

Project

Santa Sabina SHD - Proposed Alterations to Reg. Ref.: F17A/0615

Report Title

Outline Demolition and Construction Waste Management Plan

Client

Parsis Limited

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at site that formerly formed part of Santa Sabina Dominican College
and Convent Complex, Greenfield Road, Sutton, Dublin 13

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Author: R. Moynihan

Reviewed By: S. Curran

Approved By: P. Forde

Distribution: Design Team
An Bord Pleanala

DBFL Consulting Engineers

Dublin Office
Ormond House,
Upper Ormond Quay,
Dublin 7

Tel 01 4004000
Email info@dbfl.ie
Web www.dbfl.ie

Waterford Office
Suite 8b The Atrium,
Maritana Gate,
Canada Street,
Waterford. X91 W028.

Tel 051 309500
Fax 051 844913
Email info@dbfl.ie
Web www.dbfl.ie

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EXECUTIVE SUMMARY

Demolition and construction waste arising from construction, renovation and demolition activities form the second largest waste stream in Ireland. In order to achieve the National Re-cycling target of 85% outlined in “Changing our Ways – Quality Statement” published by the Department of the Environment Heritage and Local Government 1998 it is essential that material resources are used more efficiently to reduce the amount of waste required in the final disposal. The National Waste Hierarchy identifies how residual waste should be dealt with to achieve a sustainable development.

The appointed contractor shall prepare a Demolition and Construction Waste Management Plan which shall be in full compliance with the “Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects” published by the Department of the Environment Heritage and Local Government. The implementation of this Demolition and Waste Management Report will comply with the Waste Management Requirements of Fingal County Council. They will also comply with the Best Practice Recommendations for Sustainable Waste Management both nationally and internationally.

The implementation of this plan will minimise waste delivered to land fill and will result in a high level of re-cycling and the recovery of waste from this development which shall ensure the National Recycling Target of 85% of Demolition and Construction Waste is achieved. The contractor must effectively segregate all construction waste (demolition or otherwise) and maintain records of all waste disposal including recycling. These records must be provided to the Engineer upon completion of the works and demonstrate adherence with the re-cycling target of 85%.

1.0 INTRODUCTION

This Outline Demolition & Construction Waste Management Plan is for the works associated with the construction of a proposed residential development at Santa Sabina, Greenfield Road, Sutton, Dublin 13. This plan has been prepared to ensure that the waste arising from the Demolition and Construction Phases of the development will be handled, recovered or disposed of, in accordance with Waste Management Legislation, Recognised Best Practice and Guidelines, and National and Local Waste policies.

The report will ensure that waste movement within the development takes place in a manner which complies with relevant legislation and has a minimum impact on nearby existing commercial and residential areas. This strategy will ensure that the development will operate in a more economic and environmentally sustainable manner, thereby enhancing the environment of the development and the local community.

This Outline Demolition & Construction Waste Management Plan addresses the control, management and monitoring of waste produced on the site associated with the construction works.

The Demolition & Construction Waste Management Plan for Santa Sabina will remain a live document and will be subject to updates for the duration of the project. Any updated versions of the Demolition & Construction Waste Management Plan will be issued to all relevant parties.

A planning permission for a residential development on this site was approved by Fingal County Council under Reg. Ref.: F17A/0615. As part of the compliance for that permission a Demolition & Construction Waste Management Plan was submitted to Fingal County Council in February 2019. Notwithstanding, this Outline Demolition and Construction Waste Management Plan will cover all aspects of construction relating not just to the proposed SHD, but also to demolition and waste management activities that are being undertaken as part of the current Reg. Ref.: F17A/0615 permission.

An access road to serve the neighbouring Santa Sabina School, along with all associated infrastructure, has been constructed as part of the existing planning application, Reg. Ref.: F17A/0615. The construction of an access road to serve the proposed residential development, including the installation of the surface water outfall to the public system and attenuation tank and the watermain connection, is currently being undertaken as part of enabling works for the approved development.

The construction methods that are proposed under this SHD application are in keeping with those permitted for the approved site and as such the same mitigation methods shall apply. Granted that there is an increase in unit numbers but no increase in the basement footprint, it can be assumed that construction waste generated as part of these works will not be significantly higher, and as previously stated, will be managed and disposed of in the same manner as was permitted under Reg. Ref.: F17A/0615 and subsequent compliance submissions.

2.0 POLICY & LEGISLATION

The Department of the Environment Heritage and Local Government published “Best Practice Guidelines on the Preparation and Waste Management Plans for Construction and Demolition Projects” in July 2006. The Guidelines encourage the diversion of waste from landfill and give advice on the planning for demolition and construction waste management. The Guidelines outline that a waste management plan should be prepared where “demolition / renovations / refurbishment projects generating in excess of 100 m³ in volume, C & D waste”.

To comply with these Guidelines a Demolition and Construction Waste Management Plan will be written and implemented by the Project Construction Contractor, and agreed in writing, with the planning authority prior to commencement of development. The implementation of this plan will ensure that the proposed development exceeds the National Recycling Target of 85% as outlined in the Government policy document “Changing our Ways – a Policy Statement”, published by the Department of Environment Heritage and Local Government 1998.

Furthermore, at a national level the legislation currently imposed upon the removal of waste from construction sites is covered extensively. Primarily by the Waste Management Act 1996 (No. 10 of 1996) as amended while sub-ordinate legislation includes:

- European Communities (Waste Directive) Regulations 2011 (SI 126 of 2011) as amended
- Waste Management (Collection Permit) Regulations (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 2004 (S.I. No. 395 of 2004) as amended
- Waste Management (Packaging) Regulations 2014 (S.I. 282 of 2014) as amended
- Waste Management (Planning) Regulations 1997 (S.I. No. 137 of 1997)
- Waste Management (Landfill Levy) Regulations 2015 (S.I. No. 189 of 2015)

- European Union (Waste Electrical and Electronic Equipment) Regulations 2014 (S.I. No. 149 of 2014)
- European Union (Batteries and Accumulators) Regulations 2014 (S.I. No. 283 of 2014) as amended
- Waste Management (Food Waste) Regulations 2009 (S.I. 508 of 2009), as amended
- European Union (Household Food Waste and Bio-waste) Regulation 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
- Waste Management (Movement of Hazardous Waste) Regulations, 1998 (S.I. No. 147 of 1998)
- 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

Waste management is also governed at a regional level by the Local Authority, Fingal County Council, which is contained within the East-Midlands Region (EMR). The EMR Waste Management Plan 2015 – 2021 sets out three key objectives for the management of waste:

- *Prevent waste: a reduction of one per cent per annum in the amount of household waste generated over the period of the plan;*
- *More recycling: increase the recycle rate of domestic and commercial waste from 40 to 50 per cent by 2020;*
- *Further reduce landfill: eliminate all unprocessed waste going to landfill from 2016.*

The Fingal Development Plan 2017-2020 expounds upon these broad objectives and makes particular comment on Construction and Demolition Waste, invoking the European Commission's Waste Directive Regulations 2011 – which sets a 70% target for the re-use,

recycling and recovery of man-made construction and demolition waste in Ireland, feeding back into the national legislation as outlined above.

Objective WM18

Ensure that construction and demolition Waste Management Plans meet the relevant recycling / recovery targets for such waste in accordance with the national legislation and regional waste management policy.

Figure 2.1 – Extract from Fingal County Development Plan 2017 - 2023

The waste management objective highlighted above in **Figure 2.1** is pertinent to construction activities and will be observed on-site. Methods of compliance with such are detailed herein.

3.0 PROPOSED DEVELOPMENT

The permission sought is for a strategic housing development at this site that formerly formed part of Santa Sabina Dominican College and Convent Complex, Greenfield Road, Sutton, Dublin 13. St. Dominic's Convent Santa Sabina, located to the east of the application site, is a protected structure (RPS No. 0794).

The development comprises alterations to the development permitted under Reg. Ref.: F17A/0615 (currently under construction) consisting of the following:

- Provision of 2 additional storeys to Block A-B1 and alterations / redesign to the 3 permitted storeys below to provide a five storey building containing 42 no. apartments (consisting of 9 no. 1 beds, 29 no. 2 beds and 4 no. 3 beds), and including associated alterations to the courtyard communal amenity space.
- Provision of 2 additional storeys to Block C1 and alterations to the 3 permitted storeys below to provide a five storey building containing 28 no. apartments (consisting of 28 no. 2 beds).
- Replacement of Block D, comprising 10 no. two and three storey semi-detached houses, with 3 no. three storey apartment buildings (Block D1, D2 and D3) containing 32 no. apartments (consisting of 6 no. 1 beds, 21 no. 2 beds and 5 no. 3 beds), and including provision of communal amenity space to the north.
- The alterations to Block A-B1 and C1 include associated alterations to the basement under these blocks primarily relating to the omission of a core and associated alterations to plant, waste storage, car and cycle parking provision.
- The proposed alterations include the provision of balconies / terraces to the external elevations of Block A-B1, C1, D1, D2, and D3.
- An ESB substation and switchroom building and bin collection point are proposed in place of three permitted car parking spaces adjoining the western boundary of the site.
- The proposal includes alterations to the permitted car and cycle parking at basement and ground level, resulting in the provision of a total of 168 no. car parking and 270 no. bicycle spaces.
- The proposed alterations include all associated ancillary site development works.

The proposed alterations to the permitted development relate to 102 no. residential units, including the provision of 47 no. additional residential units and alterations / redesign of 55 no. permitted residential units, which results in an increase in the total number of residential units on the site from 96 to 143.

The proposed alterations to the permitted development are located entirely on lands zoned RS- Residential (see **Figure 3.1**). No alterations are proposed to Block B2-B3 (24 no. units) and C2 (17 no. units), which contain a total of 41 no. permitted apartments and a creche. The permitted access road to the adjacent school has been implemented and other site development works associated with the permitted residential development, which are not the subject of the proposed alterations, have commenced on the application site as provided for under Reg. Ref.: F17A/0615.



Figure 3.1 - Site Aerial View

4.0 CONSTRUCTION AND DEMOLITION ACTIVITIES ON SITE

The proposed development will use a range of site stripping methods to ensure the compliant preparation of the site for further construction development. After site preparation, construction of all required infrastructure, services and roads will be undertaken. Broadly these activities can be broken down as below:

- Site stripping and clearance
- Diversion of existing services
- Excavation
- Development and installation of site infrastructure
- Construction of basements, residential buildings and hard-standing surfaces
- Road access
- Landscaping and finishing

5.0 CONSTRUCTION WASTE GENERATION

Arising from these activities outlined above will be a varied waste stream which will be segregated based on potential for re-use, recycling or landfill disposal. The EPA National Waste Statistics detail the waste materials collected from construction sites across Ireland and as such a generic profile of the percentages of wastes to be expected from sites is obtained. **Figure 5.1** below shows the breakdown of waste streams.

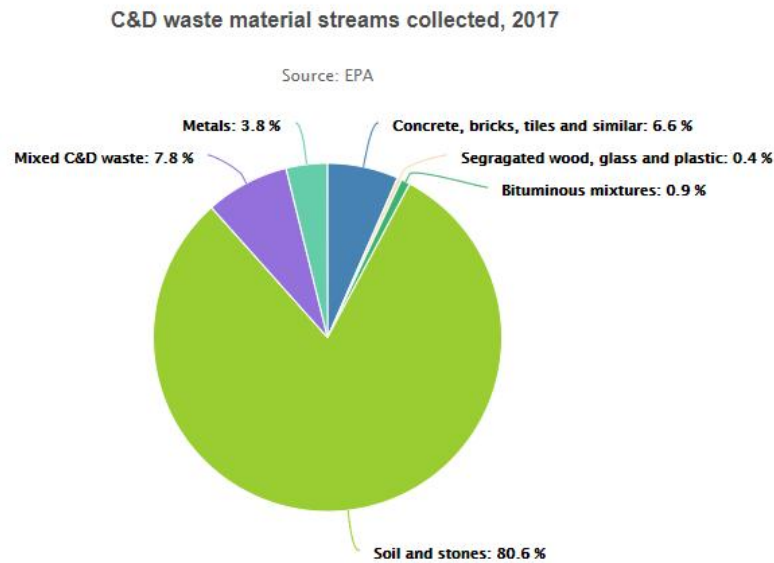


Figure 5.1 – Waste Stream Percentages from C&D activities as recorded by the EPA

For the proposed development at Santa Sabina we would expect to see a similar proportional breakdown of the wastes generated from site as there is no egregious use of one construction material over the other. Residential apartment buildings will be constructed using reinforced concrete as is typical for housing developments while all roads and infrastructure will be constructed using materials approved by respective governing bodies.

It can be seen from this breakdown that the majority of the waste generated from site will be non-hazardous given that the soil on site was not found to be contaminated (see sections 5.2 and 5.3 below).

5.1 Site Clearance

The majority of the site has been cleared of topsoil to facilitate the works proposed under the current planning application, refer to **Figure 5.2**. The remaining topsoil will be removed to facilitate the construction works proposed under this application.



Figure 5.2 - Site Clearance Undertaken Under Planning
Reg. Ref.: F17A/0615

If any hazardous waste materials is encountered it will be removed by a Specialist Contractor for disposal at an appropriate licensed waste collection facility. All non-structural items were then removed and segregated for re-use or re-cycling where possible.

Prior to these works a detailed Photographic Condition Survey was carried out of all adjoining properties as well as detailed liaisons with the Santa Sabina Dominican College and St. Fintan's Parish due to the sites adjoining proximity to both premises.

Any remaining clearance shall be in full compliance with BS 6187 "Demolition in Buildings" and all measures necessary will be taken to protect the adjoining buildings from damage and persons from injury. Prior to the site clearance works a Demolition and Construction

Waste Management Plan in accordance with the *“Department of the Environment Heritage and Local Government Best Practice Guidelines on the preparation of Waste Management Plans for construction and demolition projects”* will be prepared by the appointed Demolition Contractor.

As the development site was a greenfield site no extensive demolition works are noted across the site except for the removal of an existing oil tank, which will be undertaken under the current planning approval Reg. Ref.: F17A/0615.

5.2 Excavation

The project will involve the excavation of a basement level under the 4 no. residential apartment blocks. The Demolition and Construction Waste Plan for the development, to be prepared by the main contractor, will be in compliance with the requirements of the *“Best Practice Guidelines for the Preparation of Waste Management for the Construction and Demolition Projects”* published by the Department of the Environment Heritage and Local Government will identify and categorise any waste arising from the development.

Analysing the depth of excavation and footprint of the proposed buildings it can be seen that there will be a quantity of excavated material in excess of that which can be reused on site. Please note however there is no increase in excavation footprint or depth between the proposed alterations and the permitted development Reg. Ref.: F17A/0615. Where possible, topsoil will be reused however the lower strata are not suitable for reuse. It should also be noted that IGSL carried out a SILTA Suite (WAC) testing of five samples and these confirmed that the soils were inert and non-hazardous and no issues were raised as to safety of personnel on site or disposal of excavated material to a suitably licensed landfill. This excavated waste will be removed from site by an approved permit carrying contractor and disposed of in line with established guidelines.

It is expected that the largest quantities of waste will be generated during this and the previous phase of site development given the quantities of material required to be excavated. Soils and stones that can be reused on site will be, however as detailed above large volumes will be required to be removed from site. As the soils are inert there is high potential for them to be reused in other applications away from site and so

will contribute to the percentage of site waste being reused or recycled, as per legislation objectives.

5.3 Development of Site Infrastructure

The installation of services to the site will largely be as per those currently under construction of the permitted development Reg. Ref.: F17A/0615. Electricity cables, watermains and sewers will be installed to serve the proposed residential blocks. Consequently there will be some waste generated for these activities. Broadly speaking these are low-waste activities and the waste generated is highly recyclable and non-hazardous, for example; hard plastics from sewers, metals from cabling and pre-cast concrete sections for watermain chambers. As such, particular care will be taken to separate these wastes as they are high value and will result in the reclamation of some of the cost of construction.

5.4 Construction of Basements, Residential Buildings, and Hard Standing

During construction there is likely to be a slight surplus or excess of non-hazardous materials supplied to site, these include but are not limited to; timber, bricks, blocks, tiles, off-cuts generated during construction, ready-mix concrete, steel reinforcement, plastics, plasterboard, glass, cardboard. Packaging waste will also be generated from the supply of these materials. Where possible these materials will be reused or recycled to prevent them entering the waste stream, non-recyclable materials will be separated and disposed of off-site at an approved landfill site by a waste collection company. Disposal of all wastes will be compliant with the Waste Management Acts 1996 – 2008 and all other legislation as detailed previously.

The plan will also contain the proposals for the minimisation, re-use and re-cycling of any waste. Procedure will also be put in place to ensure that all sub-contractors fulfil the requirements of the Demolition and Construction Waste Management Plan.

5.5 Road Access

Development of the access to the proposed development will result in the excavation of soils as well as surpluses of materials supplied to site. Bituminous materials are highly recyclable for use in other carriageway constructions and as such will be separated and reused where possible. Oversupplied materials will be returned where possible to minimise waste or used in other applications across the site.

There will be removal of a small area of bituminous hardstanding which currently serves as a compound parking, this has the potential to be reused as capping on other construction sites. Care will be taken not to allow the mixing of bituminous materials with other construction waste to maximise the potential for re-use.

5.6 Landscaping and Finishing

Landscaping and finishing will allow for the re-use of some of the previously excavated topsoil thereby reducing this waste stream. Wastes generated in this phase of construction are likely to be minimal and non-hazardous.

6.0 PRINCIPALS OF DEMOLITION AND CONSTRUCTION WASTE MANAGEMENT

The waste materials generated by the activities outlined above and any further associated construction or demolition wastes will be managed in accordance with the current legislation outlined in section 2.0, with specific reference to Department of The Environment, Heritage and Local Government's 2006 document – "Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects".

The Demolition and Construction Waste Management Plan addresses the following points:

- Analysis of waste arising and material surpluses
- Waste management objectives for the project including the re-use on site of existing materials
- Methods to promote the prevention, reuse and recycling of waste materials
- Waste handling procedures
- Waste storage procedures
- Waste disposal procedures
- Waste auditing
- Record keeping

6.1 Waste Minimisation

Minimising the amount of waste generated on-site is the best way of limiting the amount of waste disposed of in landfills and is the responsibility of the appointed Construction Project Manager. The duties with respect to waste management required of the CPM are:

1. To ensure that materials ordered for construction are brought in on an 'as needed' basis to prevent oversupply and hence needless waste.
2. That materials arriving on site are correctly stored and handled to minimise breakage and waste

3. That materials are ordered in a sequence which matches the construction project timeline, thereby ensuring that storage times are limited.
4. That all site workers and sub-contractors are appropriately advised of the correct routes for waste disposal.

6.2 Construction Waste Reduction

The construction contractor, as part of their duties, will undertake regular site inspections to determine the efficacy of the waste management plan. If it is found that waste generation is exceeding anticipated levels then further methods for improving waste minimisation, reduction, reuse, recycling and disposal will need to be added to the live Demolition and Construction Waste Management Plan to maintain low levels of waste generation throughout the project lifecycle.

6.3 Waste Separation

Waste generated on site will be segregated either on site or off site. As part of the waste management plan separate storage areas will be designated on the site for various types of material in order to maximise the re-use and re-cycling potential.

Any hazardous materials on site will be separated to a dedicated waste stream for specialist disposal if required.

Table 6.3, below, details the classification of anticipated waste materials from site. Wastes will be segregated and stored on site for removal according to these designations.

Description of Waste	Corresponding EWC Code
Concrete, Bricks, Tiles and Ceramics	17 01
Concrete	17 01 01
Bricks	17 01 02
Tiles and Ceramics	17 01 03
Mixture of concrete, bricks tiles & ceramics	17 01 07
Wood, Glass and Plastic	17 02
Wood	17 02 01
Glass	17 02 02
Plastic	17 02 03
Bituminous mixtures, coal tar and products	17 03
Bituminous mixtures containing other than those mentioned in 17 03 01	17 03 02
Bituminous Mixtures including Coal Tar and Tarred products	17.03
Metals (including their alloys)	17 04
Copper, Bronze, Brass	17 04 01
Aluminium	17 04 02
Lead	17 04 03
Zinc	17 04 04
Iron and Steel	17 04 05
Tin	17 04 06
Mixed Metals	17 04 07
Insulation and Construction Materials	17 06
Gypsum based construction material	17 08
Other Construction and Demolition Waste	17 09
Mixed Construction and Demolition Waste other than those mentioned in 17 09 01, 17 09 02, 17 09 03	17 09 04
Sewage Screenings	19 08 01
Paper and Cardboard	20 01 01
Wood other than that mentioned in 20 01 37	20.01 38
Soil and Stones	20 02 02
Mixed Municipal Waste	20 03 01
Hydraulic oils	13 01 01*
Fuel oils and diesel	13 07 01*

Table 6.3 – Typically anticipated demolition and construction wastes with associated EWC codes

7.0 DEMOLITION AND CONSTRUCTION WASTE MANAGEMENT AND DISPOSAL

- From the outset of site preparation, a dedicated compound will provide receptacles for the on-site disposal of generated wastes. Separate receptacles will be provided for each type of waste to prevent cross-contamination.
- Oil, fuel, solvent, or other hazardous waste spills will be cleared up using a spill kit which will be located in the waste compound and clearly labelled with instructions for use.
- All liquid construction and fuel materials will be contained within impermeable vessels to prevent leakage.
- All generation equipment, if present, will be inspected regularly to ensure there are no spills of fuels or lubricants
- Empty hydrocarbon based vessels will be stored in a bunded area to prevent residual leakage
- The construction project manager will ensure that appropriate signage designating the wastes to be separated on-site is in place. This will be reinforced through toolbox talks emphasising the importance of correct segregation and separation of construction wastes.
- The construction project manager will ensure that a written record exists of all wastes removed from site for disposal, reuse, recycling etc. This record will detail the nature and quantity of each waste leaving site.
- The construction project manager will ensure that all waste haulage companies used to remove waste from site hold a Waste Collection Permit and that all wastes are transported to licenced or regulated waste facilities in line with the regulations outlined in section 2.0.
- A copy of the permits for each appointed waste haulage company and disposal facilities will be held by the construction project manager.
- All excavated waste materials will be classified prior to removal from site as inert, non-hazardous or hazardous to ensure that this material is transferred to an appropriately licenced and permitted facility.

8.0 ON-SITE WASTE REDUCTION, RE-USE, RECYCLING AND MANAGEMENT

Waste construction materials such as damaged or incomplete concrete slabs, blocks, bricks and tiles generated will, as deemed acceptable by the construction project manager, be reused where possible. Potential applications for the reuse of these materials are, but not limited to, ground fill and capping. Consequently this will reduce the negative environmental impact of the project by ensuring that there is a reduction in imported fill to site, a reduction in the extraction and transport emissions associated with such materials and, a reduction in materials sent to landfill.

Soils excavated on site are likely to be inert, non-hazardous judging by results of site investigation samples extracted by IGSL. As a result there is high potential for the reuse of these soils away from site and will thereby ensure a positive environmental impact by reducing the further extraction of soils for backfill or site levelling for other projects. The soils extracted from this site will be removed off-site after classification for processing at an approved waste facility.

All wood wastes generated on site will be segregated as either re-useable or scrap waste and stored in clearly identified receptacles.

All hard plastic wastes will be stored in clearly identified receptacles. All non-recyclable plastic waste will be disposed of separately.

Metallic wastes will be segregated as either ferrous or non-ferrous, allowing for potential recycling. These shall be stored in clearly identified receptacles.

Very low volumes of hazardous waste are anticipated. Any hazardous waste generated on-site will be clearly identified with consultation with the Safety and Health Management team and disposed of using a specialist contractor if deemed necessary.

Any hazardous waste that does not require a specialist contractor will be stored in a clearly identified impermeable receptacle in a bunded area.

9.0 RECORD KEEPING AND WASTE REMOVAL AUDITING

All waste removed from the site will be managed by a licenced and approved waste haulage and disposal company with records kept of quantities and movement of these materials. A copy of the Waste Collection Permits, Certificates of Registration, Waste Facility Permits and Waste Licenses will be maintained on site at all times.

The construction project manager or his/her delegate will be responsible for keeping records for all waste material which leaves the site, either for reuse on another site, recycling or disposal during the works as well as reclaimed water brought on-site for re-use.

Details of the classification and movement of these wastes will be reported to Fingal County Council upon request.

A waste management audit will be undertaken mid-way through the project to ensure that the records kept are accurate and that waste streams are being managed in accordance with relevant legislation. This audit will also ensure that waste produced is being minimised and the principles of waste reduction outlined throughout this document are adhered to.

10.0 TRAINING PROVISION

Alongside the physical separation of wastes into recyclable, re-usable and disposable materials it is essential to ensure that all workers and site personnel are committed to the minimisation of waste on site. A waste manager will be appointed for the site by the construction project manager who may further delegate responsibilities to staff with respect to the organisation and segregation of wastes, ensuring a chain of accountability for waste generation. This will require coordination with sub-contractors, suppliers and service providers to ensure adherence to the Demolition and Construction Waste Management Plan.

A basic course on waste management awareness will be implemented during induction to ensure that all site staff are aware of their responsibilities in maintaining a low waste environment as well as the procedures required in terms of segregation of materials and disposal of hazardous wastes.

11.0 CONCLUSION

This Outline Demolition & Construction Waste Management Plan addresses the control, management and monitoring of waste produced on the site associated with the construction works.

These include procedures for monitoring and tracking construction activities and ensuring construction personnel are trained and educated as necessary. The Demolition and Construction Waste Management Plan should be reviewed as the construction phase progresses to accommodate any changes in activities on site.

The construction methodology for the proposed works will not differ from those already being undertaken on the site in the construction of the works associated with the approved planning Reg. Ref.: F17A/0615. The changes proposed for the SHD application relate to additional stories and changes to unit distribution. The SHD application will not change the footprint of the main apartment block and only minor changes are proposed to the footprints of the units to the rear of the site. Therefore, the construction methodology and Demolition and Construction Management Plan proposals will not differ from those required to construct the residential development proposed in planning application Reg. Ref.: F17A/0615.