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**CONSTRUCTION AND
DEMOLITION WASTE
MANAGEMENT PLAN FOR A
PROPOSED RESIDENTIAL
DEVELOPMENT**

AT

**CONDALKIN RFC LANDS,
OLD NAAS ROAD,
KINGSWOOD, DUBLIN 24**

Report Prepared For

**Greenwalk Development Limited, 29 Earlsfort
Terrace, Dublin 2,**

Report Prepared By

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1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Outline Construction and Demolition (C&D) Waste Management Plan (WMP) on behalf of Greenwalk Development Limited, 29 Earlsfort Terrace, Dublin 2, for a proposed residential development). The proposed development will consist of 77 no. dwellings, comprised of 63 no. 2 storey houses, and 14 no. apartments & duplex units accommodated in 1 no. 3 storey building at a site located at Gordon Park, Old Naas Road, Kingswood, Dublin 22.

The purpose of this plan is to provide information necessary to ensure that the management of construction and demolition (C&D) waste at the site is undertaken in accordance with current legal and industry standards including the *Waste Management Acts 1996* as amended 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 C&D waste to be generated by the development and makes recommendations for management of different waste streams. The C&D WMP should be viewed as a live document that will be updated by the site construction contractor as and when changing site conditions require it to do so.

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. 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 strategy was issued for public consultation in April 2021.

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

- Predicted C&D wastes and procedures to prevent, minimise, recycle and reuse wastes;
- Waste disposal/recycling of C&D wastes at the site;
- Provision of training for waste manager and site crew;
- Details of proposed record keeping system;
- Details of waste audit procedures and plan; and
- Details of consultation with relevant bodies i.e. waste recycling companies, South Dublin 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 developments of 10 houses or more; and
- Demolition/renovation/refurbishment projects generating in excess of 100 m³ in volume, of C&D waste.

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

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

2.2 Regional Level

The proposed development is located in the Local Authority area of South Dublin County Council (SDCC). The *Eastern-Midlands Region Waste Management Plan 2015 – 2021* is the regional waste management plan for the SDCC area 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:

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

Municipal landfill charges in Ireland are based on the weight of waste disposed. In the Leinster Region, charges are approximately €130 - €150 per tonne of waste which includes a €75 per tonne landfill levy introduced under the Waste Management (Landfill Levy) (Amendment) Regulations 2013.

The *South Dublin County Council Development Plan 2016 – 2022*¹¹ 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 Councils 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.

With regard to C&D waste specifically the Development Plan requires that the "*Construction and Demolition Waste Management Plan, as a minimum, should include provision for the management of all construction and demolition waste arising on site, and make provision for the re-use of said material and / or the recovery or disposal of this waste to authorised facilities by authorised collectors.*" It also requires that where appropriate, excavated material from development sites should be reused on the subject site.

The *Draft South Dublin County Development Plan 2022 – 2028*¹² will supersede the current development plan and is due to be complete and come into effect in August 2022. The following policy and objectives has 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 3**
To provide for, promote and facilitate high quality sustainable waste recovery and disposal infrastructure/technology in keeping with the EU waste hierarchy and to adequately cater for a growing residential population and business sector.
- **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 5**

To ensure the provision of adequately sized public recycling facilities in association with new commercial developments and in tandem with significant change of use/extensions of existing commercial developments where appropriate.

- **IE6 Objective 6**
To continue to roll out a countywide network of green waste centres in suitable locations to expand the collection system for compostable waste
- **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.
- **IE6 Objective 9**
To support the development of indigenous capacity for the treatment of non-hazardous and hazardous wastes where technically, economically and environmentally practicable subject to the relevant environmental protection criteria for the planning and development of such activities being applied.

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 (Movement of Hazardous Waste) Regulations, 1998 (S.I. No. 147 of 1998)
- 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 ¹³

One of the guiding principles of European waste legislation, which has in turn been incorporated into the *Waste Management Act 1996* as amended and subsequent Irish legislation, is the principle of "Duty of Care". This implies that the waste producer is responsible for waste from the time it is generated through until its legal 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 applicant 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* as amended 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.

3.0 DESCRIPTION OF THE PROJECT

3.1 Location, Size And Scale Of The Development

Greenwalk Development Ltd seeks permission for a residential development on a site area of 2.28Ha, at Gordon Park, Old Naas Road, Kingswood, Dublin 22. The proposed development site is bounded to the west by the Old Nass Road, to the south by the Silken Park development, and is located in the townland of Brownsbarn.

The proposed development consists of 77 no. dwellings, comprised of 63 no. 2 storey houses, and 14 no. apartments & duplex units accommodated in 1 no. 3 storey building. The proposed houses are comprised of 8 no. 2 bed houses & 55 no. 3 bed houses. The proposed apartments & duplex units are comprised of 7 no. 1 bed apartments at ground floor & 7 no. 3 bed duplex units overhead. The proposed development also provides for all associated site development & infrastructural works, car & bicycle parking, open spaces, hard & soft landscaping, boundary treatments, bin & bicycle storage. Access to the development will be via a new vehicular entrance at the south-west corner of the site, off the Old Naas Road. Permission is also sought to demolish the existing building on site, approx. 455m².

3.2 Details Of The Non-Hazardous Wastes To Be Produced

There will be waste materials generated from the demolition an existing clubhouse building, 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 c. 11,000m³ (4,000m³ topsoil and 7,000m³ subsoil) of soil, stone, gravel and clay excavated to facilitate construction of new foundations, the installation of underground services, and for landscaping features. It is expected that c. 7,000m³ of the excavated subsoil will be re-used to raise the ground levels on site while the c. 4,000m³ of topsoil will be taken for appropriate offsite reuse, recovery, recycling and/or disposal.

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

Excavation will be required for site levelling and services. Volumes of excavated material will be minimal, and it is envisaged that any excavated material will be removed off site. If any material is removed off site, it will be taken for appropriate reuse, recycling or disposal.

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

Soil investigations and environmental soil testing is yet to be undertaken onsite. Site and soil investigations will take place post-demolition of the existing hard standing club house structure and prior to the removal of any excavated material from site. Site investigation results will be sent to the SDCC waste department upon request.

All excavations will be carefully monitored by a suitably qualified person to ensure that, if encountered, potentially contaminated soil is identified and segregated from clean/inert material. In the event that any potentially contaminated material is encountered, it will need to be 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 *Decision 2003/33/EC*¹⁵.

Prior to the removal of excess excavated material from site soil samples will be sent for environmental testing.

If asbestos or asbestos containing material (ACMs) are identified in any soil samples or during excavation, 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.

3.3.2 Fuel/Oils

As fuels and oils are classed as hazardous materials, any on-site storage of fuel/oil, 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

Enviroguide Consulting visited the site on the 13th July 2021 to complete a walkover survey of the entire site and perimeter. No invasive alien plant species (Third Schedule) noted at the site at the time. It is noted that *buddleja davidii* is growing in the south-west of the site along the treeline. *Buddleja davidii* is considered to be an invasive plant species, however it is not a Third Schedule invasive species and therefore not deemed to be of major concern.

Should any Third Schedule invasive species be found at a later date; an Invasive Species Management Plan will be prepared and will likely include a multi-pronged approach to the eradication and treatment.

3.3.4 Asbestos

An asbestos refurbishment / demolition survey will be undertaken prior to the demolition of the existing clubhouse building onsite. The survey results will be sent to the SDCC waste department upon request.

Removal of asbestos or ACMs will be carried out by a suitably qualified contractor and ACMs will only be removed from site by a suitably permitted / licenced waste contractor, in accordance with *S.I. No. 589 of 2010 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, NiCad 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 an existing clubhouse building (approx. 500m² GFA), along with the removal of 1,800m² of external paved car park/hardstanding areas. The demolition area is identified in the planning drawings provided with this application. The anticipated demolition waste and rates of reuse, recycling/recovery and disposal of the clubhouse 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	3.0	0	0.0	85	2.6	15	0.5
Concrete, Bricks, Tiles, Ceramics	165.0	30	49.5	65	107.3	5	8.3
Plasterboard	18.0	30	5.4	60	10.8	10	1.8
Tarmac	421.0	0	0.0	25	105.3	75	315.8
Metals	45.0	5	2.3	80	36.0	15	6.8
Slate	18.0	0	0.0	85	15.3	15	2.7
Timber	45.0	10	4.5	60	27.0	30	13.5
Total	715.0		61.7		304.2		349.2

4.2 Construction Waste Generation

The below Table 4.2 shows the breakdown of C&D waste types produced on a typical site based on data from the EPA *National Waste Reports*¹⁵, the *GMIT*¹⁶ and 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

The 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 m², using the waste breakdown rates shown in Table 4.2.

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	160.8	10	16.1	80	128.7	10	16.1
Timber	136.5	40	54.6	55	75.1	5	6.8
Plasterboard	48.7	30	14.6	60	29.2	10	4.9
Metals	39.0	5	1.9	90	35.1	5	1.9
Concrete	29.2	30	8.8	65	19.0	5	1.5
Mixed Hazardous	0.2	0	0.0	0	0.0	100	0.2
Other	73.1	20	14.6	60	43.9	20	14.6
Total	487.4		110.6		331.0		45.8

In addition to the information in Table 4.3, the quantity of excavated material that will be generated has been estimated to be c. 11,000m³ (topsoil and subsoil). It is expected that c. 7,000m³ of the excavated subsoil will be re-used to raise the ground levels on site while the c. 4,000m³ of topsoil will be taken for appropriate offsite reuse, recovery, recycling 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 works as the exact materials and quantities may be subject to some degree of change and variation during the construction process.

4.3 PROPOSED WASTE MANAGEMENT OPTIONS

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

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

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 contractors 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 and Clay

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.

It is anticipated that c. 4,000 m³ of excavated material will be taken off site. 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. Article 27 will be investigated to see if the material can be exported off this site for beneficial reuse instead of disposal.

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 any soils/stones are imported onto the site from another construction site as a by-product, this will also be done in accordance with Article 27. Article 27 will be investigated to see if the material can be imported onto this site for beneficial reuse instead of using virgin materials.

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* 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

It is not anticipated that bedrock will be encountered during the excavation phase of this development.

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.

Hard Plastic

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

Timber

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

Metal

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

Plasterboard

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

Glass

Glass materials will be segregated for recycling, where possible.

Waste Electrical 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.

Other Hazardous Wastes

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

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* as amended, *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 provided 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 an existing clubhouse building (approx. 500m² GFA), along with the removal of 1,800m² of external paved car park/hardstanding areas. The demolition areas are identified in the planning drawings submitted as part of this application. A formal demolition plan including safety procedures will be prepared by the demolition contractor. However, in general, the following sequence of works should be followed during the demolition stage:

Check for Hazards

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

Removal of Components

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

Removal of Roofing

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

Excavation of Services, Demolition of Walls and Concrete

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

7.0 TRAINING PROVISIONS

A member of the construction team will be appointed as the 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 arisings on site.

A waste tracking log should be used to track each waste movement from the site. On exit from the site the waste collection vehicle driver should stop at the site office and sign out as a visitor and provide the security personnel or waste manager with a waste docket (or 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 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 SDCC 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.

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

9.0 OUTLINE WASTE AUDIT PROCEDURE

9.1 RESPONSIBILITY FOR WASTE AUDIT

The appointed Waste Manager will be responsible for conducting a waste audit at the site during the C&D phase of the proposed Project. Contact details for the nominated Waste Manager will be provided to the SDCC Waste Department 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 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.

Waste management costs will also be reviewed.

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 a contractor(s) has been appointed and prior to removal of any C&D waste materials offsite, details of the proposed destination of each waste stream will be provided to SDCC.

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

10.2 RECYCLING/SALVAGE COMPANIES

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

11.0 REFERENCES

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

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11. South Dublin County Council (SDCC), *South Dublin County Council Development Plan 2016 – 2022* (2016)
 12. SDCC, *Draft South Dublin County Development Plan 2022 – 2028* (2021)
 13. Planning and Development Act 2000 (S.I. No. 30 of 2000) as amended
 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).

