



Partnership for Urban South Hampshire
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SWMP Consultation
DEFRA
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6 July 2007

Dear Sir

Consultation on Site Waste Management Plans for the Construction Industry

I am writing to you in my capacity as Chairman of the Partnership for Urban South Hampshire (PUSH), which comprises the city councils of Portsmouth, Southampton and Winchester, the borough councils of Eastleigh, Fareham, Gosport, Havant and Test Valley, the district councils of East Hampshire and New Forest and Hampshire County Council. PUSH is leading the delivery of a sub-regional strategy for sustainable economic growth. It is one of CLG's New Growth Point partners and is identified as one of eight 'Diamonds for Investment and Growth' in the South East of England Development Agency's Regional Economic Strategy.

PUSH welcomes the proposals to require Site Waste Management Plans (SWMPs) for construction and demolition projects. PUSH recognises the need to develop policies and fiscal incentives, and to introduce appropriate regulation to encourage the better use of materials and reduce the current level of waste produced by this sector of the economy (3 million tonnes were produced in Hampshire in 2006/07).

PUSH is of the view that the unacceptable level of waste materials produced in construction and demolition is due to a number of factors:

- The standards applied to certain materials discourages the re-use or recycled alternatives;
- Inefficient planning of resources often leads to an overestimation of materials required for a particular project;
- The relatively low cost of disposal as a percentage of overall costs provides insufficient incentive to address this issue.

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PUSH has developed a draft planning policy, which has now been incorporated into the Draft South East Plan as Policy SH14. This policy requires the inclusion of sustainable construction and design features in all new developments, in particular maximising the procurement and use of sustainable materials for construction.

Policy SH14 commits the local authorities in South Hampshire to produce a common policy approach for incorporation into Local Development Frameworks, sets out the scope of policy considerations and suggests more specific requirements and targets to be achieved. These planning policy requirements have also been incorporated into the current Hampshire LAA.

PUSH believes that regulation of this nature is essential to create the necessary environment in which changes will be made in the construction and demolition industry, ensuring the more effective reuse and recycling of materials and reduce incidents of fly tipping. The increased use of planning conditions requiring developers to source recycled materials and consider the re-use and recycling of materials on site should also complement the use of SWMPs.

Given the proposed rate of development over the next 20 years in South Hampshire and the limitations on landfill capacity the Government's growth agenda needs to be complemented by strong measures on construction waste that will really change behaviour and practice across the construction sector. SWMPs should ensure that the responsibility for the management of materials and waste are clear and unambiguous. SWMPs should also require the industry to look at the sourcing of its materials, think about the use of such materials and their disposal at the outset of a project. The handling and disposal of materials would be an integral part of a project rather than an afterthought.

It is the view of PUSH that all construction and demolition projects should be required to produce a SWMP, albeit with varying degrees of detail. The level of detail required in a SWMP should reflect the size of the particular project in terms of overall project cost. For smaller projects this could be limited to information on types and estimated amounts of materials used, proposals for minimising waste and proposed disposal routes.

SWMPs will increase the administrative burden to those businesses not currently considering waste management as an integral part of their operations. However, the social, economic and environmental benefits of this approach outweigh this potential additional financial cost to the industry. Also a well managed SWMP will reduce the amount of waste required to be sent to landfill and will significantly lower landfill tax and handling costs associated with the project. These reductions in cost would normally be at least equivalent to or exceed the administrative cost of an SWMP.

The level of detail required for projects with a value in excess of £250,000 is considered appropriate. However the cost: benefit analysis does not fully take into account the environmental impact of sourcing materials, transportation and disposal and the full implications of fly tipping.

PUSH is of the view that legal compulsion is required to ensure the construction industry embraces the necessary changes required to reduce waste. It is our view that a voluntary scheme that is actively promoted will achieve results in some areas of the construction industry that recognise the benefits of such an approach. However compulsion is necessary in order to have a significant impact and target those who do not currently manage their materials efficiently.

Comments on the Partial Regulatory Impact Assessment

SWMP's should be formally regulated to ensure compliance. As suggested in the consultation the most appropriate agencies for this would be local authorities for projects less than £250k and the Environment Agency for those of a greater value.

Regular Development Control or Building Control inspections could be the mechanism to check compliance at various stages of construction. Meeting the requirements of a SWMP could be one of the criteria for project completion. This should also require EA approval in cases of projects over £250k.

It is welcomed that the burden on Environment Agency and local authority resources is recognised within the RIA. The RIA recognises the social, environmental and economic costs of fly tipping in the UK costing £46 million in 2004/05. The statistics provided within the consultation show that over 53,000 incidents of fly tipping of construction waste were reported last year in the UK in construction alone (5% of total fly tipping incidents). Much more resources are required for enforcement and publicity to reduce the current level of fly tipping incidents.

The fiscal instruments within the Waste Strategy 2007, including raising the landfill tax escalator, will only be truly effective if robust action is taken to reduce current levels of fly tipped material. It is therefore essential that additional resources are provided to local authorities and the Environment Agency to deal with environmental crime.

Yours faithfully

**Councillor Seán Woodward
Chairman**