Blueprint for Water response: Review of Water Efficiency Standards in the Building Regulations 2010

16th December 2025

This response is on behalf of Blueprint for Water's Water Resources Group. Blueprint for Water is part of the nature and animal welfare coalition Wildlife and Countryside Link (Link).

This response is supported by Angling Trust, The Rivers Trust, and The Wildlife Trusts.

Blueprint for Water welcomes the opportunity to respond to this review of the Water Efficiency Standards in the Building Regulations 2010.

Our water resources are under increasing pressure. We face a shortfall of 5 billion litres of water per day for public water supplies by 2055, and a further 1 billion per day deficit for the wider economy.[1] Unsustainable abstraction is already harming the environment, with 15% of surface water bodies and 27% of groundwater bodies currently not achieving sustainable abstraction criteria.[2] The 2025 Environmental Improvement Plan clearly emphasises that tackling water shortfalls is essential for economic growth.[3] Greater ambition on increasing water efficiency and reducing demand is required if we are to avoid both environmental harm and constraints on economic activity.

As the consultation document itself acknowledges, over half of the water shortfall will need to be addressed through reducing water demand. It is therefore extremely welcome that Government is reviewing the water efficiency standards within Building Regulations, and that the proposed trajectory of this review is to increase ambition through tightening water efficiency standards. Ensuring water efficiency in the 1.5 million new homes that Government intends to see built is crucial, given that it is far easier and more cost-effective to achieve efficient water use in buildings from construction, than to retrofit to increase efficiency in the existing housing stock - though both will be needed.

However, we are concerned that the proposals continue to use the 'water calculator' approach, which has significant flaws that will undermine the impact of a tighter standard. A 'fittings based' approach would be more appropriate, alongside maintaining an ambitious overall target for water efficiency standards within the Regulations.

We would be pleased to discuss any of the points raised in our response further.

---

[1] National Framework for Water Resources. (2025). England faces 5 billion litre public water shortage by 2055 without urgent action - GOV.UK

[2] https://oifdata.defra.gov.uk/themes/water/B5/

[3] Environmental Improvement Plan. (2025). Environmental Improvement Plan (EIP) 2025 - GOV.UK

1. What is your name?

Eleanor Ward.

2. What is your email address?

eleanor@wcl.org.uk

3. Would you like your response to be confidential? Y/N

No

a. If you answered Yes to this question, please give your reason(s)

N/A

4. Are you responding as or on behalf of (select all that apply):

• Other – environmental NGO

5. If you are responding as a member of the public or a building professional, what region are you responding from?

Wildlife and Countryside Link is a national-level organisation.

6. If you are responding as a member of the public, are you a:

N/A

7. If you are responding on behalf of a business or organisation, what is the name of your business or organisation?

Blueprint for Water, part of Wildlife and Countryside Link.

8. If you are responding on behalf of a business or organisation, where is your business or organisation based or registered?

Wildlife and Countryside Link is a national-level organisation, based in England.

9. When you respond it would be useful if you can confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:

• your position (if applicable), - Principal Policy Officer

• the name of organisation (if applicable) – Wildlife and Countryside Link

Maintaining an ambitious overall target for water efficiency standards is important

Blueprint for Water is in favour of maintaining an overall target for water efficiency standards within the Regulations. An overall target should provide clear direction and expectations for action on increasing water efficiency and reducing demand; it should also help situate this within the context of progress required in order to deliver water demand targets under the Environmental Improvement Plan, and the Environment Act.

To do this, and to meaningfully address the scale of the water supply challenges we face, the target must be sufficiently ambitious. Proposals within this consultation to tighten water efficiency standards within Building Regulations are welcome, but should go further than the suggested 105 l/p/d.

We suggest a standard target of 100 l/p/d should be set. Several European countries already achieve domestic water consumption rates of less than 100 l/p/d on a national basis, suggesting that water use rates in the most efficient buildings in these countries must be significantly below this level.[4] This suggests that a 100 l/p/d target for new builds is entirely feasible – and indeed local areas have already adopted tighter standards to tackle water shortage issues, such as in the east of England.[5]

If a more stringent target continues to be set in areas deemed as water-stressed, this should be set at a maximum of 90 l/p/d, and should be mandatory. A mandatory standard will provide greater certainty for developers, including through consistency across different Local Planning Authorities (LPAs), and reduce planning delays by removing the scope for disagreement between developers and LPAs.

However, if Government is to truly drive ambitious action on water resources, **this lower 90 l/p/d standard should be made the single standard everywhere**. This would further increase consistency and clarity for developers, and therefore reduce scope for delays. This would also better reflect that water resources are now – and will increasingly be – managed as a shared resource with the most effective solutions being identified and deployed at

[4] EurEau (2020) The governance of water services in Europe.
[5] For example: Raising the standard for water efficiency in the east of England – Creating a better place

regional and cross-regional scale. As such, the idea of a distinction between areas that are or are not 'water stressed' becomes less relevant.

Water efficiency standards within Building Regulations should be a *minimum* requirement, not a cap on ambition. If there is the need to go further than the minimum requirement to address local challenges – or indeed, if there is appetite from a developer to be more ambitious – there must be support from Government and regulators to do this.

But a 'fittings based' approach should replace the current calculator approach

Blueprint for Water shares concerns raised by both eNGOs and industry stakeholders that the 'water calculator' approach – which this review proposes to continue using – is significantly flawed. Continued use of this approach risks undermining the success of tightened water efficiency standards, and progress towards water demand reduction targets.

We are concerned that the water calculator methodology does not accurately reflect water usage levels, for example due to the assumptions made regarding household occupancy and consumer behaviour, as well as outdoor water use. This problem is exacerbated if the calculator approach is used without any verification of actual water usage within properties or on a site; water efficiency is not included within post-build inspections by Building Control, and self-certification by developers is not sufficient to ensure compliance.

These concerns are exemplified by case studies from Wales, where the water efficiency standard for Building Regulations is already set at a lower target of 110 l/p/d. Investigations by WRC in 2022-23 of 80 properties across Wales that had used the water calculator approach found that the average per capita consumption was 135 l/p/d and that not a single property was compliant. A review of 50,000+ properties in Wales built 2015-2022 reported that the expected reduction in water use following the tightened standard had not been fully realised.[6] Smart meter data in England further supports these findings that the water calculator does not accurately reflect actual water usage.[7]

The consultation document states that Defra anticipates that a tightened water efficiency standard will 'help to address non-compliance with the regulation'; however, given the findings from Wales, we question how this will be achieved unless additional measures are brought into place to address known flaws. The minor updates and adjustments set out within the consultation document will not be sufficient to address the flaws within the water calculator methodology. We would welcome further detail from Defra explaining how the findings from Wales and smart meter data in England have factored into this review of the Building Regulations, and how lessons learnt have been applied to the proposals.

[6] WRC. Building Regulations Water Efficiency Review | WRc

[7] For example: Evaluating the Effectiveness of Residential Water Efficiency Initiatives in England: Influencing Factors and Policy Implications | Water Resources Management

In contrast, a 'fittings based' approach offers a simpler and more standardised approach, and therefore also opportunities for more robust compliance procedures. Assurance for a fittings approach could be provided by the rollout of the Mandatory Water Efficiency Labelling Scheme, to which Government has already committed. Furthermore, case studies of fittings based approaches suggest significant potential for success – for example, use of fittings in Cambridgeshire achieving 95 l/p/d.

As an alternative to the calculator approach, the fittings approach is already used within Part G to secure an equivalent level of water efficiency to enable the standards set out in the Regulations to be met, with Table 2.1 applying in the case of the current standard requirement of 125 l/p/d and Table 2.2 for 110 l/p/d. The maximum consumption limits for fittings set out in the Regulations would need to be updated to enable achievement of a new 100 or 90 l/p/d efficiency standard. By linking this with the MWEL Scheme, achievement would become easier over time as the least efficient products drop off the market and new, more efficient fittings are designed and made available.

As discussed, we remain in favour of an overall target for water efficiency standards, and suggest this should be set at a maximum of 100 l/p/d, and potentially at 90 l/p/d. This target should refer to *actual* PCC achieved through the fittings-based approach, *not* PCC suggested through the water calculator, which as discussed is very unlikely to accurately reflect real usage.

Assessment of external water use must be improved

We agree that an improved assessment of external water use is required, and action will be needed regardless of whether the calculator method is retained or the fittings-based approach becomes standard. The current estimate of 5 l/p/d/ within the calculator is almost certainly an underestimate of actual external water use, and does not account for the relationship between external water use and temperature change.

For example, that external water use will go up during hotter months of the year, with water industry data showing that use rises significantly during hot summers and that the % increase relates to the type of household and size of outdoor space, (e.g. with flats and apartments showing negligible increases) - indicating a significant likelihood that much of this increased use is external. Environmentally it is significant that this use is not year-round but comes at a time when the environment is most likely to be under stress due to low flows, and is least able to accommodate additional abstraction. As such, it is vital that external water use is considered more centrally within any future approach.

Options for reducing external water use must be within scope of Phase 3 of this consultation process.

A holistic approach is required

Reducing water demand and tackling water scarcity cannot be achieved through reform of the Building Regulations alone.

The Mandatory Water Efficiency Label rollout must begin with urgency, given that this is an existing Government commitment, and was due in 2025. The Building Regulations must align with the Mandatory Water Efficiency Label, to ensure that these policies work complementarily to reduce water demand.

As the latest assessment of water industry annual performance on water resources has shown, the industry is not making sufficient progress on tackling leakage and demand reduction.[8] Government must require water industry to improve performance in these areas, and water demand and efficiency must be within scope of the forthcoming Water Reform Bill. This must include urgently taking forward recommendations made by the Independent Water Commission, including to reform abstraction by bringing this under the Environmental Permitting Regime, to drive adoption of water reuse infrastructure, and to unblock barriers to water meter rollout – in particular, the uptake of smart meters. The Building Regulations should themselves be amended to include action on leakage; for example, requirements for new properties to be fitted with leak detection.

A more holistic approach to water management generally should be delivered through the Bill, including stronger management of water demand and scarcity at the regional level, and building resilience to both too little and too much water through greater use of SuDS and nature-based solutions at catchment scale.[9]

For questions or further information please contact:

Ellie Ward, Principal Policy Officer, Wildlife and Countryside Link
E: eleanor@wcl.org.uk

Wildlife & Countryside Link, Vox Studios, 1 – 45 Durham Street, Vauxhall, London, SE11 5JH
www.wcl.org.uk

[8] Water resources 2024 to 2025: analysis of the water industry's annual water resources performance - GOV.UK
[9] WCL. (2025). WCL_Briefing_Priorities_Water_Reform_Bill_Nov_2025.pdf

This response is supported by the following organisations:

- Angling Trust
- The Rivers Trust
- The Wildlife Trusts