

OPERATIONAL WASTE MANAGEMENT PLAN FOR PROPOSED RESIDENTIAL DEVELOPMENT

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Our Reference

CB/21/12139WMMR02

Date of Issue

20 December 2021

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Document History

Document Reference		Original Issue Date	
CB/21/12139WMR02		20 December 2021	
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	20 December 2021	20 December 2021

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1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Operational Waste Management Plan (OWMP) on behalf of Birkey Limited. The proposed development will principally consist of: the demolition of all existing structures on site including warehouses and 2 No. dwellings; and the construction of a part 6 No. to part 10 No. storey over basement development, comprising 1 No. café/retail unit at ground floor level and 183 No. Build-to-Rent apartments.

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 – 2011 as amended and associated Regulations¹, Protection of the Environment Act 2003 as amended², Litter Pollution Act 2003 as amended³, the *'Eastern-Midlands Region (EMR) Waste Management Plan 2015–2021'*⁴ and Dublin City Council (DCC) *'Dublin City Council (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws' 2018*⁵. In particular, this OWMP aims to provide a robust strategy for the storage, handling, collection and transport of the wastes generated at Site.

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

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

2.0 OVERVIEW OF WASTE MANAGEMENT IN IRELAND

2.1 National Level

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

A further policy document, *'Preventing and Recycling Waste – Delivering Change'* was published in 2002⁷. 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'*⁸. This document also stressed the need to decouple economic growth and waste generation, again through waste minimisation and reuse of discarded material.

In order to establish the progress of the Government policy document *Changing Our Ways*, a review document was published in April 2004 entitled *'Taking Stock and Moving Forward'*⁹. Covering the period 1998 – 2003, the aim of this document was to assess progress to date with regard to waste management in Ireland, to consider

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

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

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

It aims to fulfil the commitment in the Programme for Government to publish and start implementing a new National Waste Action Plan. It is intended that this new national waste policy will inform and give direction to waste planning and management in Ireland over the coming years. It was followed later this year by an All of Government Circular Economy Strategy. The policy document shifts focus away from waste disposal and back up the production chain. To support the policy, regulation is already in place (Circular Economy Legislative Package) or in the pipeline. The policy document contains over 200 measures across various waste areas including circular economy, municipal waste, consumer protection and citizen engagement, plastics and packaging, construction and demolition, textiles, green public procurement and waste enforcement.

One of the first actions to be taken is the development of a high-level, whole of Government Circular Economy Strategy to set a course for Ireland to transition across all sectors and at all levels of Government toward circularity. This strategy was issued for public consultation in April 2021.

Since 1998, the Environmental Protection Agency (EPA) has produced periodic 'National Waste (Database) Reports'¹¹ detailing, among other things, estimates for household and commercial (municipal) waste generation in Ireland and the level of recycling, recovery and disposal of these materials. The 2019 National Waste Statistics, which is the most recent study published, along with the national waste statistics web resource (November 2021) reported the following key statistics for 2019:

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

2.2 Regional Level

The proposed Development is located in the Local Authority administrative area of Dublin City Council (DCC).

The *EMR Waste Management Plan 2015 – 2021* is the regional waste management plan applicable to the DCC administrative area, which was published in May 2015.

The regional plan sets out the following strategic targets for waste management in the region that are relevant to the proposed development:

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

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

The *Dublin City Development Plan 2016 – 2022*¹³ sets out a number of policies and objectives for Dublin City in line with the objectives of the regional waste management plan. The plan identifies a need to further reduce the role of landfilling in favour of higher value recovery options. Waste policies and objectives with a particular relevance to this proposed Development are as follows:

Policies:

- *SI19: To support the principles of good waste management and the implementation of best international practice in relation to waste management in order for Dublin city and the region to become self-reliant in terms of waste management.*
- *SI20: To prevent and minimise waste and to encourage and support material sorting and recycling.*
- *SI21: To minimise the amount of waste which cannot be prevented and ensure it is managed and treated without causing environmental pollution.*
- *SI22: To ensure that effect is given as far as possible to the “polluter pays” principle.*

Objectives:

- *SIO16: To require the provision of adequately-sized-recycling facilities in new commercial and large scale residential developments, where appropriate.*
- *SIO18: To implement the current Litter Management Plan through enforcement of the litter laws, street cleaning and education and awareness campaigns.*
- *SIO19: To implement the Eastern-Midlands Waste Management Plan 2015 - 2021 and achieve the plan targets and objectives.*

The Draft *Dublin City Development Plan 2022 – 2028*¹⁴ sets out a number of policies and objectives for Dublin City in line with the objectives of the National climate action policy and emphasises the need to take action to address climate action across all sectors of society and the economy. In the waste sector, policy on climate action is focused on a shift towards a ‘circular economy’ encompassing three core principles: designing out waste and pollution; keeping products and material in use; and regenerating natural systems. Further policies and objectives can be found within the draft development plan.

Policies:

- CA7 F: *minimising the generation of site and construction waste and maximising reuse or recycling.*
- CA22: *The Circular economy: To support the shift towards the circular economy approach as set out in 'a Waste Action Plan for a Circular Economy 2020 to 2025, Ireland's National Waste Policy, or as updated.*
- CA23: *To have regard to existing Best Practice Guidance on Waste Management Plans for Construction and Demolition Projects as well as any future updates to these guidelines in order to ensure the consistent application of planning requirements.*
- SI27: *Sustainable Waste Management: To support the principles of the circular economy, good waste management and the implementation of best practice in relation to waste management in order for Dublin City 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.*
- SI30: *To require that the storage and collection of mixed dry recyclables, organic and residual waste materials within proposed apartment schemes have regard to the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018 (or and any future updated versions of these guidelines produced during the lifetime of this plan).*

Objectives:

- SIO14 *Local Recycling Infrastructure: To provide for a citywide network of municipal civic amenity facilities/ multi-material public recycling and reuse facilities in accessible locations throughout the city in line with the objectives of the circular economy and 15 minute city.*
- SIO16 *Eastern-Midlands Region Waste Management Plan: To support the implementation of the Eastern-Midlands Regional Waste Management Plan 2015–2021 and any subsequent plans in order to facilitate the transition from a waste management economy towards a circular economy.*

2.3 Legislative Requirements

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

- Waste Management Act 1996 as amended. Sub-ordinate and associated legislation includes:
 - European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011) as amended
 - Waste Management (Collection Permit) Regulations 2007 (S.I. No. 820 of 2007) as amended
 - Waste Management (Facility Permit and Registration) Regulation 2007 (S.I. No. 821 of 2007) as amended
 - Waste Management (Licensing) Regulations 2000 (S.I. No. 185 of 2000) as amended
 - European Union (Packaging) Regulations 2014 (S.I. No. 282 of 2014) as amended.
 - Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997) as amended
 - Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015)
 - European Communities (Waste Electrical and Electronic Equipment) Regulations 2014 as amended

- 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. 191 of 2015)
- Waste Management (Hazardous Waste) Regulations 1998 (S.I. No. 163 of 1998) as amended
- Waste Management (Shipments of Waste) Regulations 2007 (S.I. No. 419 of 2007) as amended
- *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 ¹³

These Acts and subordinate Regulations transpose the 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 and the proposed facilities management company undertake on-Site management of waste in accordance with all legal requirements and that the facilities management company 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 Industrial Emissions (IE) Licence granted by the EPA. The COR / permit / licence held will specify the type and quantity of waste able to be received, stored, sorted, recycled, recovered and / or disposed of at the specified site.

2.3.1 Dublin City Council Waste Management Bye-Laws

The DCC "Dublin City Council (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2018)" were brought into force in May 2019. These bye-laws repeal the previous Bye-Laws for the Storage, Presentation and Collection of Household and Commercial Waste. The bye-laws set a number of enforceable requirements on waste holders with regard to storage, separation and presentation of waste within the DCC administrative area. Key requirements under these bye-laws of relevance to the operational phase of the proposed Development include the following:

- Kerbside waste presented for collection shall not be presented for collection earlier than 5.00 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 10:00 am on the day following the designated waste collection day, unless an alternative arrangement has been approved in accordance with bye-law 2.3;
- 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.

The full text of the bye-laws is available from the DCC website.

2.4 Regional Waste Management Service Providers and Facilities

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

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

There is a DCC Recycling Centre at Shamrock Terrace (North Strand Recycling Centre), located c.1.15 km to the south-east of the Development Site, which can be utilised by the residents of the proposed Development for other household waste streams while a bottle bank can be found c. 600 m to the north west at the Drumcondra Tesco carpark.

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

3.0 DESCRIPTION OF THE DEVELOPMENT

3.1 Location, Size and Scale of the Development

Birkey Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at this c. 0.61 hectare (c. 6,067 sq m) site at No. 146A and Nos. 148-148A Richmond Road, Dublin 3 (Eircodes D03 W2H1, D03 T6P0, D03 Y8R9, D03 PX27, D03 K6F7, D03 E447 and D03 HR27). The site is bounded to the north-east by Richmond Road and the Leyden's Wholesalers & Distributor Site, to the north-west by an apartment development (Deakin Court), to the south-west by the Tolka River and to the south-east by a residential and commercial development (Distillery Lofts). Improvement works to Richmond Road are also proposed including carriageway widening and a new signal controlled pedestrian crossing facility on an area of c. 0.08

hectares (c. 762 sq m). The development site area and road works area will provide a total application site area of c. 0.69 hectares (c. 6,829 sq m).

The proposed development will principally consist of: the demolition of all existing structures on site (c. 2,346 sq m) including warehouses and 2 No. dwellings; and the construction of a part 6 No. to part 10 No. storey over basement development (with roof level telecommunications infrastructure over), comprising 1 No. café/retail unit (157 sq m) at ground floor level and 183 No. Build-to-Rent apartments (104 No. one bedroom units and 79 No. two bedroom units). The proposed development has a gross floor area of c. 16,366 sq m over a basement of c. 2,729 sq m. The proposed development has a gross floor space of c. 15,689 sq m.

The development also includes the construction of a new c. 126 No. metre long section of flood wall to the River Tolka along the site's southern boundary. The new flood wall is positioned at the top of the existing river bank and will connect to existing constructed sections of flood wall upstream and downstream of the site. The top of the wall will be set at the required flood defence level resulting in typical wall heights of c. 1.2 to 2 metres above existing ground levels. The development will also include the repair and maintenance of the existing river wall on site adjacent to the River Tolka.

The development also provides ancillary residential amenities and facilities; 71 No. car parking spaces including 8 No. electric vehicle spaces, 4 No. mobility impaired spaces and 1 No. car share space; 5 No. motorcycle parking spaces; bicycle parking; electric scooter storage; a drop off space; the decommissioning of the existing telecommunications mast at ground level and provision of new telecommunications infrastructure at roof level including shrouds, antennas and microwave link dishes; balconies facing all directions; public and communal open space; a pedestrian/bicycle connection along the north-western boundary of the site from Richmond Road to the proposed pedestrian/bicycle route to the south-west of the site adjoining the River Tolka; roof gardens; hard and soft landscaping; boundary treatments; green roofs; ESB Substation; switchroom; comms rooms; generator; lift overruns; stores; plant; and all associated works above and below ground.

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 less frequently / in smaller quantities which will need to be managed separately including:

- Green / garden waste may be generated from external landscaping;
- Batteries (both hazardous and non-hazardous);
- Waste electrical and electronic equipment (WEEE) (both hazardous and non-hazardous);
- Printer cartridges / toners;
- Chemicals (paints, adhesives, resins, detergents, etc.);
- Light bulbs;

- Textiles;
- Waste cooking oil (if any generated by the residents and tenants);
- Furniture (and, from time to time, other bulky wastes); and
- Abandoned bicycles.

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

3.3 European Waste Codes

In 1994, the *European Waste Catalogue* ¹⁵ and *Hazardous Waste List* ¹⁶ were published by the European Commission. In 2002, the EPA published a document titled the *European Waste Catalogue and Hazardous Waste List* ¹⁷, which was a condensed version of the original two documents and their subsequent amendments. This document has recently been replaced by the EPA 'Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous' ¹⁸, applicable since 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, CORs, permits and licences and the 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 (EWC)) for typical waste materials expected to be generated during the operation of the proposed development are provided in Table 3.1, below.

Table 3.1 Typical Waste Types Generated and LoW Codes

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

* Individual waste type may contain hazardous materials

4.0 ESTIMATED WASTE ARISING

A waste generation model (WGM) developed by AWN has been used to predict waste types, weights and volumes expected to arise 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. While the floor area usage (m²) has been used to estimate the waste arising from the café/retail unit.

The estimated waste generation for the proposed Development for the main waste types is presented in Tables 4.1.

Table 4.1 *Estimated Waste Generation for the development*

Waste Type	Waste Volume (m ³ / week)	
	Residential	Café/Retail
Organic Waste	2.56	0.10
Dry Mixed Recyclables	17.48	0.24
Glass	0.49	0.31
Mixed Non-Recyclables	10.16	0.01
Total	30.70	0.66

*BS5906:2005 Waste Management in Buildings – Code of Practice*¹⁹ has been considered in the calculations of waste estimates. AWN's modelling methodology is based on recently published data and data from numerous other similar developments in Ireland and is based on AWN's experience, it provides a more representative estimate of the likely waste arisings from the proposed Development. All amenity space has been accommodated within the residential waste figures and will be stored within the residential waste stores.

5.0 WASTE STORAGE AND COLLECTION

This section provides information on how waste generated within the Site will be stored and collected. This has been prepared with due consideration of the proposed Site layout as well as best practice standards, local and national waste management requirements, including those of DCC. 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;*
- *Dublin City Council Development Plan 2016 – 2022 (Appendix 10);*
- DCC Dublin City Council (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2018); and
- *DoHLGH, Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)*²⁰.

Waste Storage Areas

Locations of all Waste Storage Areas (WSAs) can be viewed on the drawings submitted with the planning application under separate cover.

Residential Units

Two (2 no.) shared communal WSAs have been allocated within the development design for the residential apartment blocks. These have been strategically located on the ground level, in close proximity to cores.

Café/Retail Unit

The café/retail unit has allocate space within their own unit to store the required bins.

The waste receptacles from the residential WSAs and café/retail unit will be collected by facilities management or the waste contractor (agreement dependant), at the time of collection and brought through the development, to just inside the development gate, in front of the ESB Substation. Access through the gateway will be provided to the waste contractor via the facilities management company. From here the waste contractor will rotate the bins out to the awaiting vehicle in the shared plaza, emptied and then return them. The staging/collection area is such that it will not obstruct traffic or pedestrians (allowing a footway path of at least 1.8m, the space needed for two wheelchairs to pass each other) as is recommended in the Design Manual for Urban Roads and Streets (2019) ²¹.

Using the estimated waste generation volumes in Tables 4.1, above, the waste receptacle requirements for MNR, DMR, organic waste and glass have been established for the WSA. It is envisaged that MNR, DMR, organic waste and glass will be collected on a weekly basis.

Waste Storage Requirements

Estimated waste storage requirements for the operational phase of the proposed Development are detailed in Table 5.1, below.

Table 5.1 Waste storage requirements for the proposed development

Area/Use	Bins Required			
	MNR ¹	DMR ²	Glass	Organic
Residential WSA	10 no. 1100 L	18 no. 1100 L	2 no. 240 L	11 no. 240 L
Commercial	2 no. 240 L	1 no. 240 L	1 no. 120 L or Small container	1 no. 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 facilities management company in the residential WSA.

As outlined in the current *Dublin City Development Plan*, it is preferable to use 1,100 L wheelie bins for waste storage, where practical. However, in the case of organic and glass waste, it is considered more suitable to use smaller waste receptacles due to the weight of bins when filled with organic and glass waste. The use of 240 and 120 L bins, as recommended in Table 5.1, will reduce the manual handling impacts on the facilities management personnel and waste contractor employees.

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 (240 L and 1100 L)

5.1 Waste Storage – Residential Units

Residents will be required to segregate waste into the following main waste streams:

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

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 WSAs are illustrated in the drawings submitted with the planning application under separate cover.

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

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 residential WSAs 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, light bulbs 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 – Café/Retail Unit

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

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

As required, the staff will need to bring segregated DMR, MNR, glass and organic waste to their own WSA, within their unit. Café/retail waste will not be mixed with residential waste.

Suppliers for the café/retail tenant should 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.

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

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

5.3 Waste Collection

There are numerous private contractors that provide waste collection services in the Dublin City 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 waste receptacles from the residential WSAs and café/retail unit will be collected by facilities management or the waste contractor (agreement dependant), at the time of collection and brought through the development, to just inside the development gate, in front of the ESB Substation. Access through the gateway will be provided to the waste contractor via the facilities management company. From here the waste contractor will rotate the bins out to the awaiting vehicle in the shared plaza, emptied and then return them. The staging/collection area is such that it will not obstruct traffic or pedestrians (allowing a footway path of at least 1.8m, the space needed for two wheelchairs to pass each other) as is recommended in the Design Manual for Urban Roads and Streets (2019).

A trolley / tug or suitable vehicle may be required to convey the bins to and from the staging / collection area. The facilities management or waste contractor will ensure that empty bins are promptly returned to the WSAs after collection / emptying.

Suitable access and egress has been provided to enable the bins to be moved easily from the WSA to the waste collection vehicles on the appropriate days. Waste will be collected at agreed days and times by the nominated waste contractors.

All waste receptacles should be clearly identified as required by waste legislation and the requirements of the DCC *Waste Bye-Laws*. Waste will be presented for collection in a manner that will not endanger health, create a risk to traffic, harm the environment or create a nuisance through odours or litter.

It is recommended that bin collection times are staggered to reduce the number of bins required to be emptied at once and the time the waste vehicle is on-Site. 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 Waste

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

Batteries

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

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

Waste Electrical and Electronic Equipment (WEEE)

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

As noted above, the café/retail tenant 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 café/retail unit, where appropriate. The café/retail tenant will be required to store this waste within their unit and arrange for return to retailers or collection by an authorised waste contractor, as required.

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

Chemicals

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

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

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

Light Bulbs

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

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

Textiles

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

Waste Cooking Oil

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

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

Furniture & Other Bulky Waste Items

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

Abandoned Bicycles

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

Covid-19 Waste

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

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

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

5.5 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 management company, tenants and residents will be required to maintain the resident bins and storage areas in good condition as required by the DCC Waste Bye-Laws.

6.0 CONCLUSIONS

In summary, this OWMP presents a waste strategy that addresses all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the proposed 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 contributing to 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 *DCC Waste Bye-Laws*.

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

7.0 REFERENCES

1. Waste Management Act 1996 as amended. Sub-ordinate and associated legislation includes:
 - European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011) as amended
 - Waste Management (Collection Permit) Regulations 2007 (S.I. No. 820 of 2007) as amended
 - Waste Management (Facility Permit and Registration) Regulations 2007 (S.I. No. 821 of 2007) as amended
 - Waste Management (Licensing) Regulations 2000 (S.I. No. 185 of 2000) as amended
 - European Union (Packaging) Regulations 2014 (S.I. No. 282 of 2014)
 - Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997)
 - Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015)
 - European Communities (Waste Electrical and Electronic Equipment) Regulations 2014 as amended
 - 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. 190 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. Dublin City Council (DCC) *Dublin City Council (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2018)*
6. Department of Environment and Local Government (DoELG) *Waste Management – Changing Our Ways, A Policy Statement* (1998)
7. Department of Environment, Heritage and Local Government (DoEHLG) *Preventing and Recycling Waste - Delivering Change* (2002)
8. DoELG, *Making Ireland's Development Sustainable – Review, Assessment and Future Action (World Summit on Sustainable Development)* (2002)
9. DoEHLG, *Taking Stock and Moving Forward* (2004)
10. Department of Communications, Climate Action and Environment (DCCA), *Waste Action Plan for the Circular Economy - Ireland's National Waste Policy 2020-2025* (2020).
11. Environmental Protection Agency (EPA), *National Waste Database Reports 1998 – 2012*.
12. DCC, *Dublin City Development Plan 2016 – 2022* (2016)

13. DCC, Draft Dublin City Development Plan (2022-2028)
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. *Department of Housing Local Government and Heritage (DoHLGH) Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2020).
21. DoHLGH, *Design Manual for Urban Roads and Streets* (2019).