

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

AT

**LANDS AT KILMASHOGUE
HOUSE AND COILL AVON
HOUSE, WHITECHURCH
ROAD, RATHFARNHAM,
DUBLIN 16**

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

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

Report Prepared For

BCDK Ltd. and Coill Avon Ltd

Report Prepared By

Chonail Bradley, Principal Environmental
Consultant

Our Reference

CB/20/11925WMR01

Date of Issue

16 February 2022

Cork Office



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

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

Document History

Document Reference		Original Issue Date	
CB/20/11925WMR01		16 February 2022	
Revision Level	Revision Date	Description	Sections Affected

Record of Approval

Details	Written by	Approved by
Signature		
Name	Chonaill Bradley	Fergal Callaghan
Title	Principal Environmental Consultant	Director
Date	16 February 2022	16 February 2022

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1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Operational Waste Management Plan (OWMP) on behalf of BCDK Ltd. and Coill Avon Ltd. The proposed development will consist of the construction of residential dwellings, a creche, shops and café in a neighbourhood centre, and two basement car parks at Lands at Kilmashogue House and Coill Avon house, Whitechurch Road, Rathfarnham, Dublin 16.

This OWMP has been prepared to ensure that the management of waste during the operational phase of the proposed residential development is undertaken in accordance with the current legal and industry standards including, the *Waste Management Act 1996* as amended and associated Regulations ¹, *Protection of the Environment Act 1992* as amended ², *Litter Pollution Act 1997* as amended ³, the *‘Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021’* ⁴, and the South Dublin County Council (SDCC) *South Dublin County Council Household & Commercial Waste Bye-Laws (2018)* ⁵. In particular, this OWMP aims to provide a robust strategy for storing, handling, collection and transport of the wastes generated at site.

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

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

2.0 OVERVIEW OF WASTE MANAGEMENT IN IRELAND

2.1 National Level

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

A further policy document *‘Preventing and Recycling Waste – Delivering Change’* was published in 2002 ⁷. 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’* ⁸. 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*⁹. Covering the period 1998 – 2003, the aim of this document was to assess progress to date with regard to waste management in Ireland, to consider developments since the policy framework and the local authority waste management plans were put in place, and to identify measures that could be undertaken to further support progress towards the objectives outlined in *Changing Our Ways*.

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

In September 2020, the Irish Government published a new policy document outlining a new action plan for Ireland to cover the period of 2020-2025. This plan ‘*A Waste Action Plan for a Circular Economy*’¹⁰ (WAPCE), was prepared in response to the ‘European Green Deal’ which sets a roadmap for a transition to a new economy, where climate and environmental challenges are turned into opportunities, replacing the previous national waste management plan “*A Resource Opportunity*” (2012).

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

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

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

Since 1998, the Environmental Protection Agency (EPA) has produced periodic ‘*National Waste (Database) Reports*’¹¹ 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.

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*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 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.

2.3 Legislative Requirements

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

- Waste Management Act 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) Regulation 2007 (S.I. No. 821 of 2007) as amended
- Waste Management (Licensing) Regulations 2000 (S.I. No. 185 of 2000) as amended
- European Union (Packaging) Regulations 2014 (S.I. No. 282 of 2014) as amended.
- Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997) as amended
- Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015)
- European Communities (Waste Electrical and Electronic Equipment) Regulations 2014 (S.I. No. 149 of 2014)
- Waste Management (Batteries and Accumulators) Regulations 2014 (S.I. No. 283 of 2014) as amended
- Waste Management (Food Waste) Regulations 2009 (S.I. No. 508 of 2009) as amended
- European Union (Household Food Waste and Bio-waste) Regulations 2015 (S.I. No. 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 (Transfrontier Shipment of Waste) Regulations 1994 (SI 121 of 1994)
- 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
- Environmental Protection Agency Acts 1992 and 2003 as amended;
- Litter Pollution Acts 1997 to 2003 as amended and
- Planning and Development Act 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* as amended and subsequent Irish legislation, is the principle of “*Duty of Care*”. This implies that the waste producer is responsible for waste from the time it is generated through until its legal disposal (including its method of disposal.) As it is not practical in most cases for the waste producer to physically transfer all waste from where it is produced to the final disposal area, waste contractors will be employed to physically transport waste to the final waste disposal site.

It is therefore imperative that the residents, tenants and the facilities management company undertake on-site management of waste in accordance with all legal requirements and employ suitably permitted/licenced contractors to undertake off-site management of their waste in accordance with all legal requirements. This includes the requirement that a waste contractor handle, transport and reuse/recover/recycle/dispose of waste in a manner that ensures that no adverse environmental impacts occur as a result of any of these activities.

A collection permit to transport waste must be held by each waste contractor which is issued by the National Waste Collection Permit Office (NWCPO). Waste receiving facilities must also be appropriately permitted or licensed. Operators of such facilities cannot receive any waste, unless in possession of a Certificate of Registration (COR) or waste permit granted by the relevant Local Authority under the *Waste Management (Facility Permit & Registration) Regulations 2007* as amended or a waste or IED (Industrial Emissions Directive) 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 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 and commercial sectors 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 are all operated by the private sector. There are a number of other licensed and permitted facilities in operation in the region including waste transfer stations, hazardous waste facilities and integrated waste management facilities. There are two existing thermal treatment facilities, one in Duleek, Co. Meath and a second facility in Poolbeg in Dublin.

The SDCC Ballyogan Recycling Centre, located c. 6.2km to the southeast of the development, can be utilised by the residents of the development for certain household waste streams. This centre can accept batteries, metal, paper, clothes and textiles, electrical items, glass bottles and jars, wood and soft plastic. There is also a bring bank located c. 400m to the north west of the development at Marley Park (College Road Car Park) 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/IE licenses issued are available from the EPA.

3.0 DESCRIPTION OF THE PROJECT

3.1 Location, Size and Scale of the Development

The proposed development on a site that extends to 6.77 hectares includes the derelict Kilmashogue House (southern lands) and Coill Avon house (northern lands), adjacent roads in the control of South Dublin County and Dun Laoghaire Rathdown County Councils and consists of the following developments: -

- Demolition of Kilmashogue House and outbuildings and demolition of Coill Avon house and outbuildings;
- The refurbishment and re-use of 2 no. stone outbuildings for community use, to be incorporated into an area of public open space on the southern lands;
- The construction of a mixed-use development comprising neighbourhood centre and 178 no. residential units comprising 72 no. houses, 38 no. apartments and 68 no. duplex apartments;
- The 72 no. houses will comprise 2, 2.5 and 3-storey detached, semi-detached and terraced units to include:-
 - 6 no. 2-bed houses;
 - 45 no. 3-bed houses;
 - 21 no. 4-bed houses;
- The 38 no. apartments and 68 no. duplex apartments are located across 7 no. buildings ranging in height from 3 to 5-storey consisting of 1 no. Block A/B, 1 no. Block C, 1 no. Block E, 1 no. Block S and 3 no. Blocks T-type as follows: -

- **Block A/B:** 5-storey over basement and podium accommodating 10 no. 1-bed apartments, 16 no. 2-bed duplex apartments and 1 no. 3-bed duplex apartment with associated balconies/terraces;
- **Block C:** 5-storey over basement accommodating 4 no. 1-bed apartments and 8 no. 2-bed duplex apartments with associated balconies/terraces;
- **Block E:** 4-storey over basement accommodating 8 no. 1-bed apartments and 16 no. 2-bed duplex apartments with associated balconies/terraces;
- **Block S:** 3-storey accommodating 2 no. 2-bed duplex apartments and 1 no. 3-bed apartment and 1 No. 3-bed duplex apartments with associated balconies/terraces;
- **Block T:** 3no. 3-storey buildings accommodating 6 no. 1-bed apartments, 18 no. 2-bed duplex apartments, 9 no. 3-bed apartments and 6 no. 3-bed duplex apartments, all with associated balconies/terraces;
- Block A/B and Block C are arranged around a landscaped podium. The neighbourhood centre is located below this podium and accommodates a 2-level creche (313m²) at lower ground and ground floor level, and 3 no. retail/non-retail/cafe service units (470m²) at ground level;
- The basement below Block A/B and Block C accommodates 50 no. car parking spaces, bicycle parking, bin stores, plant and staff service area (80m²);
- The basement below Block E accommodates 35 no. car parking spaces, bicycle parking, bin store and plant;
- A section of link street with footpath and cycle path (approx. 438 linear metres) extending from the junction of Whitechurch Road and College Road on an alignment parallel to the M50, to provide access to the southern development lands and incorporating a bus turning circle;
- Upgrade works to College Road including a new two-way cycle track and relocated footpath from the Whitechurch Road junction to provide connectivity to the Slang River pedestrian/cycle Greenway;
- A new signalised crossroads junction to connect the proposed link street with Whitechurch Road and College Road;
- Upgrade to the existing vehicular access at the entrance to Coill Avon house on Whitechurch Road;
- Foul sewer drainage works along Whitechurch Road from the Kilmashogue junction to the existing junction at Glinbury housing estate;
- All landscaping, surface car parking, boundary treatments, infrastructure works, ESB substation, and associated site works and services.

3.2 Typical Waste Categories

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

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

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

- Green/garden waste may be generated from internal plants;
- Batteries (both hazardous and non-hazardous);

- Waste electrical and electronic equipment (WEEE) (both hazardous and non-hazardous);
- Printer cartridge/toner
- Chemicals (paints, adhesives, resins, detergents, etc.) ;
- Lightbulbs;
- 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 should be segregated into the above waste types to ensure compliance with waste legislation and guidance while maximising the re-use, recycling and recovery of waste with diversion from landfill wherever possible.

3.3 European Waste Codes

In 1994, the *European Waste Catalogue* 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 cartridge/toner*	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 waste generation rates.

The estimated quantum/volume of waste that will be generated from the residential units has been determined based on the predicted occupancy of the units. The waste generation for the retail, café and creche (commercial) units is based on waste generation rates per m² floor area for the proposed area uses.

Waste estimates for amenity spaces are included within the waste estimates for residential units.

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

Table 4.1 Estimated waste generation for the residential units in the proposed development for the main waste types

Waste Type	Waste Volume (m ³ /week)			
	Apartment Block ABC Residential (Combined)	Apartment Block E Residential (Combined)	Duplex Block T (Combined) Per Block (3 no. Blocks total)	3 Bedroom House/Duplex (Individual)
Organic Waste	0.59	0.36	0.22	0.02
DMR	4.16	2.48	1.50	0.13
Glass	0.11	0.07	0.04	<0.01
MNR	2.19	1.44	0.87	0.08
Total	7.05	4.36	2.64	0.23

Table 4.2 Estimated waste generation for residential and commercial units in the proposed development for the main waste types

Waste Type	Waste Volume (m ³ /week)	
	4 Bedroom House/Duplex (Individual)	Apartment Block ABC Commercial (Combined)
Organic Waste	0.02	0.02
DMR	0.18	0.13
Glass	<0.01	<0.01
MNR	0.09	0.08
Total	0.29	0.24

BS5906:2005 Waste Management in Buildings – Code of Practice¹⁸ 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 development will be stored and how the waste will be collected from the development. This has been prepared with due consideration of the proposed site layout as well as best practice standards, local and national waste management requirements including those of 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;
- SDCC 'County of South Dublin (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws' (2018); and
- DoHLGH, Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)²⁰.

Seven (7 no.) dedicated shared Waste Storage Areas (WSAs) have been allocated within the development design for the residential units in the apartment blocks (A, B, C & E) and in the duplex T blocks. These shared residential WSAs are located on the basement floor level in internal locations (Apartment Blocks A, B, C & E) and at ground level in external locations (Duplex Block T).

One (1 no.) dedicated shared WSA has been allocated within the development design for the commercial units. The commercial WSA is located in an internal location at the basement level of the Block ABC buildings.

The waste receptacles from the shared residential and commercial WSAs will be collected by facilities management, immediately prior to collection and brought to staging areas at ground level. The staging areas are as such that they will not obstruct traffic or pedestrians (allowing a footway path of at least 1.8m, the space needed for two wheelchairs to pass each other) as is recommended in the Design Manual for Urban Roads and Streets (2019)²¹.

Residents in houses and in the duplex units in Block S with their own individual WSAs will be responsible for moving their waste receptacles to the curb for collection.

Using the estimated waste generation volumes in Table 4.1 and 4.2 the waste receptacle requirements for MNR, DMR, organic waste and glass have been established for the WSAs. These are presented in Table 5.1.

Table 5.1 Waste storage requirements for the proposed development

Area/Use	Bins Required			
	MNR ¹	DMR ²	Glass	Organic
Apartment Block ABC Residential (Shared)	2 x 1100L	4 x 1100L	1 x 240L	3 x 240L
Apartment Block E Residential (Shared)	2 x 1100L	3 x 1100L	1 x 240L	2 x 240L
Duplex Block T (Shared 3 no.)	1 x 1100L	2 x 1100L	1 x 120L	1 x 240L
Houses & Duplex Units Block S (Individual)	1 x 240L	1 x 240L	Bring Bank	1 x 120L
Apartment Block ABC Commercial (Shared)	2 x 1100L	3 x 1100L 1 x 240L	1 x 120L	3 x 240L

Note: * = Mixed Non-Recyclables
** = Dry Mixed Recyclables

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

Waste storage receptacles as per Table 5.1 above (or similar appropriate approved containers) will be provided by the facilities management company in the residential and commercial WSAs.

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



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

5.1 Waste Storage – Apartments and Duplex Blocks

Residents in the apartment and duplex blocks will be required to segregate waste into the following main waste streams:

- DMR;

- MNR;
- Organic waste; and
- Glass.

Residents will be required to take their segregated waste materials to a designated residential WSA and dispose of their segregated waste into the appropriate bins. Locations of all WSAs can be found on the plans submitted with the application.

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

Access to the shared residential WSAs will be restricted to authorised residents, facilities management and waste contractors by means of a key or electronic fob access. Using the estimated figures in Table 4.1 DMR, MNR, organic waste and glass will be collected on a weekly basis.

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.

Other waste materials such as textiles, batteries, lightbulbs, cooking oil, printer cartridges/toners and WEEE may be generated infrequently by the residents. Residents will be required to identify suitable temporary storage areas for these waste items within their own units and dispose of them appropriately. Further details on additional waste types can be found in Section 5.5.

5.2 Waste Storage – Individual Houses & Duplex Block S Units

Residents of individual houses and duplex units in Block S will be required to segregate waste into the following main waste streams:

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

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

It is anticipated that residents in units with external access to the rear of the property will store waste in bins at the back of the house. For units with no external access to the rear, a dedicated shielded WSA for the storage of 2 no. 240 litre and 1 no. 120 litre wheelie bins has been allocated at the front or side of the property. Residents will be required to place their segregated waste materials into these bins as necessary.

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.

It is anticipated that DMR, MNR and organic waste will be collected on a weekly basis. Residents will be required to take glass to the nearest bottle bank.

Other waste materials such as textiles, batteries, lightbulbs, cooking oil, printer cartridges/toners and WEEE may be generated infrequently by the residents. Residents

will be required to identify suitable temporary storage areas for these waste items at 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 – Retail, Café and Creche Units (Commercial)

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

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

The commercial units are located on the ground and basement floors of Blocks ABC. This units will have their own dedicated commercial WSA located at basement level

The commercial units will be required to store waste temporarily in their unit and will then transport it on a daily basis or when required to the WSA.

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

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

Based on the recommended bin requirements in Table 5.1, DMR, MNR and organic bins will be collected on a weekly basis, and the glass bin will be collected fortnightly or as required.

Other waste materials such as textiles, batteries, lightbulbs, cooking oil, printer cartridges/toners and WEEE may be generated infrequently by the commercial tenants. Commercial staff will be required to identify suitable temporary storage areas for these waste items within their own units and dispose of them appropriately. Further details on additional waste types can be found in Section 5.5.

5.4 Waste Collection

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

The facilities management company or waste contractor (depending on the agreement) will be responsible for conveying the bins from shared WSAs to their respective designated staging areas for collection. Following the emptying of bins by the waste collection vehicle, the waste receptacles will be promptly returned to their respective WSAs.

Residents in houses and duplex units in Block S with their own individual WSAs will be responsible for moving their waste receptacles to the curb for collection.

A drawing providing all staging locations can be found in the appendix of this document.

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

5.5 Additional Waste Materials

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

Green waste

Green waste may be generated from internal plants/flowers. If substantial green waste is produced by commercial tenants it can be removed by external landscape contractors. Green waste generated from internal plants/flowers can be placed in the organic waste bins.

Batteries

A take-back service for waste batteries and accumulators (e.g. rechargeable batteries) is in place in order to comply with the Waste Management Batteries and Accumulators Regulations 2014 as amended. In accordance with these regulations consumers are able to bring their waste batteries to their local civic amenity centre or can return them free of charge to retailers which supply the equivalent type of battery, regardless of whether or not the batteries were purchased at the retail outlet and regardless of whether or not the person depositing the waste battery purchases any product or products from the retail outlet.

The 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 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 relevant commercial units. The commercial tenants will be required to store this waste within their unit and arrange for return to retailers or collection by an authorised waste contractor, as required.

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

Chemicals (solvents, paints, adhesives, resins, detergents etc)

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

Any waste cleaning products or waste packaging from cleaning products generated in the commercial units that is classed as hazardous (if they arise) will be appropriately stored within the tenant's own space. Facilities management or the tenant will 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 (Fluorescent Tubes, Long Life, LED and Lilament bulbs)

Waste light bulbs may be generated by lighting in 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.

Waste light bulbs may be generated from building maintenance works. Such works are usually completed by external contractors or facilities management who are responsible for the off-site removal and appropriate recovery/recycling/disposal of any waste materials generated.

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.

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.

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

Furniture (and other bulky wastes)

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

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.

COVID-19 Waste

- Any waste generated by residents, tenants and staff of the development 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 development is open and occupied and the relevant guidance at the time will need to be reviewed.

5.6 Waste Storage Area Design

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

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

The residents, tenants and facilities management company will be required to maintain the waste storage areas in good condition as required by 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 of 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. Sub-ordinate and associated legislation includes:
 - European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011) as amended
 - Waste Management (Collection Permit) Regulations 2007 (S.I. No. 820 of 2007) as amended
 - Waste Management (Facility Permit and Registration) Regulations 2007 (S.I. No. 821 of 2007) as amended
 - Waste Management (Licensing) Regulations 2000 (S.I. No. 185 of 2000) as amended
 - European Union (Packaging) Regulations 2014 (S.I. No. 282 of 2014)
 - Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997)
 - Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015)
 - European Communities (Waste Electrical and Electronic Equipment) Regulations 2014 (S.I. No. 149 of 2014)
 - Waste Management (Batteries and Accumulators) Regulations 2014 (S.I. No. 283 of 2014) as amended
 - Waste Management (Food Waste) Regulations 2009 (S.I. No. 508 of 2009) as amended 2015 (S.I. No. 430 of 2015)
 - European Union (Household Food Waste and Bio-waste) Regulations 2015 (S.I. No. 191 of 2015)
 - Waste Management (Hazardous Waste) Regulations 1998 (S.I. No. 163 of 1998) as amended 2000 (S.I. No. 73 of 2000)
 - Waste Management (Shipments of Waste) Regulations 2007 (S.I. No. 419 of 2007) as amended
 - European Communities (Transfrontier Shipment of Waste) Regulations 1994 (S.I. No. 121 of 1994)
 - 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. Environmental Protection Act 1992 as amended;
3. Litter Pollution Act 1997 as amended;
4. Eastern-Midlands Waste Region, *Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021* (2015)
5. South Dublin County (SDCC) *'South Dublin County Council Household & 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. DoEHLG, *A Resource Opportunity - Waste Management Policy in Ireland* (2012)
11. Department of Communications, Climate Action and Environment (DCCA), *Waste Action Plan for the Circular Economy - Ireland's National Waste Policy 2020-2025* (Sept 2020).
12. DCCA, *Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less'* (2021)
13. Environmental Protection Agency (EPA), *National Waste Database Reports 1998 – 2012*.
14. SDCC, *South Dublin County Development Plan 2016 – 2022* (2016)
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 the Department of Housing, *Design Manual for Urban Roads and Streets* (2019)

Appendix A – Waste Staging/Collection Locations