

OFWAT- Consultation on changes to our New Appointments & Variations Policy and Assessment Guidance. June 2023.

The Home Builders Federation is the principal trade association for the home building industry in England and Wales. HBF's membership of more than 400 companies builds most of the market sale homes completed in England and Wales, encompassing private developers and Registered Providers. The majority of HBF's private home builder members are small or medium-sized companies.

As the main trade association for the home building industry, our members constitute one of the largest bodies of companies that will be affected by the outcome of this consultation. As such, we trust that considerable qualitative and quantitative weight will be afforded to our comments.

The document below is the summary of the representative responses from our membership and takes account of the responses of large major housebuilders, medium size and SME (small and medium-sized enterprises) as well as specialist housing providers and companies. Whilst HBF's members largely support the proposals within this consultation, they are concerned that a pragmatic, fair, balanced and considered approach should be taken.

Question 1: What are your views on the proposed update to our policy statement and application guidance that would apply to applications for sites in Wales?

It is the view of HBF and its membership that this proposed amendment to the policy statement and within the application guidance is fully supported. We encourage the introduction of identifying benefits to new customers both in terms of environmental elements and those of discounted charges, improved levels of service and additional services that are not currently offered by the incumbent water authority. HBF would encourage applications to recognise and include firefighting water mains located in adopted highways in addition to wider water responsibilities in and around new housing development sites such as the provision of SuDS features in Wales. These types of wider inclusion would bring vast benefits to customers and offer differentiation and enhanced service over what is currently being provided for in Wales whilst aligning with other developed Welsh Regulations set by Welsh Government.



Question 2; What are your view on how, with respect to this policy proposal, we can best achieve our aim that regulatory burdens are kept to a minimum while ensuring companies deliver the best outcomes for customers?

HBF believe that this policy proposal is best achieved by recognising and permitting New Appointments & Variations to operate in Wales.

Question 3; What are your views on introducing a similar requirement for sites in England at some point in the future?

HBF believe a similar approach to New Applications & Variations in England could be proposed at some point in the future. Other elements of planning and regulatory measures are currently being consulted upon in England such as the implementation of Schedule 3 of the Flood & Water Management Act 2010 which could present an opportunity for a NAV organisation to provide additional and enhanced services to residents. This would also align with Ofwat's requirements delivering enhanced value both environmental and financial to its customers.

