

# **OPERATIONAL WASTE MANAGEMENT PLAN FOR A PROPOSED MIXED-USE DEVELOPMENT**

**AT**

**COOKSTOWN INDUSTRIAL  
ESTATE, CO. DUBLIN**

**“COOKSTOWN CROSS”**

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Report Prepared For

**Joseph Costello,  
Absolute Limousines Ltd and Boherkill  
Property Development Ltd**

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Report Prepared By

**Chonail Bradley, Senior Environmental  
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Our Reference

**CB/19/10786WMR02**

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Date of Issue

**27 November 2020**

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#### **Cork Office**

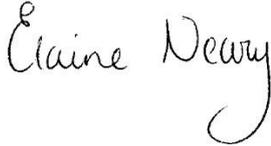
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**Document History**

Document Reference		Original Issue Date	
CB/19/10786WMR02		27 November 2020	
Revision Level	Revision Date	Description	Sections Affected

**Record of Approval**

Details	Written by	Approved by
Signature		
Name	Chonaill Bradley	Elaine Neary
Title	Senior Environmental Consultant	Associate
Date	27 November 2020	27 November 2020

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## 1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Operational Waste Management Plan (OWMP) on behalf of Joseph Costello Absolute Limousines Ltd and Boherkill Property Development Ltd. The proposed mixed-use development will comprise the construction of 4 No. predominantly residential blocks. The development will provide 1104 No. units in a mix of 1, 2 and 3 bed apartments along with commercial units and a creche unit, at a site located at lands west of Old Belgard Road and North, South & West of Cookstown Road, Cookstown Industrial Estate, Tallaght, Dublin 24.

The proposed development will also include residential amenities, hard and soft landscaping, boundary treatments, public lighting, ESB substations, plant and switch rooms, and residential waste facilities, piped site wide services, and all ancillary works and services necessary to facilitate construction and operation.

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 – 2011* as amended and associated Regulations <sup>1</sup>, *Protection of the Environment Act 2003* as amended <sup>2</sup>, *Litter Pollution Act 2003* as amended <sup>3</sup>, the '*Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021*' <sup>4</sup>, The South Dublin County Council (SDCC) *South Dublin County Council Household & Commercial Waste Bye-Laws (2018)* <sup>5</sup>. 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*' <sup>6</sup> 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 <sup>7</sup>. This document proposed a number of programmes to increase recycling of waste and allow diversion from landfill. The need for waste minimisation at source was considered a priority.

This view was also supported by a review of sustainable development policy in Ireland and achievements to date, which was conducted in 2002, entitled '*Making Irelands Development Sustainable – Review, Assessment and Future Action*' <sup>8</sup>. 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*'<sup>9</sup>. 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.

The policy document '*A Resource Opportunity*'<sup>10</sup> was published in July 2012. The policy document stresses the environmental and economic benefits of better waste management, particularly in relation to waste prevention. The document sets out a number of actions, including the following:

- A move away from landfill and replacement through prevention, reuse, recycling and recovery.
- A Brown Bin roll-out diverting 'organic waste' towards more productive uses.
- Introducing a new regulatory regime for the existing side-by-side competition model within the household waste collection market.
- New Service Standards to ensure that consumers receive higher customer service standards from their operator.
- Placing responsibility on householders to prove they use an authorised waste collection service.
- The establishment of a team of Waste Enforcement Officers for cases relating to serious criminal activity will be prioritised.
- Reducing red tape for industry to identify and reduce any unnecessary administrative burdens on the waste management industry.
- A review of the producer responsibility model will be initiated to assess and evaluate the operation of the model in Ireland.
- Significant reduction of Waste Management Planning Regions from ten to three.

While *A Resource Opportunity* covers the period to 2020, it is subject to a mid-term review in 2016 to ensure that the measures are set out properly and to provide an opportunity for additional measures to be adopted in the event of inadequate performance. In early 2016, the Department of the Environment, Community and Local Government invited comments from interested parties on the discussion paper '*Exporting a Resource Opportunity*'. While the EPA have issued a response to the consultation, an updated policy document has not yet been published.

In September 2020 the government released a new policy document outlining a new action plan for Ireland to cover the period of 2020-2025. This plan '*A Waste Action Plan for a Circular Economy*'<sup>11</sup> 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.

It aims to fulfil the commitment in the Programme for Government to publish and start implementing a new National Waste Action Plan. It is intended that this new national waste policy will inform and give direction to waste planning and management in Ireland over the coming years. It will be followed later this year by an All of Government

Circular Economy Strategy. The policy document shifts focus away from waste disposal and moves it back up the production chain. To support the policy, regulation is already being used (Circular Economy Legislative Package) or in the pipeline (Single Use Plastics Directive). The policy document contains over 200 measures across various waste areas including Circular Economy, Municipal Waste, Consumer Protection & Citizen Engagement, Plastics and Packaging, Construction and Demolition, Textiles, Green Public Procurement and Waste Enforcement.

Since 1998, the Environmental Protection Agency (EPA) has produced periodic '*National Waste (Database) Reports*'<sup>12</sup> detailing among other things estimates for household and commercial (municipal) waste generation in Ireland and the level of recycling, recovery and disposal of these materials. The 2018 National Waste Statistics, which is the most recent study published, along with national waste statistics web resource (August 2020) reported the following key statistics for 2018:

- **Generated** – Ireland produced 2,912,353 t of municipal waste in 2018, this is almost a five percent increase since 2017. This means that each person living in Ireland generated 600kg of municipal waste in 2018;
- **Managed** – Waste collected and treated by the waste industry. In 2018, a total of 2,865,207 t of municipal waste was managed and treated;
- **Unmanaged** –Waste that is not collected or brought to a waste facility and is therefore likely to cause pollution in the environment because it is burned, buried or dumped. The EPA estimates that 47,546 t was unmanaged in 2018;
- **Recovered** – the amount of waste recycled, used as a fuel in incinerators, or used to cover landfilled waste. In 2018, around 85% of municipal waste was recovered, this is an increase from 77% in 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 2018 was 38%, which is down from 41% in 2018; and
- **Disposed** – Less than a quarter (15%) of municipal waste was landfilled in 2018, this is a decrease from 23% 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*<sup>13</sup> 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.

## 2.3 Legislative Requirements

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

- Waste Management Act 1996 (No. 10 of 1996) as amended. Sub-ordinate 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 Union (Properties of Waste Which Render it Hazardous) Regulations 2015 (S.I. No. 233 of 2015) as amended
- Environmental Protection Act 1992 (S.I. No. 7 of 1992) as amended;
- Litter Pollution Act 1997 (Act No. 12 of 1997) as amended and
- Planning and Development Act 2000 (S.I. No. 30 of 2000) as amended <sup>14</sup>

These Acts and subordinate Regulations enable the transposition of relevant European Union Policy and Directives into Irish law.

One of the guiding principles of European waste legislation, which has in turn been incorporated into the *Waste Management Act 1996 - 2011* and subsequent Irish legislation, is the principle of “*Duty of Care*”. This implies that the waste producer is responsible for waste from the time it is generated through until its legal disposal (including its method of disposal.) As it is not practical in most cases for the waste producer to physically transfer all waste from where it is produced to the final disposal area, waste contractors will be employed to physically transport waste to the final waste disposal site.

It is therefore imperative that the residents, tenants and the 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 Ballymount civic amenity c. 2.66km to the north east of the development, which can be utilised by the residents of the development for certain household waste streams. This centre can accept batteries, metal cans, beverage cartons, car batteries, paper and cardboard, clothes and textiles, electrical waste, fluorescent tubes, glass bottles and jars, green waste, metal, mobile phone, plastic bottles, plastic film, print cartridges, used gas cylinders, waste oil, white polystyrene and wood. There is also a bring bank c. 1.51km to the north east at the Kingswood Shopping Centre where glass and textiles 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 is located at site located at lands west of Old Belgard Road and North, South & West of Cookstown Road, Cookstown Industrial Estate, Tallaght, Dublin 24 and will consist of the following:

- (i) Demolition of the existing industrial buildings (15,989sq.m);
- (ii) Construction of a mixed-use development featuring:
  - (a) 1104 no. 'build-to-rent' apartments in 4 no. blocks varying in height from four to eleven storeys; and
  - (b) 4 no. commercial units at ground floor level of Blocks B and D, office space across first to seventh floor levels of Block D and a crèche at ground floor level of Block C;
- (iii) Road, junction and streetscape upgrade works along First Avenue, Cookstown Road and Old Belgard Road, including the installation a signalized junction at the intersection of First Avenue and Cookstown Road and Old Belgard Road and Cookstown Road;
- (iv) Construction of 3 no. new roads and 1 no. pedestrian/cycle link to the Belgard Luas Stop;
- (v) Construction of a public plaza in the south-western corner of the site; and
- (vi) Associated site and infrastructural works are also proposed which include: foul and surface water drainage; attenuation tanks; lighting; landscaping; boundary fences; plant areas; ESB substations; internal hard landscaping, including footpaths and street furniture; and all associated site development works.

#### **3.2 Typical Waste Categories**

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

- Dry Mixed Recyclables (DMR) - includes waste paper (including newspapers, magazines, brochures, catalogues, leaflets), cardboard and plastic packaging, metal cans, plastic bottles, aluminium cans, tins and Tetra Pak cartons;
- Organic waste – food waste and green waste generated from 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 or external landscaping;
- Batteries (both hazardous and non-hazardous);
- Waste electrical and electronic equipment (WEEE) (both hazardous and non-hazardous);
- Printer cartridges/toners;
- Chemicals (paints, adhesives, resins, detergents, etc.) ;
- 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* <sup>15</sup> and *Hazardous Waste List* <sup>16</sup> were published by the European Commission. In 2002, the EPA published a document titled the *European Waste Catalogue and Hazardous Waste List* <sup>17</sup>, 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*' <sup>18</sup> 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.

Waste Material	LoW/EWC Code
Paper and Cardboard	20 01 01
Plastics	20 01 39
Metals	20 01 40
Mixed Non-Recyclable Waste	20 03 01
Glass	20 01 02
Biodegradable Kitchen Waste	20 01 08
Oils and Fats	20 01 25
Textiles	20 01 11
Batteries and Accumulators *	20 01 33* - 34
Printer Toner/Cartridges*	20 01 27* - 28
Green Waste	20 02 01
WEEE *	20 01 35*-36
Chemicals (solvents, pesticides, paints & adhesives, detergents, etc.) *	20 01 13*/19*/27*/28/29*30
Fluorescent tubes and other mercury containing waste *	20 01 21*
Bulky Wastes	20 03 07

\* Individual waste type may contain hazardous materials

**Table 3.1** Typical Waste Types Generated and LoW Codes

## 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 commercial units is based on waste generation rates per m<sup>2</sup> floor area for the proposed area uses.

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

Waste type	Waste Volume (m <sup>3</sup> /week)			
	Residential Block A	Residential Block B	Residential Block C	Residential Block D
Organic Waste	3.87	4.98	4.82	2.01
DMR	27.45	35.28	34.16	14.27
Glass	0.75	0.96	0.93	0.39
MNR	14.43	18.55	17.97	7.51
<b>Total</b>	<b>46.51</b>	<b>59.77</b>	<b>57.88</b>	<b>24.18</b>

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

Waste type	Waste Volume (m <sup>3</sup> /week)			
	Café/Restaurant /Bar Units Block B	Creche Unit Block C	Retail Unit Block D	Office Unit Block D
Organic Waste	0.8	0.05	0.08	0.13
Paper (Confidential)	-	-	-	1.18
DMR	1.16	1.93	1.50	2.90
Glass	1.21	0.01	0.05	0.02
MNR	1.51	0.86	0.69	1.26
<b>Total</b>	<b>3.97</b>	<b>2.84</b>	<b>2.38</b>	<b>5.50</b>

**Table 4.2** Estimated waste generation for the proposed development for the main waste type  
The BS5906:2005 Waste Management in Buildings – Code of Practice <sup>19</sup> was considered in the estimations of the waste arising. The predicted total waste generated from the residential units based on the Code of Practice is c. 149.35m<sup>3</sup> per week for the residential units. Whereas the AWN waste generation model estimates c. 188.35m<sup>3</sup> per week from the residential units. AWN's modelling methodology is based on data from recent published data and data from numerous other similar developments in Ireland and based on AWN's experience it is a more representative estimate of the likely waste arisings from the development.

## 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

- DoEHLG, Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018) <sup>20</sup>.

Six dedicated shared Waste Storage Areas (WSAs) have been allocated within the development design for the residential units in the apartments and own door duplex units. The shared residential WSAs are located on the ground floor of Blocks A, B1, B2, C1, C2 & D in close proximity to the access cores.

The commercial units

a dedicated shared Waste Storage Area (WSA) has been allocated within the development design for the commercial units in Block B. The commercial units in Block D will share space within the residential WSA for the storage of their separate bins, while the creche will be required to allocate space within their own unit.

The waste receptacles from the shared WSAs will be collected directly from the WSAs by facilities management or the waste contractor and taken to the curb for emptying, waste receptacles will be promptly returned to the WSAs. Waste receptacles in the mews units will be taken to the curb by residents 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.

Area/Use	Bins Required			
	MNR*	DMR**	Organic	Glass
Residential Block A	7 x 1100L	13 x 1100L	16 x 240L	4 x 240L
Residential Block B	9 x 1100L	16 x 1100L	21 x 240L	4 x 240L
Residential Block C	9 x 1100L	16 x 1100L	21 x 240L	4 x 240L
Residential Block D	4 x 1100L	7 x 1100L	9 x 240L	2 x 240L
Creche Block C	1 x 1100L	2 x 1100L	1 x 120L	1 x 120L
Commercial Block B	2 x 1100L	2 x 1100L	1 x 120L	5 x 240L
Commercial Block D	2 x 1100L	5 x 1100L	1 x 240L	1 x 120L

Note: \* = Mixed Non-Recyclables

\*\* = Dry Mixed Recyclables

**Table 5.1** Waste storage requirements for the proposed development

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)

WSAs in Blocks A, B1 and C1 have been sufficiently sized as to accommodate commercially available mini compactors for the DMR and MNR waste streams in the form of a residential WSAs Epac Lodestone compactor from AES.

This option will significantly reduce the volume of waste and as such the number of bins stored on site and the number of bins that will need to be transported to the curb for collection. The Epac Lodestone compactor option will take up slightly more space. It compresses/compacts the waste into 2 and 3m<sup>3</sup> bags. These will require storage pending collection, so this adds to the storage space required but this compactor option results in a lower collection frequency than of bins.

Alternative options can be considered in future by the building management company, as technologies are developed. Solely for the purpose of ensuring the WSA is sufficiently sized, this plan assumes that the Epac option will be used. If required, sufficient space in the has been allocated in the WSAs so that bins can be used for the storage of waste with a weekly waste collection.

The Epac Lodestone compactor referred to above is a compactor that compresses/compacts the waste into 2 and 3m<sup>3</sup> skip bags (also called Flexible Intermediate Bulk Containers or FIBCs). A photo of the Epac Lodestone compactor is provided as Figure 5.2.



**Figure 5.2** Photo of Epac Lodestone Compactor (Source: AES Bord na Móna Website)

## 5.1 Waste Storage – Residential Units

Residents 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 their 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.

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

Access to the 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 organic waste and glass will be collected on a weekly basis, while DMR and MNR will be collected on a twice weekly basis.

Other waste materials such as textiles, batteries, printer toner/cartridges and WEEE may be generated infrequently by the residents. Residents will be required to identify suitable temporary storage areas for these waste items within their own units and dispose of them appropriately. Further details on additional waste types can be found in Section 5.7.

## 5.2 Waste Storage – Office Unit

The office tenant(s) and their staff will be required to segregate waste within their units into the following main waste types:

- DMR;
- MNR;
- Paper (confidential);
- Cardboard & Paper (baling);
- Plastic (baling);
- Organic waste; and
- Glass.

The staff will bring the segregated waste materials to their allocated WSA located at ground floor level.

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

All bins/containers in the commercial units, as well as 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 wastes can be put in each.

The unit(s) may be occupied by a single tenant or multiple tenants. It is recommended that the tenants implement the 'binless office' concept where employees do not have bins located under desks and instead bring their waste to Area Waste Stations (AWSs) located strategically on the building floors, at print stations/rooms and at any canteens, micro kitchens or tea stations which may be provided within the tenant's space. Experience has shown that the maximum travel distance should be no more than 15m from the employee's desk to the AWS. This 'best in class' concept achieves maximum segregation of waste in an office setting.

Typically, an AWS would include a bin for DMR and a bin for MNR. It is recommended that a confidential paper bin with a locked lid/door should also be provided for at each AWS and/or adjacent to photocopy/printing stations, as required. In addition, it is recommended that organic and glass bins should be provided at any canteens or micro kitchens, food service or tea stations, where appropriate.

A printer cartridge/toner bin should be provided at the print/copy stations, where appropriate.

It is recommended that all bins/containers should be clearly labelled and colour coded to avoid cross contamination of the different waste streams. Signage should be posted on or above the bins to show which wastes can be put in each bin.

The binless office concept, in addition to assisting in maximising recycling rates and minimising associated landfill disposal costs, also has the advantage of substantially reducing cleaning costs, as cleaners visit only the AWSs on each floor or area, as opposed to each desk

Using the receptacles outlined in Table 5.1, it is anticipated that DMR, MNR, organic waste and glass will be collected on a weekly basis.

Other waste materials such as textiles, batteries, printer toner/cartridges and WEEE may be generated infrequently by the tenants. Tenants will be required to identify suitable temporary storage areas for these waste items within their own units and dispose of them appropriately. Further details on additional waste types can be found in Section 5.6.

### **5.3 Waste Storage – Commercial Units**

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

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

Tenants will take their waste to their allocated commercial waste store, at ground level on the eastern side of Block B or to the ground level shared WSA at Block D Commercial space allocated within the block D WAS for the storage of commercial waste, will be separate from residential waste.

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

If any kitchens/food preparation areas are allocated in unit areas, 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;

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 retail/commercial WSA.

All bins/containers in the tenant's areas as well as 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 wastes can be put in each.

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

Other waste materials such as textiles, batteries, printer toner/cartridges and WEEE may be generated infrequently by the tenants. Tenants will be required to identify suitable temporary storage areas for these waste items within their own units and dispose of them appropriately. Further details on additional waste types can be found in Section 5.6.

#### **5.4 Waste Storage – Crèche**

The crèche unit will be required to segregate their waste into the following waste categories within their own unit:

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

Tenants will be required to allocate space within their own unit at ground level for the storage of waste.

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 crèche staff, building 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, printer toner/cartridges and WEEE may be generated infrequently by the tenants. Tenants will be required to identify suitable temporary storage areas for these waste items within their own units and dispose of them appropriately. Further details on additional waste types can be found in Section 5.6.

#### **5.5 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 building management company in conjunction with the waste contractor will be responsible for conveying the bins, bales and/or compactor containers from WSAs to

the entrance of the ground level carparks or to the nearest road for temporary storage and collection. A trolley/tug or suitable vehicle may be required to convey the bins and compactor containers to/from the marshalling areas.

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.

## 5.6 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 external landscaping and internal plants/flowers. Green waste generated from landscaping of external areas will be removed by external landscape contractors. Green waste generated from gardens internal plants/flowers can be placed in the organic waste bins.

### Batteries

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

### 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.

### Printer Cartridge/Toners

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 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 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 residents generate waste cooking oil, this can be brought to a civic amenity centre.

#### Furniture (and other bulky wastes)

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

#### Abandoned Bicycles

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

#### Covid-19 Waste

Any waste generated by tenants and staff 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.

## **5.7 Waste Storage Area Design**

The 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 facilities 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 (S.I. No. 10 of 1996) as amended. Sub-ordinate and associated legislation includes:
  - European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011) as amended
  - Waste Management (Collection Permit) Regulations 2007 (S.I. No. 820 of 2007) as amended
  - Waste Management (Facility Permit and Registration) Regulations 2007 (S.I. No. 821 of 2007) as amended
  - Waste Management (Licensing) Regulations 2000 (S.I. No. 185 of 2000) as amended
  - European Union (Packaging) Regulations 2014 (S.I. No. 282 of 2014)
  - 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 (SI 121 of 1994)*
  - European Union (Properties of Waste which Render it Hazardous) Regulations 2015 (S.I. No. 233 of 2015) as amended.
2. Environmental Protection Act 1992 (Act No. 7 of 1992) as amended;
3. Litter Pollution Act 1997 (Act No. 12 of 1997) as amended;
4. Eastern-Midlands Waste Region, *Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021* (2015)
5. The 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. DoECLG, *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. Environmental Protection Agency (EPA), *National Waste Database Reports 1998 – 2012*.
13. SDCC, *South Dublin County Development Plan 2016 – 2022* (2016)
14. 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).
15. European Waste Catalogue - Council Decision 94/3/EC (as per Council Directive 75/442/EC).
16. Hazardous Waste List - Council Decision 94/904/EC (as per Council Directive 91/689/EEC).

17. EPA, *European Waste Catalogue and Hazardous Waste List* (2002)
18. EPA, *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* (2015)
19. BS 5906:2005 *Waste Management in Buildings – Code of Practice*.
20. DoEHLG, *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2018).