

**OPERATIONAL WASTE
MANAGEMENT PLAN FOR
A PROPOSED STRATEGIC
HOUSING DEVELOPMENT**

‘BARRINGTON TOWER’

**BRENNANSTOWN ROAD,
CABINTEELY,
CO. DUBLIN**

The Tecpro Building,
Clonshaugh Business & Technology Park,
Dublin 17, Ireland.

T: + 353 1 847 4220
F: + 353 1 847 4257
E: info@awnconsulting.com
W: www.awnconsulting.com

Report Prepared For

Cairn Homes Property LTD.

Report Prepared By

Niamh Kelly
Environmental Consultant

Our Reference

NK/217501.0623WMR01

Date of Issue

11 April 2022

Cork Office



Unit 5, ATS Building,
Carrigaline Industrial Estate,
Carrigaline, Co. Cork.
T: +353 21 438 7400
F: +353 21 483 4606

AWN Consulting Limited
Registered in Ireland No. 319812
Directors: F Callaghan, C Dilworth,
T Donnelly, E Porter
Associate Director: D Kelly

Document History

Document Reference		Original Issue Date	
NK/217501.0623WMR01		11 April 2022	
Revision Level	Revision Date	Description	Sections Affected

Record of Approval

Details	Written by	Approved by
Signature		
Name	Niamh Kelly	Chonaiil Bradley
Title	Environmental Consultant	Principal Environmental Consultant
Date	11 April 2022	11 April 2022

CONTENTS		Page
1.0	INTRODUCTION	4
2.0	OVERVIEW OF WASTE MANAGEMENT IN IRELAND	4
2.1	National Level	4
2.2	Regional Level	6
2.3	Legislative Requirements	8
2.3.1	Dún Laoghaire-Rathdown County Council Waste Bye-Laws	8
2.4	Local Authority Guidelines	9
2.5	Regional Waste Management Service Providers and Facilities	10
3.0	DESCRIPTION OF THE PROJECT	10
3.1	Location, Size and Scale of the Development	10
3.2	Typical Waste Categories	12
3.3	European Waste Codes	13
4.0	ESTIMATED WASTE ARISING	14
5.0	WASTE STORAGE AND COLLECTION	15
5.1	Waste Storage – Residential Units	17
5.2	Waste Storage – Commercial Unit	17
5.3	Waste Storage – Creche Unit	18
5.4	Waste Collection	18
5.5	Additional Waste Materials	19
5.6	Waste Storage Area Design	21
5.7	Facility Management Responsibilities	21
6.0	CONCLUSIONS	22
7.0	REFERENCES	23
8.0	APPENDIX 1: LOCATION OF WASTE COLLECTION AREAS (SHOWN BY RED CIRCLES)	24

1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Operational Waste Management Plan (OWMP) on behalf of Cairn Homes Property Limited. The proposed 'Build-to-Rent' (BTR) development will consist of the construction of 8 no. blocks in heights up to 10 storeys comprising 534 residential units, a creche, a retail unit, residential support facilities and residential services and amenities. The proposal also includes car and cycle parking, public and communal open spaces, landscaping, bin stores, plant areas, substations, switch rooms, and all associated site development works and services provision.

This OWMP has been prepared to ensure that the management of waste during the operational phase of the development is undertaken in accordance with current legal and industry standards including, the *Waste Management Act 1996* as amended and associated Regulations ¹, *Environmental Protection Agency Act 1992* as amended ², *Litter Pollution Act 1997* as amended ³, the '*Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021*' ⁴, *The Dún Laoghaire Rathdown County Council (Segregation, Storage and Presentation of Household and Commercial) Bye-Laws (2019)* ⁵ and the *Guidance Notes for Waste Management in Residential and Commercial Developments (2020)* ⁶. In particular, this OWMP aims to provide a robust strategy for storing, 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 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 Irish Government issued a policy statement in September 1998 titled as '*Changing Our Ways*' ⁷ 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 2002 ⁸. 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 Ireland's Development Sustainable – Review, Assessment and Future Action*' ⁹. This document also stressed the need to break the link between 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*¹⁰. 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'¹¹ (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)¹² 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'¹³ 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 development is located in the Local Authority area of Dún Laoghaire Rathdown County Council (DLRCC).

The *EMR Waste Management Plan 2015 – 2021* is the regional waste management plan for the DLRCC 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 that are relevant to the development:

- 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 2013*.

The *Dún Laoghaire-Rathdown County Development Plan 2016 – 2022*¹⁴ sets out a number of policies for the Dún Laoghaire-Rathdown area in line with the objectives of the waste management plan.

Waste policies with a particular relevance to the development are as follows:

Policy EI12: Waste Management Strategy

It is Council policy to conform to the European Union and National waste management hierarchy as follows:

- *waste prevention*
- *minimisation*
- *re-use*
- *waste recycling*
- *energy recovery and*
- *disposal*

subject to economic and technical feasibility and Environmental Assessment.

Policy EI13: Waste Plans

It is Council policy to publish plans for the collection, treatment, handling and disposal of waste in accordance with the provisions of the Waste Management Act 1996 (as amended) and the Environmental Protection Agency Act 1992 (as amended).

Policy EI14: Private Waste Companies

It is Council policy to ensure that all waste that is disposed of by private waste companies is done so in compliance with the requirements of the Environmental Protection Agency and the Waste Management Legislation and in accordance with the Planning Code.

Policy EI15: Waste Prevention and Reduction

It is Council policy to promote the prevention and reduction of waste and to co-operate with industry and other agencies in viable schemes to achieve this.

Policy EI16: Waste Re-use and Re-cycling

It is Council policy to promote the increased re-use and re-cycling of materials from all waste streams. The Council will co-operate with other agencies in viable schemes for the extraction of useful materials from refuse for re-use or re-cycling and will adopt the National targets as stated in the 'Dublin Regional Waste Management Plan 2005-2010'. (Note: the EMR Waste Management Plan 2015 - 2021 was published in 2015. It is assumed this objective is relevant to the EMR Waste Management Plan and not the Dublin Regional Waste Management Plan which is no longer valid).

In addition, Planning Scheme Objective PD15 states “*To promote the strategic design and location of bin-stores, service boxes and similar ancillary provision, including meter boxes, into the curtilage of developments or as positive design features that enhance the local streetscape and do not register as visual clutter*”.

The *Dún Laoghaire-Rathdown County Development Plan 2022 – 2028*¹⁵ sets out a number of policies for the Dún Laoghaire-Rathdown area in line with the objectives of the waste management plan.

Proposed waste policies with a particular relevance to the development are as follows:

Policy Objective EI12: Resource Management

It is a Policy Objective to implement the Eastern-Midlands Region Waste Management Plan 2015-2021 and subsequent plans, in supporting the transition from a waste management economy towards a circular economy, to enhance employment and increase the value recovery and recirculation of resources. Underpinning this objective is the requirement to conform to the European Union and National Waste Management Hierarchy of the most favoured options for waste as illustrated below subject to economic and technical feasibility and Environmental Assessment.

Policy Objective EI13: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling

- *To support the principles of the circular economy, good waste management and the implementation of best international practice in relation to waste management in order for the County and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective.*
- *To provide for civic amenity facilities and bring centres as part of an integrated waste collection system in accessible locations throughout the County and promote the importance of kerbside source segregated collection of household and commercial waste as the best method to ensure the quality of waste presented for recycling is preserved.*
- *To ensure any waste amenity facilities adhere to the Waste Regional Offices Waste Management Infrastructure siting guidelines.*
- *To develop a County wide network of multi material recycling centres, bring centres and a re-use centre and to require the provision of adequately-sized recycling facilities in new commercial and large-scale residential developments, where appropriate.*
- *To require the inclusion of such centres in all large retail developments to maximise access by the public. To ensure new developments are designed and constructed in line with the Council's Guidelines for Waste Storage Facilities*

Policy Objective EI14: Hazardous Waste

It is a Policy Objective to adhere to the recommendations of the 'National Hazardous Waste Management Plan 2014-2020' and any subsequent plan, and to co-operate with other agencies, to plan, organise, authorise and supervise the disposal of hazardous waste streams, including hazardous waste identified during construction and demolition projects.

2.3 Legislative Requirements

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

- Waste Management Act 1996 as amended.
- Environmental Protection Agency Act 1992 as amended;
- Litter Pollution Act 1997 as amended and
- Planning and Development Act 2000 as amended ¹⁶.

These Acts and subordinate Regulations enable the transposition of 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* as amended 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, commercial tenants and the proposed facilities management company undertake on-site management of waste in accordance with all legal requirements and 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 IE (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.

2.3.1 Dún Laoghaire-Rathdown County Council Waste Bye-Laws

The DLRCC "Dún Laoghaire-Rathdown County Council (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2019)" were brought into force on the 1st of February 2020. These Bye-laws repeal the previous DLRCC waste Bye-laws. The Bye-laws set a number of enforceable requirements on waste holders with regard to storage, separation and presentation of waste within the DLRCC functional area. Key requirements under these Bye-laws of relevance to the development 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 10:00am 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.

Provisions affecting Multi-user Buildings, Apartment Blocks, etc.:

A management company, or another person if there is no such company, who exercises control and supervision of residential and/or commercial activities in multi-unit developments, mixed-use developments, flats or apartment blocks, combined living/working spaces or other similar complexes shall ensure that:

- a. *separate receptacles of adequate size and number are provided for the proper segregation, storage and collection of recyclable kerbside waste, residual kerbside waste and food waste,*
- b. *the receptacles referred to in paragraph (a) are located both within any individual apartment and at the place where waste is stored prior to its collection,*
- c. *any place where waste is to be stored prior to collection is secure, accessible at all times by tenants and other occupiers and is not accessible by any other person other than an authorised waste collector,*
- d. *written information is provided to each tenant or other occupier about the arrangements for waste separation, segregation, storage and presentation prior to collection,*
- e. *an authorised waste collector is engaged to service the receptacles referred to in this section of these bye-laws, with documentary evidence, such as receipts, statements or other proof of payment, demonstrating the existence of this engagement being retained for a period of no less than two years. Such evidence shall be presented to an authorised person within a time specified in a written request from either that person or from another authorised person employed by Dún Laoghaire-Rathdown County Council,*
- f. *receptacles for kerbside waste are presented for collection on the designated waste collection day,*
- g. *adequate access and egress onto and from the premises by waste collection vehicles is maintained*

The full text of the Waste Bye-Laws is available from the DLRCC website.

2.4 Local Authority Guidelines

DLRCC's Waste Management Division have issued *Guidance Notes for Waste Management in Residential and Commercial Developments (2020)* which provide good practice guidance for the storage and collection of waste for new build high density developments. The guidelines include a form which is designed to be completed by (or on behalf of) the applicant for new high-density developments. The objective of the guidelines is to allow developers to demonstrate to local planning and

waste management authorities that they have considered how the design and the operation of waste management services will enable the occupiers and managing agents to effectively manage their wastes arising.

The ultimate goal of the guidelines is that the implemented waste strategy will achieve a 70% reuse and recovery target in accordance with the European Commission's proposal to introduce 70% reuse and recycling targets for municipal waste by 2030 and while also providing sufficient flexibility to support future targets and legislative requirements.

This OWMP has been prepared to demonstrate exactly that and aims to do so in a comprehensive manner.

The guidelines and form are available on the DLRCC website.

2.5 Regional Waste Management Service Providers and Facilities

Various contractors offer waste collection services in the DLRCC 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 are all 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 facility in Poolbeg in Dublin.

The DLRCC Ballyogan Recycling Park, located c. 1.75km west of the development site, can be used by residents of the development for other household waste streams. This centre can accept hazardous waste, waste mineral oil, mixed bulky waste, light bulbs, electrical items, batteries, wood, textiles, glass and garden waste. There is also a bring bank located c. 769m north of the development site, at Cabinteely Park Car Park, where glass and aluminium cans can be deposited.

A copy of all CORs and waste permits issued by the Local Authorities are available from the NWCPO website and all waste/IE licenses issued are available from the EPA.

3.0 DESCRIPTION OF THE PROJECT

3.1 Location, Size and Scale of the Development

The proposed development provides 534 no. residential units as follows:

- 30 no. studios (5.6%)
- 135 no. 1 beds (25.3%)
- 318 no. 2 beds (59.6%)
- 51 no. 3 beds (9.5%)

The 534 no. units provide a residential density of 140 uph.

The units will be provided in 8 blocks ranging up to 10 storeys in height. All of these units have associate private space in the form of terraces or balconies which will look east/west/ north/ south. 50.7% of the proposed units are dual aspect.

Block AB provides 40 no. units and is 5 storeys. Block CD provides 32 no. units and is 5 storeys in height. Block E provides 68 no. units and ranges in height from 5 – 8

storeys (including the lower ground floor). Block F provides 96 no. units and ranges in height from 9 – 10 storeys (including the lower ground floor). Block G provides 89 no. units and ranges in height from 7 -8 storeys (including the lower ground floor). Block H provides 99 no. units and is 9 storeys in height. Block I provides 48 no. units and ranges in height from 5 to 6 storeys (including lower ground floor). Block J provides 62 no. units and ranges in height from 5 to 6 storeys (including lower ground floor).

Additional Facilities

In addition to residential units, the proposed development also provides a retail unit and a creche. The convenience retail unit, measuring 366.8sqm, and the creche, measuring 356.5 sqm, is located on the ground floor of Block CD.

Communal Facilities

Two residential amenity spaces will be provided. One on the ground floor of Block E, measuring 646sqm, and the second on the ground floor of Block I, measuring 850sqm. The residential amenities will include flexible spaces including entertainment rooms, meeting rooms, parcel rooms, media rooms, lounge and workspaces, gyms and studio, chef's kitchen and dining area.

Communal open space is provided for each of the blocks and will be distinguishable from the private and public open spaces as demonstrated by the landscape drawings.

Site Development Works

As part of the planning application, it is proposed to demolish the existing habitable dwelling "Winterbrook", and the derelict, former dwelling attached to Barrington Tower on the site.

All associated site development works, open spaces, bat house, landscaping, boundary treatments, plant areas, waste management areas, cycle parking areas, and services provision (including ESB substations).

Layout and Design

The proposed development is set out in 8 residential blocks. The materials and finishes of the proposed blocks will be designed to a high architectural standard. The materials and finishes have also been considered with regard to the surrounding existing pattern of development and in the context of the protected structure Barrington Tower.

Blocks AB and CD are located at the northern portion of the site along the Brennanstown Road. Blocks E – J are consolidated to the south of the site.

The existing Barrington Tower will be preserved, restored and made a focal point within the heart of the new development.

Blocks AB and Blocks CD are located to the north of the site along the Brennanstown Road. These blocks are both 5 storeys in height and their positioning on the site will exploit views into the site and its main focal point of the development, Barrington Tower. The creche and retail space located at the ground floor of Blocks CD will create an active use at the schemes entrance.

Block E is located to the east of the site and to the southeast of Barrington Tower. This Block steps from 5 – 8 storeys in height (including the lower ground floor). The northern part of Block E steps down in height, enhancing the protected structure and the main area of public open space. Block E also contains c.646 sqm of communal amenity space at ground and first floor levels which will contribute to the public plaza surrounding their protected structure with their active uses.

Block F is located to the southeast of the site and steps down from 10 storeys (including the lower ground floor) to 9 storeys in height towards the north of the site. This Block takes advantage of the site's rising topography from south to the north of the site.

Block G is located at the centre of the site and steps down in height from 8 (including the lower ground floor) to 7 storeys. This Block also takes advantage of the site's rising topography from south to the north of the site.

Block H is the most southern Block and is 9 storeys in height (including the lower ground floor).

Block I is located to the southwest of the site and is 5 – 6 storeys in height (including the lower ground floor). This block contains c.850 sqm of communal amenity space.

Block J is located to the west of the site and is 5- 6 storeys in height (including the lower ground floor).

The buildings have been located to sensitively reflect the existing neighbouring properties and Barrington Tower. The buildings have been consolidated, to ensure that the built site coverage is minimised. The building footprints enable the provision of open space between the blocks within this predominantly car free development. These gaps between the buildings enables visibility throughout the development, while also ensure that the impact in terms of scale and visual impact is minimised. This provides positive views both from within the scheme to Barrington Tower and when viewed from outside the boundaries of the development site.

Access and Parking

The site is a highly accessible site, which, as set out in Chapter 11 of this EIAR ' Traffic and Transportation' can accommodate a reduced level of car parking in favour of increased levels of cycle parking and pedestrian mobility. The landscaping plan, along with various residential amenities have been located to ensure ease of pedestrian movement through the site following desire lines and enabling clear legibility within the site.

The proposed development includes a total of 419 no car parking spaces Car parking spaces for the residential units is provided at an average rate of 1.3 no. spaces per unit. These are provided within the basement and some surface level spaces. The proposal includes a total of 1,266 no. cycle parking spaces. There are 1058 for the residents in the basement, a ratio of 2 cycle spaces per unit. In addition to this, there is a further 208no. cycle parking space at surface level for residential visitors, the creche and other users.

3.2 Typical Waste Categories

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

- Dry Mixed Recyclables (DMR) - includes wastepaper (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 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 in small quantities which will need to be managed separately including:

- Green/garden waste may be generated from internal plants / flowers;
- 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 (rags);
- Waste cooking oil (if any generated by the residents, commercial tenants or creche tenants);
- Furniture (and from time to time other bulky wastes); and
- Abandoned bicycles.

Wastes will 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* ¹⁷ and *Hazardous Waste List* ¹⁸ were published by the European Commission. In 2002, the EPA published a document titled the *European Waste Catalogue and Hazardous Waste List* ¹⁹, 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*' ²⁰ which became valid from 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 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 or EWC) for typical waste materials expected to be generated during the operation of the 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
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 arising from operations within the 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 unit and creche unit. Waste generated from the shared residential amenities have been included in the residential waste figures and will be stored within the residential waste bins.

The estimated waste generation for the development for the main waste types is presented in Tables 4.1 and 4.2.

Table 4.1 Estimated waste generation for the development for the main waste types

Waste Type	m ³ per week				
	Block AB (Combined)	Block CD (Combined)	Block E (Combined)	Block F (Combined)	Block G (Combined)
Organic Waste	0.67	0.54	1.13	1.57	1.31
DMR	4.75	3.67	8.00	11.14	9.30
Glass	0.13	0.10	0.22	0.30	0.25
MNR	2.50	2.13	4.21	5.86	4.89
Total	8.05	6.44	13.56	18.87	15.76

Table 4.2 Estimated waste generation for the development for the main waste types

Waste Type	m ³ per week				
	Block H (Combined)	Block I (Combined)	Block J (Combined)	Retail Unit (Block CD)	Creche Unit (Block CD)
Organic Waste	1.36	0.72	0.95	0.11	0.03
DMR	9.63	5.13	6.76	2.10	1.23
Glass	0.26	0.14	0.18	0.06	<0.01
MNR	5.07	2.70	3.56	0.88	0.67
Total	16.32	8.70	11.45	3.15	1.94

The DLRC *Guidance Notes for Waste Management in Residential and Commercial Developments* recommends calculating residential waste using Section 4.7 of *BS5906:2005 Waste Management in Buildings – Code of Practice*²¹. The predicted total waste generated from the residential units based on the Code of Practice is c. 82.80 m³ per week for the residential units. Whereas the AWN waste generation model estimates c. 99.15 m³ per week from the residential units. AWN's modelling methodology is based on data from recent published data and data from numerous other similar developments in Ireland and based on AWN's experience it is a more representative estimate of the likely waste arising from the development.

5.0 WASTE STORAGE AND COLLECTION

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

- BS 5906:2005 Waste Management in Buildings – Code of Practice;
- DLRCC, Guidance Notes for Waste Management in Residential and Commercial Developments;
- DLRCC, Dún Laoghaire Rathdown County Council Segregation, Storage and Presentation of Household and Commercial Waste) Bye-laws (2019).
- EMR Waste Management Plan 2015 – 2021; and
- DoHLGH, Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) ²².

Apartment Units

Blocks AB and CD

One (1 no.) Waste Storage Area (WSA) has been allocated for residential use in Blocks AB and CD. This WSA is located at ground floor level in Block CD, and is for use by residents of Blocks AB and CD.

Block E

One (1 no.) WSA has been allocated for residential use in Block E. This WSA is located at lower ground floor level.

Block F

One (1 no.) WSA has been allocated for residential use in Block F. This WSA is located at lower basement level.

Block G

One (1 no.) WSA has been allocated for residential use in Block G. This WSA is located at lower ground floor level.

Block H

One (1 no.) WSA has been allocated for residential use in Block H. The WSA is located at lower basement level.

Block I

One (1 no.) WSA has been allocated for residential use in Block I. This WSA is located at lower basement floor level.

Block J

One (1 no.) WSA has been allocated for residential use in Block J. This WSA is located at lower ground floor level.

Retail Unit

One (1 no.) WSA has been allocated for use by the retail unit only. The WSA is located at ground floor level in Block CD, adjacent to the retail unit.

Creche

One (1 no.) WSA has been allocated for use by the creche unit only. The WSA is located at ground floor level in Block CD, adjacent to the creche unit.

Facilities management will supply all residents and tenants with a document that shall clearly state the methods of source waste segregation, storage, reuse and recycling initiatives that shall apply within the development.

Waste Storage Requirements

Using the estimated waste generation volumes in Tables 4.1 and 4.2, the waste receptacle requirements for MNR, DMR, organic waste and glass have been established for the residential WSA. These are presented in Table 5.1. The WSA has been appropriately sized to accommodate the weekly waste requirements for waste receptacles.

Table 5.1 Waste storage requirements for the development for the development

Area/Use	Bins Required			
	MNR ¹	DMR ²	Organic	Glass
Residential WSA (Blocks AB and CD) (Shared)	4 x 1100 L 1 x 240 L	8 x 1100 L	5 x 240 L	1 x 240 L
Residential WSAs (Block E) (Combined)	4 x 1100 L	8 x 1100 L	5 x 240 L	1 x 240 L
Residential WSAs (Block F) (Combined)	6 x 1100 L	10 x 1100 L 1 x 240 L	7 x 240 L	2 x 240 L
Residential WSAs (Block G) (Combined)	5 x 1100 L	9 x 1100 L	6 x 240 L	2 x 240 L
Residential WSA (Block H) (Combined)	5 x 1100 L	9 x 1100 L	6 x 240 L	2 x 240 L
Residential WSAs (Block I) (Combined)	3 x 1100 L	5 x 1100 L	3 x 240 L	1 x 240 L
Residential WSAs (Block J) (Combined)	4 x 1100 L	6 x 1100 L 1 x 240 L	4 x 240 L	1 x 240 L
Retail Unit	1 x 1100 L	2 x 1100 L	1 x 120 L	1 X 120 L
Creche	1 x 1100 L	1 x 1100 L 1 x 240 L	1 x 120 L	1 x 120 L

Note: * = Mixed Non-Recyclables

** = 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 facility management company in the shared 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 WSA are shown in Figure 5.2. All waste receptacles used will comply with the SIST EN 840-1:2020 and SIST EN 840-2:2020 standards for performance requirements of mobile waste containers, where appropriate. Signage will be posted above or on the bins to show exactly which waste can be put in each.



Figure 5.2 Typical waste receptacles of varying size (240L and 1100L)

5.1 Waste Storage – Residential Units

Residents will be required to segregate their waste into the following main waste categories within their own units:

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

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

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

Each bin / container 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 waste types can be placed in each bin.

Access to shared residential 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, printer toner/cartridges 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 5.5

5.2 Waste Storage – Retail Unit

The retail tenant will be required to segregate waste within their own unit into the following main waste types:

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

The retail tenant 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 WSA is illustrated in the drawings submitted with the planning application under separate cover.

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

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, lightbulbs, WEEE, cooking oil and printer toner / cartridges will be generated less frequently. The tenants 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 5.5.

5.3 Waste Storage – Creche Unit

Creche staff will be required to segregate their waste into the following waste categories within their own unit:

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

The creche tenant will be required to take their segregated waste materials to the designated shared commercial WSA and deposit their segregated waste into the appropriate bins. The location of the WSA is illustrated in the drawings submitted with the planning application under separate cover.

Each bin/container 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 waste types can be placed in each bin.

Access to the WSA will be restricted to authorised creche staff and facilities management by means of a key or electronic fob access.

Based on the recommended bin requirements in Table 5.1, DMR, MNR and organic waste will be required to be collected weekly and glass will be collected as required.

Other waste materials such as textiles, batteries, printer toner/cartridges and WEEE may be generated infrequently by the creche tenants. Creche tenants 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 5.5.

5.4 Waste Collection

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

Bins from the development will be brought to staging / collection areas by the waste contractor or facilities management immediately prior to collection. Bins from Blocks AB and CD will be brought to a staging / collection area between Block CD and Block E. Bins from Blocks E, F, G, H, I and J will be brought to a staging / collection area adjacent to Blocks E and F. All bins will be returned to the WSAs immediately following

collection. The staging areas are such that they will not obstruct traffic or pedestrians (allowing a footway path of at least 1.8m, the space needed for two wheelchairs to pass each other) as is recommended in the Design Manual for Urban Roads and Streets (2019) ²³.

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

5.5 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 internal plants / flowers. Green waste generated from gardens internal plants / flowers can be placed in the organic waste bins. If substantial green waste is produced by the commercial tenants or creche tenants it can be removed by a landscape contractor.

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 and creche units, where appropriate. The commercial tenants will be required to store this waste within their units 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 unit that is classed as hazardous (if they arise) will be appropriately stored within the tenant's 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 the commercial tenants and creche 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. The residents and commercial 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 placed in the organic bin.

Furniture & Other Bulky Waste Items

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

COVID-19 Waste

Any waste generated by residents 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.

5.6 Waste Storage Area Design

The WSAs will 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;
- Provide suitable lighting – a minimum Lux rating of 220 is recommended;
- Appropriate sensor controlled lighting;
- 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 graphical and written signage placed above and on bins indicating correct use;
- Have access for potential control of vermin, if required;
- Robust design of doors to bin area incorporating steel sheet covering where appropriate; and
- Be fitted with CCTV for monitoring.

The facility management company will be required to maintain bins and storage areas in good condition as required by the DLRCC *Waste Bye-Laws*.

5.7 Facility Management Responsibilities

It shall be the responsibility of the Facilities Management Company to ensure that all domestic waste generated by apartment residents is managed to ensure correct storage prior to collection by an appropriately permitted waste management company.

Facilities Management should provide the following items in accordance with the DLRCC *the Guidance Notes for Waste Management in Residential and Commercial Developments*:

- Provision of a Waste Management Plan document, prepared by the Facilities Management Company to all residential units, which shall clearly state the methods of source waste segregation, storage, reuse and recycling initiatives that shall apply to the management of the development;
- Provision and maintenance of appropriate graphical signage to inform residents of their obligation to reduce waste, segregate waste and in the correct bin;

- Preparation of an annual waste management report for all residential and commercial units;
- Designation of access routes to common waste storage areas to ensure safe access from the apartment units by mobility impaired persons;
- Provision of an appropriately qualified and experienced staff member, who will be responsible for all aspects of waste management at the development;
- Daily inspection of waste storage areas and signing of a daily check list, which shall be displayed within the area; and
- Maintenance of a weekly register, detailing the quantities and breakdown of wastes collected from the development and provision of supporting documentation by the waste collector to allow tracking of waste recycling rates.

6.0 CONCLUSIONS

In summary, this OWMP presents a waste strategy that complies with all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the 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 achieving 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 outlined in the DLRCC Guidance Notes for Waste Management in Residential and Commercial Developments and the *DLRCC Waste Bye-Laws*.

The waste strategy presented in this document will provide sufficient storage capacity for the estimated quantity of segregated waste. The designated area 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 Agency 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. Dún Laoghaire Rathdown County Council (DLRCC), Dún Laoghaire Rathdown County Council Segregation, Storage and Presentation of Household and Commercial Waste) Bye-laws (2019).
6. DLRCC, *Guidance Notes for Waste Management in Residential and Commercial Developments* (2020).
7. Department of Environment and Local Government (DoELG) *Waste Management – Changing Our Ways, A Policy Statement* (1998).
8. Department of Environment, Heritage and Local Government (DoEHLG) *Preventing and Recycling Waste - Delivering Change* (2002).
9. DoELG, *Making Ireland's Development Sustainable – Review, Assessment and Future Action (World Summit on Sustainable Development)* (2002).
10. DoEHLG, *Taking Stock and Moving Forward* (2004).
11. Department of Communications, Climate Action and Environment (DCCA), *Waste Action Plan for the Circular Economy - Ireland's National Waste Policy 2020-2025* (Sept 2020).
12. DCCA, *Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less'* (2021)
13. Environmental Protection Agency (EPA), *National Waste Database Reports 1998 – 2012*.
14. DLRCC, *Dún Laoghaire Rathdown County Council Development Plan 2016 – 2022* (2016).
15. DLRCC, *Dún Laoghaire Rathdown County Council Development Plan 2022 – 2028* (2022).
16. Planning and Development Act 2000 (S.I. No. 30 of 2000) as amended 2010 (S.I. No. 30 of 2010) and 2015 (S.I. No. 310 of 2015).
17. European Waste Catalogue - Council Decision 94/3/EC (as per Council Directive 75/442/EC).
18. Hazardous Waste List - Council Decision 94/904/EC (as per Council Directive 91/689/EEC).
19. EPA, *European Waste Catalogue and Hazardous Waste List* (2002)
20. EPA, *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* (2015).
21. BS 5906:2005 *Waste Management in Buildings – Code of Practice*.
22. DoHLGH, *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2020).
23. Department of Transport, Tourism and Sport and Department of Housing, Planning and Local Government, *Design Manual for Urban Roads and Streets* (2019).

8.0 APPENDIX 1: WASTE COLLECTION ROUTES AND LOCATION OF WASTE COLLECTION AREAS

