve the set baseline or better and more consistent results. Widening the range and flexibility of selection from the variety of appliances/fittings/technology would make the selection more accessible and contribute to adoption of innovations. Super low-flush toilets, vacuum type toilets or "smart" showers are just a few examples of those technologies which could play a critical part going forward. Evidence with case studies of vacuum toilet impact on domestic/non-domestic developments and water/wastewater reduction can be supplied on request.
Q6	Do you have any comments on our proposal for a common methodology / technical standards to assess water efficiency?
Response	We support the idea of the common methodology and technical standards – details to be reviewed /commented

	when more information is available.
Q7	Do you have any comments on the details of our proposal for companies to offer bespoke incentives?
Response	Bespoke incentives backed with transparent and periodic reporting on performance could accelerate innovation and allow for introduction of alternative solutions therefore are welcomed.
Q8	Do you have any comments on the potential for reputational incentives?
Response	Reputational incentives would provide valuable demonstration of achievements and are welcomed.
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.
Response	n/a
Q10	Do you have any comments on how high levels of compliance with the incentive technical standards might best be achieved?
Response	"Approved assessors list" to allow for self-declaration supported with occasional spot-checks could be one option, Also provision of specific training /education accompanied with promotion of the scheme between consultants/designers and house builders.
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?
Response	n/a
Q12	Do you have any comments on our proposal for guidance issued under the charging rules and how they are developed and maintained?
Response	n/a
Q13	Do you have any comments on our approach for managing interactions with the regulatory framework?
Response	n/a