

Draft Strategy for Sustainable Construction

Response from TRADA (Timber Research and Development Association)

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General

Q1 Do you think that the broad coverage of the key themes and sub themes in this draft Strategy is correct? If not, then what themes or sub themes should additionally be covered?

Yes.

Q2 In large part this Strategy focuses on the delivery of environmental targets. Is that the right focus?

Provided that other broad strategies to address the two other areas of the 'triple bottom line' (ie economic and society) exist then it is helpful to focus on the area of environmental targets.

Q3 What other measures should Government be doing to support the construction industry to become more sustainable - this could cover any aspect of the industry and/or any aspect of its supply chains?

Although it is not mentioned anywhere within the report a vital foundational issue to achieving all of these targets is effective building regulations. The building regulations are vitally important with regard to sustainability for the following reasons:

- Increasingly requirements are built into the building regulations
- As a minimum the building regulations have to be met. Targets and initiatives of the type given in this report have to be met after all the relevant building regulation requirements have been addressed first.
- The building regulations define to a large extent the culture and practice of the building industry. By this we are considering everything from how complex the task is, whether requirements are understood, to what extent construction believes the rules are policed and compliance is required in reality etc.

If the world of minimum building regulation requirements is characterised by an unacceptable degree of chaos and confusion, it is very difficult to add more targets and requirements. The government is aware that this issue is a very real problem and has published documents to this effect. We all know that it is not going to be a quick or easy fix – but it is foundational to creating a business environment in which government can ask companies to achieve additional targets.

Q4 Does industry have views on the use of building and planning standards across the country to promote the sustainability of developments?

Clearly good quality planning needs to play a vital role in regard to sustainability. Many of the planning related issues can be tackled separately from those addressed in this document. It is helpful to separate areas of activity so that organisations can be focussed on a manageable range of issues.

We would hope that the planning and architecture community could progress these issues using logic, facts, common sense and feedback loops to learn from experience and importantly the past.

Has the planning community spent sufficient time and effort understanding what we have already learned, both positive and negative? If there is no clear consensus on what has been learned, then we suggest that this is the highest priority. We cannot afford to blindly experiment at this point in time.

Q5 What more could the construction industry do collectively to contribute to aspects of sustainability - what targets and actions could it sign up to?

This document recommends some extremely tough targets, given where we are now. If the construction industry is given too many goals and ideas it will be in danger of achieving none of them.

All of the main topical areas in this document are important and seem to represent the important areas where effort is needed.

Actions for industry should in our opinion concentrate on achieving the targets set in this document for each specific industry sector (eg reducing waste in for each major material group)

Q6 If you represent part of the construction industry, what actions could your organisation sign-up to, to improve particular aspects of sustainability?

With adequate government funding from WRAP or BREW for example we are willing to co-ordinate and drive reduction in wood waste to landfill. We have conducted some work in this area already, typically funded by WRAP, and this needs bringing to full fruition in order to achieve the waste targets set.

For many years we have been active in areas, such as responsible sourcing certification, development and certification assistance for manufacturers of innovative products designed to improve longevity, thermal performance etc. We will continue to grow these activities.

Q7 How do you think progress should be measured against the targets? Who should be responsible for measuring, evaluating and reporting on the actions of both Government and industry in moving towards the targets?

Appropriate government departments will need to take responsibility for measurement against the key top level targets that government has set. Where ever possible we recommend that existing and / or simple measurement mechanisms are used, which do not incur additional costs.

If overall targets need to be achieved with concerted effort from each material / product sector then funding should be provided to research / trade associations to measure and provide solutions to delivering the step changes.

Q8 What in your view are the major costs and benefits of this Strategy for industry, clients, Government and the public at large?

Clearly the benefits to everyone will be enormous if we manage to achieve the targets set. These benefits are outlined in the document itself and do not need repeating.

Hopefully most of these areas will become self-funding. This should always be the goal if we want to permanently change behaviour. Waste for example will come to have a value and it will not make commercial sense to throw materials away. However getting to these points is going to be expensive.

Major costs will be incurred in terms of:

- Measurement and reporting
- Training
- New procedures
- Reading all the material on this subject and trying to keep up to date
- Solving current hurdles which prevent sustainable behaviour
- Kick-starting new businesses, which to begin with will not be profitable

Q9 Do you think that there will be compliance issues for small business and one-off clients that disadvantage these groupings relative to larger businesses and clients? If so, what are they?

Yes. One major issue for smaller businesses is simply trying to keep up to date with what they are required to do.

We would suggest that it is pretty much a full time job to keep up to date and work out the consequences for any business. If you are a smaller business this will represent proportionally a much greater cost.

Q10 Sustainability is a world-wide challenge, not simply a UK preoccupation. How can we best ensure that UK business takes full account of the trade opportunities this offers?

The same way that you would best assist UK plc in selling all its goods and services abroad. We are not aware of anything specific to this area that would require a unique generic approach.

Q11 How can the Strategy be refreshed in future?

For each target / agenda area:

- measure what has been achieved
- understand the reasons for progress and non-progress
- take stock of what conditions have changed in the meantime, that would cause you to change policy / approach
- publish the results

The strategy sets extremely long term / far-reaching goals in many areas. Presumably these will not be changing.

In order to achieve the best results in reality, we suggest the following approach (waste being used as an example):

- 1) Decide on the final end goal
- 2) Decide on the **first** achievable milestone goal (eg halve waste to landfill compared to 2005 levels)
- 3) Decide on the tactics to achieve this goal (eg landfill tax escalator, work with sector associations etc)
- 4) As the goal comes into sight, review all the lessons learned. Set the 2nd goal and associated tactics. The tactics should change over time because of changes generally in the market, lessons learned and because the issues change as it becomes harder to make the improvements.

Halving waste at each stage would be one suggested approach. This approach recognises that:

- each percentage point gets progressively harder
- there will come a point (probably at 80 or 90%) when it will become too expensive to make further gains.

We would not therefore suggest setting final utopian goals for any area of activity.

Procurement

Q12 What specific actions could the construction industry take to lead by example and procure construction projects more sustainably?

Design

Q13 Is target 5.2 stretching, achievable and realistic? If not then please propose an alternative. Which organisation or organisations should be responsible for this target?

Q14 Which of the proposed actions for business do you consider to be a priority? Why? What are the barriers to implementing this action and how might they be overcome? Who should take the lead in implementing this action?

The people agenda

Q15 If you agree that the proposed key actions and deliverables covered in the People Agenda reflect the main priority areas to deliver sustainability for the industry, what specific work streams and targets would help deliver these commitments?

Q16 Do you agree that these workstreams and targets should be peer-reviewed by industry experts (eg relevant sector skills councils), prioritised, and Action Plans developed to take the best ideas forward.

Better regulation

Q17 We would be grateful for information from you on specific pieces of legislation which are impeding your ability to be more sustainable in your business operations.

We are not aware of any specific pieces of legislation that are **impeding** our ability to be more sustainable. However there are many pieces that are costing us a lot of money in the process of complying, eg WEEE.

Climate change

Q18 Are there other actions that the Government should be taking to help the construction industry rise to the challenge of climate change?

If we are to design homes (and later non-domestic buildings) which are 'zero-carbon' then industry needs considerable additional financial assistance in achieving this from funds which are dedicated to help with this challenge (ie not part of some other agenda). One particular area which needs central assistance is in measuring the actual performance of as built and as lived in dwellings.

Q19 What targets could industry specifically sign up to, to increase the positive impact they can have on climate change through their activities?

Working through the implications of the challenges set in this strategy will keep everyone fully occupied for some considerable time.

Water

Q20 Do the targets and milestones in this chapter appear realistic, achievable and sufficiently ambitious over the time frames envisaged? If not, then please suggest alternatives, and who should be responsible for their implementation.

Q21 Are there any issues which have not been covered which you feel should be addressed? If so, what are they and what targets and milestones would you propose?

Biodiversity

Q22 The aim of the proposal in paragraph 11.8 would be to create an integrated approach to maintain and where possible enhance biodiversity as a result of construction sector activity. Please say what you think would be helpful to companies in the construction sector to support the aims of maintaining and enhancing biodiversity.

In the case of policies affecting forestry we would like to see all the principles enshrined in the Woodland Assurance standard maintained and unaltered.

Waste

Q23 Is it feasible to halve construction, demolition and excavation waste to landfill by 2012 from a baseline of 2005? Is the baseline date appropriate, and what specifically has to be done, and by whom, to achieve this target?

From consultation discussions held at CPA, with govt officials present, on this very matter it transpired that we do not have accurate breakdown figures for waste in 2005.

It is obviously crucial to have accurate sector figures to work to if we are to achieve the total goal for all sectors. We recommend choosing a year where the figures do exist.

To achieve this goal we need each sector to develop its own plan of action and method of measurement. As stated in Q6 we would be keen, with adequate funding from WRAP, BREW etc to co-ordinate and drive this forward for timber.

Q24 Do the targets, milestones and proposals for waste appear realistic, achievable and sufficiently ambitious over the time frames envisaged? If not, then please suggest alternatives and who should be responsible for their implementation.

We believe that it should be possible, with concerted, focussed and funded effort, to halve the current levels of landfill for timber in the time frame suggested. This is only a guess but given the current fairly poor performance across all sectors, the first half should be achievable.

We would not set targets in terms of 'zero net waste' – since this term is not generally intuitive or understood. All targets in this strategy should, in our opinion, be expressed in terms of a reduction on a shared base line date (? 2005) or actual tonnage.

We would not set a final target of zero with a date, since it is fairly meaningless at this stage. It would be better to have all energy focussed on reducing by the first 50%. Once we have all achieved this we will have learned valuable lessons that will help determine how to tackle the next target.

Q25 We propose new measures in paragraphs 12.1.18 and 12.1.19 to stimulate action to improve resource efficiency, reduce waste and increase diversion from landfill (through more re-use, recycling and recovery). Are these measures achievable and sufficiently ambitious? What needs to be done and by whom to achieve these aims?

We suspect that these measures may be excessive and creating time-consuming and costly activities for no great gain.

We believe that the following, which are simple, should be sufficient to encourage the market to change in the right direction:

- taxes on waste via the landfill tax system (with the stated escalator)
- Site Waste Management Plans
- Funding for each material / product sector to address issues of measurement, identification of different grades of waste, mapping of material 'waste' flows, assistance in developing markets for collection, recycling, re-use etc. Ultimately changed behaviour will only stay on course if it makes financial sense to do so.

Q26 New measures to stimulate action from companies to improve resource efficiency are proposed in paragraphs 12.1.20 - 12.1.24. Please prioritise these proposals and identify quick win opportunities with high impact.

12.1.20 General guidance on good practice is the best place to start, since some behaviour will change simply by people being informed of how to save money.

12.1.21 We are not sure why this target works from a different base line to that in 12.1.1. This will create confusion. We would suggest that all major material sectors work with

contracting to develop plans for reducing waste of their material at all stages and in particular at site level.

12.1.22 Manufacturers already do this, to a reasonable extent, driven mainly by controlling costs. Work by some of the builders merchants shows that big savings can be made when contractors sign up to a sole merchant agreement, because the merchant is prepared to take back unused material. But lack of trust currently often prevents this. This is an area which will need unlocking to achieve the goals being set. As skip costs rise the incentive to overcome mistrust will rise.

12.1.23 Architects will need to comment on this. We suspect that architects will need to work with a more limited variety of construction techniques in order to begin to really understand how to make these sorts of gains during the construction process. You need to know manufacturers' standard component sizes etc in order to do this.

12.1.24 These improvements should flow naturally as discussed in Q25.

Materials

Q27 Do you agree that the targets and milestones proposed for Materials will deliver improved resource efficiency with reduced environmental and societal impacts, and are sufficiently ambitious? If not, then please propose alternative targets.

With regard to item 12.2.1

It is not clear what is being proposed here with regard to item 12.2.1. There are several interpretations with comments as follows.

Possible interpretation	Comment
That 50% of materials/ products used by volume should be covered by generic data, such as that given in BRE's Green Guide	The generic data probably covers more than 50% of materials used, therefore there would be no change here
That 50% of materials/ products used by type should be covered by generic data, such as that given in BRE's Green Guide	Only BRE at present can provide a rating which has a worth in the market place (see below for further commentary on this) By setting this target, government would be strengthening BRE's monopoly position.
That 50% of materials / products are individually appraised for each supplier	Codes developed by BRE and government have essentially created a monopoly situation for BRE regarding producing LCA data which is accepted by the various codes (CSH, BREEAM etc) BRE does not have sufficient capacity to produce the generic data in the Green Guide, never mind any private work for individual suppliers. This current monopoly situation is not healthy for the industry. A common agreed set of rules is needed before other certification providers can offer alternative supply in the market. This is not likely to happen until the CEN 350 work is completed. Until the CEN 350 work is completed it is not sensible to set any targets which relate to individual products.

With regard to item 12.2.2

Our experience in timber is that certified responsible sourcing is delivering very real and substantial benefits in terms of improved resource efficiency, reduced environmental and societal impacts. It has been a long road and is not made easy when it comes to materials sourced from nations with poor governments. However the effort has and will continue to be very worthwhile.

We therefore welcome this goal in relation to timber.

Q28 What can you do to implement a whole life approach to sustainability in your business?

As a organisation we use very little material resources, with the exception of fuel for cars. The high cost of fuel and need to control our costs has meant that we have achieved a lot of savings through better travel planning of auditors for example.

One of our main contributions as an organisation is providing certification services that assist thousands of clients in complying with the standards and improving their performance.