

OPERATIONAL WASTE MANAGEMENT PLAN FOR A PROPOSED MIXED-USE DEVELOPMENT

**BROOMHILL ROAD,
TALLAGHT, DUBLIN 24**

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

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

Report Prepared For

Garyaron Homes

Report Prepared By


Chonail Bradley
Principal Environmental Consultant

Our Reference

CB/21/12290WMR02

Date of Issue

11 May 2022

A large, decorative swoosh in shades of green and yellow, located in the bottom left corner of the page.

Cork Office



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

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

Document History

Document Reference		Original Issue Date	
CB/21/12290WMR02		11 May 2022	
Revision Level	Revision Date	Description	Sections Affected

Record of Approval

Details	Written by	Approved by
Signature		
Name	Chonaiil Bradley	Fergal Callaghan
Title	Senior Environmental Consultant	Director
Date	11 May 2022	11 May 2022

CONTENTS	Page
1.0 INTRODUCTION	4
2.0 OVERVIEW OF WASTE MANAGEMENT IN IRELAND	4
2.1 National Level	4
2.2 Regional Level	6
2.3 Legislative Requirements	7
2.3.1 South Dublin County Council Waste Management Bye-Laws	8
2.4 Regional Waste Management Service Providers and Facilities	9
3.0 DESCRIPTION OF THE PROJECT	10
3.1 Location, Size and Scale of the Development	10
3.2 Typical Waste Categories	10
3.3 European Waste Codes	11
4.0 ESTIMATED WASTE ARISING	12
5.0 WASTE STORAGE AND COLLECTION	13
5.1 Waste Storage – Residential Units	14
5.2 Waste Collection	17
5.3 Additional Waste Materials	17
5.4 Waste Storage Area Design	19
6.0 CONCLUSIONS	20
7.0 REFERENCES	21

1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Operational Waste Management Plan (OWMP) on behalf of Garyaron Homes. The proposed development will consist of: (a) the demolition (total area approx. 4,319.9 sqm) of the existing buildings on site and the existing front boundary treatment; and (b) the construction of a new residential and mixed-use scheme of 242 no. apartment units in 5 no. blocks (Blocks A to E) ranging from 4 to 7 storeys in height.

This OWMP has been prepared to ensure that the management of waste during the operational phase of the proposed development is undertaken in accordance with the current legal and industry standards including, the *Waste Management Act 1996* as amended and associated Regulations¹, *Environmental Protection Agency Act 1992* as amended², *Litter Pollution Act 1997* as amended³, the '*Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021*'⁴ and South Dublin County Council (SDCC) *County of South Dublin (Segregation, Storage and Presentation of Household and Commercial Waste) Bye-laws (2018)*⁵. In particular, this OWMP aims to provide a robust strategy for the storage, handling, collection and transport of the wastes generated at site.

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

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

2.0 OVERVIEW OF WASTE MANAGEMENT IN IRELAND

2.1 National Level

The Irish Government issued a policy statement in September 1998 titled as '*Changing Our Ways*'⁷ which identified objectives for the prevention, minimisation, reuse, recycling, recovery and disposal of waste in Ireland. A heavy emphasis was placed on reducing reliance on landfill and finding alternative methods for managing waste. Amongst other things, *Changing Our Ways* stated a target of at least 35% recycling of municipal (i.e. household, commercial and non-process industrial) waste.

A further policy document '*Preventing and Recycling Waste – Delivering Change*' was published in 2002⁸. This document proposed a number of programmes to increase recycling of waste and allow diversion from landfill. The need for waste minimisation at source was considered a priority.

This view was also supported by a review of sustainable development policy in Ireland and achievements to date, which was conducted in 2002, entitled '*Making Ireland's Development Sustainable – Review, Assessment and Future Action*'⁹. This document also stressed the need to break the link between economic growth and waste generation, again through waste minimisation and reuse of discarded material.

In order to establish the progress of the Government policy document *Changing Our Ways*, a review document was published in April 2004 entitled '*Taking Stock and Moving Forward*'¹⁰. Covering the period 1998 – 2003, the aim of this document was to assess progress to date with regard to waste management in Ireland, to consider

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

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

In September 2020, the Irish Government published a new policy document outlining a new action plan for Ireland to cover the period of 2020-2025. This plan 'A Waste Action Plan for a Circular Economy'¹¹ (WAPCE), was prepared in response to the 'European Green Deal' which sets a roadmap for a transition to a new economy, where climate and environmental challenges are turned into opportunities, replacing the previous national waste management plan "A Resource Opportunity" (2012).

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

The policy document contains over 200 measures across various waste areas including circular economy, municipal waste, consumer protection and citizen engagement, plastics and packaging, construction and demolition, textiles, green public procurement and waste enforcement.

One of the first actions to be taken was the development of the Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less' (2021)¹² to set a course for Ireland to transition across all sectors and at all levels of Government toward circularity and was issued in December 2021. It is anticipated that the Strategy will be updated in full every 18 months to 2 years.

Since 1998, the Environmental Protection Agency (EPA) has produced periodic 'National Waste (Database) Reports'¹³ detailing, among other things, estimates for household and commercial (municipal) waste generation in Ireland and the level of recycling, recovery and disposal of these materials. The 2019 *National Waste Statistics*, which is the most recent study published, along with the national waste statistics web resource (November 2021) reported the following key statistics for 2019:

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

2.2 Regional Level

The proposed development is located in the Local Authority area of South Dublin County Council (SDCC).

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

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

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

Municipal landfill charges in Ireland are based on the weight of waste disposed. In the Leinster Region, charges are approximately €130 - €150 per tonne of waste which includes a €75 per tonne landfill levy specified in the *Waste Management (Landfill Levy) Regulations 2015*.

The *South Dublin County Council Development Plan 2016 – 2022*¹³ sets out a number of objectives and actions for the South Dublin area in line with the objectives of the waste management plan.

Waste objectives and actions with a particular relevance to the proposed development are as follows:

Objectives:

- **IE5 Objective 1:** To support the implementation of the Eastern–Midlands Region Waste Management Plan 2015-2021 by adhering to overarching performance targets, policies and policy actions.
- **IE5 Objective 2:** To support waste prevention through behavioural change activities to de-couple economic growth and resource use.
- **IE5 Objective 3:** To encourage the transition from a waste management economy to a green circular economy to enhance employment and increase the value recovery and recirculation of resources.
- **IE5 Objective 8:** To secure appropriate provision for the sustainable management of waste within developments, including the provision of facilities for the storage, separation and collection of such waste.

Actions:

- Support and facilitate the separation of waste at source into organic and non-organic streams or other waste management systems that divert waste from landfill and maximise the potential for each waste type to be re-used and recycled or composted and divert organic waste from landfill, in accordance with the National Strategy on Biodegradable Waste (2006).
- Implement the objectives of the National Waste Prevention Programme at a local level with businesses, schools, householders, community groups and within the Council's own activities.
- Promote an increase in the amount of waste re-used and recycled consistent with the Regional Waste Management Plan and Waste Hierarchy and facilitate

recycling of waste through adequate provision of facilities and good design in new developments.

- Implement the South Dublin Litter Management Plan 2015 - 2019.

The *Draft South Dublin County Development Plan 2022 – 2028*¹⁴ will supersede the current development plan and is due to be complete and come into effect in August 2022. The following policy and objectives have thus far been incorporated into the draft plan:

Policy and Objectives

Policy IE6: Waste Management

Implement European Union, National and Regional waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes.

- **IE6 Objective 1**
To encourage a just transition from a waste management economy to a green circular economy to enhance employment and increase the value, recovery and recirculation of resources through compliance with the provisions of the Waste Action Plan for a Circular Economy 2020 – 2025 and to promote the use of, but not limited to, reverse vending machines and deposit return schemes or similar to ensure a wider and varying ways of recycling.
- **IE6 Objective 2**
To support the implementation of the Eastern Midlands Region Waste Management Plan 2015-2021 or as amended by adhering to overarching performance targets, policies and policy actions.
- **IE6 Objective 4**
To provide for and maintain the network of bring infrastructure (e.g. civic amenity facilities, bring banks) in the County to facilitate the recycling and recovery of hazardous and non-hazardous municipal wastes.
- **IE6 Objective 7**
To require the appropriate provision for the sustainable management of waste within all developments, ensuring it is suitably designed into the development, including the provision of facilities for the storage, separation and collection of such waste.
- **IE6 Objective 8**
To adhere to the recommendations of the National Hazardous Waste Management Plan 2014-2020 and any subsequent plan, and to co-operate with other agencies including the EPA in the planning, organisation and supervision of the disposal of hazardous waste streams, including hazardous waste identified during construction and demolition projects.

Policy Objective EI14: Hazardous Waste

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

2.3 Legislative Requirements

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

- Waste Management Act 1996 (No. 10 of 1996) 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 facilities management company(s) undertake on-site management of waste in accordance with all legal requirements and employ suitably permitted/licenced contractors to undertake off-site management of their waste in accordance with all legal requirements. This includes the requirement that a waste contractor handle, transport and reuse/recover/recycle/dispose of waste in a manner that ensures that no adverse environmental impacts occur as a result of any of these activities.

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

2.3.1 South Dublin County Council Waste Management Bye-Laws

The SDCC “*County of South Dublin (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2018)*” came into effect in December 2018. These Bye-laws repeal the previous SDCC bye-laws; *South Dublin County Council Household Waste Bye-Laws 2012* and *South Dublin County Council (Storage, Separation at Source, Presentation and Collection of Commercial Waste) Bye-Laws 2007*. The Bye-Laws set a number of enforceable requirements on waste holders and collectors with regard to storage, separation, presentation and collection of waste within the SDCC functional area. Key requirements under these Bye-laws are:

- Kerbside waste presented for collection shall not be presented for collection earlier than 8.00pm 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 8:00am on the day following the designated waste collection day;
- Neither recyclable household kerbside waste nor food waste arising from households shall be contaminated with any other type of waste before or after it has been segregated; and
- 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:

- separate receptacles of adequate size and number are provided for the proper segregation, storage and collection of recyclable household kerbside waste and residual household kerbside waste;
- additional receptacles are provided for the segregation, storage and collection of food waste where this practice is a requirement of the national legislation on food waste;
- the receptacles referred to in paragraphs (a) and (b) are located both within any individual apartment and at the place where waste is stored prior to its collection;
- 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;
- written information is provided to each tenant or other occupier about the arrangements for waste separation, segregation, storage and presentation prior to collection; and
- 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 South Dublin County Council.

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

2.4 Regional Waste Management Service Providers and Facilities

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

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

The Ballymount Recycling Centre (South Dublin County Council), Ballymount Avenue Greenhills, located c. 2.0 km north east of the development site, can be utilised by residents of the proposed development for other household waste streams. This centre can accept mixed dry recyclables, plastic, paints, furniture, electrical items, batteries, wood, textiles, metal and glass. There is also a bring centre located c. 1.0km north east of the development at the Kilnamanagh Family recreation Centre, where glass, textiles and aluminium cans can be deposited.

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

3.0 DESCRIPTION OF THE PROJECT

3.1 Location, Size and Scale of the Development

Garyaron Homes intends to apply to An Bord Pleanála for a 5 year planning permission for a Strategic Housing Development scheme on lands at Broomhill Road, Tallaght, Dublin 24, D24 XA52 and Unit 51, Broomhill Road, Tallaght, Dublin 24, D24E124 on a site of approximately 1.4 ha.

The proposed development will consist of: (a) the demolition (total area approx. 4,319.9 sqm) of the existing buildings on site and the existing front boundary treatment; and (b) the construction of a new residential and mixed use scheme of 242 no. apartment units in 5 no. blocks (Blocks A to E) ranging from 4 to 7 storeys in height as follows:

- Block A (5 storeys) comprising 40 no. apartments (4 no. 1 bed, 31 no. 2 bed and 5 no. 3 bed units)
- Block B and C (7 storeys) comprising 102 no. apartments (45 no. 1 bed and 57 no. 2 bed units)
- Block D (5 - 7 storeys) comprising 36 no. apartments (16 no. 1 bed and 20 no. 2 bed units)
- Block E (4 - 5 storeys) comprising 64 no. apartments (31 no. 1 bed and 33 no. 2 bed units)
- Block D will accommodate a Childcare Facility/creche of approx. 465sqm at ground floor level.

The proposal will also provide for a café of approx. 50.9 sqm at the ground floor of Block C. Residential amenity areas will be provided in the form of a reception of approx. 125.1sqm, resident lounge of approx. 45sqm, a letting office of approx. 11.8sqm, a rentable room/studio space of 39sqm, a public gym of approx. 128.5sqm and a public co-working space of approx. 128.4sqm, all at the ground floor level of Blocks B & C.

Each residential unit will be afforded with private open space in the form of a balcony or terrace. Communal open space of 1,797.4sqm is proposed in the form of 2no. roof top terraces at Blocks D and E, courtyard space at ground level, outdoor seating and planting and pedestrian and cyclist links. Public open space of 1,400sqm is also proposed in the form of outdoor seating, paved areas, a lawn area, play areas and an outdoor seating area to the front of the proposed café at Block C.

A total of 136no. car parking spaces are provided at ground floor level, including 7 no. Accessible spaces at surface level; and 426 no. bicycle spaces (Visitor and Resident in bike stands and secure stacked bike spaces) are proposed.

The development shall be served via a new vehicular access point from Broomhill Road. Upgrade works are proposed to the vehicular access point to facilitate the proposed development and to provide for improved access and egress for the overall development. New pedestrian and cyclist access points will be provided on to Broomhill Road from the site.

The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; boundary treatment; internal roads and footpaths; waste storage areas and electrical services and all associated site development works.

3.2 Typical Waste Categories

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

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

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

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

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

3.3 European Waste Codes

In 1994, the *European Waste Catalogue* 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, COR's, 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
Fluorescent tubes and other mercury containing waste*	20 01 21*
Bulky Wastes	20 03 07

* Individual waste type may contain hazardous materials

4.0 ESTIMATED WASTE ARISING

A waste generation model (WGM) developed by AWN, has been used to predict waste types, weights and volumes 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 ¹⁹ waste generation rates.

Waste estimates for the residential apartments and childcare facility are based upon the predicated occupancy rates. While the floor area usage (m²) has been used to estimate the waste arising from the café unit. Waste generated in residential amenity areas is included in the overall residential waste figures and waste will be stored within the residential WSAs.

The estimated waste generation for the residential units for the main waste types are presented in Tables 4.1 and is based on the Schedule of Areas issued by the project architects (April 2022).

Table 4.1 Estimated waste generation by unit type for the proposed development

Waste Type	Waste Volume (m ³ / week)		
	Residential Waste (Combined)	Childcare Facility (Individual)	Café (Individual)
Organic Waste	3.60	0.05	0.05
DMR	26.35	1.87	0.12
Glass	0.70	0.01	<0.01
MNR	12.54	1.02	0.15
Total	43.18	2.95	0.33

BS5906:2005 Waste Management in Buildings – Code of Practice ²⁰ has been considered in the calculations of waste estimates. AWN's modelling methodology is based on recently published data and data from numerous other similar developments in Ireland and is based on AWN's experience, it provides a more representative estimate of the likely waste arisings from the proposed development.

5.0 WASTE STORAGE AND COLLECTION

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

- *BS 5906:2005 Waste Management in Buildings – Code of Practice*,
- *EMR Waste Management Plan 2015 – 2021*;
- *South Dublin County Council Development Plan 2016 – 2022*;
- *Draft South Dublin County Council Development Plan 2022 – 2028*;
- *SDCC County of South Dublin (Segregation, Storage and Presentation of Household and Commercial Waste) Bye-laws (2018)*; and
- *DoHLGH, Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)* ²¹.

Four no. (4 no.) dedicated waste storage areas (WSA) have been allocated at ground level for use by the residents. These are located in Block A, B/C, D and E. There is one no. (1 no.) commercial WSA allocated for the use of the childcare facility and café, located on the ground floor level of Block D.

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

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 for the development and can be viewed in Table 5.1 below. It is envisaged that MNR, DMR, organic and glass waste will be collected weekly.

Table 5.1 Waste storage requirements for the proposed development

Area/Use	Bins Required			
	MNR ¹	DMR ²	Organic	Glass
Block A (Residential Shared)	3 x 1100L	5 x 1100L	3 x 240L	1 x 240L
Block B/C (Residential Shared)	6 x 1100L	10 x 1100L	7 x 240L	2 x 240L
Block D (Residential Shared)	2 x 1100L	4 x 1100L	3 x 240L	1 x 240L
Block E (Residential Shared)	3 x 1100L	6 x 1100L	4 x 240L	1 x 240L
Commercial (Block D Shared)	1 x 1100L 1 x 240L	2 x 1100L	1 x 120L	1 x 120L

Note: ¹ = Mixed Non-Recyclables

² = Dry Mixed Recyclables

The waste receptacle requirements have been established from distribution of the total weekly waste generation estimate into the holding capacity of each receptacle type.

Waste storage receptacles as per Table 5.1 above (or similar appropriate approved containers) will be provided by the facilities management company in the 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 SIST EN 840-1:2020 and SIST EN 840-2:2020 as the standards for performance requirements of mobile waste containers, where appropriate.



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

Receptacles for organic, mixed dry recyclable, glass and mixed non-recyclable waste will be provided in the WSA's prior to first occupation of the development i.e. prior to the first residential unit being occupied.

This Plan will be provided to each resident from first occupation of the development i.e. once the first residential unit is occupied. This Plan will be supplemented, as required, by the property management company with any new information on waste segregation, storage, reuse and recycling initiatives that are subsequently introduced.

5.1 Waste Storage – Residential Units

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

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

As required, the residents will need to bring these segregated waste materials from their apartments/unit via the lifts to the dedicated waste storage area located on ground level.

Provision will be made in all residential units to accommodate 3 no. bin types to facilitate waste segregation at source. An example of a potential 3 bin storage system is provided in figure 5.3 below.



Figure 5.3 Example three bin storage system to be provided within the unit design

Residential units will be designed to include for sufficient space for the storage of general domestic waste, green recyclable waste, and organic waste. These temporary individual waste storage bins shall be sized to allow for easy manual handling, to be brought to the designated waste storage areas for apartments.

All bins/containers will be clearly labelled (with images and words) and colour coded to avoid cross contamination of the different waste streams. Signage will be posted on or above the bins to show which wastes can be put in each receptacle.

Residents will be informed by the management company where they are required to deposit their waste and fobs/keys for access to their dedicated storage areas will be provided along with a waste management document/strategy for the development.

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

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

Other waste materials such as batteries and WEEE will be generated less frequently. Residents will be required to identify suitable temporary storage areas for these waste items within their units and dispose of them appropriately. Further details on additional waste types can be found in Section 5.5.

5.2 Waste Storage –Childcare Facility (Commercial)

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

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

As required, the staff will need to bring segregated DMR, MNR, glass and organic waste to the shared commercial WSA at ground floor in Block D.

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

Based on the recommended bin requirements in Table 5.2, 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 crèche tenants. childcare facility 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 (Commercial)

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

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

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

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

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

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

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

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

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

Other waste materials such as textiles, batteries, cooking oil, printer toner / cartridges, bulky items, light bulbs and WEEE will be generated less frequently. The tenant will be required to store these waste types within their own unit and arrange collection with an appropriately licensed waste contractor. Facilities management may arrange collection,

depending on the agreement. Further details on additional waste types can be found in Section 5.5.

5.4 Waste Collection

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

On collection days, bins will be collected directly from the WSAs by the waste contractor or facilities management company and moved to the staging areas and then to vehicle for emptying, and immediately returned upon emptying to the WSA.

The two staging areas are located on the western side of the development to the north and south of Block A and can be seen on the drawings submitted with the planning application.

Bins will be returned to the WSAs immediately following collection. The collection area is such that it will not obstruct traffic or pedestrians (allowing a footway path of at least 1.8m, the space needed for two wheelchairs to pass each other) as is recommended in the Design Manual for Urban Roads and Streets (2019) ²².

Residents and tenants will be made aware of the waste collection arrangements and all waste receptacles must be clearly identified as required by waste legislation and the requirements of the SDCC *Waste Bye-Laws*. Waste will be presented for collection in a manner that will not endanger health, create a risk to traffic, harm the environment or create a nuisance through odours or litter.

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

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

Waste Electrical and Electronic Equipment (WEEE)

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

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

Printer Cartridge / Toners

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

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

Chemicals

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

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

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

Light Bulbs

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

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

Textiles

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

Waste Cooking Oil

If the commercial tenants use cooking oil, waste cooking oil will need to be stored within the unit on a bunded area or spill pallet and regular collections by a dedicated waste

contractor will need to be organised as required. Under sink grease traps will be installed in any cooking space.

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

Furniture & Other Bulky Waste Items

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

Abandoned Bicycles

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

Covid-19 Waste

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

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

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

5.6 Waste Storage Area Design

The 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 facilities management company, residents and tenants will be required to maintain WSA and the bins used in good condition in accordance with the requirements of the SDCC *Waste Bye-Laws*.

6.0 CONCLUSIONS

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

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

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

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

7.0 REFERENCES

1. Waste Management Act 1996 as amended.
2. Environmental Protection Agency Act 1992 (Act No. 7 of 1992) as amended.
2. Litter Pollution Act 1997 (Act No. 12 of 1997) as amended.
4. Eastern-Midlands Waste Region, *Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021* (2015).
5. SDCC *County of South Dublin (Segregation, Storage and Presentation of Household and Commercial Waste) Bye-laws* (2018).
6. Department of Environment and Local Government (DoELG) *Waste Management – Changing Our Ways, A Policy Statement* (1998).
7. Department of Environment, Heritage and Local Government (DoEHLG) *Preventing and Recycling Waste - Delivering Change* (2002)
8. DoELG, *Making Ireland's Development Sustainable – Review, Assessment and Future Action (World Summit on Sustainable Development)* (2002)
9. DoEHLG, *Taking Stock and Moving Forward* (2004)
10. Department of Communications, Climate Action and Environment (DCCAE), *Waste Action Plan for the Circular Economy - Ireland's National Waste Policy 2020-2025* (2020).
11. DCCAE, *Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less'* (2021).
12. Environmental Protection Agency (EPA), *National Waste Database Reports 1998 – 2012*.
13. SDCC, *South Dublin County Council Development Plan 2016 – 2022* (2016).
14. SDCC, *Draft South Dublin County Council Development Plan 2016 – 2022* (2021).
15. 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).
16. European Waste Catalogue - Council Decision 94/3/EC (as per Council Directive 75/442/EC).
17. Hazardous Waste List - Council Decision 94/904/EC (as per Council Directive 91/689/EEC).
18. EPA, *European Waste Catalogue and Hazardous Waste List* (2002)
19. EPA, *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* (2015)
20. BS 5906:2005 *Waste Management in Buildings – Code of Practice*.
21. DoHLGH, *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2020).
22. Department of Transport, Tourism and Sport and Department of Housing, Planning and Local Government, *Design Manual for Urban Roads and Streets* (2019).