

OPERATIONAL WASTE MANAGEMENT PLAN FOR A RESIDENTIAL DEVELOPMENT AT BALSCADDEN ROAD, HOWTH, COUNTY DUBLIN

Report Prepared For

Balscadden GP3

Report Prepared By


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1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Operational Waste Management Plan (OWMP) behalf of Balcadden GP3 for a proposed development at Balcadden Road, Howth, County Dublin. The development will consist of the demolition of existing structures onsite and construction of a predominantly residential development comprising of residential units but also including, retail, and amenity uses at Former Baily Court Hotel, Main Street, and at lands located south of the Martello Tower on Balcadden Rd, Howth, County Dublin.

This OWMP has been prepared to ensure that the management of waste during the operational phase of the proposed Development is undertaken in accordance with the current legal and industry standards including, the Waste Management Act 1996 – 2011 as amended and associated Regulations¹, Protection of the Environment Act 2003 as amended², Litter Pollution Act 1997 as amended³, the *'Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021'*⁴ and Fingal County Council (FCC) *'Fingal County Council Segregation, Storage and Presentation of household and Commercial Waste Bye-Laws'* 2020⁵. In particular, this OWMP aims to provide a robust strategy for the storage, handling, collection and transport of the wastes generated at Site.

This OWMP aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. The OWMP also seeks to provide guidance on the appropriate collection and transport of waste to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil or water resources). The plan estimates the type and quantity of waste to be generated from the proposed Development during the operational phase and provides a strategy for managing the different waste streams.

At present, there are no specific guidelines in Ireland for the preparation of OWMPs. Therefore, in preparing this document, consideration has been given to the requirements of national and regional waste policy, legislation and other guidelines.

2.0 OVERVIEW OF WASTE MANAGEMENT IN IRELAND

2.1 National Level

The Government issued a policy statement in September 1998 entitled *'Changing Our Ways'*⁶, which identified objectives for the prevention, minimisation, reuse, recycling, recovery and disposal of waste in Ireland. A heavy emphasis was placed on reducing reliance on landfill and finding alternative methods for managing waste. Amongst other things, *Changing Our Ways* stated a target of at least 35% recycling of municipal (i.e. household, commercial and non-process industrial) waste.

A further policy document, *'Preventing and Recycling Waste – Delivering Change'* was published in 2002⁷. This document proposed a number of programmes to increase recycling of waste and allow diversion from landfill. The need for waste minimisation at source was considered a priority.

This view was also supported by a review of sustainable development policy in Ireland and achievements to date, which was conducted in 2002, entitled *'Making Irelands Development Sustainable – Review, Assessment and Future Action'*⁸. This document also stressed the need to decouple economic growth and waste generation, again through waste minimisation and reuse of discarded material.

In order to establish the progress of the Government policy document *Changing Our Ways*, a review document was published in April 2004 entitled *'Taking Stock and Moving Forward'*⁹. Covering the period 1998 – 2003, the aim of this document was to

assess progress to date with regard to waste management in Ireland, to consider developments since the policy framework and the local authority waste management plans were put in place, and to identify measures that could be undertaken to further support progress towards the objectives outlined in *Changing Our Ways*.

In particular, *Taking Stock and Moving Forward* noted a significant increase in the amount of waste being brought to local authority landfills. The report noted that one of the significant challenges in the coming years was the extension of the dry recyclable collection services.

In September 2020, the Irish Government published a new policy document outlining a new action plan for Ireland to cover the period of 2020-2025. This plan 'A Waste Action Plan for a Circular Economy'¹⁰ (WAPCE), 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).

The WAPCE sets the direction for waste planning and management in Ireland up to 2025. This reorientates policy from a focus on managing waste to a much greater focus on creating circular patterns of production and consumption. Other policy statements of a number of public bodies already acknowledge the circular economy as a national policy priority.

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 was the development of the Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less' (2021)¹¹ to set a course for Ireland to transition across all sectors and at all levels of Government toward circularity and was issued in December 2021. It is anticipated that the Strategy will be updated in full every 18 months to 2 years.

Since 1998, the Environmental Protection Agency (EPA) has produced periodic 'National Waste (Database) Reports'¹² detailing, among other things, estimates for household and commercial (municipal) waste generation in Ireland and the level of recycling, recovery and disposal of these materials. The 2019 *National Waste Statistics*, which is the most recent study published, along with the national waste statistics web resource (November 2021) reported the following key statistics for 2019:

- **Generated** – Ireland produced 3,085,652 t of municipal waste in 2019. This is almost a 6% increase since 2018. This means that the average person living in Ireland generated 628 kg of municipal waste in 2019.
- **Managed** – Waste collected and treated by the waste industry. In 2019, a total of 3,036,991 t of municipal waste was managed and treated.
- **Unmanaged** – Waste that is not collected or brought to a waste facility and is, therefore, likely to cause pollution in the environment because it is burned, buried or dumped. The EPA estimates that 48,660 t was unmanaged in 2019.
- **Recovered** – The amount of waste recycled, used as a fuel in incinerators, or used to cover landfilled waste. In 2019, around 83% of municipal waste was recovered – a decrease from 84% in 2018.
- **Recycled** – The waste broken down and used to make new items. Recycling also includes the breakdown of food and garden waste to make compost. The recycling rate in 2019 was 37%, which is down from 38% in 2018.
- **Disposed** – Less than a sixth (15%) of municipal waste was landfilled in 2019. This is an increase from 14% in 2018.

2.2 Regional Level

The proposed Project is located in the Local Authority area of FCC.

The *EMR Waste Management Plan 2015 – 2021* is the regional waste management plan for the FCC area which was published in May 2015. Currently the EMR and other regional waste management plans are under review and the Regional Waste Management Planning Offices expect to publish the final plan in early 2022.

The regional plan sets out the following strategic targets for waste management in the region:

- A 1% reduction per annum in the quantity of household waste generated per capita over the period of the plan;
- Achieve a recycling rate of 50% of managed municipal waste by 2020; and
- Reduce to 0% the direct disposal of unprocessed residual municipal waste to landfill (from 2016 onwards) in favour of higher value pre-treatment processes and indigenous recovery practices.

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 *Fingal Development Plan 2017 – 2023*¹² came into effect in 2017 and sets out a number of policies and objectives for the Fingal region in line with the objectives of the regional waste management plan, including the following:

- Objective **WM03**: *Implement the provisions of the Eastern Midlands Region Waste Management Plan 2015 -2021 or any subsequent Waste Management Plan applicable within the lifetime of the Development Plan. All prospective developments in the County will be expected to take account of the provisions of the Regional Waste Management Plan and adhere to the requirements of that Plan.*
- Objective **WM05**: *Prevent and minimise the generation of waste in accordance with the Eastern Midlands Region Waste Management Plan 2015 -2021 (or any subsequent plans).*
- Objective **WM07**: *Promote the increased re-use of waste in accordance with the Eastern Midlands Region Waste Management Plan 2015-2021 (or any subsequent plan)."*
- Objective **DMS36**: *Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequate screened alcoves or other such mitigation measures are provided.*
- Objective **DMS37**: *Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres.*

2.3 Legislative Requirements

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

- Waste Management Act 1996 (No. 10 of 1996) as amended
- Environmental Protection Act 1992 as amended;
- Litter Pollution Act 1997 (Act No. 12 of 1997) as amended and
- Planning and Development Act 2000 as amended¹³

These Acts and subordinate Regulations transpose the relevant European Union Policy and Directives into Irish law.

One of the guiding principles of European waste legislation, which has in turn been incorporated into the Waste Management Act 1996 - 2011 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 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 disposal area, waste contractors will be employed to physically transport waste to the final waste disposal site.

It is, therefore, imperative that the residents, tenants and the proposed building management company undertake on-Site management of waste in accordance with all legal requirements and that the facilities management company employ suitably permitted / licenced contractors to undertake off-Site management of their waste in accordance with all legal requirements. This includes the requirement that a waste contractor handle, transport and reuse / recover / recycle / 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, as amended, or a Waste or Industrial Emissions (IE) 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.

2.3.1 Fingal County Council Waste Bye-Laws

The *Fingal County Council Segregation, Storage and Presentation of Household and Commercial Waste Bye-Laws (2020)* came into effect on the 1st of April 2020. These bye-laws repeal the previous *Fingal County Council Bye-Laws for the Storage, Presentation and Collection of Household Waste (2006)*. They set a number of enforceable requirements on waste holders with regard to storage, separation and presentation of waste within the FCC area. Key requirements under these bye-laws of relevance to the proposed Project include the following:

- Kerbside waste presented for collection shall not be presented for collection earlier than 6.00 pm on the day immediately preceding the designated waste collection day;
- All containers used for the presentation of kerbside waste and any uncollected waste shall be removed from any roadway, footway, footpath or any other public place no later than 9:00am on the day following the designated waste collection day, unless an alternative arrangement has been approved in accordance with bye-law 4;
- Documentation, including receipts, is obtained and retained for a period of no less than one year to provide proof that any waste removed from the premises has been managed in a manner that conforms to these bye-laws, to the Waste Management Act and, where such legislation is applicable to that person, to the European Union (Household Food Waste and Bio-Waste) Regulations 2015; and
- Adequate access and egress onto and from the premises by waste collection vehicles is maintained.

The full text of the bye-laws is available from the FCC website.

2.4 Regional Waste Management Service Providers and Facilities

Various contractors offer waste collection services for the residential sector in the FCC region. Details of waste collection permits (granted, pending and withdrawn) for the region are available from the NWCPO.

As outlined in the regional waste management plan, there is a decreasing number of landfills available in the region. Only three municipal solid waste landfills remain operational and all are operated by the private sector. There are a number of other licensed and permitted facilities in operation in the region including waste transfer stations, hazardous waste facilities and integrated waste management facilities. There are two existing thermal treatment facilities, one in Duleek, Co. Meath and a second in Poolbeg in Dublin.

There is a FCC bring bank c.500m to the north west of the development, which can be utilised by the residents of the development for certain household waste streams including cans, textiles and glass.

A copy of all CORs and waste permits issued by the Local Authorities are available from the NWCPO website and all Waste / Industrial Emissions Licenses issued are available from the EPA.

3.0 DESCRIPTION OF THE DEVELOPMENT

3.1 Location, Size and Scale of the Development

The proposed development relates to lands located to the south of the Martello Tower on Balscadden Road & the former Baily Court Hotel, Main Street, Howth, County Dublin. The development will consist of the demolition of existing structures on the proposed site including the disused sports building and the former Baily Court Hotel buildings and the construction of a residential development set out in 4 no. residential blocks, ranging in height from 2 to 5 storeys to accommodate 180 no. apartments with associated internal residential tenant amenity and external courtyards and roof terraces, 1 no. retail unit and 2 no. café/retail units. The site will accommodate car parking spaces at basement level and bicycle parking spaces at basement and surface level. Landscaping will include new linear plaza which will create a new pedestrian link between Main St and Balscadden Rd to include the creation of an additional 2 no. new public plazas and also maintains and upgrades the pedestrian link from Abbey Street to Balscadden Road below the Martello Tower. Please see the accompanying Statutory Notices for a more detailed description.

3.2 Typical Waste Categories

The typical non-hazardous and hazardous wastes that will be generated at the proposed Development will include the following:

- Dry Mixed Recyclables (DMR) - includes waste paper (including newspapers, magazines, brochures, catalogues, leaflets), cardboard and plastic packaging, metal cans, plastic bottles, aluminium cans, tins and Tetra Pak cartons;
- Organic waste – food waste and green waste generated from internal plants / flowers;
- Glass; and
- Mixed Non-Recyclable (MNR)/General Waste.

In addition to the typical waste materials that will be generated at the development on a daily basis, there will be some additional waste types generated less frequently / in smaller quantities which will need to be managed separately including:

- Green / garden waste may be generated from external landscaping;
- Batteries (both hazardous and non-hazardous);
- Waste electrical and electronic equipment (WEEE) (both hazardous and non-hazardous);
- Printer cartridges / toners;
- Chemicals (paints, adhesives, resins, detergents, etc.);
- Light bulbs;
- Textiles;
- Waste cooking oil (if any generated by the residents and tenants);
- Furniture (and, from time to time, other bulky wastes); and
- Abandoned bicycles.

Wastes should be segregated into the above waste types to ensure compliance with waste legislation and guidance while maximising the re-use, recycling and recovery of waste with diversion from landfill wherever possible.

3.3 European Waste Codes

In 1994, the *European Waste Catalogue* ¹⁴ and *Hazardous Waste List* ¹⁵ were published by the European Commission. In 2002, the EPA published a document titled the *European Waste Catalogue and Hazardous Waste List* ¹⁶, which was a condensed version of the original two documents and their subsequent amendments. This document has recently been replaced by the EPA '*Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous*' ¹⁷, applicable since the 1st June 2015. This waste classification system applies across the EU and is the basis for all national and international waste reporting, such as those associated with waste collection permits, CORs, permits and licences and the EPA National Waste Database.

Under the classification system, different types of wastes are fully defined by a code. The List of Waste (LoW) code (also referred to as European Waste Code (EWC)) for typical waste materials expected to be generated during the operation of the proposed development are provided in Table 3.1, below.

Table 3.1 Typical Waste Types Generated and LoW Codes

Waste Material	LoW/EWC Code
Paper and Cardboard	20 01 01
Plastics	20 01 39
Metals	20 01 40
Mixed Non-Recyclable Waste	20 03 01
Glass	20 01 02
Biodegradable Kitchen Waste	20 01 08
Oils and Fats	20 01 25
Textiles	20 01 11
Batteries and Accumulators*	20 01 33* - 34
Printer Toner/Cartridges*	20 01 27* - 28
Green Waste	20 02 01
WEEE*	20 01 35*-36
Chemicals (solvents, pesticides, paints & adhesives, detergents, etc.) *	20 01 13*/19*/27*/28/29*30
Fluorescent tubes and other mercury containing waste*	20 01 21*
Bulky Wastes	20 03 07

* Individual waste type may contain hazardous materials

4.0 ESTIMATED WASTE ARISING

A waste generation model (WGM) developed by AWN has been used to predict waste types, weights and volumes expected to arise from operations within the proposed Development. The WGM incorporates building area and use and combines these with other data, including Irish and US EPA waste generation rates.

The estimated quantum / volume of waste that will be generated from the residential units has been determined based on the predicted occupancy of the units. While the floor area usage (m²) has been used to estimate the waste arising from the retail units.

The estimated waste generation for the proposed Development for the main waste types is presented in Tables 4.1.

Table 4.1 Estimated Waste Generation for Residential & Commercial Units

Waste Type	Waste Volume (m ³ / week)	
	Residential (Combined)	Commercial (Combined)
Organic Waste	2.84	0.24
Dry Mixed Recyclables	20.80	2.30
Glass	0.55	0.06
Mixed Non-Recyclables	11.53	1.25
Total	35.71	3.85

BS5906:2005 *Waste Management in Buildings – Code of Practice*¹⁸ has been considered in the calculations of waste estimates. AWN's modelling methodology is based on recently published data and data from numerous other similar developments in Ireland and is based on AWN's experience, it provides a more representative estimate of the likely waste arisings from the proposed Development.

5.0 WASTE STORAGE AND COLLECTION

This section provides information on how waste generated within the Site will be stored and collected. This has been prepared with due consideration of the proposed Site layout as well as best practice standards, local and national waste management requirements, including those of FCC. In particular, consideration has been given to the following documents:

- *BS 5906:2005 Waste Management in Buildings – Code of Practice,*
- *EMR Waste Management Plan 2015 – 2021;*
- *FCC (2017). Fingal Development Plan 2017 – 2023;* and
- *FCC Segregation Storage, Presentation and of Household and Commercial Waste (2020) and*
- *DoHLGH, Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)* ¹⁹.

Waste Storage Areas

Locations of all Waste Storage Areas (WSAs) can be viewed on the drawings submitted with the planning application under separate cover (ref Drawings 486.02.01, 486.02.07, 486.02.08 & 486.02.13.)

Residential Block A

One (1 no.) shared communal WSA has been allocated within the development design for the residential units within this apartment block. This has been strategically located on the ground floor level, on the eastern side of the building, in close proximity to the core.

Residential Block B

Two (2 no.) shared communal WSAs have been allocated within the development design for the residential units within this block. These have been strategically located on the basement level, in close proximity to the access cores.

Residential Block C

One (1 no.) shared communal WSA, has been allocated within the development design for the residential units within this block. It has been strategically located on the ground floor level, in close proximity to the core.

Residential Block D

One (1 no.) shared communal WSA, has been allocated within the development design for the residential units within this block. It has been strategically located on the ground floor level, in close proximity to the core.

Retail Unit Block A

One (1 no.) WSA, has been allocated within the development design for the retail unit. It has been strategically located on the ground floor level, at the rear of the unit.

Café Unit Block C

One (1 no.) WSA, has been allocated within the development design for the café unit. These have been strategically located on the ground floor level, at the rear of the unit, off the proposed service corridor.

Café/Retail Unit Block D

One (1 no.) WSA has been allocated within the development design for the commercial unit. This has been strategically located at ground floor level, in the rear service area of the unit.

Bins from the proposed Development will be brought to collection points by the waste contractor or facilities management, immediately prior to collection. The basement level car parks are insufficient in height for a waste truck to access; therefore, all waste will be collected at grade. All locations for collection can be viewed on the drawings submitted with the planning application under separate cover.

Using the estimated waste generation volumes in Tables 4.1, above, the waste receptacle requirements for MNR, DMR, organic waste and glass have been established for the WSA. It is envisaged that all waste types will be collected on a weekly basis

Waste Storage Requirements

Estimated waste storage requirements for the operational phase of the proposed Development are detailed in Table 5.1, below.

Table 5.1 Waste storage requirements for the proposed development

Area/Use	Bins Required			
	MNR ¹	DMR ²	Glass	Organic
Block A	1 no. 240 L	2 no. 240 L	1 no. 120 L	1 no. 120 L
Block B	8 no. 1100 L	12 no. 1100 L	2 no. 240 L	8 no. 240 L
Block C	3 no. 1100 L	5 no. 1100 L	1 no. 240 L	3 no. 240 L
Block D	1 no. 1100 L	1 no. 1100 L	1 no. 120 L	1 no. 240 L
Retail Unit (A)	1 no. 240 L	3 no. 240 L	1 no. 120 L	1 no. 120 L
Café Unit (C)	2 no. 240 L	2 no. 240 L	1 no. 120 L	1 no. 240 L
Café/Retail Unit (D)	1 no. 1100 L	1 no. 1100L 1 no. 240 L	1 no. 120 L	1 no. 120 L

Note: 1 = Mixed Non-Recyclables

2 = Dry Mixed Recyclables

The waste receptacle requirements have been established from distribution of the total weekly waste generation estimate into the holding capacity of each receptacle type. Waste storage receptacles as per Table 5.1, above, (or similar appropriate approved containers) will be provided by the building management company in the residential WSA.

The types of bins used will vary in size, design and colour dependent on the appointed waste contractor. However, examples of typical receptacles to be provided in the WSAs are shown in Figure 5.1. All waste receptacles used will comply with the IS EN 840 2012 standard for performance requirements of mobile waste containers, where appropriate.



Figure 5.1 Typical waste receptacles of varying size (240 L and 1100 L)

5.1 Waste Storage – Residential Units

Residents will be required to segregate waste into the following main waste streams:

- DMR;
- MNR;
- Glass; and
- Organic waste.

Residents will be required to take their segregated waste materials to their designated WSA and deposit their segregated waste into the appropriate bins. The location of the WSAs are illustrated in the drawings submitted with the planning application under separate cover.

Space will be provided in the residential units to accommodate 3 no. bin types to facilitate waste segregation at source.

Each bin / container in the WSAs will be clearly labelled and colour coded to avoid cross contamination of the different waste streams. Signage will be posted above or on the bins to show exactly which waste types can be placed in each bin.

Access to the apartment block WSAs will be restricted to authorised residents, facilities management and waste contractors by means of a key or electronic fob access.

Other waste materials such as textiles, batteries, cooking oil, printer toner / cartridges, bulky items, light bulbs and WEEE may be generated infrequently by the residents. Residents will be required to identify suitable temporary storage areas for these waste items within their own units and dispose of them appropriately. Further details on additional waste types can be found in Section 5.4.

5.2 Waste Storage – Café and Retail Units (Commercial)

The commercial tenants will be required to segregate waste within their own units into the following main waste types:

- DMR;
- MNR;
- Glass; and
- Organic waste.

As required, the staff will need to bring segregated DMR, MNR, glass and organic waste to their allocated WSA.

Suppliers for the tenants should be requested by the tenants to make deliveries in reusable containers, minimize packaging or to remove any packaging after delivery where possible, to reduce waste generated by the development.

Any kitchens in the commercial unit areas will contribute a significant portion of the volume of waste generated on a daily basis, and as such it is important that adequate provision is made for the storage and transfer of waste from these areas to the WSA.

It is anticipated that waste will be generated in kitchens throughout the day, primarily at the following locations:

- Food Storage Areas (i.e. cold stores, dry store, freezer stores and stores for decanting of deliveries);
- Meat Preparation Area;
- Vegetable Preparation Area;
- Cooking Area;
- Dish-wash and Glass-wash Area; and
- Bar Area.

Small bins will be placed adjacent to each of these areas for temporary storage of waste generated during the day. Waste will then be transferred from each of these areas to the appropriate WSAs and placed into the segregated bins as detailed in Table 5.1.

All bins / containers in the commercial tenants' areas as well as in the WSA will be clearly labelled and colour coded to avoid cross contamination of the different waste streams. Signage will be posted above or on the bins to show exactly which wastes can be put in each.

Other waste materials such as textiles, batteries, cooking oil, printer toner / cartridges, bulky items, light bulbs and WEEE will be generated less frequently. The tenant will be required to store these waste types within their own unit and arrange collection with an appropriately licensed waste contractor. Facilities management may arrange collection, depending on the agreement. Further details on additional waste types can be found in Section 5.4.

5.3 Waste Collection

There are numerous private contractors that provide waste collection services in the Fingal County area. All waste contractors servicing the proposed development must hold a valid waste collection permit for the specific waste types collected. All waste collected must be transported to registered/permited/licensed facilities only.

All residential waste from shared WSAs, requiring collection by the appointed waste contractor will be transferred from the WSAs by personnel nominated by the building management company to the designated temporary staging/collection points on the internal development road. Commercial tenants will be responsible for transferring their own bins to/from the designated temporary staging / collection point.

The basement level carparks are insufficient in height for a waste truck to access; therefore, all waste will be collected at grade, adjacent to the entrance of the basement carpark. All locations for collection can be viewed on the drawings submitted with the planning application under separate cover.

A trolley / tug or suitable vehicle may be required to convey the bins to and from the collection area. The building management or waste contractor will ensure that empty bins are promptly returned to the WSAs after collection / emptying.

Suitable access and egress has been provided to enable the bins to be moved easily from the WSA to the waste collection vehicles on the appropriate days. Waste will be collected at agreed days and times by the nominated waste contractors.

All waste receptacles should be clearly identified as required by waste legislation and the requirements of the FCC *Waste Bye-Laws*. Waste will be presented for collection in a manner that will not endanger health, create a risk to traffic, harm the environment or create a nuisance through odours or litter.

It is recommended that bin collection times are staggered to reduce the number of bins required to be emptied at once and the time the waste vehicle is on-Site. This will be determined during the process of appointment of a waste contractor.

5.4 Additional Waste Materials

In addition to the typical waste materials that are generated on a daily basis, there will be some additional waste types generated from time to time that will need to be managed separately. A non-exhaustive list is presented below.

Green Waste

Green waste may be generated from gardens, external landscaping and internal plants / flowers. Green waste generated from landscaping of external areas will be removed by external landscape contractors. Green waste generated from gardens internal plants / flowers can be placed in the organic waste bins.

Batteries

A take-back service for waste batteries and accumulators (e.g. rechargeable batteries) is in place in order to comply with the S.I. No. 283/2014 - European Union (Batteries and Accumulators) Regulations 2014, as amended. In accordance with these regulations, consumers are able to bring their waste batteries to their local civic amenity centre or can return them free of charge to retailers which supply the equivalent type of battery, regardless of whether or not the batteries were purchased at the retail outlet and regardless of whether or not the person depositing the waste battery purchases any product or products from the retail outlet.

The commercial tenants cannot use the civic amenity centre. They must segregate their waste batteries and either avail of the take-back service provided by retailers or arrange for recycling / recovery of their waste batteries by a suitably permitted / licenced contractor. Facilities management may arrange collection, depending on the agreement.

Waste Electrical and Electronic Equipment (WEEE)

The WEEE Directive (Directive 2002/96/EC) and associated Waste Management (WEEE) Regulations have been enacted to ensure a high level of recycling of electronic and electrical equipment. In accordance with the regulations, consumers can bring their waste electrical and electronic equipment to their local recycling centre. In addition, consumers can bring back WEEE within 15 days to retailers when they purchase new equipment on a like for like basis. Retailers are also obliged to collect WEEE within 15 days of delivery of a new item, provided the item is disconnected from all mains, does not pose a health and safety risk and is readily available for collection.

As noted above, the commercial tenants cannot use the civic amenity centre. They must segregate their WEEE and either avail of the take-back / collection service provided by retailers or arrange for recycling / recovery of their WEEE by a suitably permitted / licenced contractor. Facilities management may arrange collection, depending on the agreement.

Printer Cartridge / Toners

It is recommended that a printer cartridge / toner bin is provided in the commercial unit, where appropriate. The commercial tenant will be required to store this waste within their unit and arrange for return to retailers or collection by an authorised waste contractor, as required.

Waste printer cartridge / toners generated by residents can usually be returned to the supplier free of charge or can be brought to a civic amenity centre.

Chemicals

Chemicals (such as solvents, paints, adhesives, resins, detergents, etc) are largely generated from building maintenance works. Such works are usually completed by external contractors who are responsible for the off-site removal and appropriate recovery / recycling / disposal of any waste materials generated.

Any waste cleaning products or waste packaging from cleaning products generated in the commercial units that is classed as hazardous (if they arise) will be appropriately stored within the tenants' own space. Facilities management may arrange collection, depending on the agreement.

Any waste cleaning products or waste packaging from cleaning products that are classed as hazardous (if they arise) generated by the residents should be brought to a civic amenity centre.

Light Bulbs

Waste light bulbs (fluorescent, incandescent and LED) may be generated by lighting at the commercial units. It is anticipated that commercial tenants will be responsible for the off-site removal and appropriate recovery / disposal of these wastes. Facilities management may arrange collection, depending on the agreement.

Light bulbs generated by residents should be taken to the nearest civic amenity centre for appropriate storage and recovery / disposal.

Textiles

Where possible, waste textiles should be recycled or donated to a charity organisation for reuse. Commercial and residential tenants will be responsible for disposing of waste textiles appropriately.

Waste Cooking Oil

If the commercial tenants use cooking oil, waste cooking oil will need to be stored within the unit on a bunded area or spill pallet and regular collections by a dedicated waste contractor will need to be organised as required. Under sink grease traps will be installed in any cooking space.

If the residents generate waste cooking oil, this can be brought to a civic amenity centre or place in the organic waste bin.

Furniture & Other Bulky Waste Items

Furniture and other bulky waste items (such as carpet, etc.) may occasionally be generated by the commercial tenant. The collection of bulky waste will be arranged, as required by the tenant. If residents wish to dispose of furniture, this can be brought to a civic amenity centre.

Abandoned Bicycles

Bicycle parking areas are planned for the development. As happens in other developments, residents sometimes abandon faulty or unused bicycles, and it can be difficult to determine their ownership. Abandoned bicycles should be donated to charity if they arise or Facilities management will arrange collection by a licensed waste contractor.

Covid-19 Waste

Any waste generated by residential and commercial tenants that have tested positive for Covid-19 should be managed in accordance with the current Covid-19 HSE Guidelines at the time that that waste arises. At the time this report was prepared, the HSE Guidelines require the following procedure for any waste from a person that tests positive for Covid-19:

- Put all waste (gloves, tissues, wipes, masks) from that person in a bin bag and tie when almost full;
- Put this bin bag into a second bin bag and tie a knot;
- Store this bag safely for 3 days, then put the bag into the non-recyclable waste / general waste wheelie bin for collection / emptying.

Please note that this guidance is likely to be updated by the time the proposed Development is open and occupied and the relevant guidance at the time will need to be reviewed.

5.5 Waste Storage Area Design

The WSAs should be designed and fitted-out to meet the requirements of relevant design Standards, including:

- Be fitted with a non-slip floor surface;
- Provide ventilation to reduce the potential for generation of odours with a recommended 6-10 air changes per hour for a mechanical system for internal WSAs;
- Provide suitable lighting – a minimum Lux rating of 220 is recommended;
- Be easily accessible for people with limited mobility;
- Be restricted to access by nominated personnel only;
- Be supplied with hot or cold water for disinfection and washing of bins;
- Be fitted with suitable power supply for power washers;
- Have a sloped floor to a central foul drain for bins washing run-off;
- Have appropriate signage placed above and on bins indicating correct use;
- Have access for potential control of vermin, if required; and
- Be fitted with CCTV for monitoring.

The building management company, tenants and residents will be required to maintain the resident bins and storage areas in good condition as required by the FCC Waste Bye-Laws.

6.0 CONCLUSIONS

In summary, this OWMP presents a waste strategy that addresses all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the proposed Development.

Implementation of this OWMP will ensure a high level of recycling, reuse and recovery at the development. All recyclable materials will be segregated at source to reduce waste contractor costs and ensure maximum diversion of materials from landfill, thus contributing to the targets set out in the *EMR Waste Management Plan 2015 – 2021*.

Adherence to this plan will also ensure that waste management at the development is carried out in accordance with the requirements of the *FCC Waste Bye-Laws*.

The waste strategy presented in this document will provide sufficient storage capacity for the estimated quantity of segregated waste. The designated areas for waste storage will provide sufficient room for the required receptacles in accordance with the details of this strategy.

7.0 REFERENCES

1. Waste Management Act 1996 as amended
2. Environmental Protection Act 1992 (Act No. 7 of 1992) as amended;
2. Litter Pollution Act 1997 (Act No. 12 of 1997) as amended;
4. Eastern-Midlands Waste Region, *Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021* (2015)
5. Fingal County Council (FCC) *FCC Segregation, Storage, Presentation and of Household and Commercial Waste (2020)*.
6. Department of Environment and Local Government (DoELG) *Waste Management – Changing Our Ways, A Policy Statement* (1998)
7. Department of Environment, Heritage and Local Government (DoEHLG) *Preventing and Recycling Waste - Delivering Change* (2002)
8. DoELG, *Making Ireland’s Development Sustainable – Review, Assessment and Future Action (World Summit on Sustainable Development)* (2002)
9. DoEHLG, *Taking Stock and Moving Forward* (2004)
10. Department of Communications, Climate Action and Environment (DCCA), *Waste Action Plan for the Circular Economy - Ireland’s National Waste Policy 2020-2025* (2020).
11. DCCA, *Whole of Government Circular Economy Strategy 2022-2023 ‘Living More, Using Less’* (2021)
12. Environmental Protection Agency (EPA), *National Waste Database Reports 1998 – 2012*.
13. FCC, *Fingal County Development Plan 2017 – 2023* (2017)
14. Planning and Development Act 2000 as amended
15. European Waste Catalogue - Council Decision 94/3/EC (as per Council Directive 75/442/EC).
16. Hazardous Waste List - Council Decision 94/904/EC (as per Council Directive 91/689/EEC).
17. EPA, *European Waste Catalogue and Hazardous Waste List* (2002)
18. EPA, *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* (2015)
19. BS 5906:2005 *Waste Management in Buildings – Code of Practice*.
20. DoHLGH, *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2020).