

Response form for the consultation on the Review of the Strategy for Sustainable Construction

Respondent Details

Name: Sara Eppel	Please return your responses by 26 th April 2006, by post or e-mail to:
Organisation: Sustainable Development Commission	David Eggleton Department of Trade & Industry Regulations, Sustainability & Innovation Team Construction Sector Unit Bay 366 151 Buckingham Palace Road London SW1W 9SS
Address: Ergon House Horseferry Road	
Town/City: London	
County/Postcode: SW1P 2AL	
Fax: 020 7238 4981	
Email: sara.eppel@sd-commission.org.uk	<u>david.eggleton@dti.gsi.gov.uk</u>

Organisation type (tick one box only)

<input type="checkbox"/> Approved Inspector	<input type="checkbox"/> Manufacturer
<input type="checkbox"/> Architects	<input type="checkbox"/> Trade body or association
<input type="checkbox"/> Civil/Structural Engineer	<input type="checkbox"/> Private individual (unaffiliated)
<input type="checkbox"/> Commercial Developers	<input type="checkbox"/> Professional body or institution
<input type="checkbox"/> Consultancy	<input type="checkbox"/> Property funder
<input type="checkbox"/> House or property developer	<input type="checkbox"/> Research/academic organization
<input type="checkbox"/> Housing Association (Registered Social Landlords)	<input type="checkbox"/> Specific interest or lobby group
<input type="checkbox"/> Other non-governmental organisation	<input type="checkbox"/> Individual in practice, trade or profession
<input type="checkbox"/> Builder/other contractor (please specify)	<input type="checkbox"/> Journalist/media
<input type="checkbox"/> Local authority – Building Control	<input type="checkbox"/> Insurer
<input type="checkbox"/> Local authority – Environmental health	x Other (please specify): Government's Independent Adviser on Sustainable Development
<input type="checkbox"/> Local authority – other (please specify)	

Please use an X in answering the following questions

Is your response confidential? No

If so please explain why.

(See disclaimer on page x)

1 Do you welcome the update of the Strategy for Sustainable Construction?

Comments:

Yes No

We welcome this opportunity for engagement in the review of the Government's Sustainable Construction Strategy¹ which reflects the fact that Government and the construction industry have recognised the need for change in priorities, policies and processes. We particularly welcome the ambition and leadership demonstrated by industry in the Sustainability Forum's targets and vision for Sustainable Construction.

The DTI's approach to engaging with the construction industry through the stakeholder consultation event is encouraging. This could have been developed further by using the consultation process to engage with the industry more thoroughly to inform the final strategy.

The Draft Sustainable Construction Strategy displays a low level of ambition for Government leadership. The Strategy should display the leadership required to reflect the sustainable development challenges that face the sector, and clearly Government has a key role to play in this. A clear framework with short- and medium-term milestones (up to 2010 and 2010-2020) is required within which the construction industry can contribute to sustainable development.

The draft strategy attempts to brigade the main strands of current government policy that is relevant to sustainable construction, but it does not bring coherence and clarity to the agenda. We are concerned that the Strategy will quickly become out of date as a series of Government sustainable construction-related documents and initiatives will be launched later in the year. Key objectives for the strategy should be to map progress on priority areas, align levers for change and give the construction industry guidance on how the vision outlined should be fulfilled.

2 Do you think that the broad coverage of the key themes and sub themes is correct?

Comments:

Yes No

The strength of the draft strategy lies in government and the construction industry together recognising the need for change in construction to deliver on the objectives of sustainable development. As such the strategy should clearly link the issues relevant to construction and delivery of the UK's Sustainable Development Strategy², to enable the industry to make its full contribution to the vision outlined within the Sustainable Development Strategy. The Sustainable Construction Strategy

¹ DTI (2006) *Sustainable construction strategy report 2006: Draft January 2006* London

² HM Government (2005) *Securing the future: Delivering UK sustainable development strategy* TSO

should be built around the core elements of the Sustainable Development Strategy, outlined below.

The Sustainable Development Strategy identifies five guiding principles of sustainable development. The twin goals of 'living within environmental limits', whilst 'ensuring a strong, healthy and just society' are to be achieved through a sustainable economy, promoting good governance and the responsible use of sound science. This means that economic growth is no longer a goal in its own right, but a pathway to wellbeing.

It also identified four priority areas for immediate action:

- Sustainable Consumption and Production
- Climate Change and Energy
- Natural Resource Protection and Environmental Enhancement
- Sustainable Communities

- **Living within Environmental Limits**

The Sustainable Construction Strategy should identify 'living within environmental limits' as a primary goal. Environmental limits are breached when the rate of environmental degradation exceeds the regenerative processes of the planet's environment, resources and biodiversity. Key environmental issues for the construction industry include minerals extraction, waste disposal, water consumption, carbon emissions, land use and land use change. These need to be assessed within the context of the whole life impact of buildings in use. Priorities for action at a national level are climate change, energy, natural resource protection and environmental enhancement. The international impact resulting from importing construction products is of growing significance and should be included.

The Sustainable Development Strategy identifies 68 indicators³ through which progress will be measured, including indicators on resource use, waste, greenhouse gas emissions and pollution. The construction industry plays a significant role both directly and indirectly in these environmental impacts, and its responsibility should be recognised and managed. The Sustainable Construction Strategy is a key opportunity to spell out the industry's role and responsibilities and how they should be managed. Using the relevant indicators from the UK Sustainable Development Strategy to monitor progress on the Sustainable Construction Strategy would help to show clearly how the industry is contributing to the delivery of the Sustainable Development Strategy.

- **Ensuring a Strong, Healthy and Just Society**

This should be the other primary goal for the Sustainable Construction Strategy. The previous strategy for sustainable construction⁴ successfully identified the relationship between the construction industry and its many stakeholders. The construction industry's stakeholders include end-users, clients, investors, shareholders, employees (including the global supply chain), pensioners and local communities. The construction industry bears responsibility for the wellbeing of its stakeholder group in meeting their diverse needs for this and future generations. Sustainable communities is identified as a priority for action so the strategy should identify how sustainable construction contributes to this agenda. The relevant sustainable

³ Defra (2005) Sustainable development indicators in your pocket 2005 London

⁴ DETR (2000) Building a better quality of life: A strategy for more sustainable construction London

development indicators³ include education, employment, social justice, environmental equality and wellbeing.

These two goals should be pursued through:

- **Achieving a sustainable economy**

A sustainable economy can support a sustainable construction industry to deliver the goals above. This means structuring the economy to incentivise efficient resource use, whilst ensuring prosperity and opportunities for all.

Whole life costing is an essential tool to ensure that short- and long-term social, environmental and economic costs and benefits are taken into account in appraising options.

The business case for a sustainable construction industry is being strengthened. Businesses increasingly find opportunities for wealth creation by engaging with the change agenda and focusing on the market openings it creates. Investment in skills to support a sustainable construction industry will give UK companies an internationally competitive edge.

There is an important opportunity for Government to show inspirational leadership through its role as the UK's largest construction client. This creates a unique opportunity to accelerate change, because this role of government's offers direct leverage to deliver market transformation.

- **Promoting Good Governance**

Good governance is about actively promoting effective, participative systems of governance. This is relevant to both the Government and the industry. Both need to engage with people to ensure transparent, accountable systems that engage with stakeholders in an effective way.

Within the UK Government, accountability for elements of sustainable construction is dispersed across a plethora of departments. Experience of delivering strategic change would identify this as a substantial risk to the delivery of sustainable construction. For example, current processes and accounting requirements often dictate that the short-term capital cost considerations dominate business decisions with negative consequences for sustainable construction. Clear focus, consistency and leadership is required through the Sustainable Construction Strategy to manage these issues across local government, government agencies, and the rest of the public sector.

As the department responsible for construction, the DTI clearly has a pivotal leadership role to coordinate government's role in setting the framework for industry to deliver. It also needs to take care in facilitating the achievement of targets by industry, devolving ownership to industry sectors. Carrying out a thorough consultation and taking responses on board is key to this.

It is also important that the Sustainable Construction Strategy shows how the industry should work with other stakeholders in key areas of transport, energy, water and waste management to deliver projects that are fit for the 21st century.

- **Using Sound Science responsibly**

The Government and industry should develop and implement policy on the basis of strong scientific evidence, including social aspects such as public attitudes and values. Where there is insufficient evidence but risk of a negative outcome, preventative action should be taken (the precautionary principle).

Research relating to sustainable construction is currently fragmented, and urgently needs a framework and strategic coherence. By setting out the sustainable development challenges up to 2010 and between 2010-2020, the Sustainable Construction Strategy can provide this direction, indicating the research requirements to 'future-proof' design, building techniques, construction materials and so on.

3 Is the balance of text on issues reporting past work OK?

Comments: Yes No

The text reporting past work does not explain how progress is being made to meet the industry targets. There has been no attempt to map the initiatives that are listed against associated targets.

Our initial critique is that the industry's vision will not be delivered on the basis of current progress and policies. Mapping the text which brigades the main strands of current Government policy relevant to the sustainable construction agenda against the targets table, we found that the strategy needs to accelerate progress across all areas, but particularly on materials, whole life value, water efficiency, design/construction quality and climate change.

If the document were structured as outlined in Question 2 (above), progress and delivery would be clearer.

5 Have we got the future targets and visions about right?

Comments: Yes No

We are supportive of the inclusion of a comprehensive set of targets and vision for the strategy. We will not comment on the specific details of the targets as we consider this was covered in the stakeholder consultation event. The stakeholder event found that although participants were supportive of having a target-led and milestone-driven strategy, there was a diversity of views around the specifics of the targets. It is vital that the DTI recognise that significant further development is needed to develop these targets with industry in order to ensure they take ownership and feel able to deliver. For example, it would have been useful to use the consultation process to gather information from industry on current good practice and best practice achievements in the key sustainability areas.

Therefore, we feel that further work is required to:

- refine the targets to ensure that they form the right structure that supports industry in contributing to sustainable development;
- engage with industry to ensure they feel ownership of the targets
- develop an implementation plan with industry to plot out delivery on the targets.

6 If not, what else would you like to see included?

Comments:

The strategy should be re-formulated to be much more coherent and relate directly to the outcomes to be delivered by the industry over the next 5 to 15 years, as a result of the changes catalysed by government.

The future targets and visions table should include an implementation strategy to outline the measures that are already and will be taken by government (including the legislative, fiscal, policy framework as well as specific initiatives) and the government's proposal for how it can support the industry to change practices and processes towards delivering the vision.

The structure should follow that outlined in our answer to Question 2 (above), and be divided into short- (up to 2010) and medium- term (2010-2020).

We propose that the government's strategy for supporting change in the industry should be based upon the behaviour change model that was introduced in the UK sustainable development strategy² (see Figure 1 below).

This model suggests that the Government has four ways in which it can support change in the industry to deliver sustainable construction and contribute to sustainable development. These are:

- to *enable* change, by removing barriers, providing information, capacity building;
- to *encourage* change, by establishing the legislative and fiscal framework to support sustainable behaviour, and where necessary penalise unsustainable practices;
- to *engage* with industry, by using stakeholder fora, existing industry communication networks and industry media to communicate the message; and
- to *exemplify* good practice, by raising awareness through awards and recognition, government and public sector leading by example in setting high standards in its own procurement. The government's role as the biggest construction client in the ongoing programme of capital investment offers direct leverage to deliver market transformation. This will result in a thriving environment for innovations in supply chains, products and services that will themselves be key enablers for more sustainable development in all sectors of construction.

The Sustainable Construction Strategy should include a rigorous process for monitoring and evaluating progress towards the targets and vision, and for reviewing policy where necessary. The Sustainable Construction Strategy should be clear about who owns the targets, and who will be responsible for delivering them.

Further, we consider that the Sustainable Construction Strategy should include guidance for industry on how they should enhance their progress towards delivering sustainable construction. The 2000 strategy⁴ included a useful section on 'What the Construction Industry can do' – it would be useful to see the strategy review update this guidance, as well as update the examples of current good practice from around the industry. The consultation process would have provided a useful opportunity to gather this data.

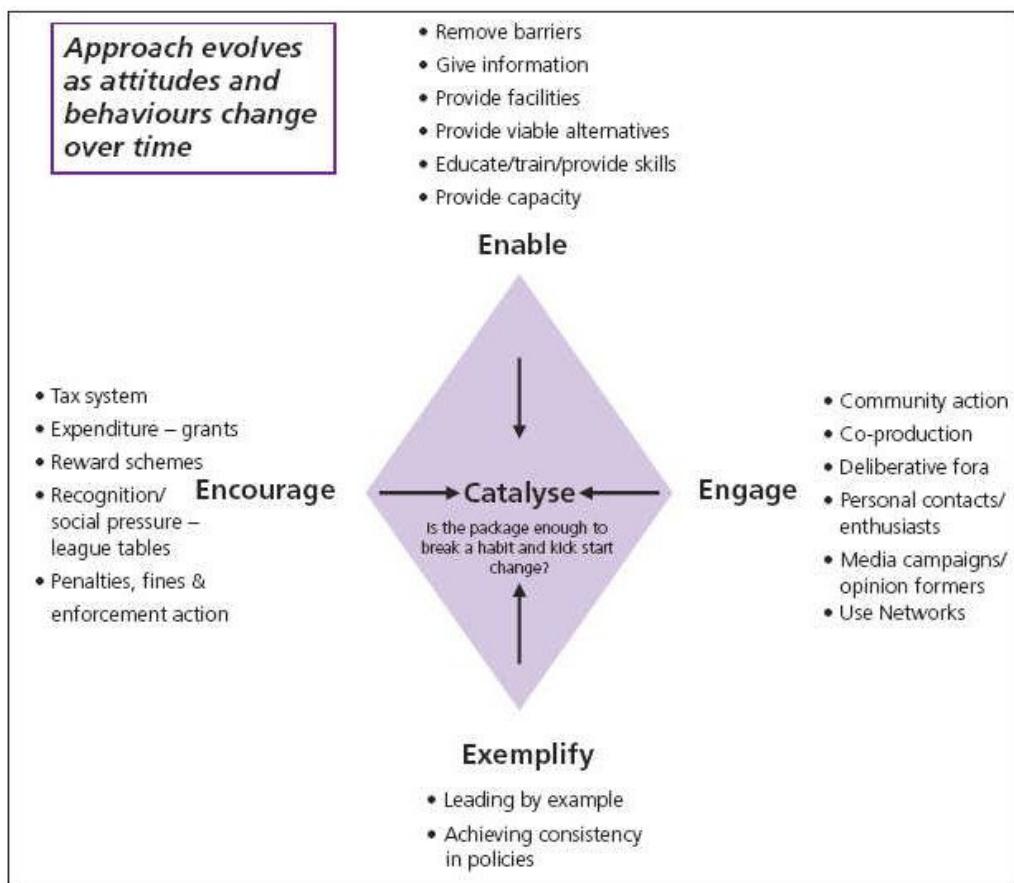


Figure 1 - Behaviour change model (HM Government 2005)