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# **Stage 1 Construction Waste Management Plan**

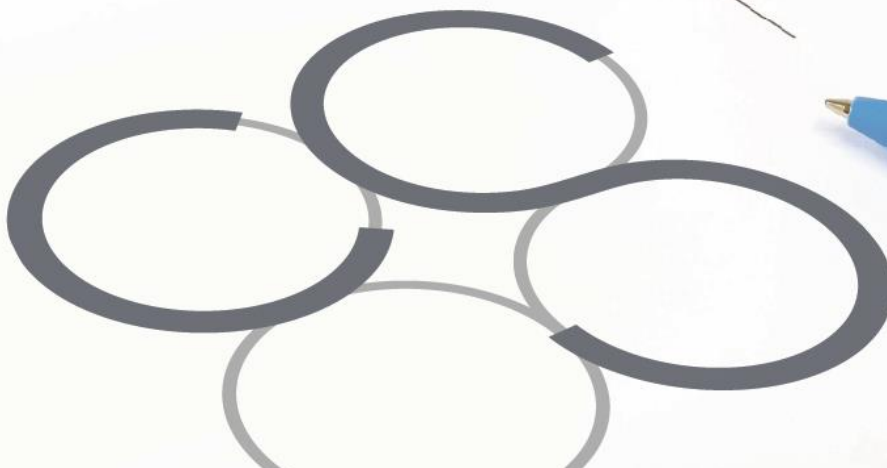
## **Proposed Residential Development**

### **Devoy Barracks, Naas, Co. Kildare**

Client: Land Development Agency

Job No. L086

March 2022



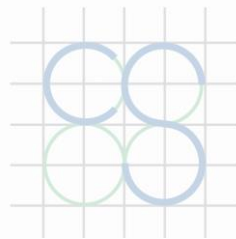


## STAGE 1 CONSTRUCTION WASTE MANAGEMENT PLAN

### PROPOSED RESIDENTIAL DEVELOPMENT, DEVOY BARRACKS, NAAS, CO. KILDARE

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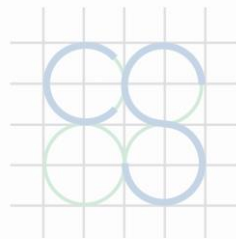


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## **1.0 INTRODUCTION**

Cronin & Sutton Consulting Engineers (CS Consulting) have been commissioned by the Land Development Agency to prepare a Construction Waste Management Plan in support of a proposed residential development at John Devoy Road, Naas, County Kildare.

The purpose of this Construction Waste Management Plan (WMP) is to ensure that waste generated during the construction phase of the development will be managed and disposed of in a way that ensures the provisions of the Waste Management Acts 1996 to 2013 and the Eastern-Midlands Region (EMR) Waste Management Plan 2015-2021 are complied with. It will also ensure that optimum levels of waste reduction, re-use and recycling are achieved.

## **2.0 GOVERNMENTAL POLICY**

### **2.1 National Level**

The publication, "*Changing Our Ways*", which identifies objectives for the prevention, minimization, reuse, recycling, recovery and disposal of waste in Ireland, was issued by the Government in September 1998. The target for C&D waste in this Strategy was to recycle at least 50% of C&D waste by 2003, with an increase to at least 85% by 2013.

The Forum for the Construction Industry, which represents the waste sector of the industry, released a report titled "*Recycling of Construction and Demolition Waste*" concerning the development and implementation of a voluntary construction industry programme to meet the governments objectives for the recovery of construction and demolition waste. The National Construction and Demolition Waste Council (NCDWC) was launched in June 2002 and subsequently produced "*Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects*" in July 2006. There are thresholds set out in the Guidelines to determine whether a C&D WMP is required and in line with the Guidelines, a development requires a C&D WMP for new residential developments of 10 houses or more and new developments, including institutional, educational, health and other public facilities, with an aggregate floor area exceeding 1,250m<sup>2</sup>.

The Guidelines outline the issues that need to be addressed at the pre-planning stage of a development all the way through to its completion. The guidelines include the following:

- predicted demolition & construction wastes and procedures to prevent, minimise, recycle and reuse wastes;
- waste disposal/recycling of C&D wastes at the site;



- list of sequence of demolition operations to be followed;
- provision of training for waste manager and site crew;
- details of proposed record keeping system;
- details of waste audit procedures and plan;
- details of consultation with relevant bodies, i.e. waste recycling companies, Kildare County Council, etc.

In 2002, the Construction Industry Federation (CIF) issued "*Construction and Demolition Waste Management – a handbook for Contractors and Site Managers*".

Annually the Environmental Protection Agency (EPA) issue a "*National Waste (Database) Reports*" detailing C&D waste generation and the level of recycling, recovery and disposal of this material, domestic and municipal waste rates, etc.

## **2.2 Regional Level**

A Waste Management Plan for Kildare County Council was in place from 2005-2010, with periodic revisions. This was superseded by the Eastern-Midlands Region (EMR) Waste Management Plan 2015-2021, which was launched in May 2015.

The Eastern-Midlands Region comprises Dublin City Council, Dún Laoghaire-Rathdown, Fingal, South Dublin, Kildare, Louth, Laois, Longford, Meath, Offaly, Westmeath and Wicklow County Councils. The Plan provides a framework for the prevention and management of waste in a sustainable manner in these 12 local authority areas.

The three overall performance targets of the Eastern-Midlands Region Waste Management Plan are as follows:

- 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.
- Reduce to 0% the direct disposal of unprocessed municipal waste to landfill (from 2016 onwards) in favour of higher value pre-treatment processes and indigenous recovery practices.

The Plan's implementation is led by the Eastern-Midlands Regional Waste Office based in Dublin City Council.

Ireland achieved 68% material recovery of non-hazardous, non-soil & stones C&D wastes in 2014. One of the primary objectives of the Plan is to achieve more sustainable waste management practices in the C&D sector. This requires the following actions:

- The development company must employ best practice at the design, planning and construction stage to ensure waste prevention and recycling opportunities are identified and implemented.
- Waste Collectors are required to introduce source-separation of recyclables and introduce graduated charges to incentivize better site practices.

Local Authorities will ensure the voluntary industry code is applied to development control, to regulate the collection and treatment of waste to meet the Plan objectives and will also work to develop markets for recycled materials.

### **2.3 Legislative Requirements**

One of the guiding principles of European waste legislation, which has in turn been incorporated into the Waste Management Act 1996 (as

amended by the Waste Management (Amendment) Act 2001) 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 to its legal disposal (including its method of disposal). Following on from this is the concept of 'Polluter Pays', whereby the waste producer is liable to be prosecuted for pollution incidents, which may arise from the incorrect management of waste produced, including the actions of any contractors engaged (e.g. for collection and transport of waste).

Waste contractors are typically engaged to transport waste off-site. Each contractor must comply with the provisions of the Waste Management Act 1996 and associated Regulations. This includes the requirement that a contractor handle, transport and 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 the relevant 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 waste permit granted by the local authority under the Waste Management (Facility Permit & Registration) Regulations 2007 or a waste license granted by the EPA. The permit/license held will specify the type and quantity of waste able to be received, stored, sorted, recycled and/or disposed of at the specified site.

Should the initial assessment of the site indicate that material would have to be removed from site then the material will be classified in accordance with legislative requirements to determine if the material is classified as hazardous or non-hazardous. All material deemed to be non-hazardous will then be assessed under Waste Acceptance Criteria requirements for disposal to a licensed landfill facility in accordance with 2002 European Landfill Directive

[2003/33/EC]. Only material deemed through independent laboratory analysis to be either inert or non-hazardous can be disposed of at landfill facilities in the Republic of Ireland at present, hazardous material having to be taken abroad for disposal.

The assessment and removal of such material will require the main contractor to employ a suitably qualified environmental specialist to develop a soil management and removal plan and ensure full compliance with statutory requirements.

### 3.0 SITE LOCATION

The proposed development site is located at Devoy Barracks, Naas, Co. Kildare. The site is located in the administrative jurisdiction of Kildare County Council and has a total gross area of approximately 4.1 ha

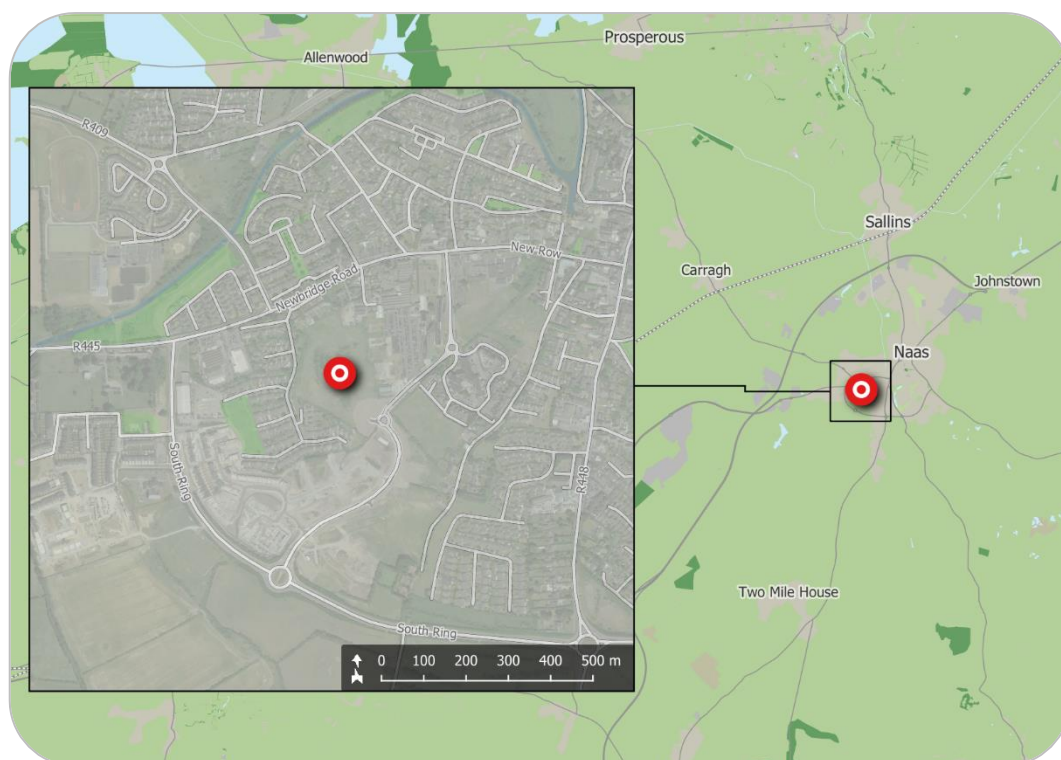


Figure 1 – Location of proposed development site  
(map data & imagery: EPA, OSi, OSM Contributors, Google)

The location of the proposed development site is shown in Figure 1. The indicative extents of the development site, as well as relevant elements of the surrounding road network, are shown in more detail in Figure 2.

The site is bounded to the east by Kildare County Council Campus, to the north by existing residential on Devoy Terrace and industrial units and to the south and west by Arconagh residential housing estate.

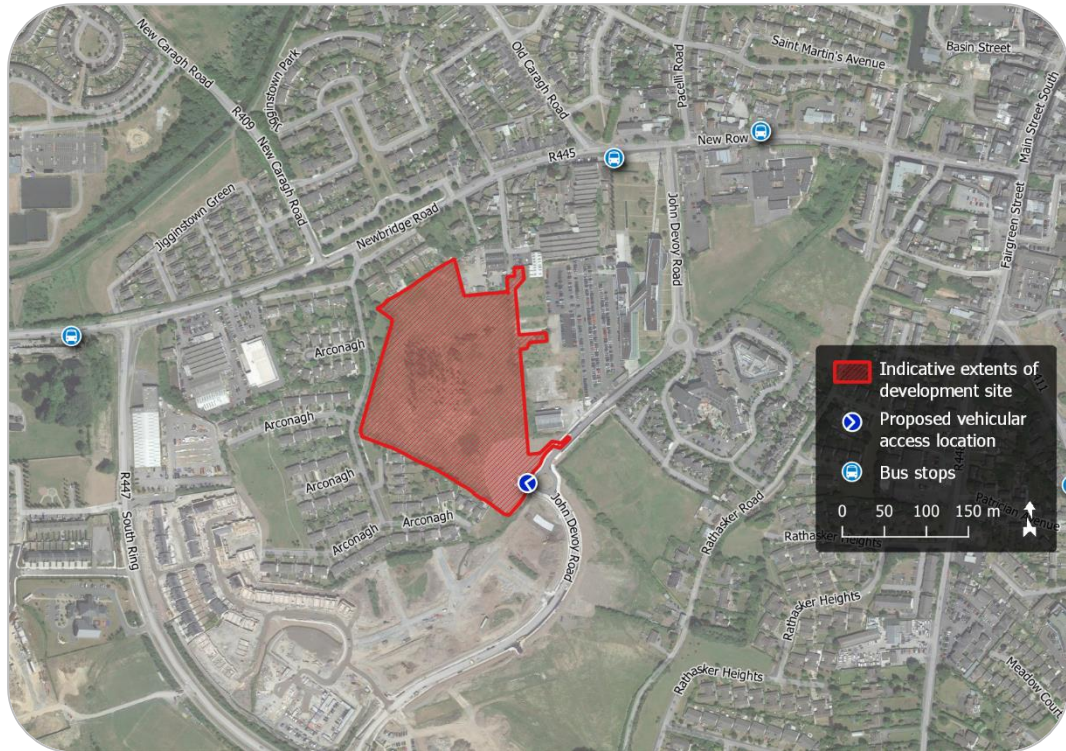


Figure 2 – Site extents and environs  
(map data & imagery: NTA, GoCar, OSM Contributors, Microsoft)

#### **4.0 EXISTING LAND USE**

The subject site is greenfield with an overall gross area of approx. 4.1 Ha. The lands fall from a maximum height of 98.15m AOD in the north to a low of 92.50m AOD in the southeast corner of the site and are currently accessed from the recently constructed John Devoy Road to the southeast.



## 5.0 DESCRIPTION OF THE DEVELOPMENT

The development site is located on John Devoy Road, Naas, Co Kildare, known locally as Devoy Barracks. The nett site area is 3.97 hectares in area, the area of the application is 4.1 hectares.

The site is located to the south-west of the town, close to the town centre, and zoned residential in the current Naas Local Area Plan 2021-2027. Access is proposed via an existing access point on the John Devoy Road along the southern boundary with additional pedestrian access provided to the east, and future pedestrian and cycle connection opportunities provided to the north, west and east.

The revised development is for the construction of 219 no. residential units, comprising of a mix of terraced houses (42 no. 3 bed units), and duplex / apartment units (177 no. in total; 64 no. 1 bed units; 105 no. 2 bed units and 8 no. 3 bed units) ranging in height from 2 to 5 storeys, a 59-place childcare facility, public and communal open spaces and all associated site works and infrastructure.

The proposed scheme has been developed having regard to the following policy documents:

- Quality Housing for Sustainable Communities 2007
- Urban Design Manual - A Best Practice Guide 2009
- Sustainable Residential Development in Urban areas (Cities, Towns & Villages) 2009 - Guidelines for Planning Authorities
- Sustainable Urban Housing - Design Standards for New Apartments 2020
- Design Manual for Urban Roads and Streets (DMURS)
- Naas Local Area Plan 2021–2027
- Kildare County Development Plan 2017-2023



## **6.0 WASTE MANAGEMENT ORGANISATION**

### **6.1 Responsibility for Construction Phase Waste Management**

A suitably competent and experienced representative from the lead contractor team will be nominated as Construction & Demolition (C&D) Waste Manager for the project. The function of the C&D Waste Manager is to communicate effectively the aims and objectives of the Waste Management programme for the project to all relevant parties and contractors involved in the project, for the duration of demolition and construction works on site.

The C&D Waste Manager will be assisted in this role by the external Safety Consultant. Site Inspections will be carried out on a weekly basis and will incorporate inspection and monitoring of the requirements of the Waste Management Plan.

### **6.2 Responsibility for Operational Phase Waste Management**

Please refer to *Operational Waste Management Plan* by Enviroguide Consulting Ltd, included with this planning submission under separate cover.

## 7.0 DEMOLITION WASTE GENERATED BY THE DEVELOPMENT

An existing small storage structure, located circa 140m from the site entrance, is to be demolished as part of these works, see figure 3 below. The area of this structure is only 10.7sqm in plan and as such the demolition waste generated by its removal shall be negligible.

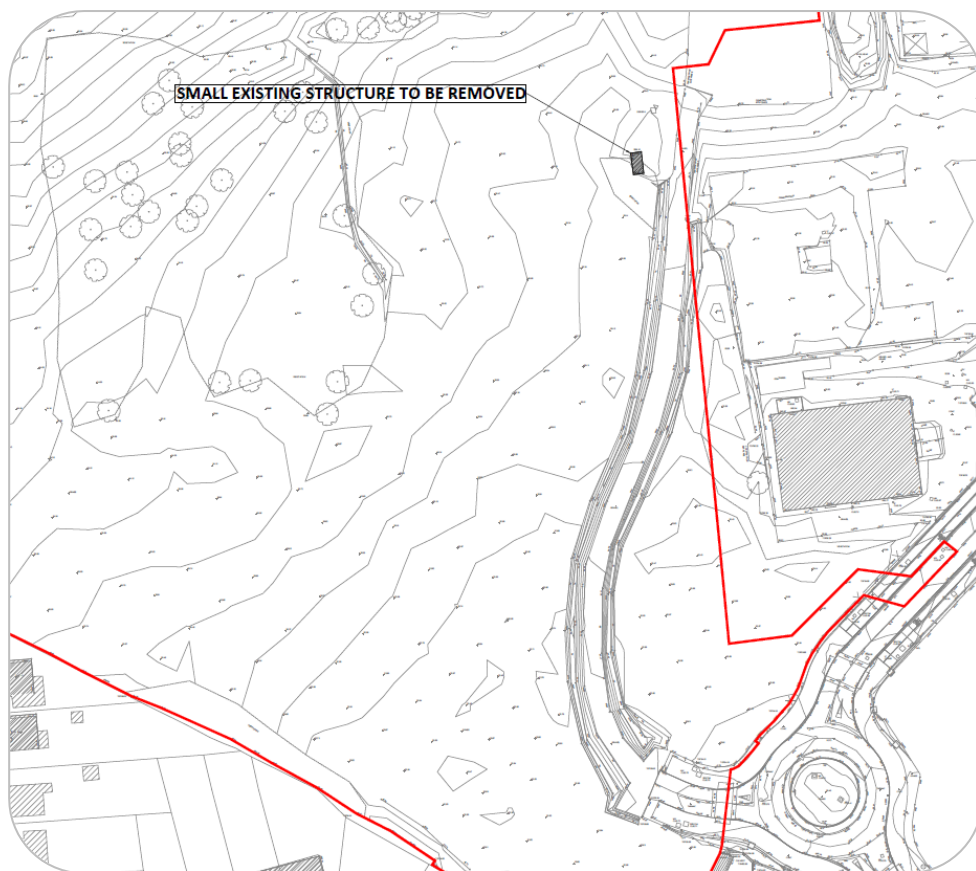


Figure 3 – Location of existing small structure

No other demolition waste is expected to be generated from the development works.

## **8.0 CONSTRUCTION WASTE GENERATED BY THE PROPOSED DEVELOPMENT**

### **8.1 Construction Waste Classification**

Waste generated during construction at a typical site includes the following:

- Concrete, bricks, tiles, and cement
- Wood
- Glass
- Plastics
- Bituminous mixtures, coal tar, and tarred products
- Metals (including their alloys)
- Soil and stones
- Insulation materials (possibly including asbestos-containing materials)
- Gypsum-based construction material
- Materials containing mercury
- PCB-containing materials (e.g. sealants, resin-based floorings, capacitors, etc.)
- Waste electrical and electronic equipment
- Oil wastes and waste of liquid fuels
- Batteries and accumulators
- Packaging (paper/cardboard, plastic, wood, metal, glass, textile, etc.)

The EPA issued the European Waste Catalogue (EWC) in January 2002 and this system is used to classify all wastes and hazardous wastes according to

a consistent EU-wide system. The EWC classification for typical waste materials to be expected to be generated during construction of the subject development is given in Table 1.

Table 1 - European Waste Catalogue

<u>Waste Material</u>	<u>EWC Code</u>
<b>Non-Hazardous</b>	
Concrete, bricks, tiles, ceramics	17 01
Wood, glass and plastic	17 02
Bituminous mixtures, coal tar and tarred products	17 03
Metals (including their alloys)	17 04
Soil, stones and dredged spoil	17 05
Gypsum-based construction material	17 08
<b>Hazardous</b>	
Electrical and Electronic Components	16 02
Batteries	16 06
Wood Preservatives	03 02
Liquid Fuels	13 07
Soil and stones containing dangerous substances	17 05 03
Insulation materials containing asbestos	17 06 01
Other insulation materials consisting of or containing dangerous substances	17 06 03
Construction materials containing asbestos	17 06 05
Construction and demolition waste containing mercury	17 09 01
Construction and demolition waste containing PCBs	17 09 02
Other construction and demolition wastes containing dangerous substances	17 09 03

## 8.2 Waste Management and Mitigation Measures

The following measures are proposed to ensure effective management of construction waste at the development site, to maximise recycling of construction waste, and to minimise the environmental impact of construction waste.

- On-site segregation of all waste materials into appropriate categories, including:
  - top-soil, sub-soil, bedrock;
  - concrete, bricks, tiles, ceramics, plasterboard;
  - asphalt, tar, and tar products;
  - metals;
  - dry recyclables (e.g. cardboard, plastic, timber).
- All waste material will be stored in skips or other suitable receptacles in a designated waste storage area on the site.
- Wherever possible, left-over material (e.g. timber cut-offs) and any suitable demolition materials shall be reused on or off site.
- Uncontaminated excavated material (top-soil, sub-soil) will be reused on site in preference to the importation of clean fill, as soil to be reused or removed from site must be tested to confirm its contamination status and subsequent management requirements.
- All waste leaving the site will be transported by a suitably licensed/permitted contractor and taken to a licensed/permitted facility.
- All waste leaving the site will be recorded and copies of relevant documentation retained.

These measures are intended to ensure that the waste arising from construction of the proposed development is dealt with in compliance with

the provisions of the Waste Management Acts 1996 to 2013, the Litter Act of 1997, and the Eastern-Midlands Region (EMR) Waste Management Plan 2015-2021, achieving optimum levels of waste reduction, re-use and recycling.

### **8.3 Predicted Impacts of the Proposed Development**

Waste materials will be generated during the construction of the proposed development, including the initial site clearance and excavation. Careful management of these, including segregation at source, will help to ensure maximum recycling, reuse and recovery is achieved, in accordance with current local and national waste targets. It is expected, however, that a certain amount of waste will still need to be disposed of at landfill.

Given the provision of appropriate facilities, environmental impacts (e.g. litter, contamination of soil or water, etc.) arising from waste storage are expected to be minimal. Particular attention must be given to the appropriate management of any construction waste containing contaminated or hazardous materials. The use of suitably licensed waste contractors will ensure compliance with relevant legal requirements and appropriate off-site management of waste.

In summary, with a high level of due diligence carried out at the site, it is envisaged that the environmental impact of the construction phase of the proposed development will be of small scale and short duration, with respect to waste management.

## **9.0 OPERATIONAL WASTE GENERATED BY THE PROPOSED DEVELOPMENT**

Please refer to Operational Waste Management Plan by Enviroguide Consulting Ltd, included with this planning submission under separate cover.

## **10.0 CONCLUSION**

This document outlines the principles and measures by which the waste generated during the construction and operational phases of the proposed development will be managed and disposed of in compliance with the provisions of the Waste Management Acts 1996 to 2013 and the Eastern-Midlands Region (EMR) Waste Management Plan 2015-2021. It describes the measures by which optimum levels of waste reduction, re-use and recycling shall be achieved.