



Waterwise Response to CLG Consultation on

The Code for Sustainable Homes and the Energy Efficiency Standard for Zero Carbon Homes: “Sustainable New Homes – the Road to Zero Carbon”

February 2010

Waterwise is an independent, not for profit, non-governmental organisation focused on decreasing water consumption in the UK and building the evidence base for large-scale water efficiency. We are the leading authority on water efficiency in the UK. In England, we sat on the UK Environment Minister’s Water Saving Group alongside the water industry and regulators, for which we produced, in October 2008, the Evidence Base for Large-scale Water Efficiency in Homes.

Context

There are considerable opportunities for water efficiency to contribute to meeting the new challenges of climate change and population growth. Water efficiency is unique in that it is a key tool in both mitigation of and adaptation to climate change.

Water efficiency is essential for mitigation, because of the carbon costs of heating water in homes, buildings and offices for cooking, bathing and cleaning (in homes this accounts for 5% of the UK’s total greenhouse gas emissions), and for industrial processes. Wasting less hot water reduces the carbon footprint at the user end, but it also does so at the supplier end, as the water company is required to pump and treat less water and wastewater.

So water efficiency can make significant, quantified contributions to the UK’s carbon targets of 34% by 2020 and 80% by 2050.

Water efficiency is also essential to the UK’s climate change adaptation plans – every sector of the economy is dependent on water, some areas of the UK are already suffering water stress (with some classified by the Environment Agency as suffering “serious water stress”), and it is known that in the near future there is going to be less water and more people in the UK: so less water will need to go further.

Overall response

Waterwise is supportive of the measures put in place in recent years by government to drive water efficiency in new homes in England and Wales. The Code for Sustainable Homes and the introduction of water efficiency into Building Regulations are beginning to drive the market for water-efficient new homes and products.

For the Code, Waterwise has sat on working groups during its development, and also works with developers and planning authorities on implementing it to deliver water efficiency through Waterwise East, in the driest region in the UK.

Waterwise appreciates that pressures on the housebuilding sector as a result of the global economic situation have led to the decision to row back on the commitment to require the Code to be mandatory at Level 3 for all new homes from 2010, and at Code Level 6 (80 litres per person per day) by 2016, to focussing on upgrading the requirements for energy efficiency only.

However, as water efficiency has an essential role to play in both climate change mitigation and adaptation (see "Context" above) - and therefore to contributing to energy efficiency achieved through the Code and to zero carbon homes - ***Waterwise would like to see a commitment to consulting within the next twelve months on reverting to the original commitment to mandatory level 3 for water efficiency as soon as possible.*** In addition, to tackle the wider problem of existing homes, all of which the government has said will need to be near zero carbon by 2050, ***Waterwise urges the government to consult as soon as possible on the review of the Water Fitting Regulations, which was due in 2009.***

Waterwise and the Bathroom Manufacturers' Association are developing a functional web-based calculator to help developers meet the water efficiency requirements set out in the Code and in Building Regulations. Local Authority Building Control have offered support for this calculator.

Responses to specific questions

Question 39: Do you have any comments on the redesign of the technical guide or suggestions for improving it?

The SAP Calculator referred to in the technical guide currently includes an energy calculation based on floor area. An alternative, fittings-based approach, similar to the Code, would help drive the water efficiency element of energy efficiency (5% of total UK greenhouse gas emissions are accounted for by heating water in homes for cooking, bathing and cleaning). This could be based on or similar to the Code Water Calculator, which calculates total water consumption and could provides a means to estimate consumption from hot water-using fittings.

Question 43: Do you agree that it is right to focus on fabric and passive energy efficiency measures within the energy efficiency standard and to capture the efficiency of heating and cooling appliances and systems, mechanical ventilation, heat recovery and gains from hot water via carbon compliance? If not, why not?

Waterwise proposes a greater focus on actual rather than estimated water consumption. One way of doing this might be as outlined above.

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