15 Waste Management

15.1 Introduction

This Chapter of the EIAR comprises an assessment of the likely impact of the proposed development on the waste generated from the development as well as identifying proposed mitigation measures to minimise any associated impacts.

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A site-specific Construction and Demolition Waste Management Plan (C&D WMP) has been prepared by AWN Consulting Ltd to deal with waste generation during the demolition, excavation and construction phases of the proposed Development and has been included as Appendix 15.1. The C&D WMP was prepared in accordance with the 'Best Practice Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects' document produced by the National Construction and Demolition Waste Council (NCDWC) in conjunction with the Department of the Environment, Heritage and Local Government in July 2006.

A separate Operational Waste Management Plan (OWMP) has also been prepared for the operational phase of the proposed Development and is included as Appendix 15.2 of this Chapter.

These documents will ensure the sustainable management of wastes arising at the Development Site in accordance with legislative requirements and best practice standards.

15.2 Study Methodology

The assessment of the impacts of the proposed Development, arising from the consumption of resources and the generation of waste materials, was carried out taking into account the methodology specified in relevant guidance documents, along with an extensive document review to assist in identifying current and future requirements for waste management, including national and regional waste policy, waste strategies, management plans, legislative requirements and relevant reports. A summary of the documents reviewed, and the relevant legislation is provided in the C&D WMP and in the OWMP provided in Appendices 15.1 and 15.2.

This Chapter is based on the proposed Project, as described in Chapter 3 (Description of Development) and considers the following aspects:

- Legislative context;
- Construction Phase (including Demolition, excavation, and site preparation); and
- Operational Phase.

A desktop study was carried out which included the following:

- Review of applicable policy and legislation which creates the legal framework for resource and waste management in Ireland;
- Description of the typical waste materials that will be generated during the Construction and Operational Phases; and
- Identification of mitigation measures to prevent waste generation and promote management of waste in accordance with the waste hierarchy.

Estimates of waste generation during the construction and operational phases of the proposed Development have been calculated. The waste types and estimated quantities are based on published data by the EPA in the National Waste Reports and National Waste Statistics, data recorded from similar previous developments, Irish and US EPA waste generation research as well as other available research sources.

Mitigation measures are proposed to minimise the effect of the proposed Development on the environment during the construction and operational phases, to promote efficient waste

segregation and to reduce the quantity of waste requiring disposal. This information is presented in Section 15.9

A detailed review of the existing ground conditions on a regional, local, and site-specific scale are presented in Chapter 7 (Land, Soils and Geology). Chapter 9 also discuss the environmental quality of any soils which will have to be excavated to facilitate construction of the proposed Development.

Legislation and Guidance

Waste management in Ireland is subject to EU, national and regional waste legislation, which defines how waste materials must be managed, transported and treated. The overarching EU legislation is the Waste Framework Directive (2008/98/EC) which is transposed into national legislation in Ireland. The cornerstone of Irish waste legislation is the Waste Management Act 1996 (as amended). European and national waste management policy is based on the concept of 'waste hierarchy', which sets out an order of preference for managing waste (prevention > preparing for reuse > recycling > recovery > disposal) (Figure 15.1).

Figure 15.1 - Waste Hierarchy (Source: European Commission)

The Irish government issues policy documents which outline measures to improve waste management practices in Ireland and help the country to achieve EU targets in respect of recycling and disposal of waste. The most recent policy document, *Waste Action Plan for a Circular Economy – Waste Management Policy in Ireland*, was published in 2020 and shifts focus away from waste disposal and moves it back up the production chain. The move away from targeting national waste targets is due to the Irish and international waste context changing in the years since the launch of the previous waste management plan, *A Resource Opportunity,* in 2012. The need to embed climate action in all strands of public policy aligns with the goals of the European Green Deal.

The strategy for the management of waste from the construction phase is in line with the requirements of the *Best Practice Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects*, published by the Department of Environment, Heritage and Local Government (DoEHLG) in 2006. The guidance document, *Construction and Demolition Waste Management: A Handbook for Contractors and Site Managers* (FÁS & Construction Industry Federation, 2002), was also consulted in the preparation of this assessment.

There are currently no Irish guidelines on the assessment of operational waste generation and guidance is taken from industry guidelines, plans and reports including the EMR Waste Management Plan 2015 – 2021, BS 5906:2005 Waste Management in Buildings – Code of Practice, 5. The Dún Laoghaire-Rathdown County Council (DLRCC) 'Dún Laoghaire-Rathdown County Council

(Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2019), DLRCC Guidance Notes for Waste Management in Residential and Commercial Developments (2020), the EPA National Waste Database Reports 1998 – 2018 and the EPA National Waste Statistics Web Resource.

Terminology

Note that the terminology used herein is generally consistent with the definitions set out in Article 3 of the Waste Framework Directive. Key terms are defined as follows:

Waste - Any substance or object which the holder discards or intends or is required to discard.

Prevention - Measures taken before a substance, material or product has become waste, that reduce:

a) the quantity of waste, including through the re-use of products or the extension of the life span of products;

b) the adverse impacts of the generated waste on the environment and human health; or

c) the content of harmful substances in materials and products.

Reuse - Any operation by which products or components that are not waste are used again for the same purpose for which they were conceived.

Preparing for Reuse - Checking, cleaning or repairing recovery operations, by which products or components of products that have become waste are prepared so that they can be re-used without any other pre-processing.

Treatment - Recovery or disposal operations, including preparation prior to recovery or disposal.

Recovery - Any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. Annex II of the Waste Framework Directive sets out a non-exhaustive list of recovery operations.

Recycling - Any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.

Disposal - Any operation which is not recovery even where the operation has as a secondary consequence the reclamation of substances or energy. Annex I sets out a non-exhaustive list of disposal operations.

15.3 The Existing Receiving Environment (Baseline)

In terms of waste management, the receiving environment is largely defined by Dún Laoghaire-Rathdown County Council (DLRCC) as the local authority responsible for setting and administering waste management activities in the area. This is governed by the requirements set out in the Eastern-Midlands Region (EMR) Waste Management Plan 2015-2021.

The waste management plan sets out the following 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.

The Regional Plan sets out the strategic targets for waste management in the region and sets a specific target for C&D waste of "70% preparing for reuse, recycling and other recovery of

construction and demolition waste" (excluding natural soils and stones and hazardous wastes) to be achieved by 2020.

The National Waste Statistics update published by the EPA in August 2020 identifies that Ireland's current progress against this C&D waste target is at 77% and our progress against 'Preparing for reuse and recycling of 50% by weight of household derived paper, metal, plastic & glass (includes metal and plastic estimates from household WEEE)' is at 51%. Both of these targets are required to be met by 12 December 2020 in accordance with the requirements of the Waste Framework Directive, however the EPA are yet to confirm that these were met.

The Dún Laoghaire-Rathdown County Development Plan 2016 – 2022 also sets policies and objectives for the DLRCC area which reflect those set out in the regional waste management plan.

In terms of physical waste infrastructure, DLRCC no longer operates any municipal waste landfill in the area. There are a number of waste permitted and licensed facilities located in the Eastern-Midlands Waste Region for management of waste from the construction industry as well as municipal sources. These include soil recovery facilities, inert C&D waste facilities, hazardous waste treatment facilities, municipal waste landfills, material recovery facilities, waste transfer stations and two waste-to-energy facilities.

15.4 Characteristics of the Proposed Development

Proposed Development

The development will consist of a new residential and mixed-use scheme to include apartments, residential amenity space, a café and a childcare facility.

A full description of the development can be found in Chapter 3. The characteristics of the development that are relevant in terms of waste management are summarised below.

Demolition Phase

There will be a quantity of waste materials generated from the demolition of some of the existing buildings and hard standing areas on site, as well as from the excavation of the building foundations.

Further detail on the waste materials likely to be generated during the demolition works are presented in the project-specific C&D WMP in Appendix 15.1. The C&D WMP provides an estimate of the main waste types likely to be generated during the C&D phase of the proposed development. The reuse, recycling/recovery and disposal rates have been estimated using the EPA National Waste Reports and these are summarised in Table 15.1.

Waste Type	Tonnes	Reuse		Recycle/Recovery		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Glass	130.5	0	0.0	85	111.0	15	19.6
Concrete, Bricks, Tiles, Ceramics	739.8	30	221.9	65	480.8	5	37.0
Plasterboard	58.0	30	17.4	60	34.8	10	5.8
Asphalts	14.5	0	0.0	25	3.6	75	10.9
Metal	217.6	5	10.9	80	174.1	15	32.6
Slate	116.0	0	0.0	85	98.6	15	17.4
Timber	174.1	10	17.4	60	104.4	30	52.2
Asbestos	1.0	0	0.0	0	0.0	100	1.0
Total	**1451.5**		**267.6**		**1007.4**		**176.5**

Table 15.1 - Estimated off-site reuse, recycle and disposal rates for demolition waste

Construction Phase

During the Construction Phase, waste will be produced from surplus materials such as broken or off-cuts of timber, plasterboard, concrete, tiles, bricks, etc. Waste from packaging (cardboard, plastic, timber) and oversupply of materials may also be generated. The appointed Contractor will be required to ensure that oversupply of materials is kept to a minimum and opportunities for reuse of suitable materials is maximised.

In addition, topsoil, sub soil and made ground will require excavation to facilitate the proposed basement, site levelling, construction of foundations, along with the installation of underground services. The Project Engineers (Barrett Mahony Consulting Engineers) have estimated that c. 34,632m^3 of material will require excavation. It is envisaged that the majority of this material will be removed off-site. These estimates will be refined prior to commencement of construction. If the material that requires removal from Site is deemed to be a waste, removal and reuse/recycling/recovery/disposal of the material will be carried out in accordance with the Waste Management Act 1996 (as amended), the Waste Management (Collection Permit) Regulations 2007 (as amended) and the Waste Management (Facility Permit & Registration) Regulations 2007 (as amended). The volume of waste requiring recovery/disposal will dictate whether a Certificate of Registration (COR), permit or licence is required for the receiving facility. Alternatively, the material may be classed as by-product under Article 27 classification (European Communities (Waste Directive) Regulations 2011, S.I. No. 126 of 2011).

In order to establish the appropriate reuse, recovery and/or disposal route for the soils and stones to be removed off-site, it will first need to be classified. Waste material will initially need to be classified as hazardous or non-hazardous in accordance with the EPA publication Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous. Environmental soil analysis will be carried out prior to removal of the material on a number of the soil samples in accordance with the requirements for acceptance of waste at landfills (Council Decision 2003/33/EC Waste Acceptance Criteria). This legislation sets limit values on landfills for acceptance of waste material based on properties of the waste including potential pollutant concentrations and leachability. It is anticipated that the surplus material will be suitable for acceptance at either inert or non-hazardous soil recovery facilities/landfills in Ireland or, in the unlikely event of hazardous material being encountered, be transported for treatment/recovery or exported abroad for disposal in suitable facilities.

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

Further detail on the waste materials likely to be generated during the excavation and construction works are presented in the project-specific C&D WMP. The C&D WMP provides an estimate of the main waste types likely to be generated during the Construction Phase of the proposed Project and these are summarised in Table 15.2.

Waste Type	Tonne	Reuse		Recycle/Recovery		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Mixed C&D	1125.7	10	112.6	80	900.6	10	112.6
Timber	955.1	40	382.1	55	525.3	5	47.8
Plasterboard	341.1	30	102.3	60	204.7	10	34.1
Metals	272.9	5	13.6	90	245.6	5	13.6
Concrete	204.7	30	61.4	65	133.0	5	10.2
Other	511.7	20	102.3	60	307.0	20	102.3
Total	**3411.2**		**774.3**		**2316.2**		**320.6**

Table 15.2 - Estimated off-site reuse, recycle and disposal rates for construction waste.

Operational Phase

As noted in Section 15.1, an OWMP has been prepared for the proposed Project and is included as Appendix A15.2. The OWMP provides a strategy for segregation (at source), storage and collection of all wastes generated within the building during the Operational Phase including dry mixed recyclables, organic waste and mixed non-recyclable waste as well as providing a strategy for management of waste glass, batteries, WEEE, printer/toner cartridges, chemicals, textiles, waste cooking oil and furniture.

The total estimated waste generation for the proposed Project for the main waste types based on the AWN Waste Generation Model (WGM) is presented in Table 15.3, below, and is based on the uses and areas as advised by the Project Architects. Further unit breakdowns can be found in Appendix 15.2.

Waste type	Waste Volume (m^3/week)		
	Residential Units (Combined)	Creche Unit	Café Unit
Organic Waste	6.81	0.03	0.04
DMR	48.25	1.10	0.10
Glass	1.32	0.01	0.01
MNR	25.37	0.49	0.13
Total	**81.75**	**1.62**	**0.28**

Table 15.3 - Estimated Operational Waste Volume m3/week for the development

The residents and tenants will be required to provide and maintain appropriate waste receptacles within their units to facilitate segregation at source of these waste types. The location of the bins within the units will be at the discretion of the residents. As required, the residents and tenants will need to bring these segregated wastes from their units to their allocated Waste Storage Areas (WSAs). All WSA's can be viewed on the plans submitted with the application.

The OWMP seeks to ensure the proposed Project contributes to the targets outlined in the *EMR Waste Management Plan 2015-2021* and the DLRCC waste Bye-laws.

Mitigation measures proposed to manage impacts arising from wastes generated during the Operational Phase of the proposed Project are summarised below.

15.5 Potential Impact of the Proposed Development

This section details the potential waste effects associated with the proposed Project.

Construction Phase

The proposed Development will generate a range of non-hazardous and hazardous waste materials during site demolition, excavation and construction. General housekeeping and packaging will also generate waste materials, as well as typical municipal wastes generated by construction employees, including food waste. Waste materials will be required to be temporarily stored on-site pending collection by a waste contractor. If waste material is not managed and stored correctly, it is likely to lead to litter or pollution issues at the Development Site and in adjacent areas. The indirect effect of litter issues is the presence of vermin in areas affected. In the absence of mitigation, the effect on the local and regional environment is likely to be ***short-term, significant*** and ***negative.***

The use of non-permitted waste contractors or unauthorised waste facilities could give rise to inappropriate management of waste, resulting in indirect negative environmental impacts, including pollution. It is essential that all waste materials are dealt with in accordance with regional and national legislation, as outlined previously, and that time and resources are dedicated to ensuring efficient waste management practices. In the absence of mitigation, the effect on the local and regional environment is likely to be ***Long-term, significant*** and ***negative.***

Wastes arising will need to be taken to suitably registered / permitted / licenced waste facilities for processing and segregation, reuse, recycling, recovery, and / or disposal, as appropriate. There are numerous licensed waste facilities in the EMR which can accept hazardous and non-hazardous waste materials, and acceptance of waste from the Development Site would be in line with daily activities at these facilities. At present, there is sufficient capacity for the acceptance of the likely C&D waste arisings at facilities in the region. The majority of construction materials are either recyclable or recoverable. However, in the absence of mitigation, the effect on the local and regional environment is likely to be ***short-term, significant*** and ***negative.***

There is a quantity of excavated material which will need to be excavated to facilitate the proposed Project. A detailed review of the existing ground conditions on a regional, local site-specific scale are presented in Chapter 8 – Land and Soils. It is anticipated that most if not all of excavated material will need to be removed off-site due to the limited opportunity for reuse onsite. Correct classification and segregation of the excavated material is required to ensure that any potentially contaminated materials are identified and handled in a way that will not impact negatively on workers as well as on water and soil environments, both on and off-site. However, in the absence of mitigation, the effect on the local and regional environment is likely to be ***short-term, significant*** and ***negative.***

Operational Phase

The potential impacts on the environment of improper, or a lack of, waste management during the operational phase would be a diversion from the priorities of the waste hierarchy which would lead to small volumes of waste being sent unnecessarily to landfill. In the absence of mitigation, the effect on the local and regional environment is likely to be ***Long-term, significant*** and ***negative.***

The nature of the development means the generation of waste materials during the operational phase is unavoidable. Networks of waste collection, treatment, recovery and disposal infrastructure are in place in the region to manage waste efficiently from this type of development. Waste which is not suitable for recycling is typically sent for energy recovery. There are also facilities in the region for segregation of municipal recyclables which is typically exported for conversion in recycled products (e.g. paper mills and glass recycling).

If waste material is not managed and stored correctly, it is likely to lead to litter or pollution issues at the Development Site and in adjacent areas. The knock-on effect of litter issues is the presence of vermin in affected areas. However, in the absence of mitigation, the effect on the local and regional environment is likely to be ***short-term, significant*** and ***negative.***

Waste contractors will be required to service the proposed Development on a regular basis to remove waste. The use of non-permitted waste contractors or unauthorised facilities could give rise to

inappropriate management of waste and result in negative environmental impacts or pollution. It is essential that all waste materials are dealt with in accordance with regional and national legislation, as outlined previously, and that time and resources are dedicated to ensuring efficient waste management practices. However, in the absence of mitigation, the effect on the local and regional environment is likely to be ***Long-term, significant*** and ***negative.***

15.6 Potential Cumulative Impacts

Construction Phase

Multiple permissions remain in place for both residential and commercial developments within the vicinity of the development. In a worst-case scenario, multiple developments in the area could be developed concurrently or overlap in the construction phase. This would require multiple vehicles / waste contractors / waste receptacles being required to service the developments. Due to the high number of waste contractors in the Dublin region there would be sufficient contractors available to handle waste generated from a large number of these sites simultaneously, if required. Similar waste materials would be generated by all the developments.

Other developments in the area will be required to manage waste in compliance with national and local legislation, policies and plans which will minimise/mitigate any potential cumulative effects associated with waste generation and waste management. As such the effect will be **short-term, not significant and negative.**

Operational Phase

There are existing residential and commercial developments close by, along with the multiple permissions remaining in. All of the current and potential developments will generate similar waste types during their operational phases. Authorised waste contractors will be required to collect waste materials segregated, at a minimum, into recyclables, organic waste and non-recyclables. An increased density of development in the area is likely improve the efficiencies of waste collections in the area.

Other developments in the area will be required to manage waste in compliance with national and local legislation, policies and plans which will minimise/mitigate any potential cumulative impacts associated with waste generation and waste management. As such the effect will be a **long-term, imperceptible and neutral.**

15.7 Do Nothing Scenario

In the absence of the proposed development being constructed, the permitted development (D17A/0337/PL06D.249248) would likely be implemented. The seven large, detached houses on large plots fronting Leopardstown Road (i.e. the part of the site added subsequent to the granting of the above permission) would remain in use as individual dwellings. This would not fully realise the potential of the subject site for sustainable residential use in line with the current national policy mandate.

15.8 Risks to Human Health

The potential impacts on human beings in relation to the generation of waste during the demolition, construction and operational phases would occur from the incorrect management of waste. This could result in littering which could cause a nuisance to the public and attract vermin. A carefully planned approach to waste management and adherence to the project specific C&DWMP and OWMP, will ensure appropriate management of waste and avoid any negative impacts on the local population. **long-term, imperceptible and neutral.**

15.9 Mitigation Measures

This section outlines the measures that will be employed in order to reduce the amount of waste produced, manage the wastes generated responsibly and handle the waste in such a manner as to minimise the effects on the environment.

Construction Stage

The following mitigation measures will be implemented during the construction phase of the proposed Development:

As previously stated, a project specific C&D WMP has been prepared in line with the requirements of the *Best Practice Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects* (DoEHLG, 2006), and is included as Appendix 15.1. Adherence to the high-level strategy presented in this C&D WMP will ensure effective waste management and minimisation, reuse, recycling, recovery and disposal of waste material generated during the demolition, excavation and construction phases of the proposed Development.

- Prior to commencement, the appointed Contractor(s) will be required to refine / update the C&D WMP (Appendix 15.1) in agreement with DLRCC or submit an addendum to the C&D WMP to DLRCC, detailing specific measures to minimise waste generation and resource consumption, and provide details of the proposed waste contractors and destinations of each waste stream.
- The Contractor will be required to fully implement the C&D WMP throughout the duration of the proposed construction and demolition phases.

A quantity of topsoil, sub soil, clay and made ground will need to be excavated to facilitate the proposed Development. Project Engineers have estimated that all or most of the c. 34,632 m^3 of excavated material will need to be removed off-site. Correct classification and segregation of the excavated material is required to ensure that any potentially contaminated materials are identified and handled in a way that will not impact negatively on workers as well as on water and soil environments, both on and off-site.

In addition, the following mitigation measures will be implemented:

- Building materials will be chosen with an aim to 'design out waste';
- On-site segregation of waste materials will be carried out to increase opportunities for off-site reuse, recycling, and recovery. The following waste types, at a minimum, will be segregated:
    - Concrete rubble (including ceramics, tiles, and bricks);
    - Plasterboard;
    - Metals;
    - Glass; and
    - Timber.
- Left over materials (e.g., timber off-cuts, broken concrete blocks / bricks) and any suitable construction materials shall be re-used on-site, where possible;
- All waste materials will be stored in skips or other suitable receptacles in designated areas of the site;
- Any hazardous wastes generated (such as chemicals, solvents, glues, fuels, oils) will also be segregated and will be stored in appropriate receptacles (in suitably bunded areas, where required);
- A Waste Manager will be appointed by the main Contractor(s) to ensure effective management of waste during the demolition, excavation and construction works;

- All construction staff will be provided with training regarding the waste management procedures;
- All waste leaving site will be reused, recycled, or recovered, where possible, to avoid material designated for disposal;
- All waste leaving the site will be transported by suitably permitted contractors and taken to suitably registered, permitted, or licenced facilities; and
- All waste leaving the site will be recorded and copies of relevant documentation maintained.
- Nearby sites requiring clean fill material will be contacted to investigate reuse opportunities for clean and inert material, if required. If any of the material is to be reused on another site as by-product (and not as a waste), this will be done in accordance with Article 27 of the EC (Waste Directive) Regulations (2011). EPA approval will be obtained prior to moving material as a by-product. However, it is not currently anticipated that Article 27 will be used.

These mitigation measures will ensure that the waste arising from the construction phase of the proposed Development is dealt with in compliance with the provisions of the Waste Management Act 1996, as amended, associated Regulations and the Litter Pollution Act 1997, and the *EMR Waste Management Plan 2015 – 2021*. It will also ensure optimum levels of waste reduction, reuse, recycling and recovery are achieved and will promote more sustainable consumption of resources.

Operational Stage

As previously stated, a project specific OWMP has been prepared and is included as Appendix 15.2.

- The Operator / Buildings Manager of the Site during the operational phase will be responsible for ensuring – allocating personnel and resources, as needed – the ongoing implementation of this OWMP, ensuring a high level of recycling, reuse, and recovery at the Site of the proposed Development.

In addition, the following mitigation measures will be implemented:

- The Operator / Buildings Manager will ensure on-Site segregation of all waste materials into appropriate categories, including (but not limited to):
    - Organic waste;
    - Dry Mixed Recyclables;
    - Mixed Non-Recyclable Waste;
    - Glass;
    - Waste electrical and electronic equipment (WEEE);
    - Batteries (non-hazardous and hazardous);
    - Cooking oil;
    - Light bulbs;
    - Cleaning chemicals (pesticides, paints, adhesives, resins, detergents, etc.);
    - Furniture (and from time-to-time other bulky waste); and
    - Abandoned bicycles.
- The Operator / Buildings Manager will ensure that all waste materials will be stored in colour coded bins or other suitable receptacles in designated, easily accessible locations. Bins will be clearly identified with the approved waste type to ensure there is no cross contamination of waste materials;
- The Operator / Buildings Manager will ensure that all waste collected from the Site of the proposed Development will be reused, recycled, or recovered, where possible, with the

exception of those waste streams where appropriate facilities are currently not available; and

- The Operator / Buildings Manager will ensure that all waste leaving the Site will be transported by suitable permitted contractors and taken to suitably registered, permitted, or licensed facilities.

These mitigation measures will ensure the waste arising from the proposed Development during the operational phase is dealt with in compliance with the provisions of the Waste Management Act 1996, as amended, associated Regulations, *the Litter Pollution Act 1997*, the *EMR Waste Management Plan 2015 – 2021* and the DLRCC waste bye-laws. It will also ensure optimum levels of waste reduction, reuse, recycling and recovery are achieved.

15.10 Predicted Impacts of the Proposed Development

The implementation of the mitigation measures outlined in Section 15.9 will ensure that the high rate of reuse, recovery and recycling is achieved at the development during the demolition, excavation and construction phases as well as during the operational phase. It will also ensure that European, National and Regional legislative waste requirements with regard to waste are met and that associated targets for the management of waste are achieved.

Construction Stage

A carefully planned approach to waste management as set out in Section 15.9 and adherence to the C&D WMP during the construction and demolition phase will ensure that the effect on the environment will be **short-term, imperceptible and neutral**.

Operational Stage

During the operational phase, a structured approach to waste management as set out in Section 15.9 will promote resource efficiency and waste minimisation. Provided the mitigation measures are implemented and a high rate of reuse, recycling and recovery is achieved, the predicted effect of the operational phase on the environment will be **long-term, imperceptible and neutral**.

15.11 Residual Impacts

Adherence to the mitigation measures outlined in Section 15.9 will ensure that there are no significant impacts on resource or waste management from the proposed development. The management of waste during the construction phase in accordance with the Construction & Demolition Waste Management Plan (C&D WMP) and during the operational phase in accordance with the Operational Waste Management Plan (OWMP) will ensure the development meets the requirements of regional and national waste legislation and promote the management of waste in line with the priorities of the waste hierarchy. The residual impact will be ***neutral*** and ***imperceptible***.

15.12 Monitoring

The management of waste during the construction phase should be monitored to ensure compliance with relevant local authority requirements, and effective implementation of the C&D WMP including maintenance of waste documentation.

The management of waste during the operational phase should be monitored to ensure effective implementation of the OWMP by the building management company and the nominated waste contractor(s).

Construction Phase

The objective of setting targets for waste management is only achieved if the actual waste generation volumes are calculated and compared. This is particularly important during the demolition, excavation and construction phases where there is a potential for waste management to become secondary to progress and meeting construction schedule targets. The C&D WMP specifies the need for a waste manager to be appointed who will have responsibility to monitor the actual waste volumes being generated and to ensure that contractors and sub-contractors are segregating waste as required. Where targets are not being met, the waste manager should identify the reasons for targets not being achieved and work to resolve any issues. Recording of waste generation during the project will enable better management of waste contractor requirements and identify trends. The data should be maintained to advise on future projects.

Operational Phase

During the operational phase, waste generation volumes should be monitored against the predicted waste volumes outlined in the OWMP. There may be opportunities to reduce the number of bins and equipment required in the WSAs where estimates have been too conservative. Reductions in bin and equipment requirements will improve efficiency and reduce waste contactor costs.

15.13 Reinstatement

In the event that the proposed development is discontinued, there is not likely to be any significant impacts on waste management at the site.

15.14 Interactions

Adherence to the mitigation measures outlined in Section 15.9 will ensure that there are no significant impacts on resource or waste management from the proposed development. The management of waste during the construction phase in accordance with the C&D WMP and during the operational phase in accordance with the OWMP will meet the requirements of regional and national waste legislation and promote the management of waste in line with the priorities of the waste hierarchy.

Land & Soils

During the Construction Phase excavated soil, stone, made ground and rock (c. 34,632m^3) will be generated from the excavations required to facilitate site levelling, construction of the basement and construction of new foundations. It is estimated that all or most of the c. 34,632m^3 of excavated material will need to be removed off-site. Where material has to be taken off-site it will be taken for reuse or recovery, where practical, with disposal as last resort. Adherence to the mitigation measures in Chapter 15 and the requirements of the C&D WMP, will ensure the effect is ***long-term, imperceptible*** and ***neutral.***

Traffic & Transportation

Local traffic and transportation will be impacted by the additional vehicle movements generated by removal of waste from the Site during the Construction and Operational Phases of the proposed Project. The increase in vehicle movements as a result of waste generated during the Construction Phase will be *temporary* in duration. There will be an increase in vehicle movements in the area as a result of waste collections during the Operational Phase but these movement will be imperceptible in the context of the overall traffic and transportation increase and has been addressed in Chapter 13 (Traffic and Transport). Provided the mitigation measures detailed in Chapter 13, Chapter 15 and the requirements of the OWMP (included as Appendix A15.2) are adhered to, the effects should be *short to* ***long-term, imperceptible*** and ***neutral.***

Population & Human Health

The potential impacts on human beings in relation to the generation of waste during the Construction and Operational Phases are that incorrect management of waste could result in littering which could cause a nuisance to the public and attract vermin. A carefully planned approach to waste management and adherence to the project specific C&D WMP and OWMP, will ensure appropriate management of waste and avoid any negative impacts on the local population. The effects should be *long-term*, *imperceptible* and *neutral.*

15.15 Difficulties Encountered

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

There is a number of licensed, permitted and registered waste facilities in the Fingal region and in the surrounding counties. However, these sites may not be available for use when required or may be limited by the waste contractor selected to service the development in the appropriate phase. In addition, there is potential for more suitably placed waste facilities or recovery facilities to become operational in the future which may be more beneficial from an environmental perspective.

The ultimate selection of waste contractors and waste facilities would be subject to appropriate selection criteria proximity, competency, capacity, serviceability, and cost.

15.16 References

- Waste Management Act 1996 (No. 10 of 1996) as amended. Sub-ordinate and associated legislation include:
    - European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011) as amended.
    - Waste Management (Collection Permit) Regulations 2007 (S.I. No. 820 of 2007) as amended.
    - Waste Management (Facility Permit and Registration) Regulations 2007 (S.I No. 821 of 2007) as amended.
    - Waste Management (Licensing) Regulations 2000 (S.I No. 185 of 2000) as amended.
    - European Union (Packaging) Regulations 2014 (S.I. No. 282 of 2014) as amended.
    - Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997) as amended.
    - Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015)
    - European Union (Waste Electrical and Electronic Equipment) Regulations 2014 (S.I. No. 149 of 2014)
    - European Union (Batteries and Accumulators) Regulations 2014 (S.I. No. 283 of 2014) as amended.
    - Waste Management (Food Waste) Regulations 2009 (S.I. No. 508 of 2009) as amended.
    - European Union (Household Food Waste and Bio-waste) Regulations 2015 (S.I. No. 430 of 2015)
    - Waste Management (Hazardous Waste) Regulations 1998 (S.I. No. 163 of 1998) as amended.

  - Waste Management (Shipments of Waste) Regulations 2007 (S.I. No. 419 of 2007) as amended.
  - European Communities (Shipments of Hazardous Waste exclusively within Ireland) Regulations 2011 (S.I. No. 324 of 2011)
  - European Union (Properties of Waste which Render it Hazardous) Regulations 2015 (S.I. No. 233 of 2015) as amended

- Protection of the Environment Act 2003, (No. 27 of 2003) as amended.
- Litter Pollution Act 1997 (S.I. No. 12 of 1997) as amended
- Eastern-Midlands Region Waste Management Plan 2015 – 2021 (2015).
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- Dún Laoghaire-Rathdown County Council (DLRCC), Dún Laoghaire-Rathdown County Council Development Plan 2016-2022 (2016)
- Planning and Development Act 2000 (S.I. No. 30 of 2000) as amended
- EPA, Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous (2015)
- Council Decision 2003/33/EC, establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC.
- Environmental Protection Agency (EPA), National Waste Database Reports 1998 – 2012.
- EPA and Galway-Mayo Institute of Technology (GMIT), EPA Research Report 146 – A Review of Design and Construction Waste Management Practices in Selected Case Studies – Lessons Learned (2015).
- BS 5906:2005 Waste Management in Buildings – Code of Practice.
- DoEHLG, Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018).
- DLRCC, County Council (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2019).
- Department of Housing, Planning & Local Government, Guidelines for Planning
- Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)
- European Commission, Environmental Impact Assessment of Projects:
- Guidance on the preparation of the Environmental Impact Assessment Report (2017)
- EPA, Guidelines on the Information to be Contained in Environmental Impact Assessment Reports – Draft (2017).
- Department of Communications, Climate Action and Environment (DCCAE), *Waste Action Plan for the Circular Economy - Ireland's National Waste Policy 2020-2025* (Sept 2020).

Appendix 15.1 – Construction & Demolition Waste Management Plan

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CONSTRUCTION & DEMOLITION WASTE MANAGEMENT PLAN FOR A PROPOSED SHD RESIDENTIAL DEVELOPMENT

'ST. JOSEPH'S HOUSE AND ADJOINING PROPERTIES'

Appendix 15.1

Report Prepared For

Homeland Silverpines Limited

Report Prepared By

Chonaill Bradley, Senior Environmental Consultant

Our Reference

CB/20/11480WMR01

Date of Issue

23 September 2021

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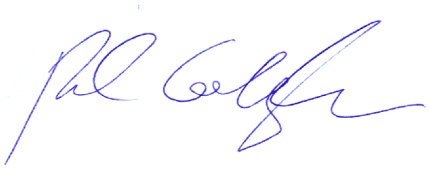
Signature		
Name	Chonaill Bradley	Fergal Callaghan
Title	Senior Environmental Consultant	Director
Date	23 September 2021	23 September 2021

Contents Page

1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Construction & Demolition Waste Management Plan (C&D WMP) on behalf of Homeland Silverpines Limited. The proposed development relates to a site at Leopardstown Road, Dublin 18 & St Joseph's House (a Protected Structure) & adjoining lands, Brewery Road, Stillorgan, Co Dublin and will involve the demolition of the existing structures on site, with the exception of St Jospeh's House which will be renovated, along with the construction of a new residential development consisting of residential unities, creche, café amenities, car and bicycle parking and all hard and soft landscaping.

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

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

2.0 CONSTRUCTION & DEMOLITION WASTE MANAGEMENT IN IRELAND

2.1 National Level

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

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

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

It aims to fulfil the commitment in the Programme for Government to publish and start implementing a new National Waste Action Plan. It is intended that this new national waste

policy will inform and give direction to waste planning and management in Ireland over the coming years. It will be followed later this year by an All of Government Circular Economy Strategy. The policy document shifts focus away from waste disposal and moves it back up the production chain. To support the policy, regulation is already being used (Circular Economy Legislative Package) or in the pipeline (Single Use Plastics Directive). The policy document contains over 200 measures across various waste areas including Circular Economy, Municipal Waste, Consumer Protection & Citizen Engagement, Plastics and Packaging, Construction and Demolition, Textiles, Green Public Procurement and Waste Enforcement.

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

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

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

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

Other guidelines followed in the preparation of this report include *'Construction and Demolition Waste Management – a handbook for Contractors and Site Managers'* [9] , published by FÁS and the Construction Industry Federation in 2002 and the Environmental Protection Agency (EPA) *'Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects'* Draft for public consultation [10] (April 2021).

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

2.2 Regional Level

The proposed development is located in the Local Authority area of Dún Laoghaire–Rathdown County Council (DLRCC).

The *Eastern-Midlands Region Waste Management Plan 2015 – 2021* is the regional waste management plan for the DLRCC area published in May 2015.

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

The DLRCC *County Development Plan 2016 – 2022* (2016) [11] sets out a number of objectives for Dún Laoghaire–Rathdown County Council in line with the objectives of the regional waste management plan.

Waste policies with a particular relevance to this proposed development are:

Policy:

- **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 Acts 1996 (as amended) and Protection of the Environment Act 2003 (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 EI16:** Waste Re-use and Recycling: 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'.

2.3 Legislative Requirements

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

- Waste Management Act 1996 (No. 10 of 1996) as amended. Sub-ordinate legislation includes:

- European Communities (Waste Directive) Regulations 2011 (SI 126 of 2011) as amended
- Waste Management (Collection Permit) Regulations (S.I No. 820 of 2007) as amended
- Waste Management (Facility Permit and Registration) Regulations 2007, (S.I No. 821 of 2007) as amended
- Waste Management (Licensing) Regulations 2004 (S.I. No. 395 of 2004) as amended
- Waste Management (Packaging) Regulations 2014 (S.I. 282 of 2014) as amended
- Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997)
- Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015)
- European Union (Waste Electrical and Electronic Equipment) Regulations 2014 (S.I. No. 149 of 2014)
- European Union (Batteries and Accumulators) Regulations 2014 (S.I. No. 283 of 2014) as amended
- Waste Management (Food Waste) Regulations 2009 (S.I. 508 of 2009), as amended
- European Union (Household Food Waste and Bio-waste) Regulation 2015 (S.I. No. 191 of 2015)
- Waste Management (Hazardous Waste) Regulations, 1998 (S.I. No. 163 of 1998) as amended
- Waste Management (Shipments of Waste) Regulations, 2007 (S.I. No. 419 of 2007) as amended
- Waste Management (Hazardous Waste) Regulations 1998 (S.I. No. 163 of 1998) as amended;
- European Communities (Transfrontier Shipment of Waste) Regulations 1994 (SI 121 of 1994)
- European Union (Properties of Waste which Render it Hazardous) Regulations 2015 (S.I. No. 233 of 2015) as amended

- Environmental Protection Act 1992 (No. 7 of 1992) as amended.
- Litter Pollution Act 1997 (No. 12 of 1997) as amended.
- Planning and Development Act 2000 (No. 30 of 2000) as amended [12.]

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

It is therefore imperative that the client ensures that the waste contractors engaged by demolition and construction contractors are legally compliant with respect to waste transportation, recycling, recovery and disposal. This includes the requirement that a

contractor handle, transport and recycle/recover/dispose of waste in a manner that ensures that no adverse environmental impacts occur as a result of any of these activities.

A collection permit to transport waste must be held by each waste contractor which is issued by the National Waste Collection Permit Office (NWCPO). Waste receiving facilities must also be appropriately permitted or licensed. Operators of such facilities cannot receive any waste, unless in possession of a Certificate of Registration (COR) or waste permit granted by the relevant Local Authority under the *Waste Management (Facility Permit & Registration) Regulations 2007 and Amendments* or a waste or 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.

2.4 Local Authority Guidelines

DLRCC's Waste Management Division have issued *Guidance Notes for Environmental Management of Construction Projects* (2020) [13] which provide good practice guidance for the preparation of Construction & Demolition Waste Management Plans for in accordance with the DOEHLG "*Best Practice Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects"*.

The objective of the guidelines is to allow developers and designers 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 construction and demolition contractors to effectively manage their wastes arisings.

The Plan should document proposals for the management of C&D waste as concisely as possible. For clarity, besides assisting assessment and implementation, the Project C&D Waste Management Plan should be organised systematically. Individual headings should be provided, describing the following:

- Description of the Project;
- Wastes arising including proposals for minimisation/reuse/recycling;
- Estimated cost of waste management;
- Demolition Plan;
- Roles including training and responsibilities for C&D Waste;
- Record keeping procedures; and
- Waste auditing protocols

This C&D WMP has been prepared to demonstrate exactly that and aims to do that in a comprehensive manner.

3.0 DESCRIPTION OF THE PROJECT

3.1 Location, Size and Scale of the Development

The development will consist of a new residential and mixed use scheme to include apartments, residential amenity space, a café and a childcare facility as follows:

- The demolition of 10 no. properties and associated outbuildings at 'Madona House' (single storey), 'Woodleigh' (2 storeys), 'Cloonagh' (2 storeys), 'Souk El Raab (2 storeys), 'Welbrook' (2 storeys), 'Calador' (2 storeys), 'Alhambra' (2 storeys), 'Dalwhinnie' (2 storeys), 'Annaghkeen' (2 storeys) and 'The Crossing' (single storey) (combined demolition approx. 2,291.3 sq m GFA)

- The refurbishment, separation and material change of use of Saint Joseph's House (a Protected Structure, RPS No. 1548) from residential care facility to residential use and a childcare facility; and the construction of a new build element to provide for an overall total of 463 no. residential units, residential amenity space and a café as follows:

    - Block A (5 storeys) comprising 49 no. apartments (13 no. 1 bed units, 33 no. 2 bed units and 3 no. 3 bed units);

    - Block B (4 - 7 storeys) comprising 88 no. apartments (28 no. 1 bed units, 57 no. 2 bed units and 3 no. 3 bed units);

    - Block C (5 - 7 storeys) comprising 115 no. apartments (26 no. studio units, 26 no. 1 bed units and 57 no. 2 bed units and 6 no. 3 bed units);

    - Block D (5 - 10 storeys) comprising 157 no. apartments (36 no. studio unit, 40 no. 1 bed units and 81 no. 2 bed units), residential amenity areas of approx. 636 sq m and a café of approx. 49 sq m;

    - Block E (St. Joseph's House) (2 storeys) comprising 9 no. apartments (8 no. 2 bed units and 1 no. 3 bed units) and a childcare facility of 282 sq m with associated outdoor play areas of approx. 130 sq m;

    - Block F (3 - 6 storeys) comprising 45 no. apartments (23 no. studio units, 10 no. 1 bed units; and 12 no. 2 bed units);

- Open Space (approx. 9,885 sq m)

- 259 no. car parking spaces (232 no. at basement level and 27 no. at surface level)

- 968 no. bicycle spaces (816 no. at basement level and 152 no. at surface level)

- 10 no. motorcycle spaces (all at basement level)

- Vehicular Access

- Basement Areas

- Substations and Switch Rooms

- All associated site development works.

3.2 Details of the Non-Hazardous Wastes to be produced

There will be waste materials generated from the demolition of most of the existing buildings and hardstanding areas onsite, as well as from the further excavation of the building foundations. The volume of waste generated from demolition will be more difficult

to segregate than waste generated from the construction phase, as many of the building materials will be bonded together or integrated i.e. plasterboard on timber ceiling joists, steel embedded in concrete etc.

There will be soil, stones, clay, made ground and rock excavated to facilitate construction of new foundations, underground services, and the installation of the proposed basement. It has been estimated by the project engineers (Barrett Mahony Consulting Engineers) that c. 32,632 m^3 of material will need to be excavated. It is currently envisaged that there will be limited chances for reuse of material onsite. While there may be some material retained and reused onsite for landscaping, the majority of excavated material, will need to be removed offsite. This material will be taken for appropriate offsite reuse, recovery, recycling and/or disposal.

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

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

3.3 Potential Hazardous Wastes Arising

3.3.1 Contaminated Soil

Site investigations and environmental soil testing were undertaken between August and September 2016, by Ground Investigations Ireland (GII) and further site investigations and environmental soil testing were undertaken in 2020, by IGSL. The purpose of the site investigations was to investigate subsurface conditions utilising a variety of investigative methods in accordance with the project specification.

Ten samples of soil/fill were submitted for detailed environmental analysis to the RILTA Suite, which includes the Waste Acceptance Criteria (WAC) parameters. This testing is used to determine the suitability of the soil for disposal to landfill and includes Heavy Metals, Polycyclic Aromatic Hydrocarbons (PAH), TPH-CWG, BTEX and Total Organic Carbon (TOC) all carried out on dry soil samples.

The results from nine of the samples confirm that no elevated levels of contaminants were found and that the material can be classified as INERT.

In one sample of FILL however (TP01 at 1.00 metre) elevated levels of Total Organic Carbon (TOC) and Loss on Ignition (LOI) were recorded.

If any potentially contaminated material is encountered, it will need to be segregated from clean/inert material, tested and classified as either non-hazardous or hazardous in accordance with the EPA publication entitled *'Waste Classification: List of Waste & Determining if Waste is Hazardous or Non-Hazardous'* [14] using the *HazWasteOnline* application (or similar approved classification method). The material will then need to be

classified as clean, inert, non-hazardous or hazardous in accordance with the *EC Council Decision 2003/33/EC* [15], which establishes the criteria for the acceptance of waste at landfills.

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

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

3.3.2 Fuel/Oils

Fuels and oils are classed as hazardous materials; any on-site storage of fuel/oil, and all storage tanks and all draw-off points will be bunded and located in a dedicated, secure area of the site. Provided that these requirements are adhered to and the site crew are trained in the appropriate refuelling techniques, it is not expected that there will be any fuel/oil waste generated at the site.

3.3.3 Invasive Plant Species

A ecological surveys were undertaken by Brian Keely and Malgorzata Wilkowska the project ecologists, in the summer of 2019 including 10th and 11th July, 8th, 16th and 17th August. This included a site walkover survey of the entire site, and around part of the outside perimeter to search for any schedule 3 invasive species. Japanese Knotweed *Fallopia japonica*, which is listed on the Third Schedule of the Birds and Habitats Regulations, was not recorded on the site.

Japanese Knotweed (*Fallopia japonica*) is an alien invasive species listed under *schedule 3 of Regulations SI No. 355/2015*. IPS's report concludes that it is not present on this site and there was no indication that it is growing in the immediate vicinity.

3.3.4 Asbestos

An asbestos refurbishment/demolition survey was undertaken by Phoenix Environmental Safety Ltd, in September 2019. The scope of the asbestos survey was confined to all accessible areas in three of the residential homes 'Marian Villas', 'Dalwhinnie' and 'Annaghkeen'. Prior to demolition of the remaining buildings, similar surveys will be undertaken.

During the asbestos survey of the Berwick Pines Site, the following ACMs were detected in multiple locations including but not limited to Cement slates, roofing felt, thermal insulation, bitumen adhesive and a toilet cistern.

Removal of asbestos or ACMs will be carried out by a suitably qualified contractor and ACM's will only be removed from site by a suitably permitted/licenced waste contractor. in accordance with *S.I. No. 386 of 2006 Safety, Health and Welfare at Work (Exposure to*

Asbestos) Regulations 2006-2010. All material will be taken to a suitably licensed or permitted facility.

3.3.5 Other known Hazardous Substances

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

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

3.4 Main Construction and Demolition Waste Categories

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

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

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

** individual waste type may contain hazardous substances*

4.0 WASTE MANAGEMENT

4.1 Demolition Waste Generation

The demolition stage will involve the demolition of multiple brick buildings onsite. The demolition areas are identified in the planning drawings provided with this application. The anticipated demolition waste and rates of reuse, recycling/recovery and disposal is shown in Table 4.1 below.

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

Waste Type	Tonnes	Reuse		Recycle/Recovery		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Glass	130.5	0	0.0	85	111.0	15	19.6
Concrete, Bricks, Tiles, Ceramics	739.8	30	221.9	65	480.8	5	37.0
Plasterboard	58.0	30	17.4	60	34.8	10	5.8
Asphalts	14.5	0	0.0	25	3.6	75	10.9
Metals	217.6	5	10.9	80	174.1	15	32.6
Slate	116.0	0	0.0	85	98.6	15	17.4
Timber	174.1	10	17.4	60	104.4	30	52.2
Asbestos	1.0	0	0.0	0	0.0	100	1.0
Total	**1451.5**		**267.6**		**1007.4**		**176.5**

4.2 Construction Waste Generation

Table 4.1 below shows the breakdown of C&D waste types produced on a typical site based on data from the EPA *National Waste Reports* [16] *and the joint EPA & GMIT study* [15], along with other research reports.

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

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

Table 4.3 below shows the estimated construction waste generation for the development based on the gross floor area of construction and other information available to date, along with indicative targets for management of the waste streams. The estimated waste amounts for the main waste types (with the exception of soils and stones) are based on an average large-scale development waste generation rate per m^2, using the waste breakdown rates shown in Table 4.2. These have been calculated from the schedule of development areas provided by the architect.

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

Waste Type	Tonnes	Reuse		Recycle/Recovery		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Mixed C&D	1125.7	10	112.6	80	900.6	10	112.6
Timber	955.1	40	382.1	55	525.3	5	47.8
Plasterboard	341.1	30	102.3	60	204.7	10	34.1
Metals	272.9	5	13.6	90	245.6	5	13.6
Concrete	204.7	30	61.4	65	133.0	5	10.2
Other	511.7	20	102.3	60	307.0	20	102.3
Total	**3411.2**		**774.3**		**2316.2**		**320.6**

In addition to the information in Table 4.3, there will be c. 34,632 m^3 soil, stones, clay, made ground and rock excavated to facilitate construction of new foundations, underground services, and the installation of the proposed basement. Any suitable excavated material will be temporarily stockpiled for reuse as fill or in landscaping, where possible, but reuse on site is expected to be limited and the majority of excavated material is expected to be removed offsite for appropriate reuse, recovery and/or disposal.

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

4.3 Proposed Waste Management Options

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

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

During construction some of the sub-contractors on site will generate waste in relatively low quantities. The transportation of non-hazardous waste by persons who are not directly involved with the waste business, at weights less than or equal to 2 tonnes, and in vehicles not designed for the carriage of waste, are exempt from the requirement to have a waste collection permit (Ref. Article 30 (1) (b) of the Waste Collection Permit Regulations 2007

as amended). Any sub-contractors engaged that do not generate more than 2 tonnes of waste at any one time can transport this waste offsite in their work vehicles (which are not designed for the carriage of waste). However, they are required to ensure that the receiving facility has the appropriate COR / permit / licence.

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

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

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

Soil, Stone, Gravel, Clay, Made Ground and Rock

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

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

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

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

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

Bedrock

Any excavated rock is expected to be removed offsite for appropriate reuse, recovery and/or disposal. If bedrock is to be crushed onsite the appropriate mobile waste facility permit will be obtained from DLRCC.

Silt & Sludge

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

Concrete Blocks, Bricks, Tiles & Ceramics

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

Hard Plastic

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

Timber

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

Metal

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

Plasterboard

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

Glass

Glass materials will be segregated for recycling, where possible.

Waste Electrical and Electronic Equipment (WEEE)

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

Other Recyclables

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

Non-Recyclable Waste

C&D waste which is not suitable for reuse or recovery, such as polystyrene, some plastics and some cardboards, will be placed in separate skips or other receptacles. Prior to removal from site, the non-recyclable waste skip/receptacle will be examined by a member of the waste team (see Section 7.0) to determine if recyclable materials have been placed in there by mistake. If this is the case, efforts will be made to determine the cause of the waste not being segregated correctly and recyclable waste will be removed and placed into the appropriate receptacle.

Asbestos Containing Materials

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

Other Hazardous Wastes

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

Onsite Crushing

It is currently not envisaged that the crushing of waste materials will occur onsite, however if the crushing of material is to be undertaken a waste facility permit will first be obtained from DLRCC and the destination of the excepting waste facility will be supplied to the DLRCC waste unit.

4.4 Tracking and Documentation Procedures for Off-Site Waste

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

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

If the waste is being transported to another site, a copy of the Local Authority waste COR/permit or EPA Waste/IE Licence for that site will be provided to the nominated project

waste manager (see Section 7.0). If the waste is being shipped abroad, a copy of the Transfrontier Shipping (TFS) notification document will be obtained from DCC (as the relevant authority on behalf of all local authorities in Ireland) and kept on-site along with details of the final destination (COR, permits, licences etc.). A receipt from the final destination of the material will be kept as part of the on-site waste management records.

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

5.0 ESTIMATED COST OF WASTE MANAGEMENT

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

5.1 Reuse

By reusing materials on site, there will be a reduction in the transport and recycle/recovery/disposal costs associated with the requirement for a waste contractor to take the material off-site.

Clean and inert soils, gravel, stones etc. which cannot be reused on site may be used as access roads or capping material for landfill sites etc. This material is often taken free of charge or a reduced fee for such purposes, reducing final waste disposal costs.

5.2 Recycling

Salvageable metals will earn a rebate which can be offset against the costs of collection and transportation of the skips.

Clean uncontaminated cardboard and certain hard plastics can also be recycled. Waste contractors will charge considerably less to take segregated wastes, such as recyclable waste, from a site than mixed waste.

Timber can be recycled as chipboard. Again, waste contractors will charge considerably less to take segregated wastes such as timber from a site than mixed waste.

5.3 Disposal

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

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

6.0 DEMOLITION PROCEDURES

The demolition stage will involve the demolition of multiple brick style buildings onsite. The demolition areas are identified in the planning drawings. A formal demolition plan including safety procedures will be prepared by the demolition contractor; however, in general, the following sequence of works should be followed during the demolition stage.

Check for Hazards

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

Removal of Components

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

Removal of Roofing

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

Excavation of Services, Demolition of Walls and Concrete

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

7.0 TRAINING PROVISIONS

A member of the construction team will be appointed as the project waste manager to ensure commitment, operational efficiency and accountability during the C&D phases of the project.

7.1 Waste Manager Training and Responsibilities

The nominated waste manager will be given responsibility and authority to select a waste team if required, i.e. members of the site crew that will aid them in the organisation, operation and recording of the waste management system implemented on site. The waste manager will have overall responsibility to oversee, record and provide feedback to the client on everyday waste management at the site. Authority will be given to the waste manager to delegate responsibility to sub-contractors, where necessary, and to coordinate with suppliers, service providers and sub-contractors to prioritise waste prevention and material salvage.

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

7.2 Site Crew Training

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

This basic course will describe the materials to be segregated, the storage methods and the location of the Waste Storage Areas (WSAs). A sub-section on hazardous wastes will be incorporated into the training program and the particular dangers of each hazardous waste will be explained.

8.0 RECORD KEEPING

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

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

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

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

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

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

Waste receipts from the receiving waste facility will also be obtained by the site contractor(s) and retained.

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

9.0 OUTLINE WASTE AUDIT PROCEDURE

9.1 Responsibility for Waste Audit

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

9.2 Review of Records and Identification of Corrective Actions

A review of all waste management costs and the records for the waste generated and transported off-site should be undertaken mid-way through the project.

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

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

10.0 CONSULTATION WITH RELEVANT BODIES

10.1 Local Authority

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

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

10.2 Recycling/Salvage Companies

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

11.0 REFERENCES

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

11. Dún Laoghaire–Rathdown County Council (DLRCC), Dún Laoghaire–Rathdown County Council Development Plan 2016-2022 (2016)

12. Planning and Development Act 2000 (S.I. No. 30 of 2000) as amended

13. DLRCC, Guidance Notes for Environmental Management of Construction Projects (2020)

14. EPA, *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* (2015)

15. Council Decision 2003/33/EC, establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC.

16. Environmental Protection Agency (EPA), *National Waste Database Reports 1998 – 2012*.

17. EPA and Galway-Mayo Institute of Technology (GMIT), *EPA Research Report 146 – A Review of Design and Construction Waste Management Practices in Selected Case Studies – Lessons Learned* (2015).

Appendix 15.2 – Operational Waste Management Plan

OPERATIONAL WASTE MANAGEMENT PLAN FOR A PROPOSED SHD RESIDENTIAL DEVELOPMENT

'ST. JOSEPH'S HOUSE AND ADJOINING PROPERTIES'

Appendix 15.2

Report Prepared For

Homeland Silverpines Limited

Report Prepared By

Chonaill Bradley
Senior Environmental Consultant

Our Reference

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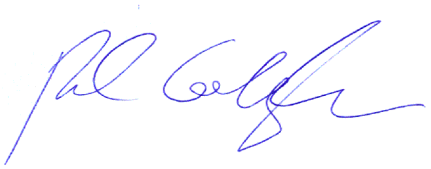
Signature		
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Date	23 September 2021	23 September 2021

CONTENTS

1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Operational Waste Management Plan (OWMP) on behalf of Homeland Silverpines Limited. The proposed development relates to a site at Leopardstown Road, Dublin 18 & St Joseph's House (a Protected Structure) & adjoining lands, Brewery Road, Stillorgan, Co Dublin and will involve the demolition of the existing structures on site, with the exception of St Jospeh's House which will be renovated, along with the construction of a new residential development consisting of residential unities, creche, café amenities, car and bicycle parking and all hard and soft landscaping.

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 current legal and industry standards including, the *Waste Management Act 1996 – 2011* as amended and associated Regulations [1], *Protection of the Environment Act 2003* as amended [2], *Litter Pollution Act 2003* 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 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 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 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 Irelands 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 government released 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] was prepared in response to the 'European Green Deal' which sets a roadmap for a transition to a new economy, where climate and environmental challenges are turned into opportunities. Replacing the previous national waste management plan "A Resource Opportunity (2012)".

It aims to fulfil the commitment in the Programme for Government to publish and start implementing a new National Waste Action Plan. It is intended that this new national waste policy will inform and give direction to waste planning and management in Ireland over the coming years. It will be followed later this year by an All of Government Circular Economy Strategy. The policy document shifts focus away from waste disposal and moves it back up the production chain. To support the policy, regulation is already being used (Circular Economy Legislative Package) or in the pipeline (Single Use Plastics Directive). The policy document contains over 200 measures across various waste areas including Circular Economy, Municipal Waste, Consumer Protection & Citizen Engagement, Plastics and Packaging, Construction and Demolition, Textiles, Green Public Procurement and Waste Enforcement.

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

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 2018 National Waste Statistics, which is the most recent study published, along with national waste statistics web resource (August 2020) reported the following key statistics for 2018:

- **Generated –** Ireland produced 2,912,353 t of municipal waste in 2018, this is almost a five percent increase since 2017. This means that each person living in Ireland generated 600kg of municipal waste in 2018;
- **Managed –** Waste collected and treated by the waste industry. In 2018, a total of 2,865,207 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 47,546 t was unmanaged in 2018;
- **Recovered –** the amount of waste recycled, used as a fuel in incinerators, or used to cover landfilled waste. In 2018, around 85% of municipal waste was recovered, this is an increase from 77% in 2017;
- **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 2018 was 38%, which is down from 41% in 2017; and

- **Disposed –** Less than a quarter (15%) of municipal waste was landfilled in 2018, this is a decrease from 23% in 2017.

2.2 Regional Level

The proposed 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.

The regional plan sets out the following strategic targets for waste management in the region that are relevant to the proposed 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* [13] 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 proposed 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 Protection of the Environment Act 2003 (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"*.

2.3 Legislative Requirements

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

- Waste Management Act 1996 (No. 10 of 1996) as amended 2001 (No. 36 of 2001), 2003 (No. 27 of 2003) and 2011 (No 20 of 2011). Sub-ordinate and associated legislation includes:
  - European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011) as amended
  - Waste Management (Collection Permit) Regulations 2007 (S.I. No. 820 of 2007) as amended
  - Waste Management (Facility Permit and Registration) Regulation 2007 (S.I No. 821 of 2007) as amended
  - Waste Management (Licensing) Regulations 2000 (S.I No. 185 of 2000) as amended
  - European Union (Packaging) Regulations 2014 (S.I. No. 282 of 2014) as amended.
  - Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997) as amended
  - Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015)
  - European Communities (Waste Electrical and Electronic Equipment) Regulations 2014 (S.I. No. 149 of 2014)
  - Waste Management (Batteries and Accumulators) Regulations 2014 (S.I. No. 283 of 2014) as amended
  - Waste Management (Food Waste) Regulations 2009 (S.I. No. 508 of 2009) as amended
  - European Union (Household Food Waste and Bio-waste) Regulations 2015 (S.I. No. 191 of 2015)
  - Waste Management (Hazardous Waste) Regulations 1998 (S.I. No. 163 of 1998) as amended
  - Waste Management (Shipments of Waste) Regulations 2007 (S.I. No. 419 of 2007) as amended
  - *European Communities (Transfrontier Shipment of Waste) Regulations 1994 (SI 121 of 1994)*
  - European Union (Properties of Waste Which Render it Hazardous) Regulations 2015 (S.I. No. 233 of 2015) as amended
- Environmental Protection Act 1992 (S.I. No. 7 of 1992) as amended;
- Litter Pollution Act 1997 (Act No. 12 of 1997) as amended and
- Planning and Development Act 2000 (S.I. No. 30 of 2000) as amended [14]

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 - 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 facility 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 contactor 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 bought 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 proposed 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 arisings.

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 that 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 for the 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 Ballyogan Recycling Centre, is located approximately 2.00km to the south west, which can be utilised by the residents of the development for other household waste streams. The closet bottle bank is located on Arkle road, Sandyford c. 500m to the north west.

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 development will consist of a new residential and mixed use scheme to include apartments, residential amenity space, a café and a childcare facility as follows:

- The demolition of 10 no. properties and associated outbuildings at ‘Madona House’ (single storey), 'Woodleigh' (2 storeys), 'Cloonagh' (2 storeys), 'Souk El Raab (2 storeys), 'Welbrook' (2 storeys), 'Calador' (2 storeys), 'Alhambra' (2 storeys), ‘Dalwhinnie’ (2 storeys), ‘Annaghkeen’ (2 storeys) and 'The Crossing' (single storey) (combined demolition approx. 2,291.3 sq m GFA)

- The refurbishment, separation and material change of use of Saint Joseph’s House (a Protected Structure, RPS No. 1548) from residential care facility to residential use and a childcare facility; and the construction of a new build element to provide for an overall total of 463 no. residential units, residential amenity space and a café as follows:

    - Block A (5 storeys) comprising 49 no. apartments (13 no. 1 bed units, 33 no. 2 bed units and 3 no. 3 bed units);

    - Block B (4 - 7 storeys) comprising 88 no. apartments (28 no. 1 bed units, 57 no. 2 bed units and 3 no. 3 bed units);

    - Block C (5 - 7 storeys) comprising 115 no. apartments (26 no. studio units, 26 no. 1 bed units and 57 no. 2 bed units and 6 no. 3 bed units);

    - Block D (5 - 10 storeys) comprising 157 no. apartments (36 no. studio unit, 40 no. 1 bed units and 81 no. 2 bed units), residential amenity areas of approx. 636 sq m and a café of approx. 49 sq m;

    - Block E (St. Joseph's House) (2 storeys) comprising 9 no. apartments (8 no. 2 bed units and 1 no. 3 bed units) and a childcare facility of 282 sq m with associated outdoor play areas of approx. 130 sq m;

    - Block F (3 - 6 storeys) comprising 45 no. apartments (23 no. studio units, 10 no. 1 bed units; and 12 no. 2 bed units);

- Open Space (approx. 9,885 sq m)

- 259 no. car parking spaces (232 no. at basement level and 27 no. at surface level)
- 968 no. bicycle spaces (816 no. at basement level and 152 no. at surface level)
- 10 no. motorcycle spaces (all at basement level)
- Vehicular Access
- Basement Areas
- Substations and Switch Rooms
- All associated site development works.

3.2 European Waste Codes

In 1994, the *European Waste Catalogue* [15] and *Hazardous Waste List* [16] were published by the European Commission. In 2002, the EPA published a document titled the *European Waste Catalogue and Hazardous Waste List* [17], 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'* [18] 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 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
Bulky Wastes	20 03 07

** Individual waste type may contain hazardous materials*

4.0 ESTIMATED WASTE ARISINGS

A waste generation model (WGM) developed by AWN, has been used to predict waste types, weights and volumes arising 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 waste estimates for the creche and café units have been calculated based on floor usage per m^2

The estimated waste generation for the proposed development for the main waste types is presented in Table 4.1.

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

Waste type	Waste Volume (m^3/week)			
	Residential Block A (Shared)	Residential Block B (Shared)	Residential Block C (Shared)	Residential Block D (Shared)
Organic Waste	0.76	1.34	1.69	2.27
DMR	5.42	9.53	11.95	16.07
Glass	0.15	0.26	0.33	0.44
MNR	2.85	5.01	6.28	8.45
Total	**9.18**	**16.14**	**20.24**	**27.23**

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

Waste type	Waste Volume (m^3/week)			
	Residential Block E (Shared)	Residential Block F (Shared)	Creche Unit	Café Unit
Organic Waste	0.15	0.59	0.03	0.04
DMR	1.09	4.20	1.10	0.10
Glass	0.03	0.11	0.00	0.01
MNR	0.57	2.21	0.49	0.13
Total	**1.84**	**7.11**	**1.62**	**0.28**

The DLR Pre-Planning Waste Management Form recommends calculating residential waste using Section 4.7 of *BS5906:2005 Waste Management in Buildings – Code of Practice* [19]*.* The predicted total waste generated from the residential units based on the Code of Practice is c. 65.62m^3 per week for the residential units. Whereas the AWN waste generation model estimates c. 81.75m^3 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 arisings from the development.

It is anticipated that the conservative estimation of waste quantities from the residents will be sufficient to cover the small quantities likely to be generated in any community facilities on a weekly basis.

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 proposed 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 Large Residential and Commercial Developments (2020);
- DLRCC, 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 (Section 4.8-4.9) (2020) [20].

Seven dedicated communal Waste Storage Areas (WSA) have been allocated within the development design for the residents of the apartments and the residential facilities. The WSAs have been supplied on basement and ground level for use by the residents. The creche will have its own WSA allocated externally next to Block E, while the café has its own WSA allocated within its unit.

All locations of the waste storage areas can be viewed in the drawings submitted with the planning application.

Facilities management will supply all 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.

It is anticipated that DMR, MNR, glass and organic waste will be collected on a weekly basis.

Using the estimated waste generation volumes in Table 4.1, 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.

Table 5.1 Waste storage requirements for the proposed development

Area/Use	Bins Required			
	MNR*	DMR**	Organic	Glass
Residential Block A (Shared)	3 x 1100L	5 x 1100L	4 x 240L	1 x 240L
Residential Block B (Shared)	5 x 1100L	9 x 1100L	6 x 240L	2 x 240L
Residential Block C (Shared)	6 x 1100L	11 x 1100L	7 x 240L	2 x 240L
Residential Block D (Shared)	8 x 1100L	15 x 1100L	10 x 240L	2 x 240L
Residential Block E (Shared)	1 x 1100L	1 x 1100L	1 x 240L	1 x 240L
Residential Block F (Shared)	2 x 1100L	4 x 1100L	3 x 240L	1 x 240L
Creche Unit	1 x 240L	1 x 240L	1 x 120L	1 x 120L or Glass Bag
Café Unit	1 x 240L	1 x 240L	1 x 120L	1 x 120L or Glass Bag

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 5.1. All waste receptacles used will comply with the IS EN 840 2012 standard 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 5.1 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:

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

Dedicated communal Waste Storage Areas (WSA) have been allocated within the development design for the residents of the apartments. The WSAs have been supplied on basement and ground level for use by the residents.

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, 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 – Creche

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

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

As required, the staff will need to store segregated DMR, MNR, glass and organic waste within their own external WSA adjacent to Block E.

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.

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 tenants. 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.

5.3 Waste Storage – Café Unit

Staff of the cafe unit will be required to segregate their waste into the following waste categories within their own units:

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

As required, the staff will need to store segregated DMR, MNR, glass and organic waste within their own WSA within their unit.

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.

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 tenants. Tenants will be required to identify suitable temporary storage areas for these waste items within their unit 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 DLRCC 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/permitted/licensed facilities only.

All waste from the basement WSAs requiring collection by the appointed waste contractor will be transferred from the WSAs by personnel nominated by facilities management company (or waste contractor, depending on arrangement) to the temporary collection point, located at the top of the basement ramp. The bins from the ground level WSAs for block E and the creche will be collected from their respective WSA directly, by the waste contractor for collection. The location of the temporary storage/collection points can be viewed on the drawings submitted with the planning application. Waste trucks will enter the development to collect waste from the temporary collection points.

Following collection, bins will promptly be returned to the WSAs by personnel nominated by the facilities management company (or waste contractor, depending on arrangement).

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 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 Waste Management 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 creche tenant 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 permited/licenced contractor. Facilties management may arrange collection depending on the agreement.

Waste Electrical and Electronic Equipment (WEEE)

The *WEEE 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 creche tenant 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 permited/licenced contractor. Facilties management may arrange collection depending on the agreement.

Printer Cartridge/Toners

It is recommended that a printer cartridge/toner bin is provided in the creche unit, where appropriate. The creche tenant tenants 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 (solvents, paints, adhesives, resins, detergents etc)
Chemicals (such as solvents, paints 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 creche unit, that is classed as hazardous (if they arise) will be appropriately stored within the tenants own space. Facilties 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 will be brought to a civic amenity centre.

Light Bulbs (Fluorescent Tubes, Long Life, LED and Lilament bulbs)
Waste light bulbs may be generated by lighting at the creche tenant's unit. It is anticipated that creche tenant will be responsible for the off-site removal and appropriate recovery/disposal of these wastes. Facilties management may arrange collection depending on the agreement.

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

Textiles
Where possible, waste textiles will be recycled or donated to a charity organisation for reuse.

Waste Cooking Oil
If the creche tenant 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.

Furniture (and other bulky wastes)
Furniture and other bulky waste items (such as carpet etc.) may occasionally be generated by the creche 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 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 will be donated to charity if they arise.

Covid-19 Waste

Any waste generated by residential and creche tenant that have tested positive for Covid-19 will be manged 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 development is open and occupied and the relevant guidance at the time will need to be reviewed.

5.6 Waste Storage Area Design

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

- Waste Storage areas will not present any safety risks to users;
- 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;
- Have access to suitable power supply for power washers, if required;
- 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 monitored by CCTV.

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 waste generated by apartment residents and creche tenant is managed to ensure correct storage prior to collection by an appropriately permitted waste management company.

Facilities Management will 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 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 The DLRCC Guidance Notes for Waste Management Planning, the *DLRCC Waste Bye-Laws* and DLRCC Guidance Notes for Waste Management in Large Residential and Commercial Developments.

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 (S.I. No. 10 of 1996) as amended 2001 (S.I. No. 36 of 2001), 2003 (S.I. No. 27 of 2003) and 2011 (S.I. No. 20 of 2011). Sub-ordinate and associated legislation includes:
    - European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011) as amended
    - Waste Management (Collection Permit) Regulations 2007 (S.I. No. 820 of 2007) as amended
    - Waste Management (Facility Permit and Registration) Regulations 2007 (S.I No. 821 of 2007) as amended
    - Waste Management (Licensing) Regulations 2000 (S.I No. 185 of 2000) as amended
    - European Union (Packaging) Regulations 2014 (S.I. No. 282 of 2014)
    - Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997)
    - Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015)
    - European Communities (Waste Electrical and Electronic Equipment) Regulations 2014 (S.I. No. 149 of 2014)
    - Waste Management (Batteries and Accumulators) Regulations 2014 (S.I. No. 283 of 2014) as amended
    - Waste Management (Food Waste) Regulations 2009 (S.I. No. 508 of 2009) as amended 2015 (S.I. No. 190 of 2015)
    - European Union (Household Food Waste and Bio-waste) Regulations 2015 (S.I. No. 430 of 2015)
    - Waste Management (Hazardous Waste) Regulations 1998 (S.I. No. 163 of 1998) as amended 2000 (S.I. No. 73 of 2000)
    - Waste Management (Shipments of Waste) Regulations 2007 (S.I. No. 419 of 2007) as amended
    - *European Communities (Transfrontier Shipment of Waste) Regulations 1994 (SI 121 of 1994)*
    - European Union (Properties of Waste which Render it Hazardous) Regulations 2015 (S.I. No. 233 of 2015) as amended.
2. Environmental Protection Act 1992 (Act No. 7 of 1992) as amended;
3. 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).
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7. Departmnt 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 (DCCAE), *Waste Action Plan for the Circular Economy - Ireland's National Waste Policy 2020-2025* (2020).
11. Environmental Protection Agency (EPA), *National Waste Database Reports 1998 – 2012*.
12. DLRCC, *Dún Laoghaire Rathdown County Council Development Plan 2016 – 2022.*
13. 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).
14. European Waste Catalogue - Council Decision 94/3/EC (as per Council Directive 75/442/EC).

15. Hazardous Waste List - Council Decision 94/904/EC (as per Council Directive 91/689/EEC).
16. EPA, *European Waste Catalogue and Hazardous Waste List* (2002)
17. EPA, *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* (2015)
18. BS 5906:2005 Waste Management in Buildings – Code of Practice.
19. DoHLGH, Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020).