

OPERATIONAL WASTE MANAGEMENT PLAN FOR A PROPOSED MIXED-USE DEVELOPMENT

“GLENAGEARY”

Report Prepared For

Red Rock Glenageary Ltd.

Report Prepared By

Chonail Bradley, Principal Environmental
Consultant

Our Reference

CB/227501.0701WMR02



Date of Issue

28 September 2023

Document History

Document Reference		Original Issue Date	
CB/227501.0701WMR02		28 September 2023	
Revision Level	Revision Date	Description	Sections Affected

Record of Approval

Details	Written by	Approved by
Signature		
Name	Chonaiil Bradley	Fergal Callaghan
Title	Principal Environmental Consultant	Director
Date	28 September 2023	28 September 2023

CONTENTS	Page
1.0 INTRODUCTION	4
2.0 OVERVIEW OF WASTE MANAGEMENT IN IRELAND	4
2.1 National Level	4
2.2 Regional Level	6
2.3 Legislative Requirements	7
2.3.1 Dún Laoghaire-Rathdown County Council Waste Bye-Laws	8
2.4 Local Authority Guidelines	9
2.5 Regional Waste Management Service Providers and Facilities	10
3.0 DESCRIPTION OF THE PROJECT	11
3.1 Location, Size and Scale of the Development	11
3.2 Typical Waste Categories	12
3.3 List of Waste Codes	12
4.0 ESTIMATED WASTE ARISING	13
5.0 WASTE STORAGE AND COLLECTION	14
5.1 Waste Storage – Residential Apartment Units	15
5.2 Waste Storage – Commercial Units	16
5.3 Waste Collection	17
5.4 Additional Waste Materials	18
5.5 Waste Storage Area Design	19
5.6 Facility Management Responsibilities	20
6.0 CONCLUSIONS	20
7.0 REFERENCES	22
APPENDIX 1: SWEPT PATH ANALYSIS FOR REFUSE TRUCK	23
APPENDIX 2: WASTE MOVEMENT AND COLLECTION POINTS	24

1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Operational Waste Management Plan (OWMP) on behalf of Red Rock Glenageary Ltd. The proposed Large Scale Residential Development is on a site of 0.74 ha at Junction of Sallynoggin Road and Glenageary Avenue, and Glenageary Roundabout, Glenageary, Co. Dublin. This Development will consist of a new neighbourhood centre to include apartments, commercial and retail units, public plaza, childcare facility and all associated residential amenity spaces.

This OWMP has been prepared to ensure that the management of waste during the operational phase of the proposed development is undertaken in accordance with the current legal and industry standards including, the *Waste Management Act 1996* as amended and associated Regulations ¹, *Environmental Protection Agency Act 1992* as amended ², *Litter Pollution Act 1997* as amended ³, the '*Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021*' ⁴, *The Dún Laoghaire Rathdown County Council (Segregation, Storage and Presentation of Household and Commercial) Bye-Laws (2019)* ⁵ and the *DLRCC Guidance Notes for Waste Management Planning for Residential and Commercial Developments (2022)* ⁶. In particular, this OWMP aims to provide a robust strategy for storing, handling, collection and transport of the wastes generated at site.

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

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

2.0 OVERVIEW OF WASTE MANAGEMENT IN IRELAND

2.1 National Level

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

A further policy document '*Preventing and Recycling Waste – Delivering Change*' was published in 2002 ⁸. This document proposed a number of programmes to increase recycling of waste and allow diversion from landfill. The need for waste minimisation at source was considered a priority.

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

In order to establish the progress of the Government policy document *Changing Our Ways*, a review document was published in April 2004 entitled '*Taking Stock and*

Moving Forward'¹⁰. Covering the period 1998 – 2003, the aim of this document was to assess progress to date with regard to waste management in Ireland, to consider developments since the policy framework and the local authority waste management plans were put in place, and to identify measures that could be undertaken to further support progress towards the objectives outlined in *Changing Our Ways*.

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

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

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

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

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

The Circular Economy and Miscellaneous Provisions Act 2022¹³ was signed into law in July 2022. The Act underpins Ireland's shift from a "take-make-waste" linear model to a more sustainable pattern of production and consumption, that retains the value of resources in our economy for as long as possible and that will to significantly reduce our greenhouse gas emissions. The Act defines Circular Economy for the first time in Irish law, incentivises the use of recycled and reusable alternatives to wasteful, single-use disposable packaging, introduces a mandatory segregation and incentivised charging regime for commercial waste, streamlines the national processes for End-of-Waste and By-Products decisions, tackling the delays which can be encountered by industry, and supporting the availability of recycled secondary raw materials in the Irish market, and tackles illegal fly-tipping and littering.

Since 1998, the Environmental Protection Agency (EPA) has produced periodic 'National Waste (Database) Reports'¹⁴ 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 2020 *National Waste Statistics web resource*, which is the most recent study published, along with the national waste statistics web resource (December 2022) reported the following key statistics for 2020:

- **Generated** – Ireland produced 3,210,220 t of municipal waste in 2020. This is a 4% increase since 2019. This means that the average person living in Ireland generated 645 kg of municipal waste in 2020.

- **Managed** – Waste collected and treated by the waste industry. In 2020, a total of 3,180,620 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 29,600 t was unmanaged in 2020.
- **Recovered** – The amount of waste recycled, used as a fuel in incinerators, or used to cover landfilled waste. In 2020, around 84% of municipal waste was recovered – an increase from 83% in 2019.
- **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 2020 was 41%, which is up from 37% in 2019.
- **Disposed** – 16% of municipal waste was landfilled in 2020. This is an increase from 15% in 2019.

2.2 Regional Level

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

The *EMR Waste Management Plan 2015 – 2021* is the regional waste management plan for the DLRCC area which was published in May 2015. Currently the EMR and other regional waste management plans are under review and the Regional Waste Management Planning Offices expect to publish the final plan in 2023.

The regional plan sets out the following strategic targets for waste management in the region that are relevant to the 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 €85 per tonne landfill levy introduced under the *Waste Management (Landfill Levy) (Amendment) Regulations 2015*.

The Draft NWMPCE does not dissolve the three regional waste areas. The NWCPCE sets the ambition of the plan to have a 0% total waste growth per person over the life of the Plan with an emphasis on non-household wastes including waste from commercial activities and the construction and demolition sector.

Proposed National Targets

1a. (Residual Municipal Waste) 1% Reduction / person /year – Waste decline for landfill or recovery by thermal treatment.

2. (Contamination of Materials) 90% of Material in Compliance – Contamination of recycling and food waste with other materials

3a. (Reuse of Materials) 10kg Per person / year – Reuse of materials like cloths or furniture to prevent waste.

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

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

Policy Objective EI11: Resource Management

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

Policy Objective EI12: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling

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

Policy Objective EI13: Hazardous Waste

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

2.3 Legislative Requirements

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

- Waste Management Act 1996 as amended;

- Environmental Protection Agency Act 1992 as amended;
- Litter Pollution Act 1997 as amended;
- Planning and Development Act 2000 as amended ¹⁶; and
- Circular Economy and Miscellaneous Provisions Act 2022.

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

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

2.3.1 Dún Laoghaire-Rathdown County Council Waste Bye-Laws

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

- Kerbside waste presented for collection shall not be presented for collection earlier than 6.00 pm on the day immediately preceding the designated waste collection day;
- All containers used for the presentation of kerbside waste and any uncollected waste shall be removed from any roadway, footway, footpath or any other public place no later than 10:00am on the day following the designated waste collection day, unless an alternative arrangement has been approved in accordance with bye-law 4;
- Documentation, including receipts, is obtained and retained for a period of no less than one year to provide proof that any waste removed from the premises has been managed in a manner that conforms to these bye-laws, to the Waste Management Act and, where such legislation is applicable to that person, to

- the European Union (Household Food Waste and Bio-Waste) Regulations 2015; and
- Adequate access and egress onto and from the premises by waste collection vehicles is maintained.

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

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

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

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

2.4 Local Authority Guidelines

DLRCC's Waste Management Division have issued *Guidance Notes for Waste Management Planning for Residential and Commercial Developments* (2022) ¹⁷ which provide good practice guidance for the storage and collection of waste for new build high density developments. The objective of this advice is to provide good practice guidance for the storage and collection of waste for new build high density developments to allow developers to demonstrate to local planning and waste management authorities that they have considered how the design and operation of waste management services will enable the occupiers and managing agents of new developments to manage waste arising through the lifetime of the development.

The document is designed to assist developers in considering measures required to maximise the reuse, recycling and recovery of waste in the operational lifetime of the development and give specific reference to best practice and associated legislation including minimising the carbon footprint of occupiers and services provided.

The ultimate goal of the guidelines is that the implemented waste strategy will achieve a 70% reuse and recovery target in accordance with the European Commission's proposal to introduce 70% reuse and recycling targets for municipal waste by 2030

and while also providing sufficient flexibility to support future targets and legislative requirements.

Waste storage issues should be considered at the initial apartment design stage, taking full account of this guidance note, to ensure access for all (including people with disabilities) in a brightly lit, safe and well-signed area, spacious enough for easy manoeuvrability, good ventilation and ready access if required for the control of potential vermin.

Where storage is provided in a basement area, sufficient access and egress must be provided to enable receptacles to be moved easily from the storage area to an appropriate bin staging point within the curtilage of the development in accordance with the *Dún Laoghaire-Rathdown County Council (Segregation, Storage And Presentation Of Household And Commercial Waste) Bye-Laws 2019*, Section 9, or any revision thereof.

The guidance notes provide requirements for five main areas of operational waste management:

1. Common Waste Storage Area Design
2. Requirements Within Residential and Commercial units
3. Initial Waste Management
4. Waste Collection System
5. Requirements for Selection of Separate Staging Area for Bin Collection Where Required.

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

The guidelines and form are available on the DLRCC website.

2.5 Regional Waste Management Service Providers and Facilities

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

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

There is a bring bank near the development in the Sallynoggin Community Centre carpark, which accepts glass and cans c. 480m to the South. The closest recycling centre to the site is the Eden Park Recycling Centre c. 1.2 km to the North which can take a wide range of household wastes (including glass bottles and jars, textiles, batteries, electronic and electrical waste, light bulbs, green garden waste, waste oil, kitchen appliances, aerosols, print cartridges, bulky items, wood, household hazardous waste).

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

Red Rock Glenageary Ltd., intend to apply to Dún Laoghaire Rathdown County Council for a Large-Scale Residential Development on a site of 0.74 ha at Junction of Sallynoggin Road and Glenageary Avenue, and Glenageary Roundabout, Glenageary, Co. Dublin.

The proposed development includes:

- a) Construction of 138 no. residential apartment units (37 no. 1-bedroom units, 68 no. 2-bedroom (4 person units), 6 no. 2-bedroom (3 person units) and 27 no. 3-bedroom units) in 2 no. interlinked blocks at third to fifth floor level (ranging in height from four to seven storeys over basement level) consisting of:
 - i. Block A (5-6 storeys) comprising 41 no. apartments (8 no. 1-bedroom units, 17 no. 2-bedroom (4 person) units, 2 no. 2-bedroom (3 person) units and 14 no. 3-bedroom units).
 - ii. Block B (4-7 storeys) containing 97 no. apartments (29 no. 1-bedroom units, 51 no. 2-bedroom (4 person) units, 4 no. 2-bedroom (3 person) units and 13 no. 3-bedroom units).

Each residential unit has associated private open space in the form of a balcony/terrace.

- b) Residential amenity areas of approx. 342 sqm are proposed in the form of resident support services, concierge services, co-working space, social/activity spaces and gym at the ground floor level of Blocks A and B.
- c) Open Space (approx. 2,806.6 sqm) is proposed in the form of (a) public open space (c. 1,848.4 sqm) in the form of a public plaza accommodating outdoor seating, planting, pedestrian footpaths and cyclist links and (b) residential/communal open space (approx. 958.2 sqm) including c. 750.6 sqm at surface level (incl. playground), roof terrace at fifth floor level of link between Blocks A and Block B (c. 151 sqm) and roof terrace (c. 56.6 sqm) at fifth floor level of Block B. 1.8 m opaque screens are proposed around both roof gardens.
- d) Commercial and retail uses at ground floor level of Blocks A and B (c. 996 sqm) to include (a) 2 no. restaurants (c. 267 sqm and 295 sqm) in Block A, (b) a retail – clothing unit (c. 142 sqm), (c) retail - florist unit (c. 66 sqm), (d) retail - pharmacy unit (c. 126 sqm) and (e) hairdresser unit (c. 100 sqm) all in Block B.
- e) Childcare facility (c. 263 sqm) with dedicated open space and children's play area (c. 39.5 sqm) at ground floor level of Block B.
- f) Basement areas (total approx. 3,411 sqm) are proposed on one level and include car and bicycle parking areas, waste management and plant areas. An ESB substation (approx. 31.7 sqm) is proposed at surface level at the top of the basement ramp accessed off Glenageary Avenue. Commercial bin stores (c. 47.9 sqm) are proposed to be located at ground floor level of both Blocks A and B.
- g) A total of 80 no. car parking spaces at basement level are proposed to include 3 no. accessible parking spaces, 2 no. GoCar spaces and 17 no. EV charging spaces. 5 no. motorcycle parking spaces are also proposed at basement level.
- h) A set down area/loading bay is proposed at surface level at Sallynoggin Road and 2 no. set down areas/loading bays including 1 no. accessible car parking space are proposed at surface level at Glenageary Avenue.

- i) A total of 310 no. bicycle parking spaces to include 254 no. bicycle parking spaces at basement level including 10 no. cargo bicycle spaces and 56 no. bicycle parking spaces including 16 no. cargo bicycle spaces at surface level.
- j) The development shall be served via a new vehicular access point to the basement level from Glenageary Avenue. New pedestrian and cyclist access points will be provided onto Sallynoggin Road and Glenageary Avenue from the site.
- k) Removal of existing cycle path and footpath and dropped kerb pedestrian crossing at Glenageary Avenue to be reinstated by soft landscaping and replaced by a new shared cyclist and pedestrian raised table crossing point located on Glenageary Avenue linking to the existing signalised crossing on the R118. Existing 1.2 m pedestrian crossing on Glenageary Avenue to be widened to 2 m.
- l) Emergency services/servicing access is proposed from Sallynoggin Road and Glenageary Avenue.
- m) All associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposal; permeable paving; all landscaping works; green roofs; roof plant room and general plant areas; photovoltaic panels; landscaped boundary treatment; footpaths; public lighting; and electrical 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 wastepaper (including newspapers, magazines, brochures, catalogues, leaflets), cardboard and plastic packaging, metal cans, plastic bottles, aluminium cans, tins and Tetra Pak cartons;
- Organic waste – food waste and green waste generated from plants/flowers;
- Glass; and
- Mixed Non-Recyclable (MNR)/General Waste.

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

- Green/garden waste may be generated from internal plants / flowers;
- Batteries (both hazardous and non-hazardous);
- Waste electrical and electronic equipment (WEEE) (both hazardous and non-hazardous);
- Printer cartridges/toners;
- Chemicals (paints, adhesives, resins, detergents, etc.);
- Light bulbs;
- Textiles (rags);
- Waste cooking oil (if any generated by the residents or 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 List of Waste Codes

In 1994, the *European Waste Catalogue* ¹⁶ and *Hazardous Waste List* ¹⁷ were published by the European Commission. In 2002, the EPA published a document titled

the *European Waste Catalogue and Hazardous Waste List* ¹⁸, 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*' ¹⁹ 2018. This waste classification system applies across the EU and is the basis for all national and international waste reporting, such as those associated with waste collection permits, CORs, permits and licences and EPA National Waste Database.

Under the classification system, different types of wastes are fully defined by a code. The List of Waste (LoW) code for typical waste materials expected to be generated during the operation of the proposed development are provided in Table 3.1 below.

Table 3.1 Typical Waste Types Generated and LoW Codes

Waste Material	LoW/EWC Code
Paper and Cardboard	20 01 01
Plastics	20 01 39
Metals	20 01 40
Mixed Non-Recyclable Waste	20 03 01
Glass	20 01 02
Biodegradable Kitchen Waste	20 01 08
Oils and Fats	20 01 25
Textiles	20 01 11
Batteries and Accumulators *	20 01 33* - 34
Printer Toner/Cartridges*	20 01 27* - 28
Green Waste	20 02 01
WEEE *	20 01 35*-36
Chemicals (solvents, pesticides, paints & adhesives, detergents, etc) *	20 01 13*/19*/27*/28/29*30
Bulky Wastes	20 03 07

* Individual waste type may contain hazardous materials

4.0 ESTIMATED WASTE 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 accommodation has been determined based on the predicted occupancy of the units, while the floor area usage (m²) has been used to estimate the waste arising from the commercial units.

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

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

Waste Type	Waste Volume (m ³ / week)		
	Residential (Combined)	Block A Commercial (combined)	Block B Commercial (combined)
Organic Waste	2.21	0.56	0.17
DMR	15.67	1.31	3.83

Glass	0.43	0.01	0.08
MNR	8.24	1.70	1.72
Total	26.54	3.58	5.81

The DLR *Guidance Notes for Waste Management in Residential and Commercial Developments* recommends calculating residential waste using Section 4.7 of the guidance document *BS5906:2005 Waste Management in Buildings – Code of Practice*²⁰, however these guidelines do not accommodate for student developments. AWN's modelling methodology is based on data from recent published data and data from numerous other similar developments in Ireland and based on AWN's experience it is a more representative estimate of the likely waste arisings from the development.

5.0 WASTE STORAGE AND COLLECTION

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

- BS 5906:2005 Waste Management in Buildings – Code of Practice;
- DLRCC Guidance Notes for Waste Management Planning for Residential and Commercial Developments (2022);
- The Draft NWMPCE (2023);
- DLRCC, Dún Laoghaire Rathdown County Council Segregation, Storage and Presentation of Household and Commercial Waste) Bye-laws (2019).
- EMR Waste Management Plan 2015 – 2021; and
- DoHLGH, Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2022)²¹.

Residential

Two (2 no.) Waste Storage Areas (WSAs) have been allocated in the design of this development for residential use; all located at basement level.

Commercial Unit in Block A and B

Two (2 no.) WSAs have been allocated for use by the commercial tenants in Block A and B. These WSAs are located at ground floor level in Block A & B.

The locations of all WSAs can be viewed in the drawings submitted with the planning application under separate cover and in the appendices of this report.

Waste Storage Requirements

Using the estimated waste generation volumes in Table 4.1, the waste receptacle requirements for MNR, DMR, organic waste and glass have been established for the shared WSAs. These are presented in Table 5.1. The WSA have been appropriately sized to accommodate the weekly waste requirements for waste receptacles. It is envisaged that all waste types will be collected on a weekly basis.

Table 5.1 Waste storage requirements for the development

Area/Use	Bins Required			
	MNR ¹	DMR ²	Glass	Organic
Residential WSAs (Shared)	8 x 1100 L	15 x 1100 L	2 x 240 L	10 x 240 L

Area/Use	Bins Required			
	MNR ¹	DMR ²	Glass	Organic
Commercial WSA Block A (Shared)	2 x 1100 L	2 x 1100 L	1 x 120 L	3 x 240 L
Commercial WSA Block B (Shared)	2 x 1100 L	4 x 1100 L	1 x 120 L	1 x 240 L

Note: ¹ = Mixed Non-Recyclables

² = Dry Mixed Recyclables

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

Waste storage receptacles as per Table 5.1 above (or similar appropriate approved containers) will be provided by the facility management company in the shared 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 WSA are shown in Figure 5.1. All waste receptacles used will comply with the SIST EN 840-1:2020 and SIST EN 840-2:2020 standards for performance requirements of mobile waste containers, where appropriate.



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

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

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

5.1 Waste Storage – Residential Apartment Units

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

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

Provision will be made in all residential units to accommodate 3 no. bin types to facilitate waste segregation at source. An example of a potential 3 bin storage system is provided in Figure 5.2 below.



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

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

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

Other waste materials such as textiles, batteries, printer toner/cartridges, waste cooking oil 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 5.4.

5.2 Waste Storage – Commercial Units

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

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

The commercial tenants will be required to take their segregated waste materials to their designated WSAs and deposit their segregated waste into the appropriate waste receptacle.

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

If any kitchens are allocated in these units, this will contribute a significant portion of the volume of waste generated on a daily basis, and as such it is important that adequate provision is made for the storage and transfer of waste from these areas to the WSAs.

If kitchens are required it is anticipated that waste will be generated in kitchens throughout the day, primarily at the following locations:

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

Small bins will be placed adjacent to each of these areas for temporary storage of waste generated during the day. Waste will then be transferred from each of these areas to the appropriate waste store.

All waste receptacles in the tenants' areas as well as in their respective 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 waste receptacles to show exactly which wastes can be put in each.

Other waste materials such as textiles, batteries, lightbulbs, WEEE, cooking oil and printer toner / cartridges will be generated less frequently. The tenants will be required to store these waste types within their own units and arrange collection with an appropriately licensed waste contractor. Facilities management may arrange collection, depending on the agreement. Further details on additional waste types can be found in Section 5.4.

5.3 Waste Collection

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

Bins from the proposed development will be brought to the staging areas by the waste contractor or facilities management immediately prior to collection. The waste collection area for the residential waste is located at the top of the carpark ramp, in close proximity to the loading bay on the south-eastern side of the development on Glenageary Avenue. Commercial bins will be stage and collected at the loading bay on the northern side off the development on Glenageary Avenue. Bins will be returned to the WSAs immediately following collection.

The staging areas are such that they will not obstruct traffic or pedestrians (allowing a footway path of at least 1.8m, the space needed for two wheelchairs to pass each other) as is recommended in the Design Manual for Urban Roads and Streets (2022)²². These staging areas and road sweep analysis can be found in the appendices of this report.

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.

5.4 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/garden waste

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

Batteries

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

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

Waste Electrical and Electronic Equipment (WEEE)

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

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

Printer Cartridge/Toners

It is recommended that a printer cartridge / toner bin is provided in the commercial units where appropriate. 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 / recycling centre.

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

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

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

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

Light Bulbs

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

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

Textiles

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

Waste Cooking Oil

If the commercial tenants use cooking oil, waste cooking oil will need to be stored within the unit on a bunded area or spill pallet and regular collections by a dedicated waste contractor will need to be organised as required. Under sink grease traps will be installed in any cooking space.

If the residents generate waste cooking oil, this can be brought to a civic amenity / recycling centre or placed in the organic 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. The collection of bulky waste will be arranged, as required by the commercial tenants. If residents wish to dispose of furniture, this can be brought a civic amenity / recycling centre.

Abandoned Bicycles

Bicycle parking areas are planned for the development. As happens in other developments, residents sometimes abandon faulty or unused bicycles and it can be difficult to determine their ownership. Abandoned bicycles should be donated to charity if they arise.

5.5 Waste Storage Area Design

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

- Be fitted with a non-slip floor surface;
- Provide ventilation to reduce the potential for generation of odours;
- Provide suitable lighting – a minimum Lux rating of 400 is recommended;

- Appropriate sensor controlled lighting;
- Be easily accessible for people with limited mobility;
- Be restricted to access by nominated personnel only;
- Be supplied with hot or cold water for disinfection and washing of bins;
- Be fitted with suitable power supply for power washers;
- Have a sloped floor to a central foul drain for bins washing run-off;
- Have appropriate graphical and written signage placed above and on bins indicating correct use;
- Have access for potential control of vermin, if required;
- Robust design of doors to bin area incorporating steel sheet covering where appropriate; and
- Be fitted with CCTV for monitoring.

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

5.6 Facility Management Responsibilities

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

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

- Provision of a Waste Management Plan document, prepared by the Facilities Management Company to all residential and commercial units, which shall clearly state the methods of source waste segregation, storage, reuse and recycling initiatives that shall apply to the management of the development;
- Provision and maintenance of appropriate graphical signage to inform residents and tenants of their obligation to reduce waste, segregate waste and in the correct bin;
- Preparation of an annual waste management report for all residential and commercial units;
- Designation of access routes to common waste storage areas to ensure safe access from the apartment units by mobility impaired persons;
- Provision of an appropriately qualified and experienced staff member, who will be responsible for all aspects of waste management at the development;
- Daily inspection of waste storage areas and signing of a daily check list, which shall be displayed within the area; and
- Maintenance of a weekly register, detailing the quantities and breakdown of wastes collected from the development and provision of supporting documentation by the waste collector to allow tracking of waste recycling rates.

6.0 CONCLUSIONS

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

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

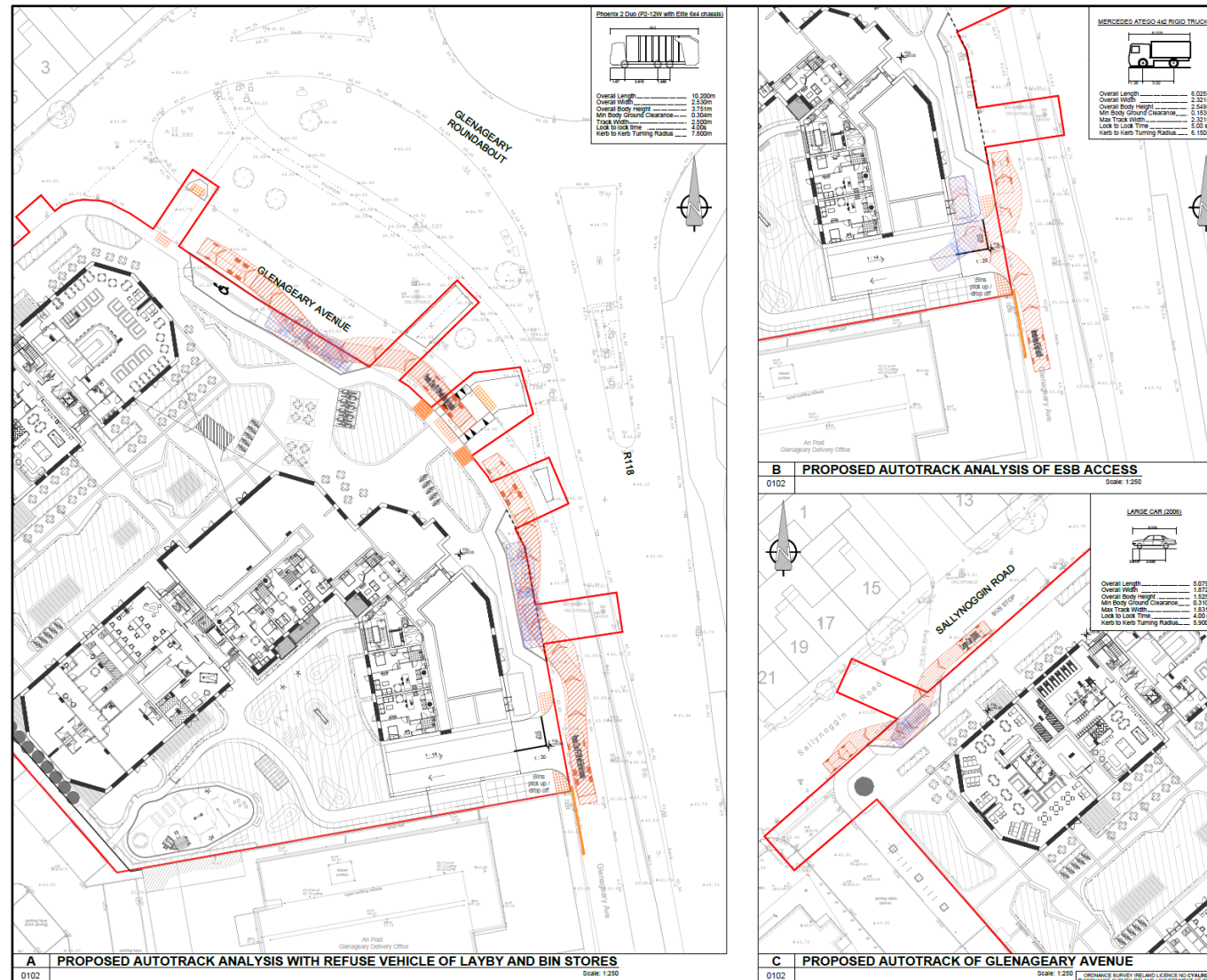
Adherence to this plan will also ensure that waste management at the development is carried out in accordance with the requirements outlined in the DLRCC Guidance Notes for Waste Management Planning for Residential and Commercial Developments and the *DLRCC Waste Bye-Laws*.

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

7.0 REFERENCES

1. Waste Management Act 1996 as amended.
2. Litter Pollution Act 1997 (Act No. 12 of 1997) as amended;
4. Eastern-Midlands Waste Region, *Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021* (2015).
5. Dún Laoghaire Rathdown County Council (DLRCC), Dún Laoghaire Rathdown County Council Segregation, Storage and Presentation of Household and Commercial Waste) Bye-laws (2019).
6. DLRCC Guidance Notes for Waste Management Planning for Residential and Commercial Developments (2022).
7. Department of Environment and Local Government (DoELG) *Waste Management – Changing Our Ways, A Policy Statement* (1998).
8. Department of Environment, Heritage and Local Government (DoEHLG) *Preventing and Recycling Waste - Delivering Change* (2002).
9. DoELG, *Making Ireland's Development Sustainable – Review, Assessment and Future Action (World Summit on Sustainable Development)* (2002).
10. DoEHLG, *Taking Stock and Moving Forward* (2004).
11. Department of Communications, Climate Action and Environment (DCCAE), *Waste Action Plan for the Circular Economy - Ireland's National Waste Policy 2020-2025* (Sept 2020).
12. DCCAE, *Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less'* (2021).
13. Circular Economy and Miscellaneous Provisions Act 2022
14. Environmental Protection Agency (EPA), *National Waste Database Reports 1998 – 2020*
15. DLRCC, *Dún Laoghaire Rathdown County Council Development Plan 2022 – 2028*.
16. Planning and Development Act 2000 (S.I. No. 30 of 2000) as amended 2010 (S.I. No. 30 of 2010) and 2015 (S.I. No. 310 of 2015).
17. European Waste Catalogue - Council Decision 94/3/EC (as per Council Directive 75/442/EC).
18. Hazardous Waste List - Council Decision 94/904/EC (as per Council Directive 91/689/EEC).
19. EPA, *European Waste Catalogue and Hazardous Waste List* (2002).
20. EPA, *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* (2015).
21. BS 5906:2005 Waste Management in Buildings – Code of Practice.
22. DoHLGH, *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2022).
23. Department of Transport, Tourism and Sport and Department of Housing, Planning and Local Government, *Design Manual for Urban Roads and Streets* (2022).

APPENDIX 1: SWEEP PATH ANALYSIS FOR REFUSE TRUCK



APPENDIX 2: WASTE MOVEMENT AND COLLECTION POINTS

