

Site Waste Management Plans: SECBE Response to DEFRA Consultation

July 2007

This report has been prepared as part of a Pilot Project for Sustainable Construction which is funded by the GROW programme



1 EXECUTIVE SUMMARY

- 1.1 SECBE supports the drive for material re-usage and minimise materials sent to landfill, recommending a considered mix of incentives and appropriate regulation**
- 1.2 With a lower site value threshold of £250k, SWMP are unlikely to have any effect on reducing fly-tipping. SECBE recommends the legislation applies to all but should be proportionate to the waste generated, i.e. simplified SWMPs for sites likely to generate low level waste and more comprehensive SWMP for larger or more complex sites.**
- 1.3 SECBE recommends further accelerated investment in effective material re-use infrastructure. Companies are more likely to be more engaged and supportive if there is more cost effective and efficient infrastructure.**
- 1.4 It is expected that the cost of implementation of SWMPs will be significant due to the training, site administration and enforcement. There are strong parallels with CDM which spawned a whole new profession and further pressure on small companies – which despite being disliked CDM has had a positive impact.**
- 1.5 SECBE, in partnership with other key sector and government bodies delivered workshops to over 250 delegates. Many of those companies expressed a desire for intensive training for contract and site management staff. SECBE would welcome the opportunity to be involved in the development and delivery of an immediate pilot training programme**

Derek Rees
Chief Executive
South East Centre for the Built Environment

2 BACKGROUND

The South East Centre for the Built Environment (SECBE) is a consortium of business leaders that exists to inform policy and drive business-to-business learning and networking. We take regional strategies and industry issues and develop action plans to improve business performance throughout the sector. Its goals are:

- To improve the business performance of the built environment sector to deliver world-class facilities and infrastructure to its customers and end users.
- Work with our Members and their supply chains to make a focused impact on the industry in the South East.
- With core capital investment from the South East England Development Agency (SEEDA), the consortium engages with government, businesses from across the whole of the supply chain (from client to manufacturer) and a host of key stakeholders.
- By facilitating collaboration, sharing information and driving business improvement, SECBE's aim is to ensure that support for construction businesses is integrated, easy to access and effective.

2.1 **Survey of Defra Consultation on Site Waste Management Plans for the construction industry - April 2007**

In accordance with the above consultation document, SECBE has surveyed its membership on its views on proposals to make site waste management plans (SWMP) a legal requirement for construction and demolition projects in England.

Responses were received from 47 individuals and companies, the majority (55%) being from contractors, and are summarised in this report together with feedback from workshops held in the South East region.

3 RESPONSES TO CONSULTATION QUESTIONS

3.1 **Q1. Do we need regulations for SWMPs or should the existing voluntary approach continue, perhaps with greater promotion?**

Overall, SECBE members support the direction of travel of the national waste strategy and its objective to reduce construction waste. In particular, SECBE membership regards it as important that Government recognises the strategic and significant investments in new infrastructure required in the waste industry in order for construction companies to meet European and Government expectations.

There is moderate support (45%) for the need for regulated SWMPs, but first and foremost to ensure the legal disposal of waste from construction sites. We are not, therefore, totally convinced (28%) of the need for regulation to enforce the resource efficiency measures. The resource efficiency measures employed for a particular site will vary greatly, and will generally depend on the location of the site (e.g. waste segregation is almost impossible on city centre sites, but good materials management is a must). There are also fiscal measures already in place, such as landfill tax, that are encouraging construction companies to segregate and recycle their waste wherever possible.

To reduce administrative burden and ensure speedy implementation it would seem preferable to seek voluntary agreements where possible. It is also important, if long-term change in company attitude is to be established, for there to be greater transparency and stronger links between behaviour and the cost of managing and disposing of waste; companies (as consumers) must begin to recognise the financial and environmental costs of their decisions. Many of the measures outlined in the draft legislation require an unnecessary amount of paperwork, which many small and medium sized contractors will be unable or unwilling to meet.

In the medium term, waste disposal authorities should be given added authority to coordinate the recovery and recycling of construction wastes, but this needs to be coupled with increased resources and support, either through private sector payments and/or from central funding. Most companies would like to recover and recycle more, but find that the waste infrastructure is somewhat lacking in the delivery of their requirements.

In addition, schemes should be fully explored that would bring clarity and transparency to the true costs of waste management and show construction companies how these costs will decrease through better waste management. There is little incentive to segregate at site level when builders do not see the benefits in reduced charges from the operators of transfer stations that claim to be remixing source-segregated wastes before disposal.

3.2 **Q2. If you agree that regulation is necessary or desirable, what should be the minimum criteria above which a construction project will require a SWMP?**

There is a majority of opinion that the cost of implementing SWMPs will be high and that there will a significant resulting impact to the company.

The minimum limit set for the requirement of a SWMP is too high, and therefore excludes many small contractors who we feel are responsible for the majority of fly tipping cases. However, the level of detail required for different sized companies should be different depending on the size of the project.

3.3 Q3. What level of detail should be required in a SWMP?

It is believed the level of detail proposed is too great for the following reasons:

- Waste volumes vary greatly depending on the type of project and the design; therefore it is difficult to estimate a total waste volume, let alone volumes for each waste type.
- It is almost impossible to determine quantities for much of the material reused on site.
- Confirmation that the SWMP has been monitored, and description of lessons learnt and how these are addressed on future projects, should be voluntary as this will be done in many different ways, not all of which would be documented. Also, cost savings may not be achieved as the cost of implementation could outweigh the savings made.

One contractor has suggested that the level of detail required should increase relative to project value as follows:

- Up to £250,000 the SWMP should include:
 1. The name of the Principal Contractor and their nominated representative on site.
 2. The name of the Client and their nominated representative on site.
 3. The location of the site, and the estimated project value.
 4. The identity of the Waste Management Contractor removing the waste including their Waste Carrier Registration number.
 5. Details of the disposal site(s), including address and Waste Management Licence (WML) number or Exemption reference.
- £250,000 to £5 million, in addition to the above these SWMPs should include:
 1. The types of waste that are likely to be produced, and which of these could be reduced, reused, recycled or recovered.
 2. Information on how materials should be stored and handled.
- Above £5 million, in addition to the above these SWMPs should include:
 3. A schedule of the waste removed, and where it was removed too. This would detail the amount of waste sent to landfill, and the amount sent to transfer stations or MRFs for recycling.

Another contractor has recently instigated a process of gathering waste quantity and type data from their waste contractor. After 8 months, they still having major issues with getting this information and larger issues related to its accuracy. Recording quantities, types and destinations could become a massive administrative undertaking and the information is likely to be far from reliable until the waste industry become more proficient at data management.

There will need to be a significant degree of work done to ensure that the figures produced in the detailed Site Waste Plan are not meaningless, and thereby discrediting the waste planning process.

3.4 Q4. How should the requirements in a SWMP further improve the level of resource efficiency in the construction industry?

In addition to the points raised in answer to other questions, we would support:

- Greater use of waste management licensing exemptions to encourage sustainable waste management where environmental risk is low, to promote the recycling of inert and low risk building materials at building yards especially in the SME sector;
- Simplification of regulatory process or use of exemptions for the community sector/social enterprises operating within the field of waste recovery;
- Greater and earlier guidance on new legislation so that control measures can be put in place;
- Simplification of site licensing arrangements.

3.5 Q5. Will SWMPs reduce the administrative burden or increase it? What might the cost of implementing SWMPs be and how would this affect your existing levels of paperwork?

Whilst some larger contractors will use them to control their normal activities, such a regulation is likely to result in higher levels of administration. The burden of paperwork will undoubtedly increase and the cost of implementation is not only in the writing of the plan, but also in the management of it, and training of the workforce in compliance to the plan.

Additional management will need to be employed by the Principal Contractor to ensure that all trade contractors are actually disposing of their waste to the sites detailed in the plan, and to ensure the efficiency measures are being employed. Currently this duty lies with the producer of the waste (which will not be the Principal Contractor in most cases).

3.6 Q6. It has been suggested that more active promotion or expansion of the voluntary scheme might achieve the same objectives as regulation and the Government would be interested to receive views on this suggestion. In particular, how great might the take-up be? How could the Government target the smaller companies? Would greater take-up of a voluntary scheme lead to real changes within the industry?

For the voluntary scheme to be successful, it should be noted that achievement is dependent on Government taking adequate steps to support the market, reduce risk and provide the long term financial and technical support required to deliver high levels of diversion from landfill.

There is a minority view (25%) that SWMPs will prevent fly-tipping or increase the levels of resource efficiency in the industry, so that the regulations may have little impact on the intentions of the Government and will only be seen as a bureaucratic means of demonstrating compliance with The Duty of Care. The same level of support is given to the view that the existing voluntary scheme would be sufficient with more training.

There is also little support to the concept that the costs of undertaking SWMPs will be recovered through resource efficiency.

A number of ideas to continue with a voluntary scheme for the promotion and adoption of SWMPs have been proposed by the consultees. These are

- Free training / grants for using systems with audits to confirm savings;
- Financial incentives or rate reduction incentives;
- Education on the need and the reasons why this needs to be introduced;
- Set up working groups and visit the smaller construction projects and give 'On Site' guidance;
- Use planning conditions;
- Need to make the bottom line benefits clearer;
- By ensuring that those complying with the legislation are not penalised financially for doing so;
- By producing clear guidance on best practice and to sign a Declaration of Intent by registering their business as part of a small companies scheme of co-operation;
- Provide adequate training and resources such as waste collection bins and possible signs and literature;
- Reduce the cost of waste disposal for those using it;
- Free training - tax offset for best practice;
- Information, incentives to recycle, perhaps some form of tax relief;

Overall it is felt that it would be difficult to encourage small companies to take up a voluntary scheme, without offering some kind of incentive, and, therefore, we feel the legislation should apply to all construction companies. However, the legislation could be phased in with reducing levels of project size.

It is also felt to be significant that the number of architects and designers that are taking notice of these regulations is surprisingly low, since they are the main group that needs to understand the waste and materials efficiency effects of their plans.

3.7 Q7. How can we be sure that SWMPs meet the joint objectives of encouraging better resource efficiency and reducing waste crime? Have we got the level of intervention right, or should we do more or less?

We are not convinced of the need for regulation to enforce the resource efficiency measures, since, with a few exceptions, no other industry is regulated to be resource efficient.

The resource efficiency measures employed for a particular site will vary greatly, and will generally depend on the location of the site (e.g. waste segregation is almost impossible on city centre sites, but good materials management is a must). There are also fiscal measures in place, such as landfill tax, that are encouraging construction companies to segregate and recycle their waste wherever possible.

The nature of activity in the Construction Industry does not lend itself to making rapid changes to processes or designs that can make immediate savings. The construction cycle (land acquisition – preliminary designs – planning – detailing – building

regulations – value engineering – construction – variations – practical completion - defects) is long compared to manufacturing (where a design or process can be changed the next day in some instances). It might take 12 months or more for the same changes to come through in construction, changes can generally only be introduced on subsequent projects.

If the site is in full legal compliance and they have a waste contractor that is segregating off-site, then all the other main issues come back to building design (architects and engineers) and the raw materials, systems and products that are purchased (QS and site or contracts manager).

3.8 Q8. It is estimated that each year some 13 percent of materials delivered to construction sites are disposed of as waste. Comments are welcome on the likely composition of this waste, why it is produced, its value and the extent to which it is recoverable.

If there is to be a true commitment to the waste hierarchy that clearly places reduction and reuse above recycling, then there needs to be a much greater focus on waste prevention and minimisation over the long term. However, this should not be done at the expense of continued and extensive recycling promotions at national level supported by additional local delivery.

We would suggest that if waste management is going to shift significantly up the waste hierarchy then a more interventionist approach is required to tackle the issues at source. The ultimate goal should be that generating high levels of waste is seen as socially unacceptable behaviour.

This should focus on all stages along the product supply chain to ensure waste generation is minimised at the design/manufacture phase of products and greater steps are taken to remove the use of unnecessary packaging and improve the recyclability of packaging and products (e.g. packaging design). To increase cost efficiency in the recovery many local authorities are investing in automated sorting systems at Material Recovery Facilities. An extended opportunity should be taken to ensure that recyclable packaging products are designed to facilitate automated recovery.

Improving resource efficiency in design, manufacture, and construction is essential if any meaningful impact is to be made on reducing waste arisings. We would support any actions which 'designed-out' inefficient resource use prior to products entering the market and ensured improved recyclability of products by designing in opportunities for automated recovery at Material Recovery Facilities.

The above factors need to be addressed by Government, working closely with RDAs, local authorities, and the construction and waste industry to take these forward.

Other specific comments on the reasons for high waste levels were given by the consultees;

- Nature of the ordering process and buying process with regard to material make-up, e.g. to order 4,500 bricks you need to order 5,000.
- Over-ordering for safety and damaged products. A lot is recyclable.
- Composition - brick, block, cement or any other 'bagged' material, plasterboard, paints or any other tinned material. Why - over ordering, poor transport, poor storage, accidental damage, not the right 'stuff'. Value -

clearly all or most of this has value. Recoverable - and the majority of it should be fully recoverable.

- If half-a-bricks are properly stacked they can be re-used higher in the wall = cost and time savings - then work out the total saving across the industry?
 - Mainly packaging - virtually non-recoverable - suppliers should be made responsible for recovery. The bulk of all waste is EWC 17 05 04 soil and stones run to landfill, if developers were environment sensitive rather than cost sensitive this waste could be incorporated in the design of the site and, therefore, almost eliminated.
 - This could be finishing materials, which often ordered with an amount which allows for wastage, in which case all could be recoverable if the suppliers were prepared to take back, and recycle.
 - Most is recoverable and re-usable in one form or another. However, main contractors no longer (for the most part) operate yards where such material might be stored. More effort needed to collect and recycle such material from sites. No reason why recycling skips cannot be used. Many contractors already used crushed material from site demolition for hardcore etc.
 - Another problem is the practice of funding institutions and banks to insist on collateral warranty agreements forcing the designer to warrant certain materials are not used in construction. Where existing materials recycled, it is impossible to offer such warranties and this is one of the reasons why we specify 'new' where recycled might do.
 - Generally produced through over-ordering because you cannot afford the time to wait further deliveries. Also certain types of construction and detailing will create more waste than others.
 - Stock control reduces waste, but some waste is always going to happen.
 - A great deal of waste is generated by over-ordering materials in the first instance, as the philosophy has been that it is cheaper to throw away a 1000 bricks than be delayed by being 100 bricks short. This is due in no small part by the industry's inability to service the smaller development efficiently when smaller quantities may be involved. There is also a general malaise in the workforce that materials are not costing the operative anything.
- Much of this is down to poor storage and lack of care by individuals on site. This is one of the reasons why it would not be feasible for one person to be held responsible; everybody on site should be responsible for waste management!
 - Much of the waste will be related to packaging and materials transport (pallets, foam, plastic wrapping, cardboard, etc). We should apply more effort to tackling manufacturers and the logistics process to greatly reduce packaging. Rather than the 'end of pipe' solution of dealing with it from site. Other materials are wasted due to over-ordering that is cleared out at the end of the project. Tackling this cultural issue within the industry is a major challenge that will not be touched by filling in a Site Waste Management Plan.
 - Packaging, over-ordering, lack of optimisation.

- Poor storage, variations, poor workmanship, double-handling, over-ordering. More awareness is always good to highlight problem areas; hopefully this will lead to better control.
- The design stage of a project needs to consider more carefully how a building is put together to assist in reducing waste; setting-out, standard dimensions, units sizes, such as plaster board standard sizes or timber sections for example. Do we need to re-invent the wheel every time? Rarely see standard dimensions on CAD detailing!
- Excessive waste is produced as there is no target level set. Estimators often allow a figure of 20% for waste. If the main contractor reduced the waste levels in terms of what he is prepared to pay for and any excess on this amount was back charged to the contractor this would make all financially responsible for waste.
- Is it written off as waste or in reality stolen? Is this measured by value or volume? Labour costs to retrieve are often greater than the value of material saved.
- One particular problem is leftover materials. Builders never want to be short, so will always order more than required. The problem with the leftovers is the cost of handling, transporting, storing and recording what is held as stock. Local materials exchanges could help here.
- There are a lot of timber off-cuts produced from building sites, which get skipped with general building rubbish. This timber should be separated on site within the skip or preferably as a hook on mini-skip (skip re-design) so that timber can be re-cycled or processed as an alternative product or a fuel source. Say 25% of the average skip could be timber waste (need to research) so millions of kilos per annum could be separated for re-cycling. Larger sites could have a timber only standard skip - more thinking required.

3.9 Q9. Does the proposed definition of construction (to which SWMPs would apply) capture the full range of construction work to which site waste management plans should apply? Should any of these activities be excluded or new ones included and, if so, why?

It is the general opinion of those consulted that the definition of construction is adequate. However, it would be appropriate to implement the requirement to larger projects and companies first, or perhaps those requiring planning as was original proposal and that adopted in April 2006 by East Sussex and Brighton and Hove councils.

Such a staged approach was adopted during the implementation of the Producer Responsibility Obligations (Packaging Waste) Regulations 1997.

3.10 Q10. What are the most practicable criteria for deciding whether a construction project requires a SWMP? What alternatives are there?

See response to Question 9.

3.11 Q11. In your view, what is the minimum value above which a Site Waste Management Plan should apply? Should further information be required for higher value projects, and if so, from what value?

If the regulations are introduced, then it is considered that all construction projects of any value should be covered. This would be achieved by a staged process over a number of years as outlined in the response to Question 9.

3.12 Q12 Is there a risk that a construction project might be broken into smaller projects to avoid the SWMP requirement? If so, how might this be addressed?

We are not overall of the view that this will happen.

3.13 Q13. Comments are invited on the level of detail we are proposing is included and recorded on the SWMP?

See response to Question 3.

3.14 Q14. What other information would it be helpful to record? Is any of the information unnecessary?

See response to Question 3.

3.15 Q15. Do you agree that the cost:benefit analysis for writing and implementing a SWMP in the partial Regulatory Assessment is accurate, or do you have any further information or suggestions that might compliment or challenge the analysis?

We believe more research is required to ascertain the true cost of implementation and benefits to be derived from the implementation of SWMPs.

3.16 Q16. Who is best placed to write and implement a SWMP? Would this identify an appropriate person in the management structure of all construction projects?

Most support was for the Contracts Manager or Project manager to be the best placed to write and manage the SWMP, with some support for the Designer and Environmental Manager.

However, there is a view that construction is a team effort and that responsibility should pass along the process from Design to Construction, which would give a role for a Planning Co-ordinator.

3.17 Q17. Is it reasonable to hold the person drafting and implementing the SWMP responsible for someone else's actions?

It is considered unreasonable (65% response) for one person to be held responsible for the implementation of the SWMP, and the duties imposed on others by the SWMP.

3.18 Q18. Should SWMPs be formally regulated and, if so, on what basis and by whom?

There must be clarity of roles between authorities and other bodies, e.g. Environment Agency. However, there are resource issues connected to heightened enforcement that need to be properly addressed. There is also the need to ensure that the courts take waste crime seriously.

- 3.19 Q19. What level of checks is reasonable in order to improve compliance?**
- Those consulted are generally not looking for extra checks and inspections, unless it is done in a spirit of offering good advice and support, especially during the period of implementation.
- 3.20 Q20. Is the proposed range of offences appropriate for encouraging maximum compliance with SWMPs, or should other offences be considered?**
- Where there is a deliberate abuse of the system, it is essential that strong action be taken.
- 3.21 Q21. Comments are welcome on the penalties suggested for these offences.**
- There is general shock and surprise at the level of penalties for a regulation that is targeting resource efficiency and financial benefit, especially at the Crown Court penalties.
- 3.22 Q22. Although voluntary uptake of SWMPs amongst larger companies has been reasonable, given the potential efficiency gains it is surprising that uptake has not been higher. Are there any barriers that might explain this?**
- Unless resource efficiencies are going to result in cost savings over a short pay back period it is unlikely that effective engagement with SMEs will be possible. The difficulty in engaging with SMEs is generally due to the nature of such organisations which have little time to spend on activities outside of their core business rather than any real or perceived resistance to the possible changes. The wide range of organisations already offering advice to SMEs may be part of the problem in effectively engaging with this sector.
- 3.23 Q23. Are there any other ways to encourage awareness of SWMPs and how they should be used?**
- With all businesses it is essential that support is provided in a readily accessible manner and that the benefits to the business are demonstrated, whether these are financial or otherwise. Government needs to act in the role of exemplar in developing and testing approaches to resource efficiency in construction, design and procurement. It is essential that Government demonstrate what can be achieved and sharing approaches and intelligence with others.
- Continuation of BREW funded activities, particularly the work of Envirowise, is essential. This, however, should be focused solely on SMEs, where capacity for initiating any changes outside their core business function is low, but positive impact of even moderate changes can be high.
- Greater opportunities for SMEs to benefit from bulk buying and shared services should be explored, and this could include extending the work of the WRAP programme into other areas. The introduction of minimum recycled content for goods would further contribute to 'closing the loop'.
- However, much support and advice exists in BREW funded programmes that is being under-utilised. In many cases the key issue is an unrealistic expectation from business that recycling can be provided as an add-on to existing household-focussed services at little or no cost.

A number of information gaps exist which require urgent research if steps are to be taken to improving diversion from landfill and escalation of waste up the hierarchy, these include:

- Improved intelligence on collection systems to maximise performance/minimise cost and the opportunities for contracts and/or system integration at collection level;
- Further studies on good practice;
- Costed data on the benefits of resource efficiency;
- Design handbooks and detailing on best practice in waste reduction.

RDAs are in an ideal position to identify the gaps in the secondary materials processing chain and to help develop businesses to fill those gaps. RDAs also have an important role to play in supporting regional-level initiatives or materials exchanges.

There is also a lack of information regarding the nature and quantity of used material that is processed before it becomes “waste” within the meaning of the waste licensing regulations. Since it is necessary to increase materials that the construction sector re-uses, an understanding of the most effective ways to keep materials out of the waste stream altogether is required. This type of activity includes wood reclamation and the refurbishment of furniture, office fit-outs, etc. This is the type of research that could usefully be carried out by the regional development agencies, with a view to supporting businesses that fulfil this role.

The community/social enterprise sector also plays a significant role in waste reduction measures through reuse. A significant barrier to these operations expanding rests with the licensing arrangements and regulatory framework waste operates in. If the process were simplified for this sector through the use of exemptions and guidance, then the opportunities for waste reuse activities would undoubtedly expand.

We would support any activities that provide greater information to designers and constructors on the environmental impact of their purchasing choices and would highlight the success of energy efficiency labelling on electrical goods as a model which could be replicated for wasteful products.

We would recommend that action is taken to provide a one-stop shop approach where a single agency acts as a conduit for the business to get the advice and support required to improve resource efficiency.

3.24 Q24. Do you have any comments on the broad content of the partial RIA which accompanies this consultation?

We believe more research is required to ascertain the true cost of implementation and benefits to be derived from the implementation of SWMPs.

4 ANNEX 1 - CONSULTEES

4.1 The following individuals and companies responded to this consultation.

| | |
|------------------|---------------------------------------|
| Warwick Clifton | Oxford Brookes University |
| Sean Herbert | Willmott Dixon Construction Ltd |
| Nigel Pacey | Premier Electrical Company |
| John Hutton | Edmund Nuttall Limited |
| David F Jones | London Borough of Bromley |
| Tony Wells | CLC Construction |
| Malcolm Clarke | Baxall Construction Ltd |
| Laurie J Cumming | John Reilly Civil Engineering Limited |
| Stewart Freegard | Laing O'Rourke |
| K Shepherd | Leadbitter |
| P D Waddy | West Waddy ADP |
| Kevin Slawson | Wilding Butler Construction Ltd |
| Mike Bulmer | Littlewood Fencing Ltd |
| Philip Charles | CIRIA |
| Adrian Henshall | Thames Vale Homes Ltd |
| Kevin Bush | Maybush Consultancy |
| Mr West | Vale Builders Southern Ltd |
| Nigel Birchley | Hilife Construction Co Ltd |
| | Camps Building Services Ltd |
| R. Denness | Croudace Homes |
| | Jenkins Associates |
| | Hotchkiss Ltd |
| Charles Law | HBG UK Ltd |
| Matt Browne | Wates Group |
| Mike Connelly | Stewart Milne Timber Systems |
| | Mace |
| Claire Ash | Environmental Property Services plc |
| John Wallis | Croudace Homes Limited |
| Mark Terrell | Thames Water |
| Richard Saward | Haymills |
| Eleanor Stedman | Coniston Limited |
| | Blue Jelly |
| David Barrett | Francis Construction Ltd |
| Keith Alderton | Workstream Construction Services Ltd |
| P Convey | Appledore developments |
| | Royland Contractors Limited |
| | Maylarch |
| Daron Mizen | Oxfordshire County Council |
| David Solomon | Britaniacrest recycling |
| Mike Nelson | Hillson Builders Ltd |
| Matthew Parratt | Dome Limited |
| Tony Munro | Croudace Ltd |

In addition, feedback was gathered from 7 workshops held on Site Waste Management Plans including over 250 delegates:

- Guildford, 30 November 2006
- West Sussex, 10 January 2007
- Milton Keynes, 24 January 2007
- Reading, 8 March 2007
- East Malling 14 March 2007
- Ashford, 20th June, 2007
- Winchester, 27th June, 2007

4.2 Company Locations

| | Response % | Response Count |
|-----------------|-------------------|-----------------------|
| Berkshire | 14.9% | 7 |
| Buckinghamshire | 2.1% | 1 |
| East Sussex | 4.3% | 2 |
| Hampshire & IOW | 6.4% | 3 |
| Kent | 19.2% | 9 |
| Oxfordshire | 14.9% | 7 |
| Surrey | 19.2% | 9 |
| West Sussex | 4.3% | 2 |
| London | 14.9% | 7 |
| | | 47 |

4.3 Company Size

| Employees | Response % | Response Count |
|------------------|-------------------|-----------------------|
| <10 | 14.9% | 7 |
| <25 | 12.8% | 6 |
| <50 | 21.3% | 10 |
| <100 | 6.4% | 3 |
| <250 | 6.4% | 3 |
| >250 | 38.3% | 18 |
| | | 47 |

4.4 Company Type

| | Response % | Response Count |
|-------------------------|-------------------|-----------------------|
| Architects | 4.3% | 2 |
| Business Consultants | 2.1% | 1 |
| Civil Engineers | 2.1% | 1 |
| Contractors | 55.3% | 26 |
| Energy/Waste Management | 2.1% | 1 |
| Environment Consultants | 2.1% | 1 |
| Further Education | 2.1% | 1 |

| | | |
|--------------------------------|-------|---|
| Local Government – Procurement | 2.1% | 1 |
| Logistics | 2.1% | 1 |
| Manufacturer | 2.1% | 1 |
| Media | 2.1% | 1 |
| Property Developers | 4.3% | 2 |
| Quality Surveyor | 2.1% | 1 |
| Research Organisation | 4.3% | 2 |
| Other (please specify) | 10.6% | 5 |

5 ANNEX 2 - RESPONSES TO DIRECT QUESTIONS

5.1 In your opinion SWMPs are being introduced to:

| | True | False | Unsure | No Comment |
|--|--------|-------|--------|------------|
| Eliminate fly-tipping | 51.4% | 34.3% | 5.7% | 8.6% |
| Monitor waste | 100.0% | 0.0% | 0.0% | 0.0% |
| Set targets for minimising waste | 94.6% | 0.0% | 5.4% | 0.0% |
| Gain savings from resource efficiency | 82.9% | 2.9% | 11.4% | 2.9% |
| Regulate/protect legitimate waste operatives | 58.8% | 8.8% | 32.4% | 0.0% |
| Ensure compliance with Supplementary Planning Guidance And sustainable construction objectives | 75.0% | 2.8% | 16.7% | 5.6% |

5.2 Please complete the following questions relating to SWMP's:

| | True | False | Unsure | No Comment |
|--|-------|-------|--------|------------|
| My company is prepared and ready for the SWMP legislation in April 2008? | 42.9% | 22.9% | 20.0% | 14.3% |
| SWMPs will have little or no impact on my company | 25.7% | 62.9% | 11.4% | 0.0% |
| Legislation for SWMP's is needed | 45.7% | 17.1% | 34.3% | 2.9% |
| The existing voluntary approach would be sufficient with more promotion and training | 20.6% | 41.2% | 32.4% | 5.9% |
| The level of information required in a SWMP should reflect the value of the project | 61.1% | 27.8% | 11.1% | 0.0% |
| Companies will avoid SWMP legislation by breaking a project up into smaller projects of less value | 14.3% | 34.3% | 48.6% | 2.9% |
| The financial cost of implementing SWMPs will be high | 22.9% | 34.3% | 37.1% | 5.7% |
| SWMPs will provide a framework for compliance with existing legislation, thereby reducing the administrative/ labour costs to your | 40.0% | 25.7% | 34.3% | 0.0% |

| | True | False | Unsure | No Comment |
|--|-------|-------|--------|------------|
| construction project. | | | | |
| The overall costs of SWMPs will be recovered through resource efficiencies | 28.6% | 20.0% | 48.6% | 2.9% |
| SWMPs will reduce waste crimes (i.e. fly tipping) | 28.6% | 31.4% | 34.3% | |

5.3 Contracts and subcontracts should make explicit reference to relevant waste management duties described in the SWMP. Is it reasonable to hold one person responsible for someone else's actions?

| Yes | No |
|-------|-------|
| 35.3% | 64.7% |

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