Project:

Old Orchard LRD, Monaleen

Report Title

Outline Construction Resource and Waste Management Plan

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1.0 INTRODUCTION

1.1 BACKGROUND

OSL Butler Consulting Engineers (OSL) has prepared this Outline Construction Resource Waste Management Plan (OCRWMP) on behalf of GLR Property Ltd., for a proposed Residential Development at Old Orchard, Monaleen, Limerick, County Limerick on a circa 3.6-hectare site.

Planning permission was previously granted for a residential development on this site comprising of 113no. residential dwellings and a creche under An Coimsiún Pleanála Reference *ABP 319009-24* (Limerick City and County Council Planning Reference 23/60842) and is currently under construction. A Construction Resource and Waste Management Plan was prepared and submitted by OSL as part of the original planning conditions (Condition 21) as granted under the aforementioned planning reference. This submission was deemed compliant by Limerick City and County Council on 13 August 2025.

This OCRWMP's intent and overall strategy have remained the same as submitted to and as agreed with LCCC as part of the original planning application and relevant planning compliance submissions, with the exception of those revisions made to accommodate the change in site layout as proposed as part of this planning application. This OCRWMP forms part of an amendment to the original permission, quoted before.

This plan will provide information necessary to ensure that the management of C&D waste at the site is undertaken in accordance with the current legal and industry standards including the Waste Management Acts 1996 - 2011 and associated Regulations 1, Protection of the Environment Act 2003 as amended 2, Litter Pollution Act 1997 as amended 3 and the South Region Waste Management Plan 2015 – 2021 4. In particular, this plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. It also seeks to provide guidance on the appropriate collection and transport of waste from the site to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil and/or water).

This OCRWMP includes information on the legal and policy framework for C&D waste management in Ireland, estimates of the type and quantity of waste to be generated by the proposed development and makes recommendations for management of different waste streams.

2.0 CONSTRUCTION AND DEMOLITION RESOURCE WASTE MANAGEMENT IN IRELAND

2.1 NATIONAL LEVEL

The Irish Government issued a policy statement in September 1998 known as 'Changing Our Ways' [5], which identified objectives for the prevention, minimisation, reuse, recycling, recovery and disposal of waste in Ireland. The target for C&D waste in this report was to recycle at least 50% of C&D waste within a five-year period (by 2003), with a progressive increase to at least 85% over fifteen years (i.e. 2013).

In response to the Changing Our Ways report, a task force (Task Force B4) representing the waste sector of the already established Forum for the Construction Industry, released a report entitled 'Recycling of Construction and Demolition Waste' [6] concerning the development and implementation of a voluntary construction industry programme to meet the Government's objectives for the recovery of C&D waste.

In September 2020, the Irish Government published a policy document outlining a new action plan for Ireland to cover the period of 2020-2025. This plan, 'A Waste Action Plan for a Circular Economy' [7] (WAPCE), replaces the previous national waste management plan, "A Resource Opportunity" (2012), and was prepared in response to the 'European Green Deal' which sets a roadmap for a transition to an altered economical model, where climate and environmental challenges are turned into opportunities.

The WAPCE sets the direction for waste planning and management in Ireland up to 2025. This reorientates policy from a focus on managing waste to a much greater focus on creating circular patterns of production and consumption. Other policy statements of a number of public bodies already acknowledge the circular economy as a national policy priority.

The policy document contains over 200 measures across various waste areas including circular economy, municipal waste, consumer protection and citizen engagement, plastics and packaging, construction and demolition, textiles, green public procurement and waste enforcement.

One of the first actions to be taken was the development of the Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less' (2021) [8] to set a course for Ireland to transition across all sectors and at all levels of Government toward circularity and was issued in December 2021. It is anticipated that the Strategy will be updated in full every 18 months to 2 years.

The Environmental Protection Agency (EPA) of Ireland issued '*Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects' in November 2021* [9]. These guidelines replace the previous 2006 guidelines issued by The National Construction and Demolition Waste Council (NCDWC) and the Department of the Environment, Heritage and Local Government (DoEHLG) in 2006 [10]. The guidelines provide a practical approach which is informed by best practice in the prevention and management of C&D wastes and resources from design to construction of a project, including consideration of the deconstruction of a project. These guidelines have been followed in the preparation of this document and include the following elements:

- Predicted C&D wastes and procedures to prevent, minimise, recycle and reuse wastes;
- Design teams roles and approach; Relevant EU, national and local waste policy, legislation and guidelines;
- Waste disposal/recycling of C&D wastes at the site;
- Provision of training for Resource Manager (RM) and site crew;
- Details of proposed record keeping system;
- Details of waste audit procedures and plan; and
- Details of consultation with relevant bodies i.e. waste recycling companies, Local Authority, etc.

Section 3 of the Guidelines identifies thresholds above which there is a requirement for the preparation of a RWMP for developments. The new guidance classifies developments on a two-tiered system. Developments which do not exceed any of the following thresholds may be classed as Tier 1 development:

- New residential development of less than 10 dwellings.
- Retrofit of 20 dwellings or less.
- New commercial, industrial, infrastructural, institutional, educational, health and other developments with an aggregate floor area less than 1,250m2.
- Retrofit of commercial, industrial, infrastructural, institutional, educational, health and other developments with an aggregate floor area less than 2,000m2; and
- Demolition projects generating in total less than 100m3 in volume of C&D waste.

A development which exceeds one or more of these thresholds is classed as Tier-2 projects. This development requires a RWMP as a Tier 2 development as it is above following criterion:

- New residential development of less than 10 dwellings.

Other guidelines followed in the preparation of this report include *'Construction and Demolition Waste Management – a handbook for Contractors and Site Managers'* [11], published by FÁS and the Construction Industry Federation in 2002 and the previous guidelines, 'Best Practice Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects' (2006).

These guidance documents are considered to define best practice for C&D projects in Ireland and describe how C&D projects are to be undertaken such that environmental impacts and risks are reduced and/or mitigated in its entirety.

2.2 NATIONAL AND LOCAL AUTHORITY IMPLEMENTATION FRAMEWORK

The proposed development is located within the administrative area of Limerick City and County Council.

Ireland's waste management policy framework is governed at national level by the National Waste Management Plan for a Circular Economy 2024-2030, which replaces all former regional waste management plans. The National Plan establishes a consistent policy approach across all local authorities and sets out mandatory and strategic actions to support Ireland's transition to a circular economy.

In relation to construction and demolition waste, the National Plan prioritises:

- Waste prevention and material efficiency at design stage
- Increased reuse of materials and products
- High-quality recycling and recovery of C&D waste streams
- Reduced reliance on landfill and backfilling
- Improved traceability, enforcement, and data reporting for C&D waste

The implementation of the National Waste Management Plan for a Circular Economy 2024–2030 is supported at local authority level through development plans, waste enforcement actions and planning conditions. The Limerick Development Plan 2022–2028, adopted by Limerick City and County Council, aligns with national and regional circular economy objectives and promotes sustainable resource management, waste prevention, reuse and recycling throughout the lifecycle of development.

The Development Plan recognises the importance of reducing waste generation and supporting the recovery and reuse of materials in line with the waste hierarchy and national policy. The policies and objectives of Limerick City and County Council relevant to this development include:

- Objective IN O17 – Waste Management and Circular Economy: To support innovative and sustainable solutions based on the principles of the circular economy, promote sustainable patterns of consumption and production, and implement national and regional waste management policy and targets through the planning process.

- Objective IN O18 – Waste Infrastructure: To support appropriate waste management infrastructure, including recycling facilities, and to ensure waste facilities are directed to suitable locations and managed in accordance with planning and environmental criteria.

These objectives support sustainable development and ensure that waste arising during construction and operation is managed responsibly, with opportunities maximised for waste prevention, reuse, recycling and recovery in accordance with the principles of the circular economy and national waste policy.

This OCRWMP has been prepared to ensure full compliance with national waste policy and local authority 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.
- Environmental Protection Act 1992 (No. 7 of 1992) as amended.
- Litter Pollution Act 1997 (No. 12 of 1997) as amended.
- Planning and Development Act 2000 (No. 30 of 2000) as amended 11.

One of the guiding principles of European waste legislation, which has in turn been incorporated into the Waste Management Act 1996 - 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 until its legal recycling, recovery or 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 destination, waste contractors will be employed to physically transport waste to the final destination. 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 transportation and disposal/recovery/recycling of waste).

It is therefore imperative that the client ensures that the waste contractors engaged by demolition and construction contractors are legally compliant with respect to waste transportation, recycling, recovery and disposal. This includes the requirement that a contractor handle, transport and recycle/recover/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 and Amendments or a waste or IE licence granted by the EPA. The COR/permit/licence held will specify the type and quantity of waste able to be received, stored, sorted, recycled, recovered and/or disposed of at the specified site.

3.0 DESIGN APPROACH

The client and the design team have integrated the 'Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects' guidelines into the design workshops, to help review processes, identify and evaluate resource reduction measures and investigate the impact on cost, time, quality, buildability, second life and management post demolition and construction. Further details on these design principals can be found within the aforementioned guidance document.

The design team have undertaken the design process in line with the international best practice principles to firstly prevent wastes, reuse where possible and thereafter sustainably reduce and recover materials. The below sections have been the focal point of the design process and material selections and will continued to be analysed and investigated throughout the design process and when selecting material.

The approaches presented are based on international principles of optimising resources and reducing waste on construction projects through:

- Prevention;
- Reuse;
- Recycling;
- Green Procurement Principles;
- Off-Site Construction;
- Materials Optimisation; and
- Flexibility and Deconstruction.

3.1 DESIGNING FOR PREVENTION, REUSE AND RECYCLING

Undertaken at the outset and during project feasibility and evaluation the Client and Design Team considered:

- Establishing the potential for any reusable site assets (buildings, structures, equipment, materials, soils, etc.);
- The potential for refurbishment and refit of existing structures or buildings rather than demolition and new build;
- Assessing any existing buildings on the site that can be refurbished either in part or wholly to meet the Client requirements; and
- Enabling the optimum recovery of assets on site.

3.2 DESIGNING FOR GREEN PROCUREMENT

Waste prevention and minimisation pre-procurement have been discussed and will be further discussed in this section. The Design Team will discuss proposed design solutions, encourage innovation in tenders and incentivise competitions to recognise sustainable approaches. They should also discuss options for packaging reduction with the main Contractor and subcontractors/suppliers using measures such as 'Just-in-Time' delivery and use ordering procedures that avoid excessive waste. The Green procurement extends from the planning stage into the detailed design and tender stage and will be an ongoing part of the long-term design and selection process for this development.

3.3 DESIGNING FOR OFF-SITE CONSTRUCTION

Use of off-site manufacturing has been shown to reduce residual wastes by up to 90% (volumetric building versus traditional). The decision to use offsite construction is typically cost led but there are significant benefits for resource management. Some further considerations for procurement which are being investigated as part of the planning stage design process are listed as follows:

- Modular buildings as these can displace the use of concrete and the resource losses associated with concrete blocks such as broken blocks, mortars, etc.;
    - Modular buildings are typically pre-fitted with fixed plasterboard and installed insulation, eliminating these residual streams from site.

- Use of pre-cast structural concrete panels which can reduce the residual volumes of concrete blocks, mortars, plasters, etc.;
- The use of prefabricated composite panels for walls and roofing to reduce residual volumes of insulation and plasterboards;
- Using pre-cast hollow-core flooring instead of in-situ ready mix flooring or timber flooring to reduce the residual volumes of concrete/formwork and wood/packaging, respectively; and
- Designing for the preferential use of offsite modular units

3.4 DESIGNING FOR MATERIALS OPTIMISATION DURING CONSTRUCTION

To ensure manufacturers and construction companies adopt lean production models, including maximising the reuse of materials onsite. This helps to reduce the environmental impacts associated with transportation of materials and from waste management activities. This includes investigating the use of standardised sizes for certain materials to help reduce the number of offcuts produced on site, focusing on promotion and development of off-site manufacture.

3.5 DESIGNING FOR FLEXIBILITY AND DECONSTRUCTION

Design flexibility has and will be investigated throughout the design process to ensure that where possible products (including buildings) only contain materials that can be recycled and are designed to be easily disassembled. Material efficiency is being considered for the duration and end of life of a building project to produce; flexible, adaptable spaces that enable a resource-efficient, low-waste future change of use; durability of materials and how they can be recovered effectively when maintenance and refurbishment are undertaken and during disassembly/deconstruction

4.0 DESCRIPTION OF THE PROJECT

4.1 LOCATION, SIZE AND SCALE OF THE DEVELOPMENT

The site is located to the east of Limerick City Centre, centred at grid reference E: 562059, N: 655886 (ITM) as highlighted in Figure 1 below.



Figure 1: Site Location

To summarise;

'The proposed development comprises of the modification of the Large-Scale Residential Development granted under Application Ref. 23/60842 and Appeal Ref. ABP-319009-24. The proposed modifications comprise of:

1. *The replacement of 57 no. units comprising of;*
    - *06 no. 4 bed semi-detached houses (139.2 sq.m.)*
    - *15 no. 3 bed semi-detached houses / townhouses (108 sq.m.)*
    - *06 no. 1 and 2 bed apartments (Block A) (54.1 sq.m. – 114.1 sq.m.)*
    - *14 no. 1 and 2 bed apartments (Block B)(54.1 sq.m. – 114.1 sq.m.)*
    - *16 no. 1, 2, and 3 bed apartments (Block D)(50.2 – 123.2 sq.m.)*

    With 59 no. units comprising of;
    - *04 no. 4 bed semi-detached houses (134.0 sq.m.)*
    - *22 no. 3 bed semi-detached houses (104.4 – 108.6 sq.m.)*
    - *04 no. 3 bed semi-detached houses (115.8 sq.m.)*
    - *08 no. 3 bed townhouses (109.8 sq.m.)*
    - *06 no. 2 bed townhouses (80.2 sq.m.)*
    - *15 no. 1 and 2 bed apartments (61.6 – 71.9 sq.m.)*

2. *The provision of 5no. additional townhouse units (2 no. 3 beds and 3 no. 2 beds).*
3. *The omission of the permitted childcare facility with capacity to accommodate 58no. children and the construction of a childcare facility on a site to the west with capacity to accommodate 102no. children.*

The development will also include the provision of private, communal, and public open spaces; internal roads and pathways; pedestrian and cyclist routes; hard and soft landscaping and boundary treatments; waste storage; plant; signage; public lighting; substations; all associated site development works; and all drainage and foul sewer infrastructure and network works including nature-based suds measures.'

The lands are bound to the north and west by the existing Ashfort neighbourhood, to the south by the existing Evanwood neighbourhood and to the east by the existing Kylemore neighbourhood.

The Vehicular and pedestrian access to the proposed site remains unchanged from that granted under Application Ref. 23/60842 and Appeal Ref. ABP-319009-24 via the School House Road which also serves the adjacent Ashfort Residential Development.

It is proposed to provide a vehicular access to the proposed creche via the Golf Links Road. No vehicular access is proposed via the Golf Links Road to serve the residential development. The Golf Links Road will serve the residential development for pedestrians and cyclists only.

4.2 DETAILS OF THE NON-HAZARDOUS WASTES TO BE PRODUCED

There will be soil, stones, and clay excavated to facilitate construction of new foundations and underground services. The project quantity surveys have estimated 5,000m3 of material will need to be excavated. It is currently envisaged that all of the excavated material can be reused on site. Should any material require removal offsite, this will be taken for appropriate offsite reuse, recovery, recycling and/or disposal.

During the construction phase there may be a surplus of building materials, such as timber off-cuts, broken concrete blocks, cladding, plastics, metals and tiles generated. There may also be excess concrete during construction which will need to be disposed of. Plastic and cardboard waste from packaging and supply of materials will also be generated. The contractor will be required to ensure that oversupply of materials is kept to a minimum and opportunities for reuse of suitable materials is maximised.

Waste will also be generated from construction workers e.g. organic/food waste, dry mixed recyclables (waste paper, newspaper, plastic bottles, packaging, aluminium cans, tins and Tetra Pak cartons), mixed non-recyclables and potentially sewage sludge from temporary welfare facilities provided on site during the construction phase. Waste printer/toner cartridges, waste electrical and electronic equipment (WEEE) and waste batteries may also be generated infrequently from site offices.

4.3 POTENTIAL HAZARDOUS WASTES ARISING

4.3.1 Contaminated Soil

From review of the site (by means of desktop studies), as well as local site knowledge, the presence of contaminated soil within the subject site is not expected.

Further geotechnical and environmental testing, to assist in the classification of soils and to provide information for the proposed design, will be carried out in future.

If any potentially contaminated material is encountered, it will need to be segregated from clean/inert material, tested and classified as either non-hazardous or hazardous in accordance with the EPA publication entitled 'Waste Classification: List of Waste & Determining if Waste is Hazardous or Non-Hazardous' [12] using the HazWasteOnline application (or similar approved classification method). The material will then need to be classified as clean, inert, non-hazardous or hazardous in accordance with the EC Council Decision 2003/33/EC [13], which establishes the criteria for the acceptance of waste at landfills.

From review of the site (by means of desktop studies), as well as local site knowledge, the presence of asbestos within the subject site is not expected. However, in the event that Asbestos containing materials (ACMs) are found, the removal will only be carried out by a suitably permitted waste contractor, in accordance with S.I. No. 386 of 2006 Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006-2010. All asbestos will be taken to a suitably licensed or permitted facility.

In the event that hazardous soil, or historically deposited waste is encountered during the construction phase, the contractor will notify Limerick CCC and provide a Hazardous/Contaminated Soil Management Plan, to include estimated tonnages, description of location, any relevant mitigation, destination for disposal/treatment, in addition to information on the authorised waste collector(s).

4.3.2 Fuel/Oils

Fuels and oils are classed as hazardous materials; any on-site storage of fuel/oil, and all storage tanks and all draw-off points will be bunded and located in a dedicated, secure area of the site. Provided that these requirements are adhered to and the site crew are trained in the appropriate refuelling techniques, it is not expected that there will be any fuel/oil waste generated at the site.

4.3.3 Invasive Plant Species

There are no third schedule invasive species onsite, such as Japanese Knotweed or Rhododendron. There is planted Cherry Laurel at the south-eastern corner of the site which will be removed in accordance with the Ecologist specification and relevant environmental guidelines.

4.3.4 Asbestos

From review of the site (by means of desktop studies), as well as local site knowledge, it is not envisaged that asbestos or asbestos containing materials (ACM) will be encountered.

If asbestos is encountered its removal will be carried out by a suitably qualified contractor and ACMs will only be removed from site by a suitably permitted / licenced waste contractor, in accordance with S.I. No. 589 of 2010 Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006-2010. All material will be taken to a suitably licensed or permitted facility.

4.3.5 Other known Hazardous Substances

Paints, glues, adhesives and other known hazardous substances will be stored in designated areas. They will generally be present in small volumes only and associated waste volumes generated will be kept to a minimum. Wastes will be stored in appropriate receptacles pending collection by an authorised waste contractor.

In addition, WEEE (containing hazardous components), printer toner/cartridges, batteries (Lead, Ni-Cd or Mercury) and/or fluorescent tubes and other mercury containing waste may be generated from during C&D activities or temporary site offices. These wastes, if generated, will be stored in appropriate receptacles in designated areas of the site pending collection by an authorised waste contractor.

4.4 MAIN CONSTRUCTION AND DEMOLITION WASTE CATEGORIES

The main non-hazardous and hazardous waste streams that could be generated by the construction activities at a typical site are shown in Table 1, that follows under Section 6 of this report. The List of Waste (LoW) code (as effected from 1 June 2015) (also referred to as the European Waste Code or EWC) for each waste stream is also shown.

5.0 ROLES AND RESPONSIBILITIES

The Best Practice Guidelines on the Preparation of Resource Waste Management Plans for Construction and Demolition Projects promotes that a RM should be appointed. The RM may be performed by number of different individuals over the life-cycle of the Project, however it is intended to be a reliable person chosen from within the Planning/Design/Contracting Team, who is technically competent and appropriately trained, who takes the responsibility to ensure that the objectives and measures within the Project RWMP are complied with. The RM is assigned the requisite authority to meet the objective and obligations of the RWMP. The role will include the important activities of conducting waste checks/audits and adopting construction and demolition methodology that is designed to facilitate maximum reuse and/or recycling of waste.

5.1 ROLE OF THE CLIENT

The Client is the body establishing the aims and the performance targets for the project.

- The Client has commissioned the preparation and submission of a preliminary RWMP as part of the design and planning submission;
- The Client is to commission the preparation and submission of an updated RWMP as part of the construction tendering process;
- The Client will ensure that the RWMP is agreed on and submitted to the local authority prior to commencement of works on site;
- The Client is to request the end-of-project RWMP from the Contractor.

5.2 ROLE OF THE CLIENT ADVISORY TEAM

The Client Advisory Team or Design Team is formed of architects, consultants, quantity surveyors and engineers and is responsible for:

- Drafting and maintaining the RWMP through the design, planning and procurement phases of the project;
- Appointing a RM to track and document the design process, inform the Design Team and prepare the RWMP.
- Including details and estimated quantities of all projected waste streams with the support of environmental consultants/scientists. This should also include data on waste types (e.g. waste characterisation data, contaminated land assessments, site investigation information) and prevention mechanisms (such as by-products) to illustrate the positive circular economy principles applied by the Design Team;
- Managing and valuing the demolition work with the support of quantity surveyors;
- Handing over of the RWMP to the selected Contractor upon commencement of construction of the development, in a similar fashion to how the safety file is handed over to the Contractor;
- Working with the Contractor as required to meet the performance targets for the project.

5.3 FUTURE ROLE OF THE CONTRACTOR

The future demolition and construction Contractors have not yet been decided upon for this RWMP. However, once select they will have major roles to fulfil. They will be responsible for:

- Preparing, implementing and reviewing the (including the Pre-Demolition) RWMP throughout the demolition and construction phases (including the management of all suppliers and sub-contractors) as per the requirements of these guidelines;
- Identifying a designated and suitably qualified RM who will be responsible for implementing the RWMP;
- Identifying all hauliers to be engaged to transport each of the resources / wastes off-site;
- Implementing waste management policies whereby waste materials generated on site are to be segregated as far as practicable;
- Renting and operating a mobile-crusher to crush concrete for temporary reuse onsite during construction and reduce the amount of HGV loads required to remove material from site;
- Applying for the appropriate waste permit to crush concrete onsite;

- Identifying all destinations for resources taken off-site. As above, any resource that is legally classified as a 'waste' must only be transported to an authorised waste facility;
- End-of-waste and by-product notifications addressed with the EPA where required;
- Clarification of any other statutory waste management obligations, which could include on-site processing;
- Full records of all resources (both wastes and other resources) should be maintained for the duration of the project; and
- Preparing a RWMP Implementation Review Report at project handover.

6.0 KEY MATERIALS AND QUANTITIES

6.1 PROJECT RESOURCE TARGETS

Project specific resource and waste management targets for the site have not yet been set and this information should be updated for these targets once these targets have been confirmed by the client. However, it is expected for projects of this nature that a minimum of 70% of waste is fully re-used, recycled or recovered. Target setting will inform the setting of project-specific benchmarks to track target progress. Typical Key Performance Indicators (KPIs) that may be used to set targets include (as per guidelines):

- Weight (tonnes) or Volume (m3) of waste generated per construction value;
- Weight (tonnes) or Volume (m3) of waste generated per construction floor area (m2);
- Fraction of resource reused on site;
- Fraction of resource notified as by-product;
- Fraction of waste segregated at source before being sent off-site for recycling/recovery; and
- Fraction of waste recovered, fraction of waste recycled, or fraction of waste disposed.

6.2 MAIN CONSTRUCTION AND DEMOLITION WASTE CATEGORIES

The main non-hazardous and hazardous waste streams that could be generated by the construction activities at a typical site are shown in Table 1 below. The List of Waste (LoW) code (applicable as of 1 June 2015) (also referred to as the European Waste Code (EWC)) for each waste stream is also shown.

Table 1: Typical waste types generated and LoW codes (individual waste types may contain hazardous substances)

Waste Material	LoW/EWC Code
Concrete, bricks, tiles, ceramics	17 01 01-03 & 07
Wood, glass and plastic	17 02 01-03
Treated wood, glass, plastic, containing hazardous substances	17-02-04*
Bituminous mixtures, coal tar and tarred products	17 03 01*, 02 & 03*
Metals (including their alloys) and cable	17 04 01-11
Soil and stones	17 05 03* & 04
Gypsum-based construction material	17 08 01* & 02
Paper and cardboard	20 01 01
Mixed C&D waste	17 09 04
Green waste	20 02 01
Electrical and electronic components	20 01 35 & 36
Batteries and accumulators	20 01 33 & 34
Liquid fuels	13 07 01-10
Chemicals (solvents, pesticides, paints, adhesives, detergents etc.)	20 01 13, 19, 27-30
Insulation materials	17 06 04
Organic (food) waste	20 01 08
Mixed Municipal Waste	20 03 01

*Individual waste type may contain hazardous substances

7.0 WASTE MANAGEMENT

7.1 CONSTRUCTION WASTE GENERATION

Table 2 below shows the composition of C and D waste types produced on construction sites in 2020 based on data from the EPA National Waste Statistics [14] and the joint EPA & GMIT study [15], along with other research reports.

Table 2: Waste Materials Generated on a Typical Irish Construction Site

Waste Types	%
Mixed C and D waste	33
Timber	28
Plasterboard	10
Metals	8
Concrete	6
Other	15
Total	**100%**

Table 3 below shows the estimated construction waste generation for the development based on the gross floor area of construction and other information available to date, along with indicative targets for management of the waste streams. The estimated waste amounts for the main waste types (with the exception of soils and stones) are based on an average large-scale development waste generation rate per m2, using the waste breakdown rates shown in Table 1. These have been calculated from the schedule of development areas provided by the architect.

Table 3: Predicted On and Off-Site Reuse, Recycle And Disposal Rates for Construction Waste

Waste Types	Tonnes	Reuse		Recycle/Recovery		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Mixed C and D waste	302.1	10	30.2	80	241.68	10	30.2
Timber	256.3	40	102.52	55	140.96	5	12.81
Plasterboard	91.5	30	27.45	60	54.9	10	9.15
Metals	73.2	5	3.66	90	65.88	5	3.66
Concrete	54.9	30	16.47	65	35.68	5	2.75
Other	137.3	20	27.46	60	82.38	20	27.46
Total	**915.3**		**207.76**		**621.48**		**86.03**

In addition to the information in Table 3, there will be approximately 5,000m3 of soil, stones, and clay excavated to facilitate construction of new foundations and underground services. It is currently envisaged that all of the excavated material can be reused on site. Should any material require removal offsite, this will be taken for appropriate offsite reuse, recovery, recycling and/or disposal.

It should be noted that until final materials and detailed construction methodologies have been confirmed, it is difficult to predict with a high level of accuracy the construction waste that will be generated from the proposed works as the exact materials and quantities may be subject to some degree of change and variation during the construction process.

7.2 PROPOSED RESOURCE AND WASTE MANAGEMENT OPTIONS

Waste materials generated will be segregated on site, where it is practical. Where the on-site segregation of certain waste types is not practical, off-site segregation will be carried out. There will be skips and receptacles provided to facilitate segregation at source where feasible. All waste receptacles leaving site will be covered or enclosed.

The appointed waste contractor will collect and transfer the wastes as receptacles are filled. There are numerous waste contractors in the Limerick Region that provide this service.

All waste arising's will be handled by an approved waste contractor holding a current waste collection permit. All waste arising's requiring disposal off-site will be reused, recycled, recovered or disposed of at a facility holding the appropriate registration, permit or licence, as required.

During construction some of the sub-contractors on site will generate waste in relatively low quantities. The transportation of non-hazardous waste by persons who are not directly involved with the waste business, at weights less than or equal to 2 tonnes, and in vehicles not designed for the carriage of waste, are exempt from the requirement to have a waste collection permit (Ref. Article 30 (1) (b) of the Waste Collection Permit Regulations 2007 as amended). Any sub-contractors engaged that do not generate more than 2 tonnes of waste at any one time can transport this waste offsite in their work vehicles (which are not design for the carriage of waste). However, they are required to ensure that the receiving facility has the appropriate COR / permit / licence.

Written records will be maintained by the contractor(s) detailing the waste arising throughout the C&D phases, the classification of each waste type, waste collection permits for all waste contactors who collect waste from the site and COR/permit or licence for the receiving waste facility for all waste removed off site for appropriate reuse, recycling, recovery and/or disposal.

Dedicated bunded storage containers will be provided for hazardous wastes which may arise such as batteries, paints, oils, chemicals etc, if required.

The anticipated management of the main waste streams is outlined below.

Soil, Stone, Gravel and Clay

The waste hierarchy states that the preferred option for waste management is prevention and minimisation of waste, followed by preparing for reuse and recycling / recovery, energy recovery (i.e. incineration) and, least favoured of all, disposal. The excavations are required to facilitate construction works so the preferred option (prevention and minimisation) cannot be accommodated for the excavation phase.

When material is removed off-site it could be reused as a by-product (and not as a waste). If this is done, it will be done in accordance with Article 27 of the European Communities (Waste Directive) Regulations 2011, which requires that certain conditions are met and that by-product notifications are made to the EPA via their online notification form. Excavated material should not be removed from site until approval from the EPA has been received. The potential to reuse material as a by-product will be confirmed during the course of the excavation works, with the objective of eliminating any unnecessary disposal of material.

The next option (beneficial reuse) may be appropriate for the excavated material, pending environmental testing to classify the material as hazardous or non-hazardous in accordance with the EPA Waste Classification – List of Waste &

Determining if Waste is Hazardous or Non-Hazardous publication. Clean inert material may be used as fill material in other construction projects or engineering fill for waste licensed sites.

Beneficial reuse of surplus excavation material as engineering fill may be subject to further testing to determine if materials meet the specific engineering standards for their proposed end use.

Any nearby sites requiring clean fill/capping material will be contacted to investigate reuse opportunities for clean and inert material. If any of the material is to be reused on another site as a by-product (and not as a waste), this will be done in accordance with Article 27. Similarly, if any soils/stones are imported onto the site from another construction site as a by-product, this will also be done in accordance with Article 27. Article 27 will be investigated to see if the material can be imported onto this site for beneficial reuse instead of using virgin materials.

If the material is deemed to be a waste, then removal and reuse / recovery / disposal of the material will be carried out in accordance with the Waste Management Act 1996 as amended, the Waste Management (Collection Permit) Regulations 2007 as amended and the Waste Management (Facility Permit & Registration) Regulations 2007 as amended. Once all available beneficial reuse options have been exhausted, the options of recycling and recovery at waste permitted and licensed sites will be considered.

In the event that contaminated material is encountered and subsequently classified as hazardous, this material will be stored separately to any non-hazardous material. It will require off-site treatment at a suitable facility or disposal abroad via Transfrontier Shipment of Wastes (TFS).

Bedrock

While it is not envisaged that bedrock will be encountered, if bedrock is encountered, it is anticipated that it will not be crushed on site. Any excavated rock is expected to be removed offsite for appropriate reuse, recovery and/or disposal. If bedrock is to be crushed onsite the appropriate mobile waste facility permit will be obtained from Limerick CCC.

Silt & Sludges

During the construction phase, silt and petrochemical interception should be carried out on runoff and pumped water from site works, where required. Sludge and silt will then be collected by a suitably licensed contractor and removed offsite.

Concrete Blocks, Bricks, Tiles & Ceramics

The majority of concrete blocks, bricks, tiles and ceramics generated as part of the construction works are expected to be clean, inert material and should be recycled, where possible. If concrete is to be crushed onsite the appropriate mobile waste facility permit will be obtained from Limerick CCC.

Hard Plastic

As hard plastic is a highly recyclable material, much of the plastic generated will be primarily from material off-cuts. All recyclable plastic will be segregated and recycled, where possible.

Timber

Timber that is uncontaminated, i.e. free from paints, preservatives, glues etc., will be disposed of in a separate skip and recycled off-site.

Metal

Metals will be segregated where practical and stored in skips. Metal is highly recyclable and there are numerous companies that will accept these materials.

Plasterboard

There are currently a number of recycling services for plasterboard in Ireland. Plasterboard from the construction phases will be stored in a separate skip, pending collection for recycling. The site manager will ensure that oversupply of new plasterboard is carefully monitored to minimise waste.

Glass

Glass materials will be segregated for recycling, where possible

Waste Electrical and Electronic Equipment (WEEE)

Any WEEE will be stored in dedicated covered cages/receptacles/pallets pending collection for recycling.

Other Recyclables

Where any other recyclable wastes such as cardboard and soft plastic are generated, these will be segregated at source into dedicated skips and removed off-site.

Non-Recyclables Waste

C&D waste which is not suitable for reuse or recovery, such as polystyrene, some plastics and some cardboards, will be placed in separate skips or other receptacles. Prior to removal from site, the non-recyclable waste skip/receptacle will be examined by a member of the waste team (see Section 9.0) to determine if recyclable materials have been placed in there by mistake. If this is the case, efforts will be made to determine the cause of the waste not being segregated correctly and recyclable waste will be removed and placed into the appropriate receptacle.

Asbestos Containing Materials

As previously mentioned in this report, no asbestos containing materials were identified during the asbestos survey.

Should (despite the findings of the aforementioned report) ACM's be encountered on site, they should be removed by a suitably competent contractor and disposed of as asbestos waste before the demolition works begin. All asbestos removal work or encapsulation work must be carried out in accordance with S.I. No. 386 of 2006 Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006-2010.

Other Hazardous Wastes

On-site storage of any hazardous wastes produced (i.e. contaminated soil if encountered and/or waste fuels) will be kept to a minimum, with removal off-site organised on a regular basis. Storage of all hazardous wastes on-site will be undertaken so as to minimise exposure to on-site personnel and the public and to also minimise potential for environmental impacts. Hazardous wastes will be recovered, wherever possible, and failing this, disposed of appropriately.

Onsite Crushing

It is currently not envisaged that the crushing of waste materials will occur onsite, however if the crushing of material is to be undertaken a mobile waste facility permit will first be obtained from Limerick CCC and the destination of the excepting waste facility will be supplied to the Limerick CCC waste unit.

7.3 TRACKING AND DOCUMENTATION PROCEDURES FOR OFF-SITE WASTE

All waste will be documented prior to leaving the site. Waste will be weighed by the contractor, either by weighing mechanism on the truck or at the receiving facility. These waste records will be maintained on site by the nominated project RM (see Section 9.0).

All movement of waste and the use of waste contractors will be undertaken in accordance with the Waste Management Acts 1996 - 2011, Waste Management (Collection Permit) Regulations 2007 as amended and Waste Management (Facility Permit & Registration) Regulations 2007 and amended. This includes the requirement for all waste contractors to have a waste collection permit issued by the NWCPO. The nominated project RM (see Section 9.0) will maintain a copy of all waste collection permits on-site.

If the waste is being transported to another site, a copy of the Local Authority waste COR/permit or EPA Waste/IE Licence for that site will be provided to the nominated project RM (see Section 9.0). If the waste is being shipped abroad, a copy of the Transfrontier Shipping (TFS) notification document will be obtained from DCC (as the relevant authority on behalf of all local authorities in Ireland) and kept on-site along with details of the final destination (COR, permits, licences etc.). A receipt from the final destination of the material will be kept as part of the on-site waste management records.

All information will be entered in a waste management recording system to be maintained on site.

7.4 ESTIMATED COST OF WASTE MANAGEMENT

An outline of the costs associated with different aspects of waste management is outlined below. The total cost of C&D waste management will be measured and will take into account handling costs, storage costs, transportation costs, revenue from rebates and disposal costs.

7.4.1 Reuse

By reusing materials on site, there will be a reduction in the transport and recycle/recovery/disposal costs associated with the requirement for a waste contractor to take the material off-site.

Clean and inert soils, gravel, stones etc. which cannot be reused on site may be used as access roads or capping material for landfill sites etc. This material is often taken free of charge or a reduced fee for such purposes, reducing final waste disposal costs.

7.4.2 Recycling

Salvageable metals will earn a rebate which can be offset against the costs of collection and transportation of the skips.

Clean uncontaminated cardboard and certain hard plastics can also be recycled. Waste contractors will charge considerably less to take segregated wastes, such as recyclable waste, from a site than mixed waste.

Timber can be recycled as chipboard. Again, waste contractors will charge considerably less to take segregated wastes such as timber from a site than mixed waste.

7.4.3 Disposal

Landfill charges are currently at around €140 - €160 per tonne which includes a €85 per tonne landfill levy specified in the Waste Management (Landfill Levy) Regulations 2015. In addition to disposal costs, waste contractors will also charge a collection fee for skips.

Collection of segregated C&D waste usually costs less than municipal waste. Specific C&D waste contractors take the waste off-site to a licensed or permitted facility and, where possible, remove salvageable items from the waste stream before disposing of the remainder to landfill. Clean soil, rubble, etc. is also used as fill/capping material, wherever possible.

8.0 TRAINING PROVISIONS

A member of the construction team will be appointed as the project RM to ensure commitment, operational efficiency and accountability during the C&D phases of the project.

8.1 RESOURCE MANAGER TRAINING AND RESPONSIBILITIES

The nominated RM will be given responsibility and authority to select a waste team if required, i.e. members of the site crew that will aid them in the organisation, operation and recording of the waste management system implemented on site. The RM will have overall responsibility to oversee, record and provide feedback to the client on everyday waste management at the site. Authority will be given to the RM to delegate responsibility to sub-contractors, where necessary, and to coordinate with suppliers, service providers and sub-contractors to prioritise waste prevention and material salvage.

The RM will be trained in how to set up and maintain a record keeping system, how to perform an audit and how to establish targets for waste management on site. The RM will also be trained in the best methods for segregation and storage of recyclable materials, have information on the materials that can be reused on site and be knowledgeable in how to implement this RWMP.

8.2 SITE CREW TRAINING

Training of site crew is the responsibility of the RM and, as such, a waste training program should be organised. A basic awareness course will be held for all site crew to outline the RWMP and to detail the segregation of waste materials at source. This may be incorporated with other site training needs such as general site induction, health and safety awareness and manual handling.

This basic course will describe the materials to be segregated, the storage methods and the location of the Waste Storage Areas (WSAs). A sub-section on hazardous wastes will be incorporated into the training program and the particular dangers of each hazardous waste will be explained.

9.0 TRACKING AND TRACING / RECORD KEEPING

Records should be kept for all waste material which leaves the site, either for reuse on another site, recycling or disposal. A recording system will be put in place to record the waste arising's on site.

A waste tracking log should be used to track each waste movement from the site. On exit from the site the waste collection vehicle driver should stop at the site office and sign out as a visitor and provide the security personnel or RM with a waste docket (or WTF for hazardous waste) for the waste load collected. At this time, the security personnel should complete and sign the Waste Tracking Register with the following information:

- Date
- Time
- Waste Contractor
- Company waste contractor appointed by e.g. Contractor or subcontractor name
- Collection Permit No.
- Vehicle Reg.
- Driver Name
- Docket No.
- Waste Type
- EWC/LoW

The waste vehicle will be checked by security personal or the RM to ensure it has the waste collection permit no. displayed and a copy of the waste collection permit in the vehicle before they are allowed to remove the waste from the site.

The waste transfer dockets will be transferred to the RM on a weekly basis and can be placed in the Waste Tracking Log file. This information will be forwarded onto the Limerick CCC Waste Regulation Unit when requested.

Each subcontractor that has engaged their own waste contractor will be required to maintain a similar waste tracking log with the waste dockets / WTF maintained on file and available for inspection on site by the main contractor as required. These subcontractor logs will be merged with the main waste log.

Waste receipts from the receiving waste facility will also be obtained by the site contractor(s) and retained. A copy of the Waste Collection Permits, CORs, Waste Facility Permits and Waste Licences will be maintained on site at all times and will be periodically reviewed by the RM. Subcontractors who have engaged their own waste contractors, should provide the main contractor with a copy of the waste collection permits and COR / permit / licence for the receiving waste facilities and maintain a copy on file, available for inspection on site as required.

10.0 OUTLINE WASTE AUDIT PROCEDURE

10.1 RESPONSIBILITY FOR WASTE AUDIT

The appointed RM will be responsible for conducting a waste audit at the site during the C&D phase of the development. Contact details for the nominated RM will be provided to the Limerick CCC Waste Regulation Unit after the main contractor is appointed and prior to any material being removed from site.

10.2 REVIEW OF RECORDS AND COSTS

A review of all waste management costs and the records for the waste generated and transported off-site should be undertaken mid-way through the project.

If waste movements are not accounted for, the reasons for this should be established in order to see if and why the record keeping system has not been maintained. The waste records will be compared with the established recovery/reuse/recycling targets for the site. Each material type will be examined, in order to see where the largest percentage waste generation is occurring. The waste management methods for each material type will be reviewed in order to highlight how the targets can be achieved.

Upon completion of the C&D phase, a final report will be prepared, summarising the outcomes of waste management processes adopted and the total recycling/reuse/recovery figures for the development.

11.0 CONSULTATION WITH RELEVANT BODIES

11.1 LOCAL AUTHORITY

Once construction contractors have been appointed, have appointed waste contractors and prior to removal of any C&D waste materials offsite, details of the proposed destination of each waste stream will be provided to the Limerick CCC Waste Regulation Unit.

Limerick CCC will also be consulted, as required, throughout the demolition, excavation and construction phases in order to ensure that all available waste reduction, reuse and recycling opportunities are identified and utilised and that compliant waste management practices are carried out.

11.2 RECYCLE/SALVAGE COMPANIES

The appointed waste contractor for the main waste streams managed by the demolition and construction contractors will be audited in order to ensure that relevant and up-to-date waste collection permits and facility registrations/permits/licences are held. In addition, information will be obtained regarding the feasibility of recycling each material, the costs of recycling/reclamation, the means by which the wastes will be collected and transported off-site, and the recycling/reclamation process each material will undergo off site.

12.0 REFERENCES

1. Waste Management Act 1996 (No. 10 of 1996) as amended.
2. Protection of the Environment Act 2003, (No. 27 of 2003) as amended.
3. Litter Pollution Act 1997 (S.I. No. 12 of 1997) as amended
4. National Waste Management Plan for a Circular Economy 2024-2030.
5. Department of Environment and Local Government (DoELG) Waste Management – Changing Our Ways, A Policy Statement (1998).
6. Forum for the Construction Industry – Recycling of Construction and Demolition Waste.
7. Department of Communications, Climate Action and Environment (DCCAE), Waste Action Plan for the Circular Economy - Ireland's National Waste Policy 2020-2025 (2020).
8. DCCAE, Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less' (2021)
9. Environmental Protection Agency (EPA) 'Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction & Demolition Projects' (2021)
10. Department of Environment, Heritage and Local Government, Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects (2006).
11. FÁS and the Construction Industry Federation (CIF), Construction and Demolition Waste Management – a handbook for Contractors and Site Managers (2002).
12. Limerick City and County Council, Limerick County Development Plan 2022-2028 (2022)
13. Planning and Development Act 2000 (S.I. No. 30 of 2000) as amended
14. EPA, Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous (2015)
15. Council Decision 2003/33/EC, establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC.
16. Environmental Protection Agency (EPA), National Waste Database Reports 1998 – 2012.
17. EPA and Galway-Mayo Institute of Technology (GMIT), EPA Research Report 146 – A Review of Design and Construction Waste Management Practices in Selected Case Studies – Lessons Learned (2015).