

**CONSTRUCTION &
DEMOLITION WASTE
MANAGEMENT PLAN FOR
A PROPOSED STRATGIC
HOUSING DEVELOPMENT**

**JUNCTION OF SANTRY
AVENUE AND SWORDS
ROAD, SANTRY, DUBLIN 9.**

Report Prepared For

Dwyer Nolan Developments Ltd

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1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Construction & Demolition Waste Management Plan (C&D WMP) on behalf of Dwyer Nolan Developments Ltd. The proposed development consists of the demolition of the existing building onsite and provides for 350 no. apartments comprised of 113 no. 1 bed, 218 no. 2 bed & 19 no. 3 bed dwellings in 4 no. blocks. The proposed development also provides for 5 no. commercial / retail units located at ground floor level facing onto Santry Avenue and Swords Road, a community use unit on the ground floor of Block E, and a residential amenity unit at ground floor level located between Blocks A and D.

This plan will provide information necessary to ensure that the management of C&D waste at the site is undertaken in accordance with the current legal and industry standards including the *Waste Management Acts 1996 - 2011* and associated Regulations ¹, *Protection of the Environment Act 2003* as amended ², *Litter Pollution Act 1997* as amended ³ and the *Eastern-Midlands Region Waste Management Plan 2015 – 2021* ⁴. In particular, this Plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. It also seeks to provide guidance on the appropriate collection and transport of waste from the site to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil and/or water).

This C&D WMP includes information on the legal and policy framework for C&D waste management in Ireland, estimates of the type and quantity of waste to be generated by the proposed development and makes recommendations for management of different waste streams.

2.0 CONSTRUCTION & DEMOLITION WASTE MANAGEMENT IN IRELAND

2.1 National Level

The Irish Government issued a policy statement in September 1998, *Changing Our Ways*⁵, which identified objectives for the prevention, minimisation, reuse, recycling, recovery and disposal of waste in Ireland. The target for C&D waste in this report was to recycle at least 50% of C&D waste within a five year period (by 2003), with a progressive increase to at least 85% over fifteen years (i.e. 2013).

In response to the *Changing Our Ways* report, a task force (Task Force B4) representing the waste sector of the already established Forum for the Construction Industry, released a report entitled '*Recycling of Construction and Demolition Waste*' ⁶ concerning the development and implementation of a voluntary construction industry programme to meet the Government's objectives for the recovery of C&D waste.

In September 2020 the government released a new national policy document outlining a new action plan for Ireland and its waste to cover the period of 2020-2025. This plan, 'A Waste Action Plan for a Circular Economy' ⁷, was prepared in response to the 'European Green Deal' which sets a roadmap for a transition to a new economy, where climate and environmental challenges are turned into opportunities, replacing the previous national waste management plan 'A Resource Opportunity (2012)'

It aims to fulfil the commitment in the Programme for Government to publish and start implementing a new National Waste Action Plan. It is intended that this new national waste policy will inform and give direction to waste planning and management in Ireland over the coming years. It will be followed later this year by an All of Government Circular Economy Strategy. The policy document shifts focus away from waste disposal and moves it back up the production chain. To support the policy, regulation is already in place (Circular Economy Legislative Package) or in the pipeline (Single Use Plastics Directive). The policy document contains over 200 measures across various waste areas including circular economy, municipal waste, consumer protection and citizen engagement, plastics and packaging, construction and demolition, textiles, green public procurement and waste enforcement.

One of the first actions to be taken is the development of a high-level, whole of Government Circular Economy Strategy to set a course for Ireland to transition across all sectors and at all levels of Government toward circularity. This strategy was issued for public consultation in April 2021.

The National Construction and Demolition Waste Council (NCDWC) was launched in June 2002, as one of the recommendations of the Forum for the Construction Industry, in the Task Force B4 final report. The NCDWC subsequently produced '*Best Practice Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects*'⁸ in July 2006 in conjunction with the then Department of the Environment, Heritage and Local Government (DoEHLG). The guidelines outline the issues that need to be addressed at the pre-planning stage of a development all the way through to its completion. These guidelines have been followed in the preparation of this document and include the following elements:

- Predicted C&D wastes and procedures to prevent, minimise, recycle and reuse wastes;
- Waste disposal/recycling of C&D wastes at the site;
- Provision of training for waste manager and site crew;
- Details of proposed record keeping system;
- Details of waste audit procedures and plan; and
- Details of consultation with relevant bodies i.e. waste recycling companies, Dublin City Council, etc.

Section 3 of the Guidelines identifies thresholds above which there is a requirement for the preparation of a C&D Waste Management Plan for developments. This development requires a C&D WMP under the following criterion:

- New residential development of 10 houses or more; and
- Demolition/renovation/refurbishment projects generating in excess of 100 m³ in volume, of C&D waste.

Other guidelines followed in the preparation of this report include '*Construction and Demolition Waste Management – a handbook for Contractors and Site Managers*'⁹, published by FÁS and the Construction Industry Federation in 2002 and the Environmental Protection Agency (EPA) '*Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects*' Draft for public consultation¹⁰ (April 2021).

These guidance documents are considered to define best practice for C&D projects in Ireland and describe how C&D projects are to be undertaken such that environmental impacts and risks are minimised and maximum levels of waste recycling are achieved.

2.2 Regional Level

The proposed development is located in the Local Authority area of Dublin City Council (DCC). The *Eastern-Midlands Region Waste Management Plan 2015 – 2021* is the regional waste management plan to the administrative area, published in May 2015.

The Regional Plan sets out the strategic targets for waste management in the region and sets a specific target for C&D waste of “70% preparing for reuse, recycling and other recovery of construction and demolition waste” (excluding natural soils and stones and hazardous wastes) to be achieved by 2020.

Municipal landfill charges in Ireland are based on the weight of waste disposed. In the Leinster Region, charges are approximately €130 - €150 per tonne of waste, which includes a €75 per tonne landfill levy introduced under the *Waste Management (Landfill Levy) (Amendment) Regulations 2012*.

The *Dublin City Development Plan 2016 – 2022*¹⁰ sets out a number of policies and objectives for Dublin City in line with the objectives of the regional waste management plan. The plan identifies the development of recycling in order to minimise the use of landfill as the main objective of the City Council. Waste policies and objectives with a particular relevance to the proposed development are:

Policies:

- *SI19: To support the principles of good waste management and the implementation of best international practice in relation to waste management in order for Dublin City and the region to become self-reliant in terms of waste management.*
- *SI20: To prevent and minimise waste and to encourage and support material sorting and recycling.*
- *SI21: To minimise the amount of waste which cannot be prevented and ensure it is managed and treated without causing environmental pollution.*

Objectives:

- *SIO17: To promote the re-use of building materials, recycling of demolition material and the use of materials from renewable sources. In all developments in excess of 10 housing units and commercial developments in excess of 1000 sqm, a materials source and management plan showing type of materials/proportion of re-use/recycled materials to be used shall be implemented by the developer.*
- *SIO18: To implement the current Litter Management Plan through enforcement of the litter laws, street cleaning and education and awareness campaigns.*
- *SIO19: To implement the Eastern-Midlands Waste Management Plan 2015-2021 and achieve the plan targets and objectives.*

2.3 Legislative Requirements

The primary legislative instruments that govern waste management in Ireland and applicable to the development are:

- Waste Management Act 1996 (No. 10 of 1996) as amended. Sub-ordinate legislation includes:
 - European Communities (Waste Directive) Regulations 2011 (SI 126 of 2011) as amended
 - Waste Management (Collection Permit) Regulations (S.I No. 820 of 2007) as amended
 - Waste Management (Facility Permit and Registration) Regulations 2007, (S.I No. 821 of 2007) as amended
 - Waste Management (Licensing) Regulations 2004 (S.I. No. 395 of 2004) as amended
 - Waste Management (Packaging) Regulations 2014 (S.I. 282 of 2014) as amended
 - Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997)
 - Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015)
 - European Union (Waste Electrical and Electronic Equipment) Regulations 2014 (S.I. No. 149 of 2014)
 - European Union (Batteries and Accumulators) Regulations 2014 (S.I. No. 283 of 2014) as amended
 - Waste Management (Food Waste) Regulations 2009 (S.I. 508 of 2009), as amended
 - European Union (Household Food Waste and Bio-waste) Regulation 2015 (S.I. No. 191 of 2015)
 - Waste Management (Hazardous Waste) Regulations, 1998 (S.I. No. 163 of 1998) as amended
 - Waste Management (Shipments of Waste) Regulations, 2007 (S.I. No. 419 of 2007) as amended
 - Waste Management (Hazardous Waste) Regulations 1998 (S.I. No. 163 of 1998) as amended;
 - European Communities (Transfrontier Shipment of Waste) Regulations 1994 (SI 121 of 1994)
 - European Union (Properties of Waste which Render it Hazardous) Regulations 2015 (S.I. No. 233 of 2015) as amended
- Environmental Protection Act 1992 (No. 7 of 1992) as amended.
- Litter Pollution Act 1997 (No. 12 of 1997) as amended.
- Planning and Development Act 2000 (No. 30 of 2000) as amended ¹¹.

One of the guiding principles of European waste legislation, which has in turn been incorporated into the *Waste Management Act 1996 - 2001* and subsequent Irish legislation, is the principle of “*Duty of Care*”. This implies that the waste producer is responsible for waste from the time it is generated through until its legal recycling, recovery or disposal (including its method of disposal). As it is not practical in most cases for the waste producer to physically transfer all waste from where it is produced to the final destination, waste contractors will be employed to physically transport waste to the final destination. Following on from this is the concept of “*Polluter Pays*” whereby the waste producer is liable to be prosecuted for pollution incidents, which may arise from the

incorrect management of waste produced, including the actions of any contractors engaged (e.g. for transportation and disposal/recovery/recycling of waste).

It is therefore imperative that the Developer ensures that the waste contractors engaged by demolition and construction contractors are legally compliant with respect to waste transportation, recycling, recovery and disposal. This includes the requirement that a contractor handle, transport and recycle/recover/dispose of waste in a manner that ensures that no adverse environmental impacts occur as a result of any of these activities.

A collection permit to transport waste must be held by each waste contractor which is issued by the National Waste Collection Permit Office (NWCPO). Waste receiving facilities must also be appropriately permitted or licensed. Operators of such facilities cannot receive any waste, unless in possession of a Certificate of Registration (COR) or waste permit granted by the relevant Local Authority under the *Waste Management (Facility Permit & Registration) Regulations 2007 and Amendments* or a Waste or Industrial Emissions Licence granted by the EPA. The COR / permit / licence held will specify the type and quantity of waste able to be received, stored, sorted, recycled, recovered and/or disposed of at the specified site.

3.0 DESCRIPTION OF THE DEVELOPMENT

3.1 Location, Size and Scale of the Development

Dwyer Nolan Developments Ltd. intend to apply to An Bord Pleanála for permission for a strategic housing development, on a site of c. 1.5 hectares, located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9. The development site is bounded to the north by Santry Avenue, to the east by Swords Road, to the west by Santry Avenue Industrial Estate, and to the south by the permitted Santry Place development (granted under Dublin City Council Ref's. 2713/17 & 2737/19).

The proposed development provides for 350 no. apartments, comprised of 113 no. 1 bed, 218 no. 2 bed, & 19 no. 3 bed dwellings, in 4 no. seven to fourteen storey buildings, over basement level, with 5 no. retail / commercial units and a community use unit located at ground floor level facing onto Santry Avenue and Swords Road. A one storey residential amenity unit, facing onto Santry Avenue, is also provided for between Blocks A & D.

The development consists of the following:

Demolition of the existing building on site i.e. the existing Chadwicks Builders Merchants (c. 4,196.8m²).

Construction of 350 no. 1, 2, & 3 bed apartments, retail / commercial and community uses in 4 no. buildings that are subdivided into Blocks A-G as follows:

- Block A is a 7 to 14 storey block consisting of 59 no. apartments comprised of 26 no. 1 bed & 33 no. 2 bed dwellings, with 2 no. commercial/retail units located on the ground floor (c. 132.4m² & 173m² respectively). Adjoining same is Block B, which is a 7 storey block consisting of 38 no. apartments comprised of 6 no. 1 bed, 20 no. 2 bed, & 12 no. 3 bed dwellings, with 2 no. commercial/retail units located on the ground floor (c. 162.3m² & 130.4m² respectively). Refuse storage areas are also provided for at ground floor level.

- Block C is a 7 storey block consisting of 55 no. apartments comprised of 13 no. 1 bed & 42 no. 2 bed dwellings. Refuse storage areas are provided for at ground floor level. Adjoining same is Block D which is a 7 to 10 storey block consisting of 51 no. apartments comprised of 25 no. 1 bed, 19 no. 2 bed, & 7 no. 3 bed dwellings, with 1 no. commercial unit / café located on the ground floor (c. 163.3m²). A refuse storage area is also provided for at ground floor level.
- Block E is a 7 to 10 storey block consisting of 58 no. apartments comprised of 10 no. 1 bed & 48 no. 2 bed dwellings, with 1 no. community use unit located on the ground floor (c. 188.1m²). A refuse storage area, substation, & switchroom are also provided for at ground floor level. Adjoining same is Block F which is a 7 storey block consisting of 55 no. apartments comprised of 13 no. 1 bed & 42 no. 2 bed dwellings. A refuse storage area & bicycle storage area are also provided for at ground floor level.
- Block G is a 7 storey block consisting of 34 no. apartments comprised of 20 no. 1 bed & 14 no. 2 bed dwellings. A refuse storage area & bicycle storage area are also provided for at ground floor level. Construction of a 1 storey residential amenity unit (c. 187.9m²) located between Blocks A & D.

Construction of basement level car parking (c.5,470.8m²) accommodating 173 no. car parking spaces & 719 no. bicycle parking spaces. Internal access to the basement level is provided from the cores of Blocks A, B, C, D, E, & F. External vehicular access to the basement level is from the south, between Blocks B & C. 36 no. car parking spaces & 58 no. bicycle parking spaces are also provided for within the site at surface level.

Public open space of c. 1,915m² is provided for between Blocks C, D, E, & F. Communal open space of c. 3,122m² provided for between (i) Blocks E, F, & G, (ii) Blocks A, B, C, & D, and (iii) in the form of roof gardens located on Blocks A, C, & F and the proposed residential amenity use unit. The development includes for hard and soft landscaping & boundary treatments. Private open spaces are provided as terraces at ground floor level of each block and balconies at all upper levels.

Vehicular access to the development will be via 2 no. existing / permitted access points: (i) on Santry Avenue in the north-west of the site (ii) off Swords Road in the south-east of the site, as permitted under the adjoining Santry Place development (Ref. 2713/17).

The development includes for all associated site development works above and below ground, bin & bicycle storage, plant (M&E), sub-stations, public lighting, servicing, signage, surface water attenuation facilities etc.

3.2 Details of the Non-Hazardous Wastes to be Produced

There will be waste materials generated from the demolition of the existing building and hardstanding areas on site, as well as from the further excavation of the building foundations. The volume of waste generated from demolition will be more difficult to segregate than waste generated from the construction phase, as many of the building materials will be bonded together or integrated i.e. plasterboard on timber ceiling joists, steel embedded in concrete, etc.

There will be soil, stones, clay and made ground excavated to facilitate construction of the basement, new foundations, underground services, and the installation of the proposed basement. The development engineers (DBFL) have estimated that 20,000m³ of material will need to be excavated to do so. It is currently envisaged that there will be limited

opportunity for reuse of excavated material on site and all excavated material will need to be removed offsite. When excavated material is required to be removed offsite it will be taken for appropriate offsite reuse, recovery, recycling and / or disposal.

During the construction phase there may be a surplus of building materials, such as timber off-cuts, broken concrete blocks, cladding, plastics, metals and tiles generated. There may also be excess concrete during construction which will need to be disposed of. Plastic and cardboard waste from packaging and supply of materials will also be generated. The contractor will be required to ensure that oversupply of materials is kept to a minimum and opportunities for reuse of suitable materials is maximised.

Waste will also be generated from construction workers e.g. organic / food waste, dry mixed recyclables (waste paper, newspaper, plastic bottles, packaging, aluminium cans, tins and Tetra Pak cartons), mixed non-recyclables and potentially sewage sludge from temporary welfare facilities provided on site during the construction phase. Waste printer / toner cartridges, waste electrical and electronic equipment (WEEE) and waste batteries may also be generated infrequently from site offices.

3.3 Potential Hazardous Wastes Arising

3.3.1 Contaminated Soil

Site investigations and environmental soil testing have not yet been undertaken for this site as the site is currently occupied and operating. Prior to any material being removed offsite, site investigations and appropriate environmental soil testing will be undertaken to classify the material for appropriate reuse, recycling or disposal.

If any potentially contaminated material is encountered, it will need to be segregated from clean / inert material, tested and classified as either non-hazardous or hazardous in accordance with the EPA publication entitled '*Waste Classification: List of Waste & Determining if Waste is Hazardous or Non-Hazardous*'¹² using the *HazWasteOnline* application (or similar approved classification method). The material will then need to be classified as clean, inert, non-hazardous or hazardous in accordance with the *EC Council Decision 2003/33/EC*¹³, which establishes the criteria for the acceptance of waste at landfills.

In the event that Asbestos Containing Materials (ACMs) are found within the excavated material, the removal will only be carried out by a suitably permitted waste contractor, in accordance with *S.I. No. 386 of 2006 Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006-2010*. All asbestos will be taken to a suitably licensed or permitted facility.

In the event that hazardous soil, or historically deposited waste is encountered during the construction phase, the contractor will notify DCC and provide a Hazardous / Contaminated Soil Management Plan, to include estimated tonnages, description of location, any relevant mitigation, destination for disposal / treatment, in addition to information on the authorised waste collector(s).

3.3.2 Fuel/Oils

Fuels and oils are classed as hazardous materials; any on-site storage of fuel / oil, and all storage tanks and all draw-off points will be bunded and located in a dedicated, secure area of the site. Provided that these requirements are adhered to and the site crew are

trained in the appropriate refuelling techniques, it is not expected that there will be any fuel / oil waste generated at the site.

3.3.3 Invasive Plant Species

An invasive species survey was undertaken by Enviroguide Consulting in May 2021 for the purpose of identifying and managing any schedule 3 (*Regulations SI No. 355/2015*) invasive species such as Japanese Knotweed (*Fallopia japonica*). There were no invasive species found on the site.

3.3.4 Asbestos

An asbestos refurbishment / demolition survey will be undertaken prior to the demolition of the existing structures on site to determine the presence of asbestos or asbestos containing materials (ACMs).

Removal of asbestos or ACMs will be carried out by a suitably qualified contractor and ACMs will only be removed from site by a suitably permitted / licenced waste contractor, in accordance with *S.I. No. 386 of 2006 Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006-2010*. All material will be taken to a suitably licensed or permitted facility.

3.3.5 Other Known Hazardous Substances

Paints, glues, adhesives and other known hazardous substances will be stored in designated areas. They will generally be present in small volumes only and associated waste volumes generated will be kept to a minimum. Wastes will be stored in appropriate receptacles pending collection by an authorised waste contractor.

In addition, WEEE (containing hazardous components), printer toner / cartridges, batteries (Lead, Ni-Cd or Mercury) and / or fluorescent tubes and other mercury containing waste may be generated from during C&D activities or temporary site offices. These wastes, if generated, will be stored in appropriate receptacles in designated areas of the site pending collection by an authorised waste contractor.

3.4 Main Construction and Demolition Waste Categories

The main non-hazardous and hazardous waste streams that could be generated by the construction activities at a typical site are shown in Table 3.1. The List of Waste (LoW) code (applicable as of 1 June 2015) (also referred to as the European Waste Code (EWC)) for each waste stream is also shown.

Table 3.1 Typical waste types generated and LoW codes (individual waste types may contain hazardous substances)

Waste Material	LoW/EWC Code
Concrete, bricks, tiles, ceramics	17 01 01-03 & 07
Wood, glass and plastic	17 02 01-03
Treated wood, glass, plastic, containing hazardous substances	17-02-04*
Bituminous mixtures, coal tar and tarred products	17 03 01*, 02 & 03*
Metals (including their alloys) and cable	17 04 01-11
Soil and stones	17 05 03* & 04
Gypsum-based construction material	17 08 01* & 02
Paper and cardboard	20 01 01
Mixed C&D waste	17 09 04
Green waste	20 02 01
Electrical and electronic components	20 01 35 & 36
Batteries and accumulators	20 01 33 & 34
Liquid fuels	13 07 01-10
Chemicals (solvents, pesticides, paints, adhesives, detergents etc.)	20 01 13, 19, 27-30
Insulation materials	17 06 04
Organic (food) waste	20 01 08
Mixed Municipal Waste	20 03 01

* Individual waste type may contain hazardous substances

4.0 WASTE MANAGEMENT

4.1 Demolition Waste Generation

The demolition stage will involve the demolition and renovation of the existing warehouse style building with attached office and hard standing on-site. The demolition areas are identified in the planning drawings provided with this application. The anticipated demolition waste and rates of reuse, recycling / recovery and disposal are shown in Table 4.1, below.

Table 4.1 Estimated off-site reuse, recycle and disposal rates for demolition waste

Waste Type	Tonnes	Reuse		Recycle / Recovery		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Glass	56.7	0	0.0	85	48.2	15	8.5
Concrete, Bricks, Tiles, Ceramics	513.0	30	153.9	65	333.5	5	25.7
Plasterboard	25.2	30	7.6	60	15.1	10	2.5
Asphalts	6.3	0	0.0	25	1.6	75	4.7
Metals	94.4	5	4.7	80	75.5	15	14.2
Timber	75.5	10	7.6	60	45.3	30	22.7
Total	771.1		173.7		519.2		78.2

4.2 Construction Waste Generation

Table 4.2 shows the breakdown of C&D waste types produced on a typical site based on data from the EPA *National Waste Reports*¹⁴ and the joint EPA & GMIT study¹⁵.

Table 4.2: Waste materials generated on a typical Irish construction site

Waste Types	%
Mixed C&D	33
Timber	28
Plasterboard	10
Metals	8
Concrete	6
Other	15
Total	100

Table 4.3, below, shows the estimated construction waste generation for the proposed Project based on the gross floor area of construction and other information available to date, along with indicative targets for management of the waste streams. The estimated amounts for the main waste types (with the exception of soils and stones) are based on an average large-scale development waste generation rate per m², using the waste breakdown rates shown in Table 4.2. These have been calculated from the schedule of development areas provided by the architect.

Table 4.3: Predicted on and off-site reuse, recycle and disposal rates for construction waste

Waste Type	Tonnes	Reuse		Recycle / Recovery		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Mixed C&D	652.0	10	65.2	80	521.6	10	65.2
Timber	553.2	40	221.3	55	304.3	5	27.7
Plasterboard	197.6	30	59.3	60	118.5	10	19.8
Metals	158.1	5	7.9	90	142.3	5	7.9
Concrete	118.5	30	35.6	65	77.1	5	5.9
Other	296.4	20	59.3	60	177.8	20	59.3
Total	1975.7		448.5		1341.5		185.7

In addition to the waste streams in Table 4.3, there will be c. 20,000 m³ of soil, stones, clay and made ground excavated to facilitate construction of new foundations, underground services, and the installation of the proposed basements. Any suitable excavated material will be temporarily stockpiled for reuse as fill, where possible, but reuse on site is expected to be limited and all of the excavated material is expected to be removed off- site for appropriate reuse, recovery and / or disposal.

It should be noted that until final materials and detailed construction methodologies have been confirmed, it is difficult to predict with a high level of accuracy the construction waste that will be generated from the proposed works as the exact materials and quantities may be subject to some degree of change and variation during the construction process.

4.3 Proposed Waste Management Options

Waste materials generated will be segregated on- site, where it is practical. Where the on-site segregation of certain wastes types is not practical, off- site segregation will be carried out. There will be skips and receptacles provided to facilitate segregation at source, where feasible. All waste receptacles leaving site will be covered or enclosed. The appointed waste contractor will collect and transfer the wastes as receptacles are filled. There are numerous waste contractors in the Dublin region that provide this service.

All waste arisings will be handled by an approved waste contractor holding a current waste collection permit. All waste arisings requiring disposal off- site will be reused, recycled, recovered or disposed of at a facility holding the appropriate registration, permit or licence, as required.

During construction, some of the sub-contractors on site will generate waste in relatively low quantities. The transportation of non-hazardous waste by persons who are not directly involved with the waste business, at weights less than or equal to 2 tonnes, and in vehicles not designed for the carriage of waste, are exempt from the requirement to have a waste collection permit (per Article 30 (1) (b) of the Waste Collection Permit Regulations 2007, as amended). Any sub-contractors engaged that do not generate more than 2 tonnes of waste at any one time can transport this waste off- site in their work vehicles (which are not designed for the carriage of waste). However, they are required to ensure that the receiving facility has the appropriate COR / permit / licence.

Written records will be maintained by the contractor(s), detailing the waste arising throughout the C&D phases, the classification of each waste type, waste collection permits for all waste contactors who collect waste from the site and COR / permit / licence for the receiving waste facility for all waste removed off- site for appropriate reuse, recycling, recovery and / or disposal

Dedicated bunded storage containers will be provided for hazardous wastes which may arise, such as batteries, paints, oils, chemicals, if required.

The anticipated management of the main waste streams is outlined as follows:

Soil, Stone, Clay & Made Ground

The waste hierarchy states that the preferred option for waste management is prevention and minimisation of waste, followed by preparing for reuse and recycling / recovery, energy recovery (i.e. incineration) and, least favoured of all, disposal. The excavations are required to facilitate construction works so the preferred option (prevention and minimisation) cannot be accommodated for the excavation phase.

When material is removed off- site it could be reused as a by-product (and not as a waste). If this is done, it will be done in accordance with Article 27 of the *European Communities (Waste Directive) Regulations 2011*, which requires that certain conditions are met and that by-product notifications are made to the EPA via their online notification form. Excavated material should not be removed from site until approval from the EPA has been received.

The next option (beneficial reuse) may be appropriate for the excavated material, pending environmental testing to classify the material as hazardous or non-hazardous in accordance with the EPA *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* publication. Clean inert material may be used as fill material in other construction projects or engineering fill for waste licensed sites. Beneficial reuse of surplus excavation material as engineering fill may be subject to further testing to determine if materials meet the specific engineering standards for their proposed end use.

If the material is deemed to be a waste, then removal and reuse / recovery / disposal of the material will be carried out in accordance with the *Waste Management Acts 1996 – 2011* as amended, the *Waste Management (Collection Permit) Regulations 2007* as amended and the *Waste Management (Facility Permit & Registration) Regulations 2007* as amended. Once all available beneficial reuse options have been exhausted, the options of recycling and recovery at waste permitted and licensed sites will be considered.

In the event that contaminated material is encountered and subsequently classified as hazardous, this material will be stored separately to any non-hazardous material. It will require off-site treatment at a suitable facility or disposal abroad via Transfrontier Shipment of Wastes (TFS).

Bedrock

While it is not envisaged that bedrock will be encountered, if bedrock is encountered, it is anticipated that it will not be crushed on site. Any excavated rock is expected to be removed off- site for appropriate reuse, recovery and / or disposal. If bedrock is to be crushed on- site, the appropriate mobile waste facility permit will be obtained from DCC.

Silt & Sludge

During the construction phase, silt and petrochemical interception will be carried out on run-off and pumped water from site works, where required. Sludge and silt will then be collected by a suitably licensed contractor and removed off- site.

Concrete Blocks, Bricks, Tiles & Ceramics

The majority of concrete blocks, bricks, tiles and ceramics generated as part of the construction works are expected to be clean, inert material and should be recycled, where possible. If concrete is to be crushed on- site, the appropriate mobile waste facility permit will be obtained from DCC.

Hard Plastic

As hard plastic is a highly recyclable material, much of the plastic generated will be primarily from material off-cuts. All recyclable plastic will be segregated and recycled, where possible.

Timber

Timber that is uncontaminated, i.e. free from paints, preservatives, glues, etc., will be disposed of in a separate skip and recycled off- site.

Metal

Metals will be segregated, where practical, and stored in skips. Metal is highly recyclable and there are numerous companies that will accept these materials.

Plasterboard

There are currently a number of recycling services for plasterboard in Ireland. Plasterboard from the construction phases will be stored in a separate skip, pending collection for recycling. The site Manager will ensure that oversupply of new plasterboard is carefully monitored to minimise waste.

Glass

Glass materials will be segregated for recycling, where possible.

Waste Electrical & Electronic Equipment (WEEE)

Any WEEE will be stored in dedicated covered cages / receptacles / pallets pending collection for recycling.

Other Recyclables

Where any other recyclable wastes, such as cardboard and soft plastic, are generated, these will be segregated at source into dedicated skips and removed off- site.

Non-Recyclable Waste

C&D waste which is not suitable for reuse or recovery, such as polystyrene, some plastics and some cardboards, will be placed in separate skips or other receptacles. Prior to removal from site, the non-recyclable waste skip / receptacle will be examined by a member of the waste team (see Section 7.0) to determine if recyclable materials have

been placed in there by mistake. If this is the case, efforts will be made to determine the cause of the waste not being segregated correctly and recyclable waste will be removed and placed into the appropriate receptacle.

Asbestos Containing Materials

Any asbestos or ACM found on-site should be removed by a suitably competent contractor and disposed of as asbestos waste before the demolition works begin. All asbestos removal work or encapsulation work must be carried out in accordance with *S.I. No. 386 of 2006 Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006-2010*.

Other Hazardous Wastes

On-site storage of any hazardous wastes produced (i.e. contaminated soil if encountered and / or waste fuels) will be kept to a minimum, with removal off-site organised on a regular basis. Storage of all hazardous wastes on-site will be undertaken so as to minimise exposure to on-site personnel and the public and to also minimise potential for environmental impacts. Hazardous wastes will be recovered, wherever possible, and failing this, disposed of appropriately.

On-Site Crushing

It is currently not envisaged that the crushing of waste materials will occur on-site. However, if the crushing of material is to be undertaken, a mobile waste facility permit will first be obtained from DCC and the destination of the accepting waste facility will be supplied to the DCC waste unit.

4.4 Tracking and Documentation Procedures for Off-Site Waste

All waste will be documented prior to leaving the site. Waste will be weighed by the contractor, either by a weighing mechanism on the truck or at the receiving facility. These waste records will be maintained on site by the nominated project Waste Manager (see Section 7.0).

All movement of waste and the use of waste contractors will be undertaken in accordance with the *Waste Management Acts 1996 - 2011, Waste Management (Collection Permit) Regulations 2007* as amended and *Waste Management (Facility Permit & Registration) Regulations 2007* and amended. This includes the requirement for all waste contractors to have a waste collection permit issued by the NWCPO. The nominated project Waste Manager (see Section 7.0) will maintain a copy of all waste collection permits on-Site.

If the waste is being transported to another site, a copy of the Local Authority waste COR / permit or EPA Waste / Industrial Emissions Licence for that site will be provided to the nominated project Waste Manager (see Section 7.0). If the waste is being shipped abroad, a copy of the Transfrontier Shipping (TFS) notification document will be obtained from DCC (as the relevant authority on behalf of all Local Authorities in Ireland) and kept on-Site along with details of the final destination (COR, permits, licences, etc.). A receipt from the final destination of the material will be kept as part of the on-Site waste management records.

All information will be entered in a waste management recording system to be maintained on-Site.

5.0 ESTIMATED COST OF WASTE MANAGEMENT

An outline of the costs associated with different aspects of waste management is outlined below. The total cost of C&D waste management will be measured and will take into account handling costs, storage costs, transportation costs, revenue from rebates and disposal costs.

5.1 Reuse

By reusing materials on site, there will be a reduction in the transport and recycle / recovery / disposal costs associated with the requirement for a waste contractor to take the material off-Site. Clean and inert soils, gravel, stones, etc., which cannot be reused on-Site may be used as access roads or capping material for landfill sites, etc. This material is often taken free of charge or at a reduced fee for such purposes, reducing final waste disposal costs.

5.2 Recycling

Salvageable metals will earn a rebate, which can be offset against the costs of collection and transportation of the skips. Clean, uncontaminated cardboard and certain hard plastics can also be recycled. Waste contractors will charge considerably less to take segregated wastes, such as recyclable waste, from a site than mixed waste. Timber can be recycled as chipboard. Again, waste contractors will charge considerably less to take segregated wastes, such as timber, from a site than mixed waste.

5.3 Disposal

Landfill charges are currently at around €130 - €150 per tonne which includes a €75 per tonne landfill levy specified in the *Waste Management (Landfill Levy) Regulations 2015*. In addition to disposal costs, waste contractors will also charge a collection fee for skips.

Collection of segregated C&D waste usually costs less than municipal waste. Specific C&D waste contractors take the waste off-site to a licensed or permitted facility and, where possible, remove salvageable items from the waste stream before disposing of the remainder to landfill. Clean soil, rubble, etc., is also used as fill / capping material, wherever possible.

6.0 DEMOLITION PROCEDURES

The demolition stage will involve the demolition of multiple brick style buildings on-Site. The demolition areas are identified in the planning drawings submitted as part of this application. A formal demolition plan including safety procedures will be prepared by the demolition contractor. However, in general, the following sequence of works should be followed during the demolition stage:

Check for Hazards

Prior to commencing works, buildings and structures to be demolished will be checked for any likely hazards including asbestos, ACMs, electrical power lines or cables, gas reticulation systems, telecommunications, unsafe structures and fire / explosion hazards, e.g. combustible dust, chemical hazards, oil, fuels and contamination.

Removal of Components

All hazardous materials will be removed first. All components from within the buildings that can be salvaged will be removed next. This will primarily be comprised of metal; however, may also include timbers, doors, windows, wiring and metal ducting, etc.

Removal of Roofing

Steel roof supports, beams, etc., will be dismantled and taken away for recycling / salvage.

Excavation of Services, Demolition of Walls and Concrete

Services will be removed from the ground and the breakdown of walls will be carried out once all salvageable or reusable materials have been taken from the buildings. Finally, any existing foundations and hard standing areas will be excavated.

7.0 TRAINING PROVISIONS

A member of the construction team will be appointed as the Waste Manager to ensure commitment, operational efficiency and accountability in relation to waste management during the C&D phases of the development.

7.1 Waste Manager Training and Responsibilities

The nominated Waste Manager will be given responsibility and authority to select a waste team if required, i.e. members of the site crew that will aid them in the organisation, operation and recording of the waste management system implemented on site.

The Waste Manager will have overall responsibility to oversee, record and provide feedback to the client on everyday waste management at the site. Authority will be given to the Waste Manager to delegate responsibility to sub-contractors, where necessary, and to coordinate with suppliers, service providers and sub-contractors to prioritise waste prevention and material salvage.

The Waste Manager will be trained in how to set up and maintain a record keeping system, how to perform an audit and how to establish targets for waste management on site. The Waste Manager will also be trained in the best methods for segregation and storage of recyclable materials, have information on the materials that can be reused on site and be knowledgeable in how to implement this C&D WMP.

7.2 Site Crew Training

Training of site crew in relation to waste is the responsibility of the Waste Manager and, as such, a waste training program should be organised. A basic awareness course will be held for all site crew to outline the C&D WMP and to detail the segregation of waste materials at source. This may be incorporated with other site training needs such as general site induction, health and safety awareness and manual handling.

This basic course will describe the materials to be segregated, the storage methods and the location of the Waste Storage Areas (WSAs). A sub-section on hazardous wastes will

be incorporated into the training program and the particular dangers of each hazardous waste will be explained.

8.0 RECORD KEEPING

Records should be kept for all waste material which leaves the site, either for reuse on another site, recycling or disposal. A recording system will be put in place to record the waste arisings on Site.

A waste tracking log should be used to track each waste movement from the site. On exit from the site, the waste collection vehicle driver should stop at the site office and sign out as a visitor and provide the security personnel or Waste Manager with a waste docket (or Waste Transfer Form (WTF) for hazardous waste) for the waste load collected. At this time, the security personnel should complete and sign the Waste Tracking Register with the following information:

- Date
- Time
- Waste Contractor
- Company waste contractor appointed by, e.g. Contractor or subcontractor name
- Collection Permit No.
- Vehicle Reg.
- Driver Name
- Docket No.
- Waste Type
- EWC / LoW

The waste vehicle will be checked by security personal or the Waste Manager to ensure it has the waste collection permit no. displayed and a copy of the waste collection permit in the vehicle before they are allowed to remove the waste from the site.

The waste transfer dockets will be transferred to the Waste Manager on a weekly basis and can be placed in the Waste Tracking Log file. This information will be forwarded onto the DCC Waste Regulation Unit when requested.

Alternatively, each subcontractor that has engaged their own waste contractor will be required to maintain a similar waste tracking log with the waste dockets / WTF maintained on file and available for inspection on site by the main contractor as required.

Waste receipts from the receiving waste facility will also be obtained by the site contractor(s) and retained. A copy of the Waste Collection Permits, CORs, Waste Facility Permits and Waste Licences will be maintained on site at all times. Subcontractors who have engaged their own waste contractors, should provide the main contractor with a copy of the waste collection permits and COR / permit / licence for the receiving waste facilities and maintain a copy on file, available for inspection on site as required.

9.0 OUTLINE WASTE AUDIT PROCEDURE

9.1 Responsibility for Waste Audit

The appointed Waste Manager will be responsible for conducting a waste audit at the site during the C&D phase of the proposed Project. Contact details for the nominated Waste Manager will be provided to the DCC Waste Regulation Unit after the main contractor is appointed and prior to any material being removed from site.

9.2 Review of Records and Identification of Corrective Actions

A review of all waste management costs and the records for the waste generated and transported off-site should be undertaken mid-way through the demolition and construction phase of the proposed Project.

If waste movements are not accounted for, the reasons for this should be established in order to see if and why the record keeping system has not been maintained. The waste records will be compared with the established recovery / reuse / recycling targets for the site. Each material type will be examined, in order to see where the largest percentage waste generation is occurring. The waste management methods for each material type will be reviewed in order to highlight how the targets can be achieved.

Upon completion of the C&D phase, a final report will be prepared, summarising the outcomes of waste management processes adopted and the total recycling / reuse / recovery figures for the development.

10.0 CONSULTATION WITH RELEVANT BODIES

10.1 Local Authority

Once construction contractors have been appointed and have appointed waste contractors, and prior to removal of any C&D waste materials off-site, details of the proposed destination of each waste stream will be provided to the DCC Waste Regulation Unit.

DCC will also be consulted, as required, throughout the demolition, excavation and construction phases in order to ensure that all available waste reduction, reuse and recycling opportunities are identified and utilised and that compliant waste management practices are carried out.

10.2 Recycling / Salvage Companies

The appointed waste contractor for the main waste streams managed by the demolition and construction contractors will be audited in order to ensure that relevant and up-to-date waste collection permits and facility registrations / permits / licences are held. In addition, information will be obtained regarding the feasibility of recycling each material, the costs of recycling / reclamation, the means by which the wastes will be collected and transported off-site, and the recycling / reclamation process each material will undergo off-site.

11.0 REFERENCES

1. Waste Management Act 1996 (No. 10 of 1996) as amended. Sub-ordinate and associated legislation includes:
 - European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011) as amended.
 - Waste Management (Collection Permit) Regulations 2007 (S.I. No. 820 of 2007) as amended.
 - Waste Management (Facility Permit and Registration) Regulations 2007 (S.I. No. 821 of 2007) as amended.
 - Waste Management (Licensing) Regulations 2000 (S.I. No. 185 of 2000) as amended.
 - European Union (Packaging) Regulations 2014 (S.I. No. 282 of 2014) as amended.
 - Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997) as amended.
 - Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015)
 - European Union (Waste Electrical and Electronic Equipment) Regulations 2014 (S.I. No. 149 of 2014)
 - European Union (Batteries and Accumulators) Regulations 2014 (S.I. No. 283 of 2014) as amended.
 - Waste Management (Food Waste) Regulations 2009 (S.I. No. 508 of 2009) as amended.
 - European Union (Household Food Waste and Bio-waste) Regulations 2015 (S.I. No. 430 of 2015)
 - Waste Management (Hazardous Waste) Regulations 1998 (S.I. No. 163 of 1998) as amended.
 - Waste Management (Shipments of Waste) Regulations 2007 (S.I. No. 419 of 2007) as amended.
 - European Communities (Shipments of Hazardous Waste exclusively within Ireland) Regulations 2011 (S.I. No. 324 of 2011)
 - European Union (Properties of Waste which Render it Hazardous) Regulations 2015 (S.I. No. 233 of 2015) as amended
2. Protection of the Environment Act 2003, (No. 27 of 2003) as amended.
3. Litter Pollution Act 1997 (S.I. No. 12 of 1997) as amended
4. Eastern-Midlands Region Waste Management Plan 2015 – 2021 (2015).
5. Department of Environment and Local Government (DoELG) *Waste Management – Changing Our Ways, A Policy Statement* (1998).
6. Forum for the Construction Industry – *Recycling of Construction and Demolition Waste*.
7. Department of Communications, Climate Action and Environment (DCCA), *Waste Action Plan for the Circular Economy - Ireland's National Waste Policy 2020-2025* (Sept 2020).
8. Department of Environment, Heritage and Local Government, *Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects* (2006).
9. FÁS and the Construction Industry Federation (CIF), *Construction and Demolition Waste Management – a handbook for Contractors and site Managers* (2002).
10. Environmental Protection Agency (EPA) '*Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects*' Draft (April 2021)
11. Dublin City Council (DCC), Dublin City Council Development Plan 2016-2022 (2016)

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12. Planning and Development Act 2000 (S.I. No. 30 of 2000) as amended
 13. EPA, *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* (2015)
 14. Council Decision 2003/33/EC, establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC.
 15. Environmental Protection Agency (EPA), *National Waste Database Reports 1998 – 2012*.
 16. EPA and Galway-Mayo Institute of Technology (GMIT), *EPA Research Report 146 – A Review of Design and Construction Waste Management Practices in Selected Case Studies – Lessons Learned* (2015).