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RESOURCE & CONSTRUCTION WASTE MANAGEMENT PLAN

FOR

MARSHALL YARDS DEVELOPMENT COMPANY LTD
DIGITAL OFFICE CENTRE
BLOCK B, MAYNOOTH BUSINESS CAMPUS
CO. KILDARE

RELATING TO A PROPOSED

LARGE-SCALE RESIDENTIAL DEVELOPMENT

AT

BLESSINGTON
CO. WICKLOW

3rd October 2024

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1.0 INTRODUCTION

This document presents the Resource and Construction Waste Management Plan (RWMP) for the control, management and monitoring of resources and construction waste associated with a proposed large-scale residential development at Blessington, Co. Wicklow.

The proposed development will consist of the construction of 233 No. residential dwellings (24 No. 1-bed, 103 No. 2-bed, 94 No. 3-bed and 12 No. 4-bed); 36 No. 'later living' dwellings (12 No. 1-bed and 24 No. 2-bed); a medical centre; a pharmacy; and a café.

The RWMP has been prepared to demonstrate how the Construction Phase will comply with the following relevant legislation, relevant Best Practice Guidelines and Local Authority Waste Management Policies:

Waste Management Act 1996-2021

Waste Management (Collection Permit) Amendment Regulations 2016 (SI No. 24 of 2016)

EPA Best Practice Guidelines for the preparation of resource and management plans for construction and demolition projects, April 2021

Wicklow County Development Plan 2022 – 2028

The National Waste Management Plan for a Circular Economy 2024-2030

EPA (2020). A guide to by-products and submitting a notification under Article 27 of the European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011)(Draft):

EPA (2019). Guidance on Soil and Stone By-Products in the context of Article 27 of the European Communities (Waste Directive) Regulations 2011

The Key Aspects of this RWMP are:

1 To maximise the use of resources in the Design and Construction Phases and to minimise the generation of waste with regard to the following principals:

- Green Procurement and Design
- Resource Re-Use, Recycling and Management
- Waste Prevention and Segregation

2 To maximise the segregation of construction waste materials on-site to produce uncontaminated waste streams for re-use and recycling both on-site and off-site.

2.0 WICKLOW COUNTY DEVELOPMENT PLAN WASTE OBJECTIVES

Chapter 15.2 of the Wicklow County Development Plan 2022-2028 refers to Climate Action, the Circular Economy and Construction and Demolition waste as follows:

The Waste Action Plan for a Circular Economy fulfils the commitment in the Programme for Government to publish and start implementing a new National Waste Action Plan. The policy document shifts focus away from waste disposal and moves it back up the production chain. To support the policy, regulation is already being used (Circular Economy Legislative Package) or in the pipeline (Single Use Plastics Directive). The policy document contains over 200 measures across various waste areas including Circular Economy, Municipal Waste, Consumer Protection and Citizen Engagement, Plastics and Packaging, Construction and Demolition, Textiles, Green Public Procurement and Waste Enforcement.

Chapter 15.3 of the Wicklow County Development Plan 2022-2028 includes the following Solid Waste Management Objective:

CPO 15.1 *To require all developments likely to give rise to significant quantities of waste, either by virtue of the scale of the development or the nature of the development (e.g., one that involves demolition) to submit a construction management plan, which will outline, amongst other things, the plan to minimise waste generation and the plan to protect the environment with the safe and efficient disposal of waste from the site.*

3.0 THE CIRCULAR ECONOMY

This Resource and Waste Management Plan has been prepared with regard to the *National Waste Management Plan for a Circular Economy 2024-2030 (NWMPCE).* This is Ireland's national waste strategy published in March 2024 that will replace the existing regional waste management plans across provincial and local regional authorities and places the emphasis on more waste prevention and increased recycling, reusing and repair practices.

The *NWMPCE* intends to move Ireland toward a circular economy in which focus is shifted away from waste disposal, favouring circularity and sustainability by identifying and maximising the value of material through improved design, durability, repair and recycling. By extending the time resources are kept within the local economy, both environmental and economic benefits are foreseen.

The *National Management Plan for a Circular Economy 2024-2030 has the following construction waste target*

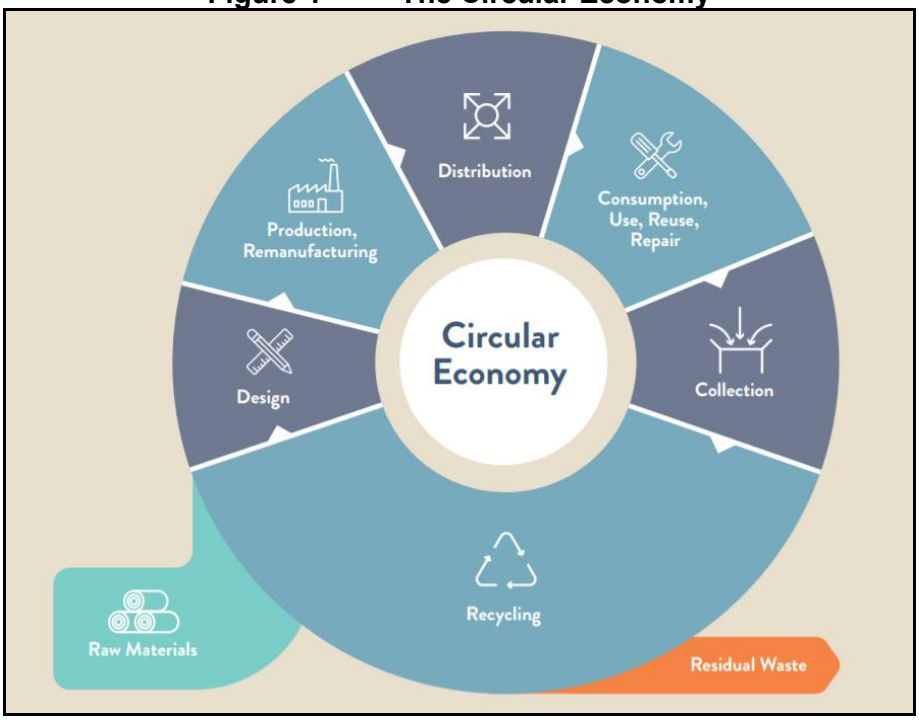
- Target 1B Reduce Construction and Demolition Waste by 12% by 2030

The *Waste Framework Directive* has set a recycling target of 70% for non-hazardous Construction & Demolition Waste.

The proposed development will implement the above policy as follows:

- Re-Use on-site of excavated soils and stones as fill material and as landscaping material.
- The purchase of construction materials as needed to prevent over supply and potential for damage whilst in storage.
- The segregation of construction waste streams into separate storage containers to maximise the potential for the re-use of the materials.
- The import of Article 27 soils where possible.
- The Developer of the Project is committed to implementing the relevant aspects of the Circular Economy Policy throughout the construction phase of the development.

Figure 1 The Circular Economy



It is the Applicants (Marshall Yards Development Company Ltd) Policy to conform to the waste hierarchy (Figure 2), whereby waste prevention is the most preferred strategy. Where waste generation is unavoidable, re-use is the most preferred fate, followed by recycling and then energy recovery, with disposal (e.g. to landfill) being the least preferred fate.

Figure 2 The Waste Hierarchy

4.0 PROJECT DESCRIPTION

4.1 Proposed Development

Marshall Yards Development Company Ltd intend to apply for permission for a Large-Scale Residential Development at this site of 6.05 hectares at Blessington Demesne, Blessington, Co. Wicklow. The site is generally bound: to the north-east by undeveloped land and Oak Drive; to the south-east by Saint Mary's Senior National School, Cocoon Childcare and Newtown Centre (across a local street); to the south-west by Downshire Park (across a local street); and to the north-west by the Blessington Inner Relief Road.
The proposed development principally comprises the construction of a mixed-use development with a gross floor area of 23,219.1 square metres and ranging in height from 1 No. to 5 No. storeys that includes: 233 No. residential dwellings (24 No. 1-bed, 103 No. 2-bed, 94 No. 3-bed and 12 No. 4-bed), of which 185 No. are houses (103 No. 2-bed, 70 No. 3-bed and 12 No. 4-bed) and 48 No. are apartments/duplexes (24 No. 1-bed and 24 No. 3-bed); 36 No. 'later living' dwellings (12 No. 1-bed and 24 No. 2-bed), of which 12 No. are houses (all 2-bed) and 24 No. are apartments (12 No. 1-bed and 12 No. 2-bed); a medical centre (224 sq m); a pharmacy (115 sq m); and a café (60 sq m).

Figure 3 Site Plan

4.2 Site History

The proposed application area is undeveloped greenfield and was formerly in agricultural use.

4.3 Existing Structures

There are no structures on the site to be demolished.

4.4 Site Clearance

To facilitate the development the site shall be stripped of soils and vegetation. Soils for re-use on site will be maintained in stockpiles.

4.5 Material Balance Cut and Fill

Table 1 Cut & Fill Volumes

Scenario	Volume (m3)	Tonnes
Cut	25,000	40,000
Fill	30,000	48,000
Net Fill	5000	8000
Top Soil	12,000	19,200
Re-Used	1200	1920
Net Export	10,800	17,280

A conversion figure of 1.6 to convert m^3 to tonnes has been applied to determine the tonnage of soils.

4.6 Soil Analysis

Soils at the site prior to the commencement of site works will be classified as non-hazardous or hazardous in accordance with the *EPA (2018) Waste Classification Guidance – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* by utilising the results of laboratory analysis and the *Haz Waste Online Classification Tool.* This RWMP will be updated when the classification is completed and issued to Wicklow Co. Co.

4.7 Invasive Species

Species listed on the *Third Schedule of S.I. 477/2011 (as amended)*

A survey for invasive species was undertaken as part of an EcIA for the development in by project ecologists, *Openfield.*

No invasive species were identified at the subject site.

4.8 Asbestos

There are no structures on site that could contain asbestos containing materials (ACM).

4.9 Project Phasing

The general sequence of development works is detailed below in Table 3.

Table 3 Sequence of Construction Works

Activity Sequence	General Description
Site access and security	Set up site access point and erect site hoarding
Identification of Existing Utility Services	Set up bunting, mark location of live services, including E.S.B., Gas etc.
Removal of Vegetation	e.g. Trees and vegetation
Site Preparation	Soil stripping, stockpiling, export
Compounds	Establish materials storage compound and waste management compound
Facilities	Install site offices and welfare units
Infrastructure installation	Drainage, Utility ducts, power, internal roads
Substructure	Foundations
Superstructure	Frames
External Envelope	Place façade to superstructure
Internal Finishes	Mechanical & Electrical
External Landscaping	Hard and soft landscaping, road surfacing

5.0 RWMP Roles and Responsibilities

5.1 Project Director / Manager

The Project Director will be responsible for the overall implementation of the RWMP and providing the budget for its implementation and management. The Project Director will ensure that the reporting and recording requirements are met and all necessary resources are in place to support the implementation of the RWMP from Design Stage to Project Completion.

5.2 Resource and Waste Manager

The Resource and Waste Manager (RWM) will be responsible for:

- Implementing all aspects of the RWMP throughout the Construction Phase.
- Assisting the Project Manager on the implementing of the aspects of the Circular Economy.
- Ensuring that all resources are managed throughout the Construction Phase
- Recording the volumes and types of construction wastes generated.
- Communicating with the Local Authority on waste related matters and issuing of waste records.

- Management of the waste storage compound to ensure that all construction waste streams are stored separately and that cross-contamination does not occur.

- Maintaining a file of all Waste Collection Permits and Waste Facility Permits / Waste Licences that each waste load is exported to.

- Ensuring that all waste loads exiting the site are contained in a vehicle displaying an appropriate NWCPO Permit number.

- Maintaining a receipt of each waste load delivered to authorised facilities.

- Identifying and reporting on damaged construction materials and identifying how damage to resources and materials shall be prevented.

- Preparation of monthly waste management report detailing waste volumes generated, re-use and recycling rates and details on damaged raw materials and how they can be returned for repair and future re-use.

- Conducting Resource and Waste Management Audits

- Communicating with the EPA regarding Article 27 By-Product determinations

5.3 Site Personnel

All personnel on site will be responsible for the effective implementation of the RWMP. All staff will receive Induction and Tool-Box training on resource management and waste prevention, segregation and disposal.

5.4 Gate Person

Gate Person duties will include the inspection all vehicles exiting site with waste to ensure that they have a Waste Collection Permit (WCP) Number displayed on the side of the vehicle.

If the vehicle does not have a WCP Number displayed, the vehicle will be refused exit and the RWM will ensure that the waste load is returned to the site area from where it came.

5.5 Staff Training

Copies of the RWMP will be made available to all relevant personnel on site. The RWM will arrange for all site personnel and contractors to be instructed about / receive training on the objectives of the RWMP and materials management, and be informed of the responsibilities that fall upon them as a consequence of its implementation The topics to be covered will include;

- Project programme and requirements
- Health and Safety requirements
- RWMP
- Materials to be segregated
- Segregation systems and protocols
- Arrangement for the storage and handling of reusable materials and recyclables
- Document control requirements

Where source segregation and materials re-use techniques apply, each member of staff will be given instructions on how to comply with the RWMP and will be displayed for the benefit of site staff.

Table 4 Principal Project Staff

Title	Name	Contact Details
Project Director	TBC	TBC
Construction Director	TBC	TBC
Construction Manager	TBC	TBC
Resource & Waste Manager	TBC	TBC
Site Engineer	TBC	TBC

TBC To be confirmed prior to commencement of construction phase

6.0 RESOURCE AND CONSTRUCTION WASTE MANAGEMENT DESIGN APPROACH

This section provides details on how resource optimisation and the management and minimisation of waste streams shall be implemented from design phase through to completion of the project.

6.1 Site Preparation

- Reuse site fencing and staff welfare units from previous Projects.
- Minimise concrete use in site compounds.

6.2 Re-Use of existing site elements

- Identify materials that can be re-used or recycled on-site to minimise the use of virgin materials.
- Top and sub-soils may be retained on-site and re-used for landscaping purposes
- Stone from the northern boundary wall to be demolished may be retained and re-used in its restoration.

6.3 The Use of Recycled materials and surplus materials

- Use recycled aggregates where possible to minimise the use of virgin materials.
- Identify materials which have a % of recycled material contained within them e.g., Asphalt may include recycled glass or recycled asphalt.
- Where material surpluses arise, they shall be stored to prevent damage and re-used on other projects or returned to the supplier.

6.4 Materials Procurement

- Identify suppliers that can supply low environmental impact products and materials
- Identify recycled materials to be used on the project
- Minimise over-ordering to reduce over storage and to minimise potential of damage to materials
- Request that material suppliers take back damaged materials for repair and re-use.
- Request that suppliers minimise packaging on all materials

6.5 Off-Site Construction

The use of pre-constructed building elements is an efficient process that minimises the generation of on-site construction waste.

- Wood / Steel frames shall be constructed off-site and assembled on-site.
- Balconies where part of the design shall be constructed off-site
- Pre formed façade panels where part of the design shall be constructed off-site

6.6 SOIL MANAGEMENT

Planning the Optimal Site Level
The Applicant undertakes surveys of the levels of sites to determine the most appropriate ground level for the development. In doing so we reduce the requirement for either excavating material or bringing additional soil to site to bring the site to the designed finished floor levels. This intervention at the design stage directly impacts our carbon footprint by reducing the number of heavy goods vehicle journeys to and from site carrying soil.

Circular Economy: Targeting Net Zero Soil Import
Once on site, wherever possible, the required level is achieved by transferring soil within the site rather than importing and exporting soil. This process, known as “cut and fill” is used on all our sites. This approach gives the ability to work towards net zero soil import and export. Where this is not possible, we leverage our total landbank using our excess soil for fill on other sites, with the end goal of sending as little soil to landfill as possible.

There is a requirement to import c.5000m^3 of fill to facilitate the development, thus there will no subsoils exported from the site.

There is requirement to export c.10,800m^3 of top soils after c. 1200 tonnes is retained on site for re-use for landscaping purposes.

7.0 DESCRIPTION OF WASTE ARISINGS

The calculated construction waste tonnage has been derived from the *Building Research Establishment Environmental Assessment Method (BREEAM)* which specifies that 11.1 tonnes of construction waste is generated for every 100m^2 of development area. Based on the combined building area contained in the Schedule of Accommodation for the development of c.23,291m^2 it has been calculated that up to c. 2585 tonnes of construction waste may be produced.

The tonnage of soils and stones to be generated has been determined from the cut and fill analysis for the site.

Table 5 details the most recent EPA's % breakdown of Construction waste for 2022.

The expected construction waste that will be generated throughout the course of the development is detailed in Table 6 below.

Table 5 Construction Waste Composition EPA 2022 Waste Statistics

Waste Type	% composition of total waste
Metal	15
Wood Plastic Glass	4
Bituminous Materials	10
Concrete Brick Gypsum	41
Mixed C&D	30

Table 6 provides the calculated construction waste associated with the project.

Table 6 Calculated construction waste

LoW Code	Description	Volume Generated (tonnes)	Prevention (tonnes) Non Waste	Reused (tonnes) Non-Waste	Recycled (tonnes) Waste	Recovered (tonnes) Waste	Disposed (tonnes) Waste
17 01 01 17 01 02 17 01 03	Concrete Brick Tiles and Ceramics	1060	0	572	435	0	53
17 02 01 17 02 02 17 02 03	Wood Glass Plastic	103	0	0	82	21	1
17 03 02	Bituminous Material	259	0	111	148	0	0
17 04 07	Mixed Metals	388	0	0	388	0	0
17 05 04	Soil and Stone (Topsoils)	19,200	0	1920	0	0	17,280
17 09 04	Mixed C&D Waste	776	0	240	287	140	109
20 01 08	Biodegradable Canteen Waste	10	0	0	0	0	10
20 03 01B	Mixed Municipal Waste	10	0	0	0	0	10
20 01 01	Paper & Cardboard	3	0	0	3	0	0

8.0 CONSTRUCTION WASTE MANAGEMENT

- From the outset of construction activities, a dedicated and secure compound containing bins, and/or skips, and storage areas, into which all waste materials generated by construction site activities, will be established within the active construction phase of the development site.

- Spill kits shall be located within the site compound with clearly labelled instructions on how they shall be used to clean up fuel/oil spills.

- All vehicle and plant oils and liquid construction materials shall be stored in secure impermeable storage units.

- All diesel-powered generators shall be inspected on at least a weekly basis by a delegate of the project manager to ensure it is not leaking diesel or oils.

- All empty containers containing residual quantities of oils, greases and hydrocarbon-based liquids shall be stored in a dedicated, clearly labelled impermeable container.

- In order to ensure that the construction contractor correctly segregate waste materials, it is the responsibility of the site construction manager to ensure all staff are informed by means of clear signage and verbal instruction and made responsible for ensuring site housekeeping and the proper segregation of construction waste materials.

- It will be the responsibility of the Resource and Waste Manager (RWM) to ensure that a written record of all quantities and natures of wastes exported off-site are maintained on-site in a Waste File at the Project office.

- It is the responsibility of the RWM that all contracted waste haulage drivers hold an appropriate Waste Collection Permit for the transport of waste loads and that all waste materials are delivered to an appropriately licenced or permitted waste facility in compliance with the following relevant Regulations:

  Waste Management (Collection Permit) Regulations 2007 (SI No.820 of 2007)
  Waste Management (Collection Permit) Amendment Regulations 2016 (SI No.247 of 2016)
  Waste Management (Collection Permit) Amendment No. 2 Regulations 2023 (SI No.104 of 2023)
  Waste Management (Facility Permit and Registration) Regulations S.I.821 of 2007 and the Waste Facility Permit under the Waste Management (Facility Permit and Registration) (Amendment) Regulations S.I.250 of 2019.
  Waste Management Act 1996 (Revised 1st July 2023).

- Prior to the commencement of the Project, the RWM shall identify a permitted Waste Contractor(s) who shall be engaged to collect and dispose of all inert and hazardous wastes arising from the project works.

- The RWM shall maintain copies of all Waste Collection Permits and copies of the Waste Facility Permit or Waste Licence to which waste materials are exported to. The RWM shall ensure that all Permits/Licences are within date.

- All waste soils prior to being exported off-site, shall be classified as inert, non-hazardous or hazardous in accordance with the *EPA (2018) Waste Classification Guidance – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* document to ensure that the waste material is transferred by an appropriately permitted waste collection permit holder and brought to an appropriately permitted or licensed waste facility.

Figure 4 Construction Waste segregation compound design concept

Figure 5 Oil Spill Kit

Figure 6 Bund for waste oil container storage

9.0 ON-SITE RESOURCE MANAGEMENT & WASTE REUSE RECYCLING AND MANAGEMENT

This section of the RWMP describes how construction waste shall be minimised and how the re-use and recycling of wastes shall be maximised

- Materials shall be ordered on an *"as needed"* basis to prevent over supply and preventing damage to bulk orders stored on-site.
- Materials shall be stored and handled in a manner that minimises the generation of damaged materials
- Materials shall be ordered in appropriate sequence to minimise materials stored on site
- All staff and Sub contractors shall be advised through inductions and tool box talks on how to dispose of their waste correctly on-site.
- Broken concrete blocks and excess aggregate materials shall be segregated and stored off-site for use as hard standing material on future projects. This will result in the following positive impacts:
    - Reduction in the requirement for virgin aggregate materials from quarries
    - Reduction in energy required to extract, process and transport virgin aggregates
    - Reduced HGV movements associated with the delivery of imported aggregates to the site
    - Reduction in the amount of landfill space required to accept C&D waste
- Excess wood will be segregated in separate skips and sent for recycling.
- Plastic arising from general waste or packaging will be segregated and stored in separate skips.
- Metals waste shall be stored in dedicated skips
- Top soil that is stripped shall be retained in managed bunds to prevent erosion and reduce the leaching of minerals from the soil.

10.0 WASTE SOILS & STONES EXPORT & ARTICLE 27 DECLARATIONS

Excavated excess soils that are required to be exported off-site shall be tested in accordance with EPA (2018) *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous.* Non-Hazardous soils may be suitable for re-use in other construction sites and may be declared as a by-product in accordance with Article 27 of the *European Communities (Waste Directive) Regulations 2011*. Article 27 requires that the material classified not a waste but a by-product must meet specific criteria and that a declaration of a material as a by-product is notified to the EPA. The EPA publication *A guide to by-products and submitting a notification under Article 27 of the European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011)* shall be considered in this regard. Appendix I presents the schematic process by which a material is determined as a waste or a by-product.

The records of all Article 27 declarations and WAC Analytical Tests and *Haz Waste Online* assessments shall be maintained on-site by the RWM.

11.0 WASTE RECORD KEEPING

It is the responsibility of the RWM that a record of all quantities and natures of all wastes reused / recycled and exported off-site during the project are maintained in a Waste File at the Project office.

The following information shall be recorded for each load of waste exported off-site:

- Waste Type EWC Code and description.
- Volume of waste collected.
- Waste collection contractor's Waste Collection Permit Number and collection receipt including vehicle registration number.
- Destination of waste load including Waste Permit / Licence number of facility.
- Description of how waste at facility shall be treated i.e. disposal / recovery / export

An indicative template is contained in Figure 7, to ensure that full traceability of materials to its final destination.

Verifiable and validated tracking and authorisation documentation will be maintained for all wastes destined for re-use, recovery, recycling or disposal. Justification will also be provided where a disposal option had been employed.

The waste records shall be maintained on-site and made available to Wicklow County Council as requested.

12.0 RESOURCE AND WASTE MANAGEMENT AUDITING

The effectiveness of a Resource and Construction Waste Management Plan and its implementation, will be subject to quarterly audits by the RWM throughout the duration of the construction phase.

Audits will focus on materials inputs to the project and the waste outputs identifying:

Resources
How resource management was integrated into the design of project buildings and areas

Re-use, recycling of existing on-site materials prior to development including soils, buildings, structures.

Re-using surplus materials from previous development projects eg office cabins, fencing, aggregates, concrete products.

Additional opportunities for future resource management.

Waste
The audits will also investigate the operational factors and management policies that contribute to the generation of waste and identify appropriate corrective actions, where necessary.

Performance targets will be developed, e.g. an 85% overall recycling target, successes and failures will be recorded and Action Plans will be developed to address any issue which arise.

Inspections of the waste storage areas will be undertaken and recorded on a weekly basis, issues relating to housekeeping, inappropriate storage and segregation of wastes.

The RWM will record the findings of the audits, including types and quantities of waste arising, final treatments and costs, in a quarterly audit report.

The Final Waste Audit will examine the manner of how resources are managed and how and where the waste is produced and how waste generation can be reduced in future projects.

13.0 WASTE EXPORT PERMITS/LICENCES

All vehicles exiting the site containing any waste material shall be inspected by the gate man to ensure that they display on the side of the vehicle a NWCPO (National Waste Collection Permit Office) issued Waste Collection Permit Number.

Where a NWCPO issued Waste Collection Permit Number is not displayed the RWM shall be notified and the vehicle shall be instructed to return the waste load to the specific area on the site and will not be allowed exit the site with the waste load.
Table 5 shall be updated once a main contractor has been appointed.

Table 7a Register of Waste Collection Permits

Holder	Address & Contact	Waste Collection Permit #	Expiry Date	Materials Accepted
TBC				

TBC To be Confirmed

Table 7b Register of Local Authority issued Waste Facility Permits

Holder	Facility Address & Contact	Waste Collection Permit #	Expiry Date	Materials Accepted
TBC				

TBC To be Confirmed

Table 7c Register of EPA issued Waste Licences

Holder	Facility Address & Contact	Waste Licence #	Expiry Date	Materials Accepted
TBC				

TBC To be Confirmed on appointment of Contractor

Figure 7 Example of Waste Tracking Template

Waste Source	Waste Type	LoW Code	Haulier	Acceptance Facility Permit #	Tonnage	Date	Vehicle Reg NWCPO#
Site 1	Inert Soil & Stone	17 05 04	Murphy	Huntstown Quarry Wfpfg09000601	20	10.10.21	22D1234 NWCPO-ABC123
Site 1	Metals	17 04 07	O' Reilly	Hammond Lane P1002-01	10	11.10.21	22D5678 NWCPO-123ABC
Site 1	Concrete	17 01 01	Smyth	IMS Hollywood W0129-02	30	12.10.21	22D1234 NWCPO-ABC123