

The Chartered Institute of Building (CIOB)

submission to

The Department for Environment, Food & Rural Affairs (DEFRA)

on the consultation on

Water Efficiency Standards: a review of Building Regulations 2010 Part G2

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Consultation on Water Efficiency Standards: a review of Building Regulations 2010 Part G2

About CIOB

The Chartered Institute of Building (CIOB) is the world's largest and most influential professional body for construction management and leadership. We have a Royal Charter to promote the science and practice of building and construction for the benefit of society, and we have been doing that since 1834.

Our members work worldwide in the development, conservation and improvement of the built environment. We accredit university degrees, educational courses and training. Our professional and vocational qualifications are a mark of the highest levels of competence and professionalism, providing assurance to clients and other professionals procuring built assets.

This response has been informed by members of the CIOB's Sustainability Advisory Panel and other specialist members who work in geotechnical and groundwater related matters.

Full Response

1. What is your name?

The Chartered Institute of Building (CIOB)

2. What is your email address?

reception@ciob.org.uk / policy@ciob.org.uk

3. Would you like your response to be confidential

No

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

Professional body or institution

10. Do you agree that the 'mandatory water efficiency standard', should be amended from 125 l/p/d to 105 l/p/d? Y/N

Yes – From CIOB member input, there is broad support for the amendment from 125 l/p/d to 105 l/p/d. Respondents noted 105 l/p/d is technically straightforward so long as a fittings-based approach, a practical deployment of water re-use and a consistent specification is adhered to.

We note that reference should be made to the environmental incentives offered by water companies, with many, such as Thames Water and Severn Trent setting 100 l/p/d as the benchmark to achieve a discount on water connection charges as set out in their Developer Charging Arrangements (DCAs).

It should also be noted that different water companies offer different financial incentives. Many companies also undertake pre-handover checks to ensure what has been designed/approved is delivered – usually taking a 10 per cent sample of all dwellings.

As personal water use diminishes so to the likely level of environmental incentive – the latter is usually assessed and revised each year and takes effect from 1 April. Synergy with this water company requirement needs to be considered or flagged in Approved Document G, i.e., a combined approach to reducing personal water use.

11. Do you agree that the ‘optional technical water efficiency standard’, should be amended from 110 l/p/d, where there is a clear local need such as in areas of serious water stress, to 100 l/p/d? Y/N

Yes – As per the response to question 10. Furthermore, many Local Planning Authority’s (LPA) and water companies are already working at, or below, 105 l/p/d in water stressed areas for several years so 100 l/p/d is a reasonable step, which should be under regular review.

It would also be sensible to bring in a national framework that catches what various LPAs are already doing in water stressed areas to capture existing challenges but also best practice to alleviate water stresses.

12. Do you agree with the suggested updates to the water calculator? Y/N

Yes – We agree the l/p/d calculator needs updating and does not reflect current real-world use, especially external water and how people use their shower and toilet facilities (e.g. the significant shift from bathing to showering). With this in mind, the existing calculator was designed around outdated assumptions that no longer reflect current behaviour, technological advances, fittings or the updated evidence base.

Further, there is nothing to suggest that rainwater harvesting systems still need a potable water supply at times of drought and/or limited rainfall. It would be beneficial if the Approved Document G could better address this aspect. Likewise, it would be useful for further detail on how sprinkler systems and/or fire suppressing systems (misting) are to be dealt with.

13. Do you agree with the suggested updates to the fittings-based approach as set out in Annex A the Approved Document? Y/N

Yes – We believe a fittings-based approach should be increasingly seen as the “default” route for compliance. This also aligns with the forthcoming Mandatory Water Efficiency Labelling (MWEL) changes.

14. Do you agree that the Approved Document, which can be found at Annex A, reflects the current industry practice for the revised water efficiency standard as detailed in The Building Regulations 2010, Schedule 1, Part G2, Para 36? Y/N

No – see below

a. If you answered no to the previous question, please provide additional information to explain your answer. Select all that apply.

As we have identified in this response, there is variability in the standards that are being set with Local Planning Authorities and water companies setting differing requirements. The Approved Documents G should have a primary objective of simplifying an appropriate standard as well as for water companies to adopt a standardised approach under the duty to cooperate, as required under the Localism Act 2011. However, it is likely the environmental incentives that water companies are willing to offer for reduced personal water use will fall away. It must also be noted that these incentives are often insignificant and nowhere near the total cost of providing alternatives such as rainwater harvesting systems and greywater recycling.

Essentially Annex A reflects the minimum regulatory standard and does not represent current industry practices.

20. Do you agree with the approach set out in this consultation to review alignment of the Mandatory Water Efficiency Label (MWEL) with the Building Regulations 2010 and (AD-G) through guidance, post introduction and review of the MWEL?

Yes - Alignment between a mandatory product-level label (MWEL) and Part G will make compliance transparent and procurement-friendly.

Call for Evidence Questions

QA. To what extent do you agree or disagree that government should pursue wider reform of the water efficiency standards in Part G of the Building Regulations?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Strongly Agree – We believe the Government should pursue wider reform of Part G and not just limited changes to l/p/d numbers. As part of this wider reform, Government should also engage with water companies to see what further improvements can be made. For example, some water companies are installing flow restriction devices at the water meter location, and this can affect the performance of certain low flow fittings. These restrictions make a useful contribution, but we should be aware of potential unintended consequences.

As noted by WaterWise, *“Building Regulations should not function as a cap on ambition. Local authorities need to be given support from government, regulators, planning inspectors and other players if they believe they need to go further than Building Regulations requirements to address specific local challenges, such as in areas where water availability is preventing or limiting agreed growth plans.”*

QB. Do you think that the ‘mandatory water efficiency standard’, should be amended to an even tighter standard, from 125 l/p/d to 100 or 95 l/p/d?

In the short term, we are comfortable with the 105 l/p/d mandatory standard as the new national baseline, but we would like to see a clear signal now that the Government intends to

¹ WaterWise, [What Waterwise want to see in the review of Building Regulations Part G \(March 2024 Position\)](#), 25 March 2024

move to 100 l/p/d for all new homes on a defined timescale (for example, by 2030). We believe tighter standards should continue to be evaluated and under review with regular consultation with industry to understand where the sector is heading and what changes it can 'cope' with.

One CIOB member mentioned that requirements under 80 l/p/d would become difficult to achieve without recourse to water-use offsetting within the existing building stock. This need for water offsetting has already been an issue for housebuilders confronted by the Local Planning Authority imposing rigorous water-use standards in the South of England driven through planning policy and/or planning decisions. Whilst laudable, this opens up several questions regarding how water use demand of the existing building stock is being assessed, who is responsible for designing and implementing reduced water consumption in the existing stock, how are occupiers engaged in the process, amongst numerous other areas that must be analysed.

QC. Do you think that the 'optional technical water efficiency standard', should be amended to an even tighter standard, from 110 l/p/d, where there is a clear local need such as in areas of serious water stress, to 90 or 85, or 80 l/p/d?

See previous response.

QD. Do you consider that reuse systems should be required through the Building Regulations 2010?

- a. Yes
- b. No
- c. If you answered yes, please indicate which form of reuse system:
 - i. Rainwater harvesting systems
 - ii. Grey water harvesting systems
 - iii. Black water harvesting system

d. Please provide additional information to explain your answer.

Yes – Reuse systems should become a normal part of compliance over time, but not as a blanket requirement for every small site, from day one. A sensible starting point would be to require water reuse (although we are not best placed in this answer to say which one specifically) for large new non-domestic buildings above a certain floor area and major residential developments in areas of serious water stress. For smaller schemes, Part G could at least require "water-reuse ready" design so systems can be added at a later stage.

Regardless, any inclusion of reuse systems must be 'appropriate' or based upon defined criteria. Additionally, inclusion of this needs to be part of a holistic solution that measures and assesses all key aspects of sustainability to identify and mitigate impacts of each upon the other to achieve a solution that is effective from an overall perspective.

QE. If you answered yes to 'Do you consider that reuse systems should be required through the Building Regulations 2010?', what systems or enablers in your opinion are required:

See previous response.

QF. Please provide links to any relevant evidence that you have used to inform your views

for this consultation. If there's anything else, you'd like us to know or consider please add it here. We're particularly interested in information around:

We are broadly supportive of Waterwise's position from 25 March 2024, which can be found here: [What Waterwise want to see in the review of Building Regulations Part G \(March 2024 Position\)](#).

In terms of other aspects to consider in this debate, we recommend considering the following:

- The value of regular maintenance cannot be understated to ensure a water re-use system is running as intended. These checks require consumers to pay for competent professionals to check and can be costly if major faults are found, particularly if contamination or blockages are found.
- Further research on how rainwater harvesting systems cope during high intensity rainfall events must be properly considered to avoid introducing a potential flood risk.
- As we progress towards reduced potable water consumption, how we calculate the corresponding wastewater discharge must be updated. It should be brought into line with more realistic water use data and household occupation rates, the latter currently an average of 2.35 persons dwelling.²
- In addition to changes within Approved Document G, water companies should be given more stretching targets for reducing water leakage. The Environment Agency have urged water companies to speed up fixing of leaks, noting the amount lost by water companies before reaching customers' taps is around 19%.³ With this in mind, consideration about a compulsory water metering system should be considered for all building types. This would align with the forthcoming Mandatory Water Efficiency Labelling (MWEL) which we strongly support.
- We are aware that the Good Homes Alliance (GHA) have produced a detailed Water Efficiency and Reuse in Housing Design Guide which demonstrates how higher standards are both necessary and achievable to meet National Water targets, this can be found [here](#).

We are happy to remain engaged in the consultation process, should you require any further information, please contact policy@ciob.org.uk.

² Office for National Statistics, [Families and households in the UK: 2024](#), 23 July 2025

³ Environment Agency & Department for Environment, Food & Rural Affairs, [Water efficiency must become a national priority says EA](#), 18 November 2025