



"Working for our members to be the voice of government on waste minimisation and recycling issues"

LOCAL AUTHORITY RECYCLING  
ADVISORY COMMITTEE

Nathan Laing,  
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Waste Strategy Branch,  
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Dear Nathan,

### **Consultation Response – Draft Construction and Demolition Sector Plan**

I am writing to present the LARAC response to the Draft Construction and Demolition Sector Plan Consultation, which is contained below, and I thank you for the opportunity to respond to the above consultation.

The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of around 330 local authorities across England, Scotland, Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

If you have any queries on this response or would like to discuss the matter further then please contact me on (01495) 766745 or [roger.mills@torfaen.gov.uk](mailto:roger.mills@torfaen.gov.uk).

Yours faithfully,

Roger Mills  
LARAC Policy Team



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GREEN GLASS

## **Consultation Response – Draft Construction and Demolition Sector Plan**

**Consultation Question 1:** Do you agree with the findings and conclusions of the Sustainability Appraisal? If no, please explain why.

YES

**Consultation Question 2:** Do you consider that a producer responsibility measure would be appropriate for the construction industry? If yes, would you prefer to see a legislative or non-legislative approach?

We would welcome more producer responsibility. However for buildings, we feel that their lifespan is too great to make the builder responsible – the building company may last less time than the building. The design of houses for deconstruction and disassembly would be welcome, and the introduction of mandatory site waste management plans will help to ensure materials are separated during the deconstruction phase. Also, the introduction of site waste management plans would potentially ensure that the waste hierarchy is considered and (hopefully) applied from the planning phase, and through to both the build and the deconstruction phases.

**Consultation Question 3:** Do you agree that a voluntary agreement would be appropriate and deliverable? If no, please state why. If yes, do you feel that it would be beneficial to have separate agreements for each of the sub-sectors?

The difficulty with a voluntary agreement is that it makes the playing field uneven. Smaller companies won't be able to afford to commit to such measures, whilst larger companies will have to increase their prices.

We would prefer to see legislation, as this would apply to all.

However if voluntary agreements can be shown to increase recycling rates like the Courtauld Commitment then they should be encouraged. Separate agreements for each sub-sector would be needed, as the waste compositions for each sub-sector are quite different.

**Consultation Question 4:** Do you consider that the best method for monitoring the resource efficiency of the sector would be to measure the total material used per standardised unit? If no, please suggest an alternative.

Does this mean total used compared with not used? i.e. percentage wastage? Might be clearer to state "percentage wasted". A standardised methodology needs to be adopted to allow like for like comparisons to take place.

**Consultation Question 5:** Do you agree with the proposed waste prevention target?

YES.



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**Consultation Question 6:** Do you consider that setting 5 yearly milestones is a fair way of monitoring progress against the overall Towards Zero Waste target? If no, please explain why.

YES, but the figures on p.54 seem to be incorrect. They are not based on 5 year periods, and do not equal 1.5% reduction?

**Consultation Question 7:** Do you consider these actions to be sufficient to meet the waste prevention targets? If not, what other measures would you propose?

YES – we particularly like the idea of a surplus centre for redistribution of materials for community based projects.

**Consultation Question 8:** "At least 10% of the total value of materials and products used in all new buildings promoted or supported by the Welsh Government or Welsh Government Sponsored Bodies (WGSBs) should be recycled and reused content." Should this target be increased? If so, what would be an appropriate target?

If some contractors in the industry are using internal targets of 20% then it would be good for the Welsh Government to emulate this sort of level – to be exemplary.

**Consultation Question 9:** Do you consider these actions to be sufficient to meet the recycling targets? If not, what other measures would you propose?

We like the idea of developing Trade Waste Bring Sites.

Re: allowing businesses to use HWRC's for recycle - this will need to be assessed on an authority by authority basis. Some authorities do allow permitted trade waste recycle for a fee; however, others struggle with capacity for household waste and are constantly in a battle to discourage trade abuse with van bans, permit schemes etc. Separate facilities for trade waste would be more appropriate.

**Consultation Question 10:** We have asked a number of specific questions. If you would like to comment on any specific actions, or raise any issues which you feel we have not fully addressed, please use the space provided.

The figures used to inform the Plan are from 2005-06, some 6 years old. We are sure the industry will have moved on since then and it's a shame more up to date information is not available.

Tables 2 (p.23) and 3 (p.24) show "transfer station" as a destination of waste – this is potentially additional landfill as the final destinations are not known.