

WORSHIPFUL COMPANY OF WATER CONSERVATORS

BRIEFING ON THE RESPONSE TO THE DEFRA CONSULTATION ON WATER EFFICIENCY STANDARDS IN THE BUILDING REGULATIONS V2 DECEMBER 2025

Note: after the submission was made, Defra requested that the key point about bringing the Building Regulations and Ofwat Scheme into line, should also made via the Citizen Space Portal. This was done with no change in the content of the submission per se.

1 The Worshipful Company of Water Conservators ('WCWC') is a City of London Livery Company focussed on the long-term health of our water resources and the broader environment. Our members include senior professionals from water, environmental and related industries and regulators, along with others who share our concern for water and the environment. Our experience and knowledge ranges from the complexities of environmental sciences, through the application of engineering to deliver the goals identified by those sciences, and the subsequent management of the assets created. The WCWC's purpose is *promoting a diverse and sustainable environment*.

2 As part of that purpose, the WCWC has been responding to relevant consultations particularly on matters relating to water conservation. These are archived on its website over the last three years. In making this response it does so with more than just straight answers to the questions to provide information to a diversity of readers on the depth and width of the context. The full response to this consultation is so. Archived.

<https://waterconservators.org/policies-and-practices/>

3 It has been accepted that reducing the use of water, along with developing new sources of water, will contribute to coping with a drier and more demanding future water environment.

4 In 2023, the former Government published the Environmental Improvement Plan (EIP) and set out a so-called Road Map.

<https://www.gov.uk/government/publications/environmental-improvement-plan>

Along with the Plan for Water

<https://www.gov.uk/government/publications/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water>

5 The Environmental Targets (Water) (England) Regulations 2023 set targets for the reduction of potable water supplied by water undertakers in England. The volume supplied per day per head of population must be at least 20% lower than the 2019-2020 baseline by 31 March 2038. This has been set based on a trajectory to achieve per capita consumption (PCC) of 110 l/h/d, 50% reduction in leakage and a 15% reduction in business demand by 2050. The glidepath is such that the estimated target of 31 March 2038 is based on a PCC of 122 l/h/d, leakage reduced by 37% and business demand reduced by 9%. This is part of the trajectory to achieving 110 l/p/d household water use by 2050, outlined by the National Framework (strategic planning and development guidance) as central to meeting the supply and demand balance by 2050. It also targets, 50% reduction in leakage and a 15% reduction in business demand by 2050. The current Government recommitted to the statutory targets, outlined in the EIP, in Summer 2024.

6 A revised EIP was issued in December 2025. The key water consumption targets are unaltered.

[https://assets.publishing.service.gov.uk/media/692d8d9cce50d215cae962a5/Environmental Improvement Plan EIP 2025.pdf](https://assets.publishing.service.gov.uk/media/692d8d9cce50d215cae962a5/Environmental_Improvement_Plan_EIP_2025.pdf)

7 The Roadmap to Water Efficiency in new developments and retrofits has ten actions. Action 7 required a review of building regulations. It stated.

Action 7 - Review the Building Regulations 2010, and the water efficiency, water reuse and drainage standards (regulation 36 and Part G2, H1, H2, H3 of Schedule 1), considering the competence and skills to enable this transition. We will encourage the use of a fittings-based approach linked to the water efficiency label. We will consider a new standard for new homes in England of 105 litres per person per day (l/p/d) and 100 l/p/d where there is a clear local need, such as in areas of serious water stress'

8 To execute this and as part of the implementation and review of the EIP, the Defra states that. *To ensure due consideration is given to the review of the water efficiency standards within the Building Regulations we intend to conduct a phased approach to the review of Parts G and H of the Building Regulations and Approved Documents G and H. This consultation will focus on and consider Phase 1. Whilst Phases 2 and 3 will happen independently. The details of which are set out below:*

Phase 1: Strengthening the Water Efficiency Standard

- To consult on a reduction of the maximum value from 125 litres/per person/ day (or 110 l/p/d where this optional requirement applies) to 105 l/p/d and 100 l/p/d respectively.*
- To consult on a revision of the Water Calculator approach, and Fittings-based approach.*
- To update AD-G which contains out of date information. These could pose a risk to building standards and affect safety and should be updated to ensure that they reflect current industry practice and adapt to future challenges. A draft amended AD-G accompanies this consultation at Annex A.*

<https://www.gov.uk/government/consultations/water-efficiency-standards-a-review-of-building-regulations-2010-part-g2>

[consultation-call-for-evidence-review-of-building-regulations-part-g2pdf](#)

https://consult.defra.gov.uk/water-efficiency-demand/review-of-water-efficiency-standards/supporting_documents/consultation-call-for-evidence-review-of-building-regulations-part-g2pdf

9 The WCWC supported the principles of the proposals but had concerns about the detail. The WCWC was concerned that, once again changes are to be made in ways which do not address a holistic approach. Whilst the section on Wider Actions in the Consultation does give passing reference to the work by Ofwat, no mention is made of the Ofwat Incentives Scheme to encourage developers to install more efficient fittings.

[Environmental-Incentives-Common-Framework---English-New-Connection-Rules---effective-April-2025.pdf](#)

10 This is focused on the optional standard in water stressed areas of 90l/h/d. It is based on sound evidence provided by a wide range of stakeholders. The two schemes do not fit together. It would leave a revised incentives scheme dealing just with fittings for 100l/h/d down to 90 l/h/d, which does not seem to be streamlined or efficient regulation. There is every practical reason to make the Building Regulations Optional Standard 90l/h/d for streamlined regulation and to reflect current practice. There are no cost implications for water companies beyond those agreed for PR 24, indeed there could be savings which the WCWC suggests below could be invested for customer benefits.

11 Whatever happens, the Ofwat scheme will need modification to restrict Incentives for requirements of less than 90l/h/d to very stressed areas. Any future statutory obligations such as the introduction of Mandatory SuDS, can be removed in due course where appropriate.

12 If this suggestion is followed, the money released from the current incentives scheme could be repurposed to grant aid existing customers to retrofit more efficient fittings. The WCWC draws attention to similar notions in energy management and of course to the lead pipe replacement scheme. Such a grant scheme could become part of a revised Ofwat incentives scheme. A popular alternative would be to repurpose the money to support a rekindled 'dripping tap service', once the pride of water companies but not delivered now.

13 The WCWC also explores the Ofwat Water Efficiency Campaign concepts in relation, not just to existing customers (which is outside the scope of this Consultation), but in relation to the provision of information to new customers on the continuing diligent use of these newer fittings and could embrace the grant system for existing customers. It notes progress.

14 The WCWC is mindful of the wider implications of building regulation as intimated in the Consultation. It sets out a simple matrix to address all the issue as follows:

For homes in Flood Risk Areas

- Buildings in flood zones should be constructed with flood-resistant materials and raised floor levels to protect against flooding.
- Water fittings for 105 l/p/d, optional for 90/h/d with incentives for less than 90 l/p/d as per the Ofwat scheme
- Ordinary water meters, maybe with a new incentive to install smart water meters
- Compulsory enhanced SuDS with no incentives as offered in Company schemes
- 'Bag and bin it' compliant bathrooms and toilets for sanitary waste preferred

For homes in Water Stressed Areas:

- All water fittings for 90 l/p/d with incentives offered for less where needed in extremis
- Smart water meters
- Voluntary SuDS, with incentives as per Company schemes
- 'Bag and bin it' compliant bathrooms and toilets for sanitary waste preferred

For homes in Stressed Catchments, apart from water stressed, eg nutrient neutrality and Stressed Drainage Plans

- Water fittings for 105 l/p/d with options for 90 l/p/d and incentives for less
- Ordinary water meters, maybe with a new incentive to install smart water meters
- Compulsory enhanced SuDS , no incentives as per water company schemes
- 'Bag and bin it' compliant bathrooms and toilets required

For all other homes

- Water fittings for 105 l/p/d with no incentives envisaged for less
- Ordinary water meters, except shared properties with smart water meters, with a new incentive for smart water meters in other properties
- Voluntary SuDS with incentives, as per water company schemes
- 'Bag and bin it' compliant bathrooms and toilets for sanitary waste preferred

15 In addition, the WCWC recommended that a review of the Water Fittings Regulations 2016 to make sure that they are fit for purpose with the new Building Regulations.

16 The WCWC submitted that the suggestions it is making should be addressed in the review of the EIP. It would also make sense, in terms of more efficient regulation to bring the Ofwat scheme and the Building Regulations into line and this would be consistent with the drive for more efficient regulation

[New common-sense approach to environmental regulation to support new homes drive - GOV.UK](https://www.gov.uk/government/news/new-common-sense-approach-to-environmental-regulation-to-support-new-homes-drive)

17 The WCWC understands that this Consultation is a further step in a committed course of action it is anxious that any delays in the building programme must not be attributed to this aspect of water services delivery and their regulation. The cost of implementation of the new regulations should not exceed the value ascribed in PR24 to the Ofwat Incentive Scheme.

19 The WCWC looks forward to the further phases of consultation and a more holistic approach, which will address issues of importance in water conservation.

20 From the information publicly available to the WCWC, it is difficult to determine what the balance of national consumption of water there is from older properties compared to new ones and hence what contribution any of the current rules for 'new build' properties will have on achieving the targets. It is essential that new builds avoid, as much as possible, adding to problems

21 There must be a drive for increasing the efficiency of water consumption for existing properties alongside the efficiency of fittings in new builds (and of course continuing efficiency of consumption from new fittings in due course) and this is where a great effort is needed.

22 Whilst it is vital that 'new build' does not add to the challenges of managing water consumption, consumption by many existing properties needs reduction and it cannot be left just to the water companies to achieve this. The WCWC has highlighted the Ofwat Water Efficiency Campaign and urged Defra to make the installation of smart water meters even more compelling.

<https://www.ofwat.gov.uk/regulated-companies/water-efficiency-fund/>