Student Management Plan – Goatstown, Dublin

Sept 2024
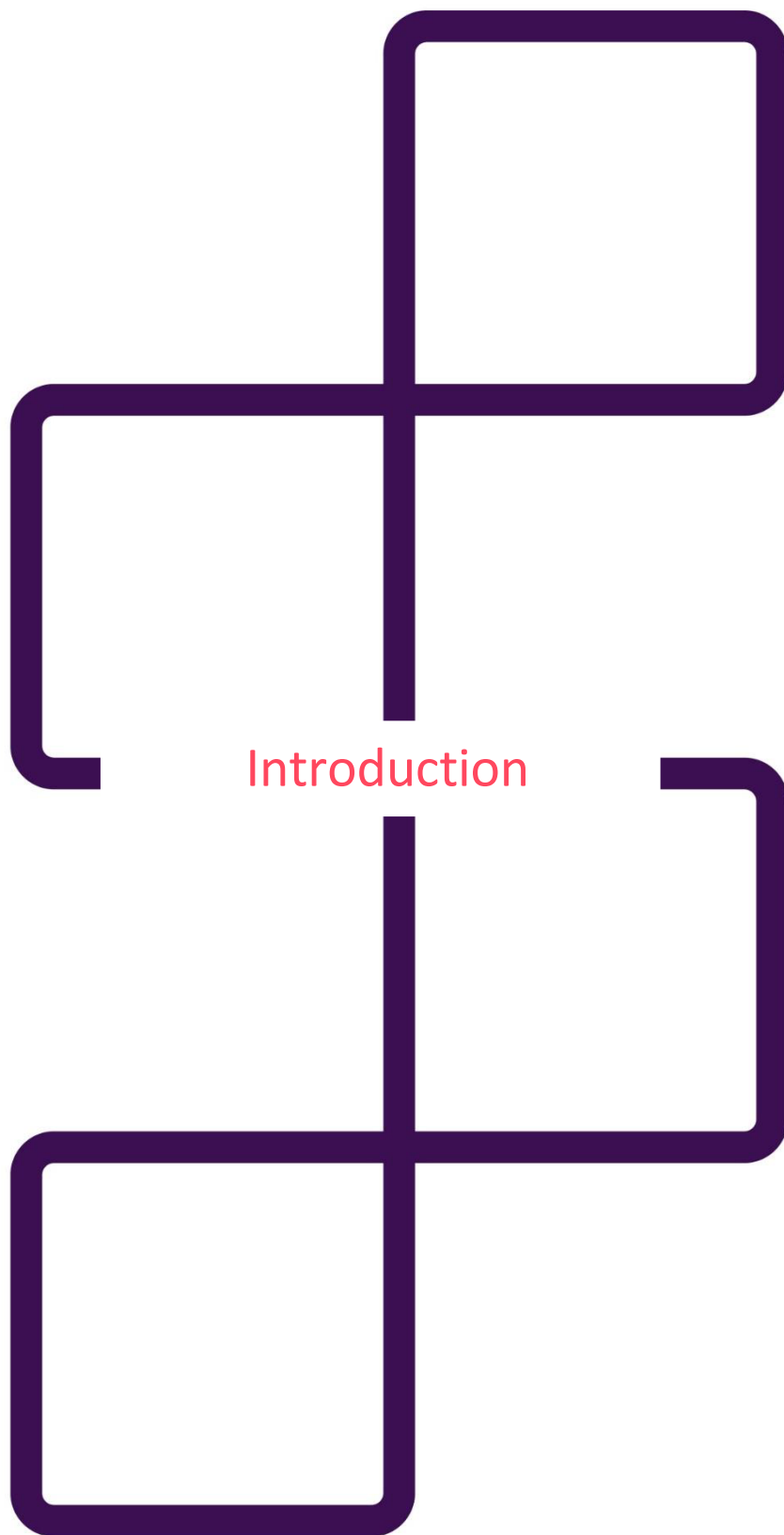
fresh.

Contents

Fresh are the 2023 winners of the Best Private Housing (UK and Ireland)

Introduction

1.   Introduction

Fresh was founded in 2010 and are experts in the management of residential for rent properties, which includes Purpose Built Student Accommodation (PBSA), Build to Rent (BTR) and Co-Living.

This is the Fresh Management Plan for Goatstown, Dublin. This document sets out the key principles by which the building will be managed.

1.1 Our Experience

Fresh is a marketing leading operator of residential for rent properties with over 13 years of experience in the sector. We manage circa 17,000 units of accommodation in 28 locations across the UK and Ireland[1].

Our Credentials
Impressive scale, with a personal touch

Fresh.

16,940 Total units under management	£2.67 billion Assets under management	55 Operational schemes	27 Individual clients
28 Operational cities	+35 Net promoter score	100 Central services team	£151 million Cash under management
364 Total staff	32 National awards won

This is **Fresh.**

[1] As of December 2023.

1.2 Our Approach

Our overall objective is providing residents with an exceptional living experience. The properties are the start, but our people are the difference. We create great places to live, built on the simple principal that the people around you can make a huge difference to your way of life.

We are big enough to have a national infrastructure, but also smart enough to know that feet on the ground and local knowledge will really count. Therefore, each site will have a dedicated team overseeing the day-to-day operations supported by our large central team who are experts in their field. We manage properties from 100 beds to over 1,000 units in size providing full end to end services for our residents and the

investors who own the buildings. We have created an operational framework that makes everything as easy as possible for our residents and staff. Our systems, processes and software are created to liberate people from unnecessary tasks or make them much simpler. We tell our people, time spent with residents and the community is never a waste of time.

1.3 Accreditations

As members of ANUK and ARLA we are committed to maintaining our professional standards and are fully compliant with the Code.

ANUK provides support, expertise and promotes best practice for scheme operators, through ANUK's National Codes for Large Student Developments, which ensures transparent and professional management of purpose-built accommodation.

ARLA Propertymark is the UK's foremost professional and regulatory body for letting agents and the biggest and most influential body in the sector, ensuring that all members must follow a strict code of practice and be part of their Client Money Protection (CMP) scheme.

PRS Is a Property Redress Scheme authorised by the Government since 2014, to provide an impartial service that considers consumer complaints about a variety of property related issues. Their aim is to help everyone understand their position in relation to the problem by sharing our knowledge and working to reach a fair and reasonable outcome for both parties, quickly and efficiently, as an alternative to the option of going to court.

PRSA (Ireland) Is a government body in Ireland that oversees and regulates the property services industry. Their responsibilities include licensing and monitoring property service providers, maintaining registers of licensed agents, and ensuring compliance with relevant legislation.

We also work with the local councils or educational establishments to sign up to any local accreditation property where appropriate.

In addition, we have our own Quality Assurance Framework which ensures that a broader range of service levels are achieved.

Fresh are the 2023 winners of the Best Private Housing (UK and Ireland)

1.4 Our Staffing Model

Central Services Team – The on-site staff will be supported by the Central Services Team who are specialists in Marketing, Finance, Maintenance, Health & Safety and Customer Service. The Central Team creates the detailed framework for implementation at site level.

Site teams – Each site has a dedicated team of staff, the number of staff required on site is determined by the number of units under management.

Our overall objective is to work with the owner to deliver well-designed buildings that are professionally managed. We provide a safe, secure home for residents, in an environment that is conducive to study, and integrates into the local community, contributing positively to the local housing provision for residents in Dublin. This provides reassurance to all stakeholders that:

- Residents have a safe and well-maintained place to live.
- Licence Agreements are correctly executed and enforced.
- Student deposits are registered and secure.
- There is an on-site team for face-to-face contact with the residents, neighbours, and other stakeholders.
- We have a commitment to developing strong relationships with the local Universities and Colleges.
- Physical aspects of the estate are maintained to meet legislative compliance and to a high standard.

1.5 The Fresh Difference

The properties are the start, but our people are the difference. We create great places to live, built on the simple principle that the people around you can make a huge difference to your way of life.
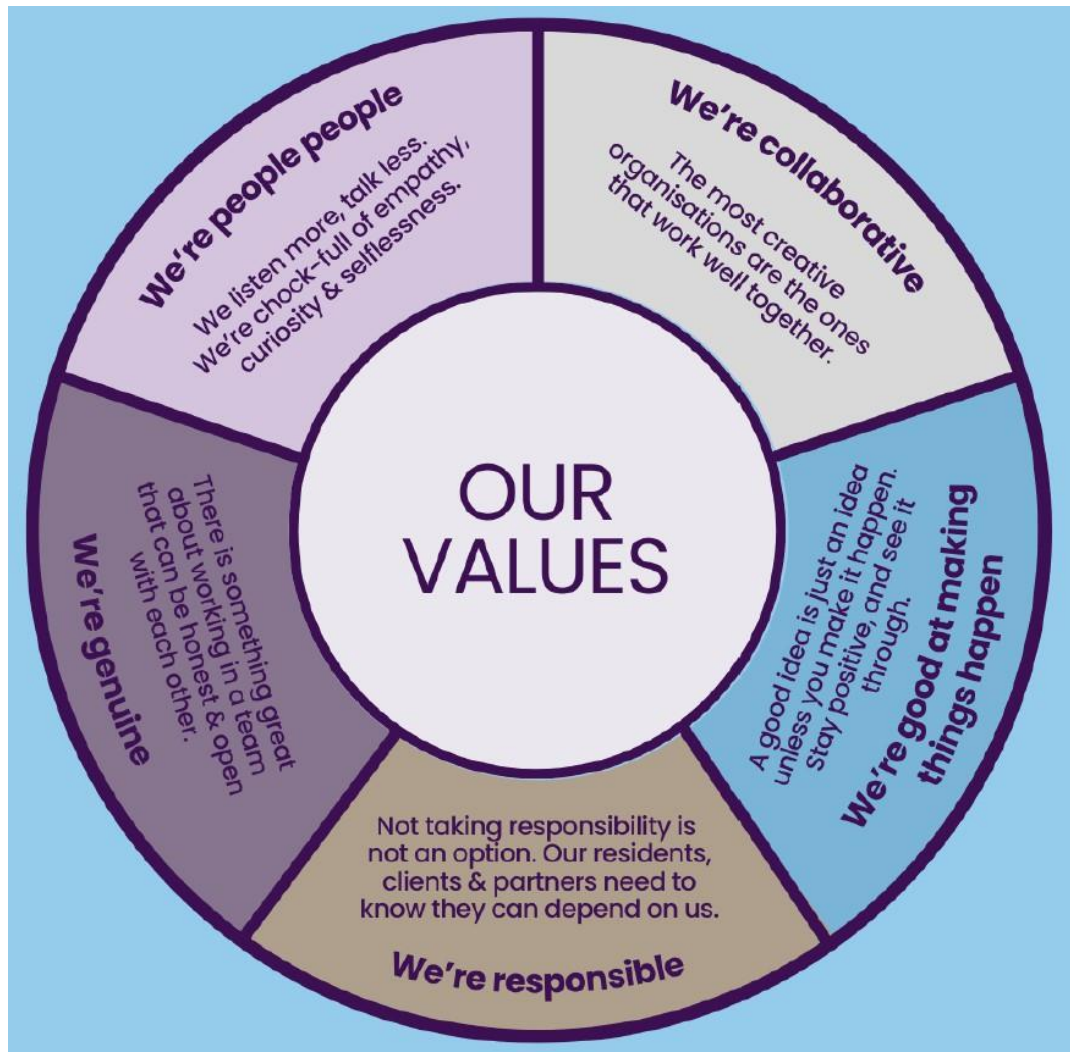
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General Management Plan

2. General Management Plan

2.1 Site Details

The scheme, Goatstown PBSA is situated in Dublin. The building is located on Goatstown Road, Dublin.

The proposals consist of demolition of the existing structures on site and construction of a purpose-built student accommodation scheme (PBSA) comprising approximately 220 no. bed spaces, indoor and outdoor student amenity space and site wide landscaping.

The scheme will provide studios and individual ensuite study bedroom accommodation, in clustered groupings, generally of 5-8 bedrooms with associated shared living / kitchen / dining areas, providing a model of high-quality student accommodation.

Amenity space equating to c. 1,785 sqm is provided across the site consisting of c.1,247 sqm of external amenity in the form of a central courtyard at ground level and roof terraces at 4th and 5th floor levels. Internal amenity space equating to c.538 sqm is provided in the form of 2 no. ground floor lounge/study areas, kitchen/tearoom, laundry, and concierge/office space.

Provision of 218 no. bicycle parking spaces distributed within the central courtyard (stacked parking with glass roof cover) and northern boundary and adjacent to the front boundary (north-west) and provision for 6 no. carparking spaces comprising 2 no. disabled parking spaces and 4no. set-down parking spaces adjacent to the front entrance to the site. Vehicular access to the site is via Goatstown Road from 2 no. entrance points.

The property will be operational from September 2027.

2.2 Resident Profile

The site is ideally located to attract students who attend University College Dublin.

The Cluster flats are ideal for undergraduates and international students looking for a secure, but social environment in which to live.

Studios are an attractive housing option for the mature 2nd, 3rd and 4th years, postgraduates and international students who are looking for independent, but well managed and secure environment to complete their studies.

2.3   Service Delivery

2.3.1   Staffing

The onsite team at Goatstown will consist of a General Manager, Senior Resident Advisor, plus a Housekeeper and Maintenance Operative.

The customer facing services and day to day running of the site will be delivered by the on-site Residents' Team who will be responsible for marketing, tenancy management, rent collection, health & safety and maintaining stakeholder relationships and building maintenance.

The on-site staff will be supported by the Central Services Team who are specialists in Marketing, Finance, Maintenance, Health & Safety and Customer Service. Our Central Team creates the detailed framework for implementation at site level.

The General Manager will report to the Operations Manager. All members of the Residents' Team will receive full training, comprising of an induction, a Management Development Programme, ANUK training in the National Code of Standards for Larger Developments, monthly 1-1's with their manager, probation review and annual appraisals. New managers are 'buddied' with existing site managers, who will offer practical guidance and support. The Residents' Team will also have regular communication with, and support from the Marketing and Facilities Team.

All staff have annual key performance targets that cover hard KPI areas such as lettings and arrears, and softer KPI's including customer satisfaction and building management.

Bonuses will be paid to staff based on performance against a range of KPI's ensuring attention to all areas of their role.

2.3.2   Front of House Services

The Reception will generally be open Monday to Friday 9am till 5:30pm, providing a point of contact for:

- Reporting repairs.
- Delivery and collection of parcels.
- Resident disputes and complaints.
- Organising social events.
- Provision of general local information and signposting to specialist services.
- Marketing enquiries.
- General customer support and guidance
- Neighbour and local community contact

At key marketing and check in times, Reception opening hours will be extended to provide weekend and evening cover.

2.3.3   Wellbeing Programme

The creation of a thriving, strong, healthy and vibrant community in this building is important for customer satisfaction and also retention.

Regular events through our 'Be Wellbeing' programme will be organised for residents to help to create a sense of community. The following represents a non-exhaustive list of the types of events that will be organised:

- Book clubs
- Grow it Fresh
- Bake off events
- Movie nights
- Quiz nights
- Cultural celebrations such as Halloween/ Christmas/ Eid etc

The Pillars of the Be Programme

Be Active
Focuses on fitness inspo and events so you can keep active and feel energised

Be Connected
Opportunities for you to meet your neighbours and get to know your dedicated Residents' Team

Be Social
Regular meet–ups and socials so you can get to know each other and create your community

Be Supported
We provide you with the support you need, with links to resources and blogs to benefit mental health, wellbeing and mindfulness

All events will be organised and communicated by the onsite Residents' Team who will be available at the reception desk or contactable via telephone/ email/ WhatsApp and WeChat.

As well as creating a positive community inside the property, the residents' team will also look for opportunities to engage with and encourage our residents to seek employment and volunteering opportunities at local businesses, charities, and community groups. The residents' team will signpost residents to local groups and opportunities through social media posts and organised events.

2.3.4   Tenancy Management System

To ensure that our service is transparent and accessible we use an online integrated Resident Portal and Tenancy Management System (Yardi).

Yardi provides the interactive resident portal and back-office tenancy management operating system that will be used to manage Goatstown.

The system provides an online service for residents allowing them to book their room, manage their booking, pay their rent, report repairs and complete and view the condition and inventory for their accommodation online 24 hours a day.

It highly automates key admin processes ensuring that on-site staff can focus on customer facing services, whilst still enabling central monitoring of activity.

2.3.5   Our Platform

Yardi is a worldwide Finance and Property Management software provider that has been running successfully for over 35 years. Yardi is well established in the UK and used by a wide number of Build-to-Rent providers. The company has more recently established a client base of Student Housing Management Companies in the UK, with Fresh being the first company to adopt the software. Fresh has built a strong working relationship with key executives within the Yardi team and taken part in developing the software to make improvements that strongly support our business.

The Yardi platform is used by Fresh:
- to manage our website,
- provide an online leasing platform (where tenants can submit an application and sign their Licence agreements online),
- provide a tenant app where rental payments can be made,
- manage the maintenance of properties,
- provide full supplier management, including processing purchase orders and invoicing,
- hold financial records and perform all accounting tasks on real time data.

Our Yardi platform is hosted on a private cloud to ensure security and system speed. We have an integration with the payment provider, Stripe, to allow us to take credit and debit card payments from residents. Our app has a direct link with Student Crowd, making it simple for students to submit a review. We have a dedicated internal training team that ensures all users are empowered to use the system. We have worked closely with Yardi and the TDS team to build a direct API connection that allows deposits to be registered automatically by the system.

What sets our platform apart?

- We make use of Yardi's "apply by unit" model, which ensures our students know exactly what unit they will be renting from the beginning of their application journey.
- We have developed in-house custom reports that allow us to extract valuable information for investors.
- We have a team of expert system analysts that are incredibly knowledgeable on the system, allowing us to make best use of the tools available to our business. Our system analysts have experience in setup and mobilisations of new properties on the system, to make this process as seamless as possible.
- We work collaboratively, to ensure that our marketing, operations and systems team are aligned to provide the best possible user experience, whether that is through updates to our app, or making operations tasks less manual to give them time to focus on other tasks.
- Our excellent relationship with the Yardi team means we are aware of new enhancements and can continue to improve the platform we are using.
- We make use of other software where relevant, to enhance our resident journey, such as utilising Calendly to allow our residents to book a move in slot.
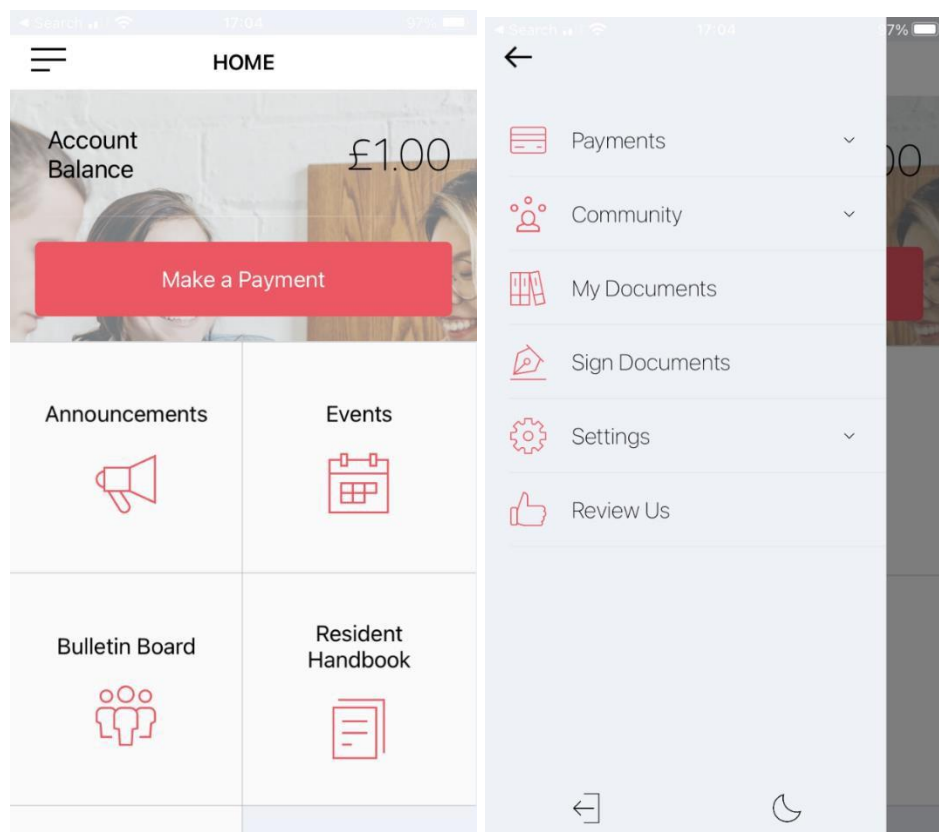
2.3.6   License Agreement and Resident Handbook

The License Agreements clearly sets out the responsibilities of the tenant and the owner. All License Agreements will be registered with the Residential Tenancies Board (RTB).

In addition to the license, each tenant is provided with an online tenants' handbook. The handbook provides guidance and a range of useful information on things such as:

- Security.
- What to do in an emergency.
- House rules.
- Room inspections.
- Repairs and maintenance.

All our residents are required to provide us with a guarantor who agrees to ensure that the resident complies with all the conditions required of them as set out in their Licence Agreement

2.3.7   Security

Security provisions are tailored around the nature, size and location of each site. At Goatstown, Dublin, we aim to provide visible but unobtrusive security, through a combination of CCTV provision, access control and security personnel.

At Goatstown there will be:

- Secure entrances which require a fob or card to gain access to the building thus ensuring that only authorised persons are on site.
- The door entry system will not allow access to be granted to the building from individual flats, but will require residents to meet their visitors at the main door.
- Full colour, high definition, IP based CCTV is provided which will cover a range of areas, including as a minimum; the entrances, fire exits, external areas, lifts, office, reception, bin store, amenity spaces, laundry and resident foyer. The CCTV will be linked back to monitoring screens in the office, with the ability for remote internet log-in, and storage capacity for a 28-day period.

Fresh will work closely with the local Police and will encourage the local beat officer, to become a known presence at Goatstown. We will encourage active participation in any local Resident Watch Schemes and other initiatives to reduce crime and improved security for the residents.

All staff including security personnel undertake an induction to ensure they are fully aware of Fresh' procedures on site.

2.3.8   Out of Hours

The out of hours service will be provided by security personnel who are SIA accredited. We also ensure that there is a maximum of 2-3 dedicated security staff that become part of the Residents' Team and are familiar to the residents, rather than having a different person on each shift.

Security personnel will provide an on-call response service and will be the first response for any emergencies and will carry out regular patrols of the interior and exterior of the building, ensuring that no instances of anti-social behaviour occur.

In the event that a significant incident occurs, Fresh has an escalation procedure to enable on site staff to contact senior staff out of hours. Contact details are also provided in a prominent place both within and on the exterior of the properties, to ensure that residents and neighbours can promptly contact a response service to mitigate any anti-social behaviour.

2.3.9   Health & Safety

The Health & Safety of the residents is paramount. Fresh have partnered with EDP Ltd to provide external and independent professional Health & Safety advice. EDP Ltd provide a 24/7/365 Health & Safety telephone helpline, allowing all Fresh staff to have access to Health & Safety professionals at any time it is required.

The fire alarm system will be monitored by a remote monitoring centre with an investigation delay programmed in, where permitted, to allow on-site staff to minimise false alarms. The cause-and-effect logic will balance the need for fire safety whilst avoiding unwanted fire signals.

Residents are required to complete an online induction using our Resident Portal prior to arrival. The induction contains a section on fire safety that requires residents to confirm that they will 1) make themselves aware of the evacuation point and the evacuation route upon their arrival, 2) immediately leave the building to the agreed evacuation point when the fire alarm sounds, 3) call the fire brigade (999) and activate a fire alarm call point (if available) should they discover a fire, 4) not tamper with the smoke detectors or fire safety equipment, and 5) not cause any obstructions in the shared flat corridors or the communal stairwells and corridors.

In addition, Fresh will invite the local fire service to attend the resident induction meetings where we will provide residents with information and guidance of the potential hazards within the home that could cause a fire. The Fire Service and on-site management team will also explain the consequences of raising false alarms.

The fire alarm system hardware will support our fire management plan.

To ensure compliance with legislation, we ensure that we carry out and record all necessary testing. With the guidance from our Health & Safety partners EDP Ltd, Fresh have introduced Health & Safety management software, Yardi Elevate. This system allows all Fresh management the ability to view live information from each site in regard to Health & Safety compliance actions required to be completed e.g. fire alarm tests, lift checks etc. It also allows the user to add additional actions onto the system.

Our on-site staff are responsible for carrying out and recording a range of routine tests, these include the following:

- Weekly fire alarm.
- Weekly call point/firefighting equipment inspection.
- Monthly emergency lights.
- Monthly water temperature.
- Weekly fire door inspections.
- Routine Health & Safety inspection and audit of the building.

We employ specialist contractors to carry out the following tests:

- Lift inspection
- Annual full system test for fire alarms,
- Annual full duration tests for emergency lighting
- Water sampling for legionella, including an annual tank inspection and clean if required.
- CCTV/Security alarm maintenance.
- Automated gates/doors

A record of all testing will be kept ensuring we have an audit trail. Records of statutory testing and actions completed are stored within Yardi Elevate system and also within the onsite Health & Safety filing system.

We use external consultants to carry out a range of risk assessments following industry regulations to ensure legal compliance and the safety of our residents. We regularly review the guidance to ensure we are following best practice.

Risk Assessments include the following:
- Fire
- Legionella
- General health & safety

The Licence Agreement and handbook prohibits the use of candles, and any equipment or device that has a flame, generates heat or smoke. Smoking is not permitted anywhere within the building including resident bedrooms, kitchens and communal areas.

Termly evacuation tests will be undertaken to ensure all residents are aware of the procedures and assembly points. The on-site team undertake formal room inspections 3 times per year to check that all equipment is being used as designed and that there are no breaches of health and safety.

2.3.10   Maintenance

Maintenance is a key area of resident dissatisfaction if not properly managed. We operate a tiered approach to maintenance to ensure a value for money response maintenance service.

We have an approved list of small local contractors which enables us to deal quickly and cost effectively with more minor issues creating good customer satisfaction.

For larger and more specialist jobs we work with approved regional or national contractors to carry out necessary works. Our Property Team are experienced in negotiating contracts and harnessing economies of scale across our portfolio to drive cost efficiencies that benefit our clients.

Residents can report repairs via our online portal, Rent Cafe, or direct to the Residents' Team. We then assess the situation and grade repairs as Emergency, Urgent or Routine.

We operate in accordance with the table of response times, which are fully compliant with the ANUK code.

Urgency	Timescale	Includes
Emergency Repairs	Within 24 hours of being reported.	An emergency repair is any repair required to avoid danger to the health and safety of residents. **E.g.** No power supply, overflow of sewage.
Urgent Repairs	Within 5 working days of being reported	An urgent repair is any repair which materially affects the comfort or convenience of the residents. **E.g.** Broken handrails, faulty electrical fittings such as the microwave.
Non Urgent Repairs	Within 28 days of being reported	A non-urgent repair is any repair not falling into the two above categories. **E.g.** Single electric light or power point failure within room, sticking doors or windows.

Procuring Works

We operate an online purchase order system, and no works or supply of goods or services are carried out without a purchase order. Contractors and suppliers email invoices which are automatically matched against the PO. Once an invoice is received the PO originator must confirm satisfactory receipt of goods and services via the PO system before the invoice is paid.

All contractors must be on our 'approved list' of contractors and their performance is monitored against response times, and in respect of quality and customer service.

2.3.11 Cleaning

Residents will be responsible for cleaning their own flat, including bedrooms and shared kitchen areas.

Fresh will clean all common areas as listed below on a scheduled basis, which is published to the residents.

Area	Frequency
Reception/foyer	Daily
Amenity spaces	Daily
Corridors	Weekly
Staircases	Weekly
Lifts	Daily
Windows	Annual
Deep cleans	Annual

Deep cleaning and window cleaning will be carried out by specialist contractors and tendered annually.

The annual deep cleaning of the rooms during the summer is generally contracted out due to the high volume of work needed in a short space of time – we always tender early in the year to ensure we get the best contractors and secure the time slots we want, and when reviewing tenders, we focus on quality as well as price - as the effectiveness of this service will have a direct influence on the first impressions of the new intake.

All hazardous substances are used and stored in compliance with COSHH regulations. A register is provided for each site and is reviewed during Health & Safety audits.

2.3.12 Post and Deliveries

The regular post-person will have fob access to the site to make their regular deliveries to each letterbox.

For all other deliveries, the courier/postman will use the intercom call button for the address of the delivery. If the resident is at home, they will meet the courier/post person at the entrance to receive the delivery.

If the resident is not home the Residents Team will take in and sign for deliveries. All parcels received on behalf of the resident will be recorded on Google Sheets, which is shared with the residents online. The resident will be notified of the delivery and asked to come to reception with ID to collect it. The resident will sign the post book to confirm they have received the delivery.

2.3.13 Noise Management

Residents are made aware of the behaviours expected of them in the Terms and Conditions of the Licence Agreement, as well as in the Resident Handbook, the online induction, and at the welcome meeting with the Residents Team.

Specific references are made in the Licence Agreement to reducing noise and disturbance to neighbours within and beyond the scheme, including public paths/lighting.

The Terms and Conditions of our Licence Agreement specifies under Building Clause A19 & A21:

> **A19** (e) play any radio, music player, television or musical instrument or sing in a way that may be a nuisance or disturb or annoy neighbours within or beyond the building, or be heard outside the Room between 11pm and 9.00am;

> **A21** I will obtain the Landlord/Agent's prior written approval for any party or meeting of more than 10 people. I will ensure that all gatherings arranged by me or taking place in the building respect the terms of this Licence Agreement and the House Rules as set out in the Residents' Handbook.

2.3.14   Management of Anti-Social Behaviour

Fresh operates a 4-tier escalation process to deal with anti-social behaviour and will work closely with the universities and their disciplinary procedures.

2.3.15   Complaints Procedure

Fresh are determined to provide a high-quality service to all customers. Residents and neighbours are therefore encouraged to raise any complaints / grievances in person to a member of the onsite Residents' Team, either by telephone on the number provided at the main entrance or at Reception. We'll try our best to resolve any complaints at this initial point of contact. If this is not possible then complaints should be submitted in writing and will be dealt with in accordance with the stages set out below. Any complaints that are sent to Central Services will be re-directed to the relevant Residents' Team for them to investigate in the first instance.

We operate a three-stage approach to dealing with complaints:

Stage 1

All new complaints will be dealt with at Stage 1. The majority of complaints will be resolved at Stage 1 by our local staff. Where this is not the case, we will aim to acknowledge the receipt of a complaint within 24 hours. Should the complaint be received whilst our offices are closed, we will respond within 24 hours of our return. The acknowledgement to the complaint will include the name and contact details of the person who will be handling the complaint.

Stage 2

All Stage 2 complaints will be dealt with by a Senior Manager. There are some occasions where a complaint is complex where we may require more time to investigate to be able to properly respond to your complaint. When this occurs, we will communicate this, providing an update on progress and revised date when to expect to receive a full response. At Stage 2 and 3 of our complaints procedure we aim to provide you with a full response within 10 working days.

Stage 3

Stage 3 is the final stage of the complaints procedure. At Stage 3 the complaint will be handled by another Senior Manager not previously connected to the complaint. This stage can only commence once stages 1 and 2 are complete. We will notify the complainant of Fresh's decision in writing, normally within 10 working days of receiving the request to escalate the complaint.

2.4   Third Party Services

2.4.1   Laundry

The on-site laundries will be provided at Goatstown, by a third-party provider on a lease basis. The laundries will be open to residents 24 hours a day, 7 days a week. The machines will be operated using the service providers app that residents can download to their smartphone, payment and top-ups are made securely online. Residents can also view online how busy the laundry room is to ensure there is an empty machine before taking their washing down.

Machines will be provided on a minimum ratio of 1:75 residents, and be fully DDA compliant.

### 2.4.2   Information Technology

Residents will receive a high-speed broadband and Wi-Fi service to ensure there is excellent internet connectivity for residents to complete their studies. The service also offers unlimited upload/download, data backup storage, Freeview TV, a dedicated resident portal and a free 24/7 helpdesk.

2.4.3   Summer Lets

Aligning with the University timetable, during the summer holidays a large part of the scheme will be vacant, with some postgraduate and language students choosing to use/remain at the site. In order to reduce the number of voids during these quiet periods FPG will reach out to a third-party agency whom will manage and let the accommodation to visitors and tourists.

The third-party agency will be responsible for check in/out of their own customers, with FPG staff on hand should they have any queries relating to the scheme. All customers with the third-party letting agency will be provided with a fob to gain access into the scheme and will have access to all amenity spaces.
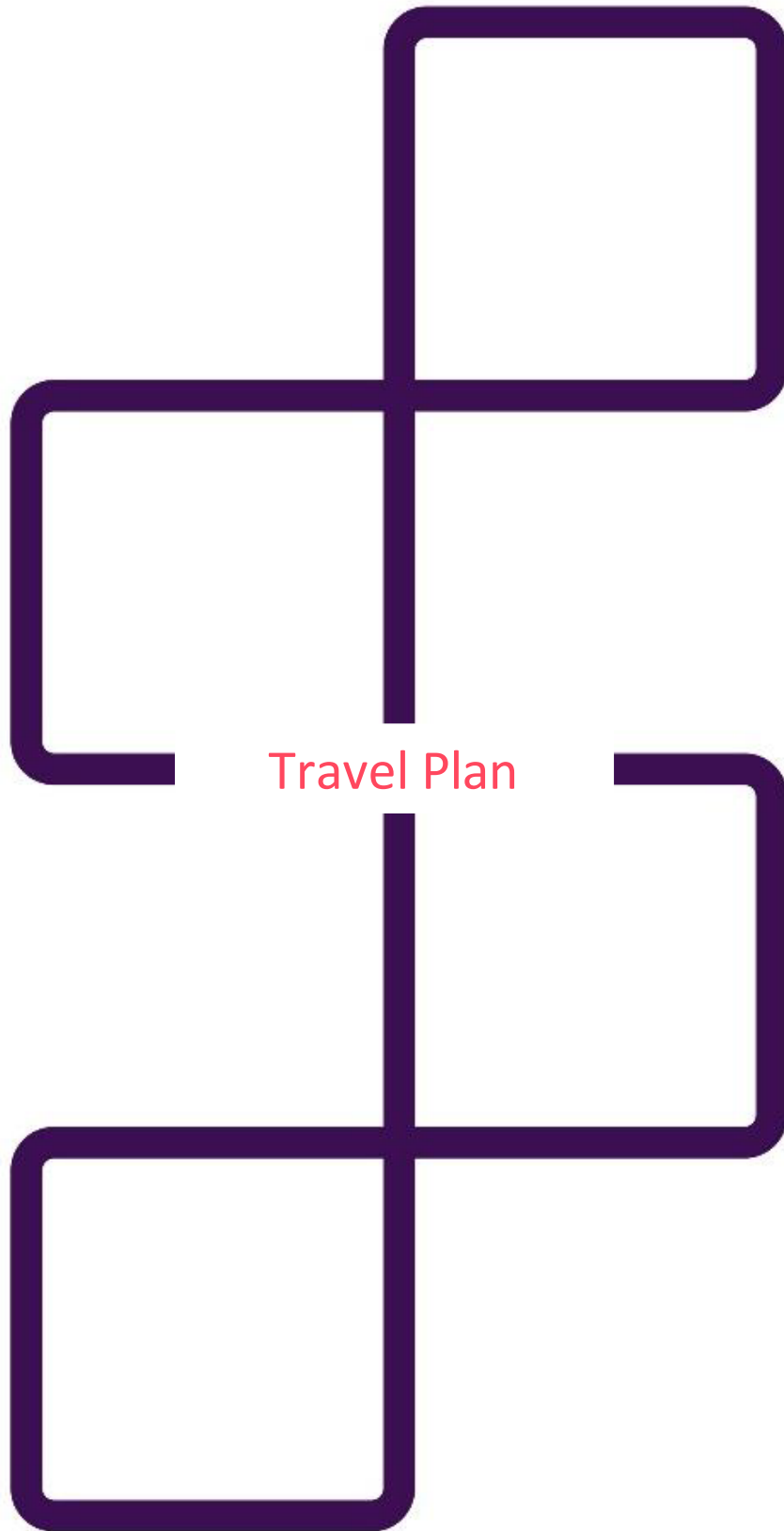
Travel Plan

3.   Travel Plan

This is the Fresh travel plan for Goatstown, Dublin and should be read in conjunction with any framework Travel Plan required for planning consents. This document sets out the Travel Plan for residents living at Goatstown.

The Travel Plan has been prepared mainly for the residents living at the development and the measures proposed are intended to encourage residents to reduce their reliance on private car travel. Much of what is proposed in the Travel Plan will also apply to the small number of staff employed at the site.

The implementation and the management of the Travel Plan is the responsibility of the General Manager based at Goatstown and will be monitored by the Operations Manager.

3.1   Key Benefits of the Travel Plan

3.1.1   Benefits to the individual

To involve residents and successfully promote the Travel Plan it is important to outline the benefits to the individual. The use of non-car modes of transportation can bring several benefits, including:

- **Improved Health**
  Walking and cycling can bring about a number of health benefits. According to the British Heart Foundation, half an hour of cycling or walking a day can reduce the risk of heart disease by 50%.

- **Cost Benefits**
  Promotion of the savings that can be achieved by using other forms of transport other than owning and running a car should appeal to residents who have increased pressures on their finances.

- **Time Savings and Convenience**
  For the key journeys the residents will undertake, it will often be quicker to walk, cycle or use public transport than use a car.

  It is often more convenient to be able to use a range of transport modes depending on the purpose or destination of the travel; e.g. travel to University, city centre or to enjoy the night life, it will be easier using a range of transportation other than the driving of a private car.

- **Environmental Awareness**

Build awareness that the travel choice has an impact on the local and global environment and will enable the individual to appreciate their surroundings and contribute to its protection.

3.1.2   Benefits to the Universities

The benefits to the University will include:

- **Increased Attendance**
  Residents who either walk or cycle more will have improved health and wellbeing and therefore will reduce absenteeism.

- **Reduced Congestion and Pressure on Parking near or on Campus**
  Fewer trips by car and reduction of single occupancy trips travelling to and from campus and the site will lessen traffic levels and lessen the need for parking on or near the campus.

3.1.3   Benefits to the Community

The Travel Plan would be aimed at bringing benefits to the community as a whole including:

- **Improved Air Quality**
  Fewer vehicles will result in less pollution and improved air quality. Cars are a major generator of pollutants according to the Department of Transport, emissions from road transport now constitute over 70% of all emissions of carbon monoxide and CO_2 emissions. A reduction in car use will, therefore, lead to improvements in both local and global air quality.

- **Reduced Traffic Levels**
  Reduced traffic levels provide the community with an environment that is less congested and improves the overall quality of environment. The site has been designed without car parking spaces, in order to discourage residents relying on this form of transport.

3.2   On Site Resident Parking

The site has 6 parking spaces (2 of which are allocated disabled parking spaces and 4 set down spaces) which are available for visitors, or maintenance and servicing companies to use whilst attending the site. Goatstown PBSA does not allow for any student parking on or near the premises. The licence agreement and tenant handbook specifies the location is car free and that students are not to bring their own cars to the accommodation.

At Goatstown PBSA there are secure cycle racks for 218 bicycle parking spaces distributed within the central courtyard (stacked parking with glass roof cover) and northern boundary and adjacent to the front boundary (north-west).

3.3   Start and End of Term

The following is the procedure employed by Fresh for the arrival and departure of 220 students at the beginning and end of the academic year.

Prior to arrival, all students are contacted by email to confirm the arrival arrangements and move-in procedure. They are provided with details of travel arrangements from key airports, the main line train stations, and cost of taxis from these key arrival hubs. We will also provide information about the location and cost of public paid car parking facilities close to the site.

Fresh encourage students to spread their arrival to the accommodation by offering the facility to arrive up to three days prior to the tenancy start date at no additional charge.

Students are required to book their arrival online through the student portal. Limited time slots are built into the system to avoid congested arrival periods.

Students who arrive by car with family and friends are given information about local car parks before they arrive. They are advised to park away from the site before they have been checked in. This avoids the reception area being congested with lots of family members and luggage blocking the entrance.

The students are met at reception and in a couple of minutes they are checked-in and have been shown to their room. Once the student has been shown to their room, and been given an induction of the building they are advised they can use one of the 6 parking spaces for 15 minutes only to unload their luggage. The use of the parking spaces during check-in are managed by a security guard.

To ensure the move-in process is managed efficiently, additional staffing resources are employed to manage the road congestion and for directing students quickly to their accommodation.

We will liaise with the local police and traffic management bodies and agree a strategy to avoid blocked roads and parking problems.

The student move-out period is managed in a similar fashion to the move-in process. Students are expected to confirm with the Accommodation Team their proposed move-out times and dates. However, move-out periods are unlikely as the students tend to move out over an extended period.

Additionally, unlike other traditional halls of residence, residents at Goatstown PBSA will not need to remove all their belongings at Christmas and Easter, therefore reducing the traffic associated with the site as students are more likely to head home by train or coach, as opposed to a car.

Summer Lets

The arrival and departure times will be more spread out due to the nature of tourist accommodation and therefore the risk of any impact on neighbouring properties from additional traffic is minimal, particularly as summer guests will be advised in advance that parking is not provided onsite. Taxi pick up/set down would be the main form of vehicle movement from the site in the summer months, noting tourists are more likely to avail of the public transport system. The set down area will be managed in the same manner as during the student calendar year.

Waste & Recycling Plan

4.   Waste and Recycling Plan

The below section should be read in conjunction with the Operational Waste Management Plan For a Student Accommodation Development at Goatstown Road, Goatstown, Dublin 14 prepared for Orchid Residential Ltd by AWN Consulting. See Appendix 1.0

4.1   Overview

The management of waste can be expensive if not undertaken correctly, so we take a structured approach in order to minimise costs and environmental impact.

Residents will be responsible for putting their waste in the bin store. We will actively promote recycling and the use of specialist banks for clothing and other recyclables to avoid as much refuse going to landfill as possible.

Waste and recycling levels will be monitored, allowing us to identify trends and take corrective action when required.

Waste generated by residents will be stored within each studio or flat in refuse and recycling bins in accordance with the Local Authority waste strategy. It will be the responsibility of the residents to take their own refuse down to the ground floor main bin store using the lifts or staircase as and when required and place refuse in the wheeled Eurobins provided.

We minimise management staff handling of bins as this will add significant management costs. All waste and recycling is stored in a secure purpose built bin storage accessible from the ground floor.

4.2   Capacity

The bin store/recycling centre at Goatstown has been designed to accommodate numerous wheeled Eurobins for mixed/recyclable and general waste. There will be one large bin store on the Ground floor, accessible internally and from the secure parking area.

4.3   Recycling

To assist in maximising the recycling and recovery of waste and thus minimise waste disposed to landfill, storage will be provided for mixed/recyclable waste within each studio and flat and also within the main bin store at ground floor level.

Recyclables including paper, cardboard, cans, plastics and bottles will be stored in a proportion of the bins provided. These will be clearly labelled to advise the occupants about what materials can be recycled in the mixed/recycle waste bins.

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Fire Safety Management

5.   Fire Safety

Management STATEMENT OF

INTENT

Fresh Property Group believes that ensuring the health and safety of staff, residents, visitors and all relevant persons is essential to our success.

We are committed to:

1. Preventing accidents and work-related ill health.
2. Compliance with statutory requirements as a minimum.
3. Assessing and controlling the risks that arise from our work activities.
4. Providing a safe and healthy environment.
5. Ensuring safe working and management methods
6. Providing effective information, instruction and training.
7. Consulting with employees, residents and visitors on health and safety matters.
8. Monitoring and reviewing our systems and prevention measures to ensure their effectiveness.
9. Setting targets and objectives to develop a culture of continuous improvement.
10. Ensuring adequate resources are made available for health and safety issues, so far as is reasonably practicable.

A Fire Safety Management System will be created to ensure the above commitments can be met. Employees throughout the company must play their part in the creation of a safe and healthy working environment for all.

Revision History

Issue	Date of issue	Description	Author
1.0	04/02/2019	First Draft	Amy E Simpson (AES)
2.0	26/02/2020	Second Draft	Samuel Walker (SW)
3.0	15/07/2020	Third Draft	Amy E Simpson (AES)
4.0	01/09/2020	Fourth Draft	Amy E Simpson (AES)
5.0	03/09/2020	Fifth Draft	Amy E Simpson (AES)
6.0	14/03/2022	Sixth Draft	Amy E Simpson (AES)
7.0	14/05/2024	Seventh Draft	Jonathan Burcham (JKB)

6.   Appendix 1.0

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OPERATIONAL WASTE MANAGEMENT PLAN FOR A STUDENT ACCOMMODATION DEVELOPMENT

AT

GOATSTOWN ROAD, GOATSTOWN, DUBLIN 14

Report Prepared For

Orchid Residential Limited

Report Prepared By

Chonaill Bradley, Principal Environmental Consultant

Our Reference

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Details	Written by	Approved by
Signature		
Name	Chonaill Bradley	Fergal Callaghan
Title	Principal Environmental Consultant	Director
Date	25 September 2024	25 September 2024

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1.0   INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Operational Waste Management Plan (OWMP) on behalf of Orchid Residential Limited, for a proposed student development on a site located on lands at Goatstown Road, Goatstown, Dublin 14.

The proposals consist of demolition of the existing structures on site and construction of a purpose-built student accommodation scheme (PBSA) comprising approximately 220 no. bed spaces, indoor and outdoor student amenity space and site wide landscaping.

This OWMP has been prepared to ensure that the management of waste during the operational phase of the proposed development is undertaken in accordance with the current legal and industry standards including, the *Waste Management Act 1996* as amended and associated Regulations [1], *Environmental Protection Agency Act 1992* as amended [2], *Litter Pollution Act 1997* as amended [3], the *National Waste Management Plan for a Circular Economy 2024 - 2030* (NWMPCE) (2024) [4] *The Dún Laoghaire Rathdown County Council (Segregation, Storage and Presentation of Household and Commercial) Bye-Laws (2019)* [5] and the *DLRCC Guidance Notes for Waste Management Planning for Residential and Commercial Developments (2022)* [6]. In particular, this OWMP aims to provide a robust strategy for storing, handling, collection and transport of the wastes generated at site.

This OWMP aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. The OWMP also seeks to provide guidance on the appropriate collection and transport of waste to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil or water resources). The plan estimates the type and quantity of waste to be generated from the proposed development during the operational phase and provides a strategy for managing the different waste streams.

At present, there are no specific national guidelines in Ireland for the preparation of OWMPs. Therefore, in preparing this document, consideration has been given to the requirements of national and regional waste policy, legislation and other guidelines.

2.0   OVERVIEW OF WASTE MANAGEMENT IN IRELAND

2.1 National Level

The Irish Government issued a policy statement in September 1998 titled as *'Changing Our Ways'* [7] which identified objectives for the prevention, minimisation, reuse, recycling, recovery and disposal of waste in Ireland. A heavy emphasis was placed on reducing reliance on landfill and finding alternative methods for managing waste. Amongst other things, Changing Our Ways stated a target of at least 35% recycling of municipal (i.e. household, commercial and non-process industrial) waste.

A further policy document *'Preventing and Recycling Waste – Delivering Change'* was published in 2002 [8]. This document proposed a number of programmes to increase recycling of waste and allow diversion from landfill. The need for waste minimisation at source was considered a priority.

This view was also supported by a review of sustainable development policy in Ireland and achievements to date, which was conducted in 2002, entitled *'Making Irelands Development Sustainable – Review, Assessment and Future Action'* [9]. This document also stressed the need to break the link between economic growth and waste generation, again through waste minimisation and reuse of discarded material.

In order to establish the progress of the Government policy document *Changing Our Ways*, a review document was published in April 2004 entitled *'Taking Stock and Moving Forward'* [10]. Covering the period 1998 – 2003, the aim of this document was to assess progress to date with regard to waste management in Ireland, to consider developments since the policy framework and the local authority waste management plans were put in place, and to identify measures that could be undertaken to further support progress towards the objectives outlined in *Changing Our Ways*.

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

In September 2020, the Irish Government published a new policy document outlining a new action plan for Ireland to cover the period of 2020-2025. This plan *'A Waste Action Plan for a Circular Economy'* [11] (WAPCE), was prepared in response to the 'European Green Deal' which sets a roadmap for a transition to a new economy, where climate and environmental challenges are turned into opportunities, replacing the previous national waste management plan *"A Resource Opportunity"* (2012).

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) [12] 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 Circular Economy and Miscellaneous Provisions Act 2022 [13] was signed into law in July 2022. The Act underpins Ireland's shift from a "take-make-waste" linear model to a more sustainable pattern of production and consumption, that retains the value of resources in our economy for as long as possible and that will to significantly reduce our greenhouse gas emissions. The Act defines Circular Economy for the first time in Irish law, incentivises the use of recycled and reusable alternatives to wasteful, single- use disposable packaging, introduces a mandatory segregation and incentivised charging regime for commercial waste, streamlines the national processes for End-of- Waste and By-Products decisions, tackling the delays which can be encountered by industry, and supporting the availability of recycled secondary raw materials in the Irish market, and tackles illegal fly-tipping and littering.

Since 1998, the Environmental Protection Agency (EPA) has produced periodic *'National Waste (Database) Reports'* which as of 2023 have been renamed *Circular Economy and National Waste Database Report (CENWDR)* [14] detailing, among other things, estimates for household and commercial (municipal) waste generation in Ireland and the level of recycling, recovery and disposal of these materials. The *CENWDR*, which is the most recent study published, along with the national waste statistics web resource (November 2023) reported the following key statistics for 2020:

- **Generated** – Ireland produced 3,170,000 t of municipal waste in 2021. This is a 1% decrease since 2020. This means that the average person living in Ireland generated 630 kg of municipal waste in 2021.
- **Managed** – Waste collected and treated by the waste industry. In 2020, a total of 3,137,000 t of municipal waste was managed and treated.
- **Unmanaged** – An estimated 33,000 tonnes of this was unmanaged waste i.e., not disposed of in the correct manner in 2021.
- **Recovered** – The amount of waste recycled, used as a fuel in incinerators, or used to cover landfilled waste. In Ireland 42% of Municipal waste was treated by energy recovery through incineration in 2021.
- **Recycled** – Just over 1.3 million tonnes of municipal waste generated in Ireland was recycled in 2021, resulting in a recycling rate of 41 per cent. The recycling rate remains unchanged from 2020 and indicates that we face significant challenges to meet the upcoming EU recycling targets of 55% by 2025 and 65% by 2035.
- **Disposed** – The proportion of municipal waste sent to landfill also remains unchanged at 16% the same as 2020.
- **Reuse** – 54,800 tonnes of second-hand products we estimated by the EPA to have been reused in Ireland in 2021. The average annual Reuse rate per person in Ireland is 10.6 kg per person.

2.2   Regional Level

The development is located in the Local Authority area of Dún Laoghaire Rathdown County Council (DLRCC).

The Eastern Midlands Region (EMR) Waste Management Plan 2015 – 2021, which previously governed waste management policy in the DLRCC area, has been superseded as of March 2024 by the NWMPCE 2024 – 2030, the new national waste management plan for Ireland.

The NWMPCE does not dissolve the three regional waste areas. The NWCPCE sets the ambition of the plan to have a 0% total waste growth per person over the life of the Plan with an emphasis on non-household wastes including waste from commercial activities and the construction and demolition sector.

This Plan seeks to influence sustainable consumption and prevent the generation of waste, improve the capture of materials to optimise circularity and enable compliance with policy and legislation.

The national plan sets out the following strategic targets for waste management in the country that are relevant to the development:

Proposed National Targets

1A.   (Residual Municipal Waste) 6% Reduction in Residual Municipal Waste per person by 2030

2A.   (Contamination of Materials) 90% of Material in Compliance in the Dry Recycling Bin

2B.   (Material Compliance Residual) 10% per annum increase in Material Compliance in the residual bin. (90% by the end of 2030)

3A.   (Reuse of Materials) 20kg Per person / year – Reuse of materials like cloths or furniture to prevent waste.

Municipal landfill charges in Ireland are based on the weight of waste disposed. In the Leinster Region, charges are approximately €140-160 per tonne of waste, which

includes a €85 per tonne landfill levy introduced under the Waste Management (Landfill Levy) (Amendment) Regulations 2015.

The *Dún Laoghaire-Rathdown County Development Plan 2022 – 2028* [15] sets out a number of policies for the Dún Laoghaire-Rathdown area in line with the objectives of the waste management plan.

Proposed waste policies with a particular relevance to the development are as follows:

Policy Objective EI11: Resource Management

It is a Policy Objective to implement the Eastern-Midlands Region Waste Management Plan 2015-2021 and subsequent plans, in supporting the transition from a waste management economy towards a circular economy, to enhance employment and increase the value recovery and recirculation of resources. Underpinning this objective is the requirement to conform to the European Union and National Waste Management Hierarchy of the most favoured options for waste as illustrated below subject to economic and technical feasibility and Environmental Assessment.

Policy Objective EI12: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling

- To support the principles of the circular economy, good waste management and the implementation of best international practice in relation to waste management in order for the County and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective.

- To provide for civic amenity facilities and bring centres as part of an integrated waste collection system in accessible locations throughout the County and promote the importance of kerbside source segregated collection of household and commercial waste as the best method to ensure the quality of waste presented for recycling is preserved.

- To ensure any waste amenity facilities adhere to the Waste Regional Offices Waste Management Infrastructure siting guidelines.

- To develop a County wide network of multi material recycling centres, bring centres and a re-use centre and to require the provision of adequately-sized recycling facilities in new commercial and large-scale residential developments, where appropriate.

- To require the inclusion of such centres in all large retail developments to maximise access by the public. To ensure new developments are designed and constructed in line with the Council's Guidelines for Waste Storage Facilities

Policy Objective EI13: Hazardous Waste

It is a Policy Objective to adhere to the recommendations of the 'National Hazardous Waste Management Plan 2014-2020' and any subsequent plan, and to co-operate with other agencies, to plan, organise, authorise and supervise the disposal of hazardous waste streams, including hazardous waste identified during construction and demolition projects.

2.3   Legislative Requirements

The primary legislative instruments that govern waste management in Ireland and applicable to the project are:

- Waste Management Act 1996 -2021 as amended.
- Environmental Protection Agency Act 1992 as amended;
- Litter Pollution Act 1997 as amended and
- Planning and Development Act 2000 as amended [16].

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

One of the guiding principles of European waste legislation, which has in turn been incorporated into the *Waste Management Act 1996* as amended and subsequent Irish legislation, is the principle of *"Duty of Care"*. This implies that the waste producer is responsible for waste from the time it is generated through until its legal disposal (including its method of disposal.) As it is not practical in most cases for the waste producer to physically transfer all waste from where it is produced to the final disposal area, waste contractors will be employed to physically transport waste to the final waste disposal site.

It is therefore imperative that the residents, commercial tenants and the proposed facilities management company undertake on-site management of waste in accordance with all legal requirements and employ suitably permitted/licenced contractors to undertake off-site management of their waste in accordance with all legal requirements. This includes the requirement that a waste contactor handle, transport and reuse/recover/recycle/dispose of waste in a manner that ensures that no adverse environmental impacts occur as a result of any of these activities.

A collection permit to transport waste must be held by each waste contractor which is issued by the National Waste Collection Permit Office (NWCPO). Waste receiving facilities must also be appropriately permitted or licensed. Operators of such facilities cannot receive any waste, unless in possession of a Certificate of Registration (COR) or waste permit granted by the relevant Local Authority under the *Waste Management (Facility Permit & Registration) Regulations 2007* as amended or a waste or IE (Industrial Emissions) licence granted by the EPA. The COR/permit/licence held will specify the type and quantity of waste able to be received, stored, sorted, recycled, recovered and/or disposed of at the specified site.

2.3.1 Dún Laoghaire-Rathdown County Council Waste Bye-Laws

*The DLRCC "*Dún Laoghaire-Rathdown County Council *(Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2019)"* were bought into force on the 1st of February 2020. These Bye-laws repeal the previous DLRCC waste Bye-laws. The Bye-laws set a number of enforceable requirements on waste holders with regard to storage, separation and presentation of waste within the DLRCC functional area. Key requirements under these Bye-laws of relevance to the development include the following:

- Kerbside waste presented for collection shall not be presented for collection earlier than 6.00 pm on the day immediately preceding the designated waste collection day;
- All containers used for the presentation of kerbside waste and any uncollected waste shall be removed from any roadway, footway, footpath or any other public place no later than 10:00am on the day following the designated waste collection day, unless an alternative arrangement has been approved in accordance with bye-law 4;

- Documentation, including receipts, is obtained and retained for a period of no less than one year to provide proof that any waste removed from the premises has been managed in a manner that conforms to these bye-laws, to the Waste Management Act and, where such legislation is applicable to that person, to the European Union (Household Food Waste and Bio-Waste) Regulations 2015; and
- Adequate access and egress onto and from the premises by waste collection vehicles is maintained.

Provisions affecting Multi-user Buildings, Apartment Blocks, etc.:

A management company, or another person if there is no such company, who exercises control and supervision of residential and/or commercial activities in multi-unit developments, mixed-use developments, flats or apartment blocks, combined living/working spaces or other similar complexes shall ensure that:

a. *separate receptacles of adequate size and number are provided for the proper segregation, storage and collection of recyclable kerbside waste, residual kerbside waste and food waste,*
b. *the receptacles referred to in paragraph (a) are located both within any individual apartment and at the place where waste is stored prior to its collection,*
c. *any place where waste is to be stored prior to collection is secure, accessible at all times by tenants and other occupiers and is not accessible by any other person other than an authorised waste collector,*
d. *written information is provided to each tenant or other occupier about the arrangements for waste separation, segregation, storage and presentation prior to collection,*
e. *an authorised waste collector is engaged to service the receptacles referred to in this section of these bye-laws, with documentary evidence, such as receipts, statements or other proof of payment, demonstrating the existence of this engagement being retained for a period of no less than two years. Such evidence shall be presented to an authorised person within a time specified in a written request from either that person or from another authorised person employed by Dún Laoghaire-Rathdown County Council,*
f. *receptacles for kerbside waste are presented for collection on the designated waste collection day,*
g. *adequate access and egress onto and from the premises by waste collection vehicles is maintained*

The full text of the Waste Bye-Laws is available from the DLRCC website.

2.4 Local Authority Guidelines

DLRCC's Waste Management Division have issued *Guidance Notes for Waste Management Planning for Residential and Commercial Developments* (2022) [17] which provide good practice guidance for the storage and collection of waste for new build high density developments. The objective of this advice is to provide good practice guidance for the storage and collection of waste for new build high density developments to allow developers to demonstrate to local planning and waste management authorities that they have considered how the design and operation of waste management services will enable the occupiers and managing agents of new developments to manage waste arising through the lifetime of the development.

The document is designed to assist developers in considering measures required to maximise the reuse, recycling and recovery of waste in the operational lifetime of the development and give specific reference to best practice and associated legislation including minimising the carbon footprint of occupiers and services provided.

The ultimate goal of the guidelines is that the implemented waste strategy will achieve a 70% reuse and recovery target in accordance with the European Commission's proposal to introduce 70% reuse and recycling targets for municipal waste by 2030 and while also providing sufficient flexibility to support future targets and legislative requirements.

Waste storage issues should be considered at the initial apartment design stage, taking full account of this guidance note, to ensure access for all (including people with disabilities) in a brightly lit, safe and well-signed area, spacious enough for easy manoeuvrability, good ventilation and ready access if required for the control of potential vermin.

Where storage is provided in a basement area, sufficient access and egress must be provided to enable receptacles to be moved easily from the storage area to an appropriate bin staging point within the curtilage of the development in accordance with the *Dún Laoghaire-Rathdown County Council (Segregation, Storage And Presentation Of Household And Commercial Waste) Bye-Laws 2019*, Section 9, or any revision thereof.

The guidance notes provide requirements for five main areas of operational waste management:

1. Common Waste Storage Area Design
2. Requirements Within Residential units
3. Initial Waste Management
4. Waste Collection System
5. Requirements for Selection of Separate Staging Area for Bin Collection Where Required.

This OWMP has been prepared to demonstrate exactly that and aims to do that in a comprehensive manner.

The guidelines and form are available on the DLRCC website.

2.5 Regional Waste Management Service Providers and Facilities

Various contractors offer waste collection services in the DLRCC region. Details of waste collection permits (granted, pending and withdrawn) for the region are available from the NWCPO.

As outlined in the regional waste management plan, there is a decreasing number of landfills available in the region. Only three municipal solid waste landfills remain operational and are all operated by the private sector. There are a number of other licensed and permitted facilities in operation in the region including waste transfer stations, hazardous waste facilities and integrated waste management facilities. There are two existing thermal treatment facilities, one in Duleek, Co. Meath and a second facility in Poolbeg in Dublin.

There is a bring bank near the development in the Goat Grill Pub carpark on Kilmacud Road, Goatstown, which accepts glass and cans. The closet recycling centre to the site is the Ballyogan Recycling Park c. 4km to the southeast which can take a wide range of household wastes (including glass bottles and jars, textiles, batteries, electronic and electrical waste, light bulbs, green garden waste, waste oil, kitchen appliances, aerosols, print cartridges, bulky items, wood, household hazardous waste).

A copy of all CORs and waste permits issued by the Local Authorities are available from the NWCPO website and all waste/IE licenses issued are available from the EPA.

3.0   DESCRIPTION OF THE PROJECT

3.1 Location, Size and Scale of the Development

The development will consist of demolition of the existing building (c.960sqm) and hard surface parking area on site and construction of a purpose built student accommodation development (including use as tourist or visitor accommodation outside the academic term) comprising:

- 220 no. student bedspaces (including 10 no. studios), all within a part single storey, part 4 no. storey and part 6 no. storey 'U'-Shaped building;
- The building is single to 4 no. storeys along the southern boundary, part 5 and 6 storeys along Goatstown Road and northern boundary (with setbacks) and roof terraces at fourth and fifth floor levels fronting onto Goatstown Road;
- Amenity space equating to c. 1,785 sqm is provided across the site consisting of c. 1,247 sqm of external amenity in the form of a central courtyard at ground level and roof terraces at 4th and 5th floor levels;
- Internal amenity space equating to c. 538 sqm is provided in the form of 2 no. ground floor lounge/study areas, kitchen/tearoom, laundry, and concierge/office space;
- Provision of 218 no. bicycle parking spaces distributed across the central courtyard and northern boundary and adjacent to the front boundary of the site (north-west);
- Provision for 6 no. carparking spaces comprising 2 no. disabled parking spaces and 4 no. setdown parking spaces adjacent to the front entrance to the site;
- Vehicular access to the site is via Goatstown Road from 2 no. entrance points [reduction from 3 no. entrances currently];
- Ancillary single storey ESB substation and switch room and refuse store are provided at ground level;
- Provision of surface water and underground attenuation and all ancillary site development works including site wide landscaping works, lighting, planting and boundary treatments.

3.2 Typical Waste Categories

The typical non-hazardous and hazardous wastes that will be generated at the proposed development will include the following:

- Dry Mixed Recyclables (DMR) - includes wastepaper (including newspapers, magazines, brochures, catalogues, leaflets), cardboard and plastic packaging, metal cans, plastic bottles, aluminium cans, tins and Tetra Pak cartons;
- Organic waste – food waste and green waste generated from plants/flowers;
- Glass; and
- Mixed Non-Recyclable (MNR)/General Waste.

In addition to the typical waste materials that will be generated at the development on a daily basis, there will be some additional waste types generated in small quantities which will need to be managed separately including:

- Drink Cans and Bottles (Deposit Return Scheme)
- Green/garden waste may be generated from internal plants and external landscaping;
- Batteries (both hazardous and non-hazardous);
- Waste electrical and electronic equipment (WEEE) (both hazardous and non-hazardous);
- Printer cartridges/toners;
- Chemicals (paints, adhesives, resins, detergents, etc.);

- Light bulbs;
- Textiles (rags);
- Waste cooking oil (if any generated by the residents);
- Furniture (and from time to time other bulky wastes); and
- Abandoned bicycles.

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

3.3   European Waste Codes

In 1994, the *European Waste Catalogue [16]* and *Hazardous Waste List [17]* were published by the European Commission. In 2002, the EPA published a document titled the *European Waste Catalogue and Hazardous Waste List [18]*, which was a condensed version of the original two documents and their subsequent amendments. This document has recently been replaced by the EPA '*Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous' [19]* (2018). This waste classification system applies across the EU and is the basis for all national and international waste reporting, such as those associated with waste collection permits, CORs, permits and licences and EPA National Waste Database.

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

Table 3.1 Typical Waste Types Generated and LoW Codes

Waste Material	LoW/EWC Code
Paper and Cardboard	20 01 01
Plastics	20 01 39
Metals	20 01 40
Mixed Non-Recyclable Waste	20 03 01
Glass	20 01 02
Biodegradable Kitchen Waste	20 01 08
Oils and Fats	20 01 25
Textiles	20 01 11
Batteries and Accumulators*	20 01 33* - 34
Printer Toner/Cartridges*	20 01 27* - 28
Green Waste	20 02 01
WEEE*	20 01 35*-36
Chemicals (solvents, pesticides, paints & adhesives, detergents, etc) *	20 01 13*/19*/27*/28/29*30
Bulky Wastes	20 03 07

* Individual waste type may contain hazardous materials

4.0   ESTIMATED WASTE ARISINGS

A waste generation model (WGM) developed by AWN, has been used to predict waste types, weights and volumes arising from operations within the proposed development. The WGM incorporates building area and use and combines these with other data including Irish and US EPA waste generation rates.

The estimated quantum/volume of waste that will be generated from the student accommodation has been determined based on the predicted occupancy of the units.

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

Waste type	Waste Volume (m³/week)
Organic Waste	1.15
DMR	7.86
Glass	0.22
MNR	4.57
Total	**13.81**

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

It has been assumed that the student accommodation areas will generate similar waste volumes over a seven-day period. This is considered to be a 'worst case' scenario as the student accommodation areas may not always be fully occupied on weekends. Additionally, it is considered that waste generation quantities per person for students would typically be less than domestic dwellings.

The DLRCC *Guidance Notes for Waste Management in Residential and Commercial Developments* recommends calculating residential waste using Section 4.7 of *BS5906:2005 Waste Management in Buildings – Code of Practice* [20] however these guidelines do not accommodate for student developments*.* AWN's modelling methodology is based on data from recent published data and data from numerous other similar developments in Ireland and based on AWN's experience it is a more representative estimate of the likely waste arisings from the development.

5.0   WASTE STORAGE AND COLLECTION

This section provides information on how waste generated within the development will be stored and how the waste will be collected from the development. This has been prepared with due consideration of the proposed site layout as well as best practice standards, local and national waste management requirements including those of DLRCC. In particular, consideration has been given to the following documents:

- BS 5906:2005 Waste Management in Buildings – Code of Practice;
- DLRCC Guidance Notes for Waste Management Planning for Residential and Commercial Developments (2022);
- DLRCC, Dún Laoghaire Rathdown County Council Segregation, Storage and Presentation of Household and Commercial Waste) Bye-laws (2019).
- NWMPCE; and
- DoHLGH, Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023) [21].

A dedicated communal Waste Storage Area (WSA) has been allocated within the development design for the student accommodation. The WSA is located externally, in on the eastern side of the development, between the buildings and the development boundary.

Facilities management will supply all residents with a document that shall clearly state the methods of source waste segregation, storage, reuse and recycling initiatives that shall apply within the development.

Using the estimated waste generation volumes in Table 4.1, the waste receptacle requirements for MNR, DMR, organic waste and glass have been established for the WSA. These are presented in Table 5.1. Using the estimated figures in Table 4.1, DMR, MNR, organic waste will be collected on a weekly basis, while glass waste be collected as required.

Area/Use	Bins Required			
	MNR*	DMR**	Organic	Glass
Student Accommodation	4 x 1100L 1 x 240L	7 x 1100L 1 x 240L	5 x 240L	2 x 120L

Note: ** = Mixed Non-Recyclables*
             ** = Dry Mixed Recyclables

Table 5.1   *Waste storage requirements for the proposed development*

The waste receptacle requirements have been established from distribution of the total weekly waste generation estimate into the holding capacity of each receptacle type. Additional allowance has been provided for glass storage in the student accommodation WSA to account for student specific lifestyles.

Waste storage receptacles as per Table 5.1 above (or similar appropriate approved containers) will be provided by the building management company in the WSA.

The types of bins used will vary in size, design and colour dependent on the appointed waste contractor. However, examples of typical receptacles to be provided in the WSA are shown in Figure 5.1. All waste receptacles used will comply with the SIST EN 840- 1:2020 and SIST EN 840-2:2020 standards for performance requirements of mobile waste containers, where appropriate.

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

Receptacles for organic, mixed dry recyclable, glass and mixed non-recyclable waste will be provided in the WSA's from first occupation of the development i.e. prior to the first residential unit being occupied.

A plan developed by the facilities management company will be developed and will be provided to each resident from first occupation of the development i.e. once the first residential unit is occupied. This Plan will be supplemented, as required, by the property management company with any new information on waste segregation, storage, reuse and recycling initiatives that are subsequently introduced.

**5.1** Waste Storage – Student Accommodation

Students in the accommodation will be required to segregate waste into the following main waste streams:

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

Provision will be made in all residential units to accommodate 3 no. bin types to facilitate waste segregation at source. An example of a potential 3 bin storage system is provided in Figure 5.3 below.
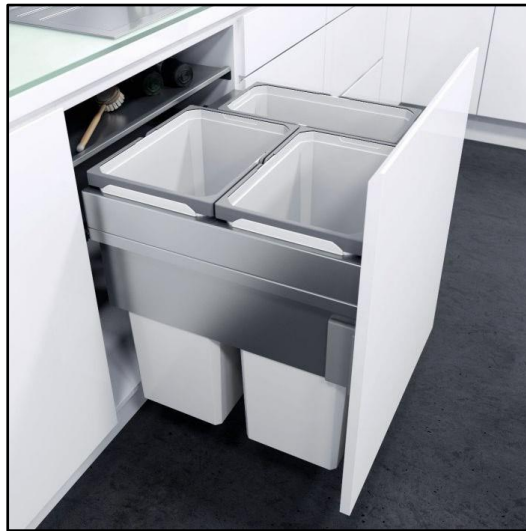
Figure 5.3   Example three bin storage system to be provided within the unit design

Additional bins for segregation of DMR and MNR will also be provided in the common areas, where appropriate. Students will be required to segregate their waste as above into the provided receptacles in accordance with the terms of the letting agreements of the Operator (The Student Housing Company).

Segregated waste from guests' bedrooms should be bought to the nearest AWS for disposal. It is envisaged that guests will not have access the WSA.

No food macerators will be installed within any area of the student accommodation building.

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

As required, the students will bring waste from within their clusters to the dedicated WSAs. Students on the floors above ground level will use the lifts or stairs of their building to bring waste to the ground floor. Students will be provided with access fobs/key/code by the Operator to access the WSA. Building cleaning staff will bring waste from within the common areas to the WSA as required.

Receptacles will also be labelled, and colour coded to avoid cross contamination.

Other waste materials such as batteries, printer toner/cartridges and WEEE may be generated infrequently in the student accommodation areas. Students will be required to identify suitable temporary storage areas for these waste items themselves and dispose of them appropriately. The DLRCC Ballyogan Recycling Park is located approximately 4 km to the south east of the development and can be used by student residents to dispose of these wastes. Further details on additional waste types can be found in Section 5.3.

5.2 Waste Collection

There are numerous private contractors that provide waste collection services in the DLRCC area. All waste contractors servicing the proposed development must hold a valid waste collection permit for the specific waste types collected. All waste collected must be transported to registered/permitted/licensed facilities only.

All waste requiring collection by the appointed waste contractor will be collected from the WSA by waste contractors nominated by the building management company and taken to the waste collection vehicle in the front courtyard carpark for emptying. The

vehicle can be viewed in figure 5.3 or in the drawing submitted with the planning application (ref Barrett Mahony 19289-BMD-ZZ-XX-DR-C-1011)

REFUSE TRUCK TWIN AXLE AUTOTRACK
SCALE @ A1: 1:250
SCALE @ A3: 1:500
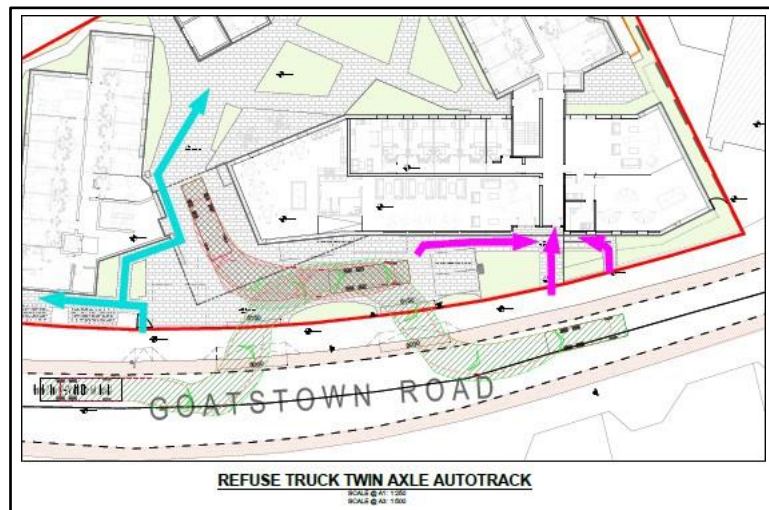
Figure 5.3   Waste Vehicle tracking

The waste contractor along with facilities management will ensure that empty bins are promptly returned to the WSA after collection/emptying.

The staging/collection area is such that they will not obstruct traffic or pedestrians (allowing a footway path of at least 1.8m, the space needed for two wheelchairs to pass each other) as is recommended in the Design Manual for Urban Roads and Streets (2019) [23].

It is recommended that bin collection times/days are staggered to reduce the number of bins required to be emptied at once and the time the waste vehicle is onsite. This will be determined during the process of appointment of a waste contractor.

5.3   Additional Waste Materials

In addition to the typical waste materials that are generated on a daily basis, there will be some additional waste types generated from time to time that will need to be managed separately. A non-exhaustive list is presented below.

Deposit Return Scheme

Most drinks containers can be recycled via the deposit return scheme, such as bottles, cans and tins made from plastic, aluminium or steel can be returned once they are between 150ml and 3 litres in size and have the Re-turn logo on them.

At the shops you can either return the containers:

- Using a Reverse Vending Machine (RVM)
- Manually in the shop

If a shop does not have a RVM but they sell containers with the Re-turn logo, the shop may allow you to manually return containers in store, unless they have a take back exemption.

Locations of RVM machines can be found via the Re-turn website (www.re-turn.ie)

Green/garden waste
Green/garden waste may be generated from external landscaping and internal plants/flowers. Green/garden waste generated from landscaping of external areas will

be removed by the external landscape contractor. Green waste generated from internal plants/flowers can be placed in the organic waste bins in the WSAs.

Batteries
A take-back service for waste batteries and accumulators (e.g. rechargeable batteries) is in place to in order to comply with the *European Union (Batteries and Accumulators) Regulations 2014.* A system for the free take-back of waste batteries from the household waste stream is well established through retail outlets and recycling centres. Alternativly, residents can bring betteries to recycling centres.

Waste Electrical and Electronic Equipment (WEEE)
The *WEEE Directive 2002/96/EC* and associated *European Union (WEEE) Regulations 2014* have been enacted to ensure a high level of recycling of electronic and electrical equipment. It is the manufacturers' responsibility to take back the WEEE, regardless of whether a replacement product is purchased or not and retailers are required to take back WEEE where a similar product is purchased. Residents can use the one-for-one return scheme at any EEE retailer or bring WEEE waste to their local recycling centre.

Printer Cartridge/Toners
Waste printer cartridge/toners generated by residents can usually be returned to the supplier free of charge.

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

Any waste cleaning products or waste packaging from cleaning products that are classed as hazardous (if they arise) generated by the residents should be brought to a recycling centre.

Light Bulbs
Waste light bulbs will be generated by external electrical/maintenance contractors servicing the public areas of the development. Where waste light bulbs are generated, it is anticipated that maintenance contractors will be responsible for the off-site removal and appropriate recovery/disposal of these wastes.

Light bulbs generated by residents should be taken to the nearest recycling centre for appropriate storage and recovery/disposal or residents can use the one-for-one return scheme at any EEE retailer.

Textiles
Where possible, waste textiles should be recycled or donated to a charity organisation for reuse. Recycling centres provide for collection of waste clothes and other textiles.

Waste Cooking Oil
If the residents generated waste cooking oil, this can be brought to a recycling centre.

Furniture (and other bulky wastes)
Furniture and other bulky waste items (such as carpet etc.) may occasionally be generated by the residents. If residents wish to dispose of furniture, this can be brought a recycling centre.

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

5.4   Waste Storage Area Design

The shared WSA will be designed and fitted-out to meet the requirements of relevant design Standards, including:

- Be fitted with a non-slip floor surface;
- Provide ventilation to reduce the potential for generation of odours;
- Provide suitable lighting – a minimum Lux rating of 220 is recommended;
- Appropriate sensor controlled lighting;
- Be easily accessible for people with limited mobility;
- Be restricted to access by nominated personnel only;
- Be supplied with hot or cold water for disinfection and washing of bins;
- Be fitted with suitable power supply for power washers;
- Have a sloped floor to a central foul drain for bins washing run-off;
- Have appropriate graphical and written signage placed above and on bins indicating correct use;
- Have access for potential control of vermin, if required;
- Robust design of doors to bin area incorporating steel sheet covering where appropriate; and
- Be fitted with CCTV for monitoring.

The facility management company will be required to maintain bins and storage areas in good condition as required by the DLRCC *Waste Bye*-Laws.

5.5   Facility Management Responsibilities

It shall be the responsibility of the The Student Housing Company to ensure that all domestic waste generated by residents is managed to ensure correct storage prior to collection by an appropriately permitted waste management company.

The Student Housing Company should provide the following items in accordance with the DLR *the Guidance Notes for Waste Management in Residential & Commercial Developments:*

- Provision of a Waste Management Plan document, prepared by the Facilities Management Company to all residential units, which shall clearly state the methods of source waste segregation, storage, reuse and recycling initiatives that shall apply to the management of the development;
- Provision and maintenance of appropriate graphical signage to inform residents of their obligation to reduce waste, segregate waste and in the correct bin;
- Preparation of an annual waste management report for all residential units;
- Designation of access routes to common waste storage areas to ensure safe access from the units by mobility impaired persons;
- Provision of an appropriately qualified and experienced staff member, who will be responsible for all aspects of waste management at the development;
- Daily inspection of waste storage areas and signing of a daily check list, which shall be displayed within the area; and
- Maintenance of a weekly register, detailing the quantities and breakdown of wastes collected from the development and provision of supporting documentation by the waste collector to allow tracking of waste recycling rates.
- The provision of a full waste management system will be provided from the first occupation of the units in the development.

5.6   Pest Management

A pest control operator will be appointed as required to manage pests onsite during the operational phase of this development. All waste generated within the development will be stored in closed waste receptacles both within units and within the WSAs. Any waste receptacles will be carefully managed to prevent leaks, odours and pest problems.

All WSAs will have access for potential control of vermin, if required, be supplied with hot or cold water, drainage point and will be regularly inspected by facilities management to deter pests.

6.0 CONCLUSIONS

In summary, this OWMP presents a waste strategy that complies with all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the development.

Implementation of this OWMP will ensure a high level of recycling, reuse and recovery at the development. All recyclable materials will be segregated at source to reduce waste contractor costs and ensure maximum diversion of materials from landfill, thus achieving the targets set out in the *NWMPCE*.

Adherence to this plan will also ensure that waste management at the development is carried out in accordance with the requirements outlined in the DLRCC Guidance Notes for Waste Management in Residential and Commercial Developments and the *DLRCC Waste Bye-Laws*.

The waste strategy presented in this document will provide sufficient storage capacity for the estimated quantity of segregated waste. The designated area for waste storage will provide sufficient room for the required receptacles in accordance with the details of this strategy.

7.0   REFERENCES

1.   Waste Management Act 1996 as amended.
2.   Litter Pollution Act 1997 (Act No. 12 of 1997) as amended;
4.   Regional Waste Management Planning Offices, *Draft The National Waste Management Plan for a Circular Economy (June 2023).*
5.   Dún Laoghaire Rathdown County Council (DLRCC), Dún Laoghaire Rathdown County Council Segregation, Storage and Presentation of Household and Commercial Waste) Bye-laws (2019).
6.   DLRCC Guidance Notes for Waste Management Planning for Residential and Commercial Developments (2022).
7.   Department of Environment and Local Government (DoELG) *Waste Management – Changing Our Ways, A Policy Statement* (1998).
8.   Department of Environment, Heritage and Local Government (DoEHLG) *Preventing and Recycling Waste - Delivering Change* (2002).
9.   DoELG, *Making Ireland's Development Sustainable – Review, Assessment and Future Action (World Summit on Sustainable Development)* (2002).
10.   DoEHLG, *Taking Stock and Moving Forward* (2004).
11.   Department of Communications, Climate Action and Environment (DCCAE), *Waste Action Plan for the Circular Economy - Ireland's National Waste Policy 2020-2025* (Sept 2020).
12.   DCCAE, *Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less'* (2021).
13.   Circular Economy and Miscellaneous Provisions Act 2022
14.   Environmental Protection Agency (EPA), *National Waste Database Reports 1998 – 2020* and the *Circular Economy and National Waste Database Report 2021 -*
15.   DLRCC, *Dún Laoghaire Rathdown County Council Development Plan 2022 – 2028.*
16.   Planning and Development Act 2000 (S.I. No. 30 of 2000) as amended 2010 (S.I. No. 30 of 2010) and 2015 (S.I. No. 310 of 2015).
17.   European Waste Catalogue - Council Decision 94/3/EC (as per Council Directive 75/442/EC).
18.   Hazardous Waste List - Council Decision 94/904/EC (as per Council Directive 91/689/EEC).
19.   EPA, *European Waste Catalogue and Hazardous Waste List* (2002).
20.   EPA, *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* (2015).
21.   BS 5906:2005 Waste Management in Buildings – Code of Practice.
22.   DoHLGH, Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2022).
23.   Department of Transport, Tourism and Sport and Department of Housing, Planning and Local Government, *Design Manual for Urban Roads and Streets* (2019).

8.0 APPENDIX 1: WASTE STORAGE AREA

Waste Storage Area