

**OPERATIONAL WASTE
MANAGEMENT PLAN FOR
A PROPOSED SHARED
LIVING DEVELOPMENT
AT
HENDRONS, DOMINICK
STREET UPPER**

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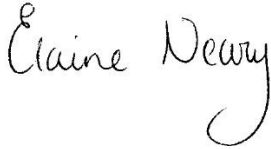
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1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Operational Waste Management Plan (OWMP) on behalf of Western Way Developments Ltd, for a proposed shared living development on a site at Dominick Street Upper, Dublin 7.

The proposed development comprises demolition of the existing warehouse buildings and no. 36 Dominick Street Upper and retention of the Hendrons Building as part of an overall redevelopment of the site to accommodate a shared living scheme including neighbourhood uses (including café/shop, gym and yoga studios). The scheme will include 280 no. shared living rooms (281. no bedspaces), internal and external amenity space over 5 no. blocks ranging in height from 4 no. storeys to 9 no. storeys, secure bicycle parking, site-wide landscaping, ESB substation and switch-room and site development works all on the 0.3285 hectare site.

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 Regulations ¹, *Protection of the Environment Act 2003* as amended ², *Litter Pollution Act 2003* as amended ³, the '*Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021*' ⁴ and the 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 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 WASTEMANAGEMENT IN IRELAND

2.1 National Level

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

A further policy document '*Preventing and Recycling Waste – Delivering Change*' was published in 2002 ⁷. This document proposed a number of programmes to increase recycling of waste and allow diversion from landfill. The need for waste minimisation at source was considered a priority.

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

also stressed the need to break the link between economic growth and waste generation, again through waste minimisation and reuse of discarded material.

In order to establish the progress of the Government policy document *Changing Our Ways*, a review document was published in April 2004 entitled '*Taking Stock and Moving Forward*'⁹. Covering the period 1998 – 2003, the aim of this document was to assess progress to date with regard to waste management in Ireland, to consider developments since the policy framework and the local authority waste management plans were put in place, and to identify measures that could be undertaken to further support progress towards the objectives outlined in *Changing Our Ways*.

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

The policy document '*A Resource Opportunity*'¹⁰ 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*'¹¹ 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*'¹² 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 Dublin City Council (DCC).

The *EMR Waste Management Plan 2015 – 2021* is the regional waste management plan for the DCC 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:

- 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 development are:

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.*

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 2001 (No. 36 of 2001), 2003 (No. 27 of 2003) and 2011 (No 20 of 2011). 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 ¹⁴

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

One of the guiding principles of European waste legislation, which has in turn been incorporated into the *Waste Management Act 1996 - 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 proposed building management company undertake on-site management of waste in accordance with all legal requirements and employ suitably permitted/licenced contractors to undertake off-site management of their waste in accordance with all legal requirements. This includes the requirement that a waste contractor handle, transport and reuse/recover/recycle/dispose of waste in a manner that ensures that no adverse environmental impacts occur as a result of any of these activities.

A collection permit to transport waste must be held by each waste contractor which is issued by the National Waste Collection Permit Office (NWCPO). Waste receiving facilities must also be appropriately permitted or licensed. Operators of such facilities cannot receive any waste, unless in possession of a Certificate of Registration (COR) or waste permit granted by the relevant Local Authority under the *Waste Management (Facility Permit & Registration) Regulations 2007* as amended or a waste or IE (Industrial Emissions 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 Dublin City Council Waste Bye-Laws

The DCC “Dublin City Council (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2018)” came into force in May 2019. These bye-laws repeal the previous ‘*Bye-Laws for the Storage, Presentation and Collection of Household and Commercial*’. The bye-laws set a number of enforceable requirements on waste holders with regard to storage, separation and presentation of waste within the DCC functional area. Key requirements under these bye-laws of relevance to 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;
- In the Central Commercial District, the prescribed time for kerbside waste to be presented shall be not before 5.00 pm on the designated waste collection day;
- All containers used for the presentation of kerbside waste and any uncollected waste shall be removed from any roadway, footway, footpath or any other public place no later than 10:00am on the day following the designated waste collection day, unless an alternative arrangement has been approved in accordance with bye-law 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 Waste 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 and commercial sectors 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 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 closest civic amenity site to the development is located c. 1.81 km to the east, at Shamrock Terrace, North Strand, while the closest bring bank is located c. 860 m to the north west of the development at the Phibsborough Shopping Centre.

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

Western Way Developments Ltd, intend to apply to An Bord Pleanála for permission for a strategic housing development at this site of approximately 0.3285ha at nos. 36 – 40 Dominick Street Upper, Dublin 7, D07 X4HW. The site includes the Hendrons Building (and western railings) protected structure no. 8783 and the boundary wall of the application site on Western Way, protected structure no. 8483.

The development, which ranges from 4 to 9 no. storeys across 5 no. blocks (Block A over basement) and includes the re-use and extension of the protected structure, c. 10,953.9 sq.m of Build-to-Rent Shared Living accommodation (inclusive of amenity space), 280 no. units [281 no. bedspaces], c. 429.8 sq.m of publicly accessible uses including a gym, café/shop and yoga studios. The development will consist of;

- Demolition of the existing vacant warehouses and dwelling at no. 36 Dominick Street Upper (c. 2356sqm);
- Retention and re-use of the existing Hendrons building (including retention of existing 'Hendrons' signage), a protected structure under RPS Ref.: 8783, including alterations and additions and an additional storey (resulting in a 5 no. storey building [Block B]) to facilitate the proposed redevelopment, including removal of non-original internal dividing walls, 2 no. external emergency exit stairs, reinstatement and restoration of original window

openings on the front façade and retention of the existing glass blocks, original railings, stairs and lift shaft;

- Construction of 4 no. additional buildings on site including; Block A fronting Palmerston Place (4 – 5 no. storeys), Block C on the corner of Dominick Street Upper and Western Way (9 no. storeys), Block D fronting Western Way (7 – 8 no. storeys) and Block E fronting Western Way (5-6 no. storeys);
- Block C will accommodate a gym, yoga/pilates studio and changing rooms at lower ground floor level (259.7sqm);
- Resident internal amenity space is provided within the upper levels of the Hendrons Building and throughout the site including; living, kitchen dining areas, co-working spaces, a sky lounge, laundry, cinema room, games room, waste management facilities, bicycle repair station, storage and lounge areas (2,020.4sqm);
- External amenity space is provided in the form of 2 no. roof terraces at Blocks A (fourth floor level) and D (seventh floor level) and within a central courtyard and entrance plaza (1267.1sqm);
- Provision of an ancillary single storey ESB substation and switch-station including access via Western Way (and partial demolition of the boundary wall (protected strut no. 8483) to accommodate this],
- Provision of site wide landscaping including pathways, lighting, sedum roofs and all ancillary site development works including boundary treatments.

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 tenants);
- Furniture (and from time to time other bulky wastes); and
- Abandoned bicycles.

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

3.3 European Waste Codes

In 1994, the *European Waste Catalogue*¹⁵ and *Hazardous Waste List*¹⁶ were published by the European Commission. In 2002, the EPA published a document titled the *European Waste Catalogue and Hazardous Waste List*¹⁷, which was a condensed version of the original two documents and their subsequent amendments. This document has recently been replaced by the EPA '*Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous*'¹⁸ which became valid from the 1st June 2015. This waste classification system applies across the EU and is the basis for all national and international waste reporting, such as those associated with waste collection permits, COR's, permits and licences and EPA National Waste Database.

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

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 and shared spaces has been determined based on the predicted occupancy of the units. While the estimated waste volumes for the café and gym/yoga/pilates unit have been calculated based upon floor area m² usage.

The total estimated waste generation for the development for the main waste types is presented in Table 4.1 below and is based on the uses and areas as advised by the project Architects (John Fleming Architects) in November 2020.

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

Waste type	Waste Volume (m ³ /week)		
	Shared Living Accommodation	Cafe	Gym/Yoga/Pilates Studio
Organic Waste	1.11	0.17	0.05
DMR	10.66	0.40	0.56
Glass	0.90	0.01	0.01
MNR	6.20	0.51	0.23
Total	18.87	1.08	0.86

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

The BS5906:2005 Waste Management in Buildings – Code of Practice ¹⁸ was considered in the estimations of the waste arising. It has been assumed that the shared living units, café and gym/yoga/pilates studio units will generate similar waste volumes over a seven-day period. The estimated waste quantities for the residents include for the waste generated in the community facilities and areas on a weekly basis.

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 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*
- DoEHLG, Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (Section 4.8-4.9) (2018) ¹⁹.

A communal Waste Storage Area (WSA), split into a resident access and management only access areas has been allocated within the development design to accommodate waste arising from the residents. The WSA is located on the ground floor with both internal and external access. All residents will have access to the resident access side of the WSA, but it is envisaged that they will empty their waste into the Area Waste Stations (AWS) located on each floor of the development. Space will be required to allocated internally by building management for the storage of Waste Electrical and Electronic Equipment (WEEE), lightbulbs and waste cooking oil. The WSA location can viewed on the drawings submitted with the application.

The commercial units will have their own separate bins stored in the management access only side of the WSAs. These bins will be locked to avoid cross contamination with the residential waste.

Using the estimated waste generation volumes in Table 4.1, the waste receptacle requirements for MNR, DMR, organic waste and glass have been established for the for the development and can be viewed in table 5.1 below.

Area/Use	Bins Required				
	MNR*	DMR**	Organic	Glass	WEEE, Lightbulbs, Cooking Oil
Shared Living Accommodation	6 x 1100L	10 x 1100L	5 x 240L	4 x 240L	Roll Cage & Bunded Container
Café Unit	2 x 240L	2 x 240L	1 x 240L	1 x 120L	-
Gym/Yoga/Pilates Studio	1 x 240L	2 x 240L	1 x 120L	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 building management company in the WSAs.

As outlined in the current Dublin City Development Plan, it is preferable to use 1,100 litre 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 & 120 litre bins as recommended in Table 5.1 will reduce the manual handling impacts on the building 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 WSA are shown in Figure 5.1. All waste receptacles used will comply with the IS EN 840 2012 standard for performance requirements of mobile waste containers, where appropriate.



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

5.1 Waste Storage – Shared Living Units

Residents in the shared living accommodation will be required to segregate waste into the following main waste streams:

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

Segregated bins for DMR, MNR, organic waste and glass will be provided within the kitchens/dining areas of the residential units by the building management company. Additional bins for segregation of DMR and MNR will also be provided in the common areas, where appropriate. Resident's bedrooms will have bins for DMR, MNR and organic waste segregation. Residents will be required to segregate their waste as above into the provided receptacles in accordance with the terms of the letting agreements of the Operator.

No food macerators will be installed within any area of the shared living accommodation units.

All bins/containers will be clearly labelled, and colour coded to avoid cross contamination of the different waste streams. Signage will be posted on or above the bins to show which wastes can be put in each bin.

As required, the residents will bring waste from their bedrooms as required to the Area Waste Stations (AWSs) located on each floor or to the WSA on ground level. Cleaning staff will also empty the bins in the resident's bedrooms on a fortnightly basis. More frequent room servicing can be arranged with building management. If residents need to access the WSA, Residents will use the lifts or stairs of the building to bring waste to the ground level. Residents will be provided with access fobs/key/code by the Operator to access the WSA, however the majority of waste can be taken to the nearest AWS for disposal. Building cleaning staff will bring waste from the AWSs and common areas to the WSA as required.

Segregated waste bins (as per Table 5.1) will be provided by the building management company in the WSA. Bins will be labelled, and colour coded to minimise cross contamination.

Suitable storage containers will be provided within the development to store WEEE, light bulbs and waste cooking oil, until collection is arranged by building management.

Other waste materials such as batteries, printer toner/cartridges and textiles may be generated infrequently in the shared living areas. Residents will be required to identify suitable temporary storage areas for these waste items within their units and dispose of them appropriately. Further details on how these waste types will be managed can be found in Section 5.4.

5.1.1 Kitchen/Living/Dining and Common Areas

Shared kitchen/ dining areas will be located throughout the development, other common areas will also be spread out throughout the development.

Kitchen/Living/Dining Areas

The kitchen/living/dining areas will generate a significant volume of waste on a daily basis and, as such, it is important that adequate provision is made for the storage and daily transfer of wastes.

AWS will be required to be provided in the kitchen/dining areas to facilitate segregation at source of waste. The AWS should include a bin for organic (food), DMR, MNR and glass. Alternatively, another larger bin will be provided in the WSA for larger glass collections.

Segregated waste from residents' bedrooms should be brought to the nearest AWS or the ground floor WSA for disposal by residents. It is envisaged that residents will not generally need to access the WSA on ground floor level. However, access to the WSA will be provided to residents.

An option for the types of bins that could be provided are illustrated in Figure 5.2 below.



Figure 5.2 An Indicative Area Waste Station (AWS) unit

Common Areas

AWSs will be strategically located in the common areas for residents/visitors to dispose of waste. The common area AWSs will be strategically located throughout the development where required and should contain bins for DMR and MNR.

Building cleaning staff will empty the AWS bins each day (or more frequently as required) and will bring the bin bags using trolleys, via the lifts to the dedicated Waste Storage Area(s) (WSA) at ground level.

All bins/containers should be clearly labelled, and colour coded to avoid cross contamination of the different waste streams. Signage should be posted above or on the bins to show exactly which wastes can be put in each.

It is currently proposed that DMR, MNR organic waste and glass will be collected on a weekly basis. Other waste types (e.g. WEEE, batteries etc.) will be collected less frequently, as required.

Other waste materials such as batteries and WEEE, batteries and lightbulbs will be generated less frequently. Space will be allowed for in the WSA or building, for containers and cages for storage of these waste types as required.

5.2 Waste Storage – Café & Gym/Yoga/Pilates Unit

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

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

The commercial tenants will have their bins located in the building WSA on the management access side (separated from the residential access room). The commercial bins will be locked to prevent cross contamination with residential waste.

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

All bins/containers in the tenants areas 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.

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 5.4.

5.3 Waste Collection

There are numerous private contractors that provide household and commercial waste collection 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 and/or licensed facilities only.

Waste collection will occur from the loading Bay adjacent to Block C for all of the developments waste receptacles. The waste management company will park their vehicle into the developments loading bay then retrieve the waste receptacles from the WSA.

Other waste types (e.g. batteries, WEEE, waste cooking oil etc.) are discussed in Section 5.4.

It is recommended that waste collection times/days are staggered for the different waste types to reduce the number of bins required to be presented for collection/emptying at the collection point adjacent to Block C at any one time, immediately prior to collection.

All waste receptacles presented for collection will be clearly identified as required by waste legislation and the requirements of the DCC Waste Bye-Laws. Also, 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.

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

Waste Electrical and Electronic Equipment (WEEE)

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

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

Printer Cartridge/Toners

It is recommended that a printer cartridge/toner bin is provided in the commercial units, where appropriate. The commercial tenants tenants will be required to store this waste within their unit and arrange for return to retailers or collection by an authorised waste contractor, as required.

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

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

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

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

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

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

Textiles

Where possible, waste textiles should be recycled or donated to a charity organisation for reuse.

Waste Cooking Oil

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

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

Furniture (and other bulky wastes)

Furniture and other bulky waste items (such as carpet etc.) may occasionally be generated by the commercial tenants. 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.

Covid-19 Waste

Any waste generated by residents and tenants 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.

Abandoned Bicycles

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

5.5 Waste Storage Area Design

The WSA 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(s) will be required to maintain the waste 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 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 *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 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 2001 (S.I. No. 36 of 2001), 2003 (S.I. No. 27 of 2003) and 2011 (S.I. No. 20 of 2011). 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. 190 of 2015)
 - 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 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. DoEHLG, *A Resource Opportunity - Waste Management Policy in Ireland* (2012)
11. Department of Communications, Climate Action and Environment (DCCA), *Waste Action Plan for the Circular Economy - Ireland's National Waste Policy 2020-2025* (2020).
12. Environmental Protection Agency (EPA), *National Waste Database Reports 1998 – 2012*.
13. DCC, *Dublin City 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).