

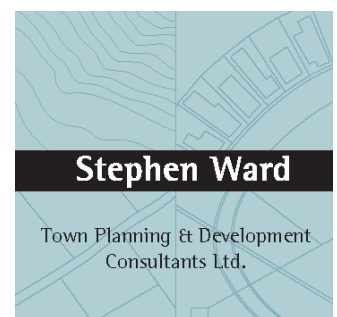
Preliminary Operational Waste Management Plan

Large Scale Residential Development

Flemington and Bremore, Balbriggan, Co. Dublin



Prepared on behalf of
Lagan Homes Balbriggan Ltd
August 2026



CONTENTS

1.0 Introduction	3
2.0 Legislative and Policy Framework on Waste Management	4
3.0 Planning Policy Context	6
4.0 Trends in the Management of Household Waste.....	8
4.1 Management of Day-to-Day Household Waste.....	8
4.2 Additional Waste Materials Generated by Households	10
5.0 Waste and Recycling Facilities in Balbriggan and Environs	11
5.1 Authorised Waste Collection Firms	11
5.2 Civic Amenity/Recycling Centres	12
6.0 The Proposed Development	12
7.0 Waste Design Quality Audit	13
7.1 Criterion 1 Ease of Access for Waste Collectors	13
7.2 Criterion 2 Waste Storage Area for Houses	14
7.3 Criterion 3 Waste Storage Areas for Apartments	15
8.0 Conclusion	17
Appendix A – Coolmine and Estuary Recycling Centres	19
Appendix B – Site Layout Plan with Waste Management Details	20

1.0 INTRODUCTION

This preliminary Operational Waste Management Plan accompanies a planning application to Fingal County Council for a Large-Scale Residential Development (LRD) at Flemington and Bremore, Balbriggan, Co. Dublin.

The proposed development LRD consists of 146no dwellings in 120no houses and 26no apartments, including a childcare facility with 80no full-time childcare spaces. It is considered that the creche will have similar waste streams to households. The application site extends to c4.4ha.

Once constructed and occupied, the development will generate a variety of municipal waste. Municipal waste is defined by the EPA as waste from households and other sources such as schools, shops, small businesses and commercial premises. Municipal waste can include:

- paper and cardboard
- glass
- metals
- plastics
- biowaste
- wood
- textiles
- packaging
- waste electrical and electronic equipment
- waste batteries and accumulators
- bulky waste, including mattresses and furniture.

Municipal waste is usually collected at kerbside or people bring it to collection centres such as bring banks or civic amenity facilities. Additionally, the Re-turn deposit return scheme at all retail outlets are obliged to accept returns of eligible plastic bottles and cans.

In Ireland the following types of municipal waste are collected at kerbside or from Civic Amenity Sites (CAS) and bring centres:

- **Residual waste** – mixed waste that is not recyclable;
- **Recyclable waste** – mixed dry recyclable materials inc. plastic, paper, cardboard and metals;
- **Biowaste (i.e. brown bin)** – organic waste composed mainly of food and garden waste;
- **Bring centre waste** – separately collected glass, metals, textiles, etc.
- **Hazardous wastes** – paint, waste oils, chemicals, medicines, etc.
- **Bulky waste** – large waste items that do not fit into a wheelie bin, e.g. broken furniture, carpets, toys etc; and
- **Batteries and Waste Electrical and Electronic Equipment (WEEE).**

This preliminary operational waste management plan will consider the proposed development in terms of how the development will operate to achieve relevant waste management targets and how the design and layout will facilitate waste storage and collection.

2.0 LEGISLATIVE AND POLICY FRAMEWORK ON WASTE MANAGEMENT

Since the introduction of the Waste Management Act of 1996, the management of household waste in Ireland has evolved significantly due to a number of factors including changes in practices in international markets and the waste industry, changes and refinements in European legislation and institutional reform at domestic level such as the establishment of the Office of Environmental Enforcement in the EPA and the role of environmental NGOs, for example.

The policy focus in recent years has been to treat waste as a resource and this continues to be the case. In 2020 the Department of the Environment, Climate and Communications (currently titled the Department of Climate, Energy and the Environment) published a new national waste management plan – **The Waste Action Plan for a Circular Economy**. One of the key objectives of this Plan is to shift the focus away from waste disposal and treatment and to encourage materials to be kept in productive use and make the transition to a circular economy.¹

Under European waste legislation Ireland has a number of targets to meet with regard to the management of household waste. These are –

- 50 per cent (by weight) of household-derived paper, metal, plastic, and glass to be prepared for reuse and recycling by 2020 rising to 55 per cent by 2025, 60 per cent by 2030, and 65 per cent by 2035.²
- Municipal waste going to landfill to be no more than 10 per cent by 2035.³
- All households to be provided with separate organic waste collection from January 2024.⁴

The **Fingal County Council Waste Segregation, Storage and Presentation of Household and Commercial Waste Bye-laws 2020**⁵ came into force on the 1st of March 2020 and applies to the functional area of Fingal County Council. In order to comply with the bye-laws households must;

- Have a contract in place with an authorised waste collector for removal of household kerbside waste.
- Maintain the containers used for presentation of kerbside waste so that waste therein will not be a source of nuisance or litter.
- Keep containers used for kerbside waste within the curtilage of the premises where the waste is produced, other than on the day before and the designated waste collection day.
- Not over-load containers and ensure lids are securely closed on collection.

¹ A Waste Action for a Circular Economy Ireland's National Waste Policy 2020-2025, Department of Communications, Climate Action and Environment

² Waste Framework Directive (2008/98/EC).

³ Landfill Directive (1999/31/EC).

⁴ Waste Framework Directive (2008/98/EC) – See mywaste.ie/brown-bin-service/

⁵ <https://www.fingal.ie/sites/default/files/2020-02/final-waste-presentation-bye-laws-ian-2020-v7.pdf>

- Not present kerbside waste for collection earlier than 1800 hours on the day immediately preceding the designated waste collection day, and removed no later than 0900 hours on the day following the designated waste collection day.
- Not include hazardous waste or waste electrical and electronic equipment in a waste container for kerbside collection.

Household kerbside waste must be:

- Segregated into residential household waste and recyclable household waste, with these fractions being stored separately. Such separated recyclable waste shall not be deposited into a container designated for residual household kerbside waste or for food waste; separated food waste shall not be deposited into a container designated for residual household kerbside waste or recyclable household kerbside waste.

These bye-laws generally require a three-bin system with the exception of designated areas where a two-bin system is permitted. No such areas have been designated within Fingal County Council at the coming into force of the bye-laws.

For multi-user buildings and apartment blocks, a management company (or another person if there is no such company) shall ensure that:

- waste can be properly segregated, stored and collected with individual receptacles.
- the receptacles are located both within any individual apartment and at the place where waste is stored prior to its collection.
- 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.
- written information is provided to each tenant or other occupier about the arrangements for waste separation, segregation, storage and presentation prior to collection.
- 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.
- receptacles for kerbside waste are presented for collection on the designated waste collection day.
- adequate access and egress onto and from the premises by waste collection vehicles is maintained.

This OWMP relates to the management of household waste within the proposed residential development having regard to the above Bye-laws.

3.0 PLANNING POLICY CONTEXT

In 2024, the Regional Waste Management Planning Offices published the *National Waste Management Plan 2024-2030*, which provides a framework to support the strategy of the national transition to a circular economy. It sets out policy responses and actions to address the current and future challenges identified and provides a delivery roadmap to help navigate the Plan period from 2024-2030. At the time of the adoption of the Fingal Development Plan 2023-2029, the policy document in place for waste management was the Eastern Midlands Region Waste Management Plan 2015-2021. Policies in the FDP note that any updated waste management plans will be adhered to.

The Fingal Development Plan states that “In accordance with the Eastern and Midlands Region Waste Management Plan 2015–2021 (EMRWMP) (and any future National Waste Management Plan), the waste management policies and objectives included in this chapter will support a move towards achieving a ‘circular economy’.”

Policy IUP20 – Implementation of Existing Waste Management Policy

Support the implementation of existing waste management policy and promote education and awareness on all issues associated with waste management, both at industry and community level, including the promotion of waste reduction by encouraging reuse, recycling and recovery of waste. Fingal County Council will continue to promote and support the objectives of the Eastern and Midlands Region Waste Management Plan 2015–2021, or such plans as may be updated.

The approach of Fingal County Council to waste management is consistent with the EU Waste Hierarchy and the circular economy approach to waste which promotes the principles of prevention, re-use, recycling, energy recovery, and sustainable disposal.

Set out below are policies and objectives contained within the Fingal Development Plan relevant to the proposed development.

IUP21 – Environmental Policy, Legislation and Guidance

Have regard to European Union, National and Regional waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes.

IUP23 – Segregated Public Waste Bins and Compactor Bins

Promote a Countywide system of segregated public waste bins and segregated compactor bins.

IUP28 – Eastern Midlands Region Waste Management Plan

Implement the provisions of the Eastern Midlands Region Waste Management Plan 2015–2021 or any subsequent Waste Management Plan applicable within the lifetime of the Development Plan. All prospective developments in the County will be expected to take account of the provisions of the Regional Waste Management Plan and adhere to the requirements of that Plan.

IUP24 – Recycling / Re-Use

Promote and encourage the establishment of re-use, recycling and repair activities to prevent and minimise waste generation and disposal, in accordance with the Eastern Midlands Region Waste Management Plan 2015–2021 (or any subsequent plan).

The Development Management policies of the Fingal Development Plan are set out at Section 14.20.12 ‘Waste Management.’ These policies are related to communal storage and individual storage provision. According to the Fingal Development Plan, the collection point for communal refuse should be accessible to both the resident and the external collector, and should be secured against illegal dumping by non-residents. In the case of individual houses, the applicant shall clearly demonstrate the proposed location and design of bin storage to serve each dwelling.

Planning applications should show the proposed location and design of bin storage to serve each dwelling, and have regard to the number of individual bins required to serve each dwelling at the time of the application and any possible future requirements for refuse storage / collection.

Criteria for assessment of communal refuse storage include:

- The location and design of any refuse storage or recycling facility should ensure that it is easily accessible both for residents and/or public and for bin collection, be insect and vermin proofed, will not present an odour problem, and will not significantly detract from the residential amenities of adjacent property or future occupants.
- Provision for the storage and collection of waste materials shall be in accordance with the guidelines for waste storage facilities in the relevant Regional Waste Management Plan and the design considerations contained in Section 4.8 and 4.9 of the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, DHLGH 2020*.⁶
- Refuse storage for houses should be externally located, concealed / covered and adequate to cater for the size and number of bins normally allocated to a household. For terraced houses, the most appropriate area for bins to be stored is to the front of the house, which should be located in well-designed enclosures that do not detract from visual amenity.
- All applications shall clearly identify the waste storage and collection points and detail the anticipated waste collection schedule having regard to the impact on road users both within the development and the surrounding area.
- Access to private waste storage in residential schemes should be restricted to residents only.

Policies in relation to refuse storage include:

DMSO236

Ensure all new large-scale residential and mixed-use developments include appropriate facilities for source segregation and collection of waste.

⁶ These standards have since been replaced by the *Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)*.

DMSO237

Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequate screened alcoves or other such mitigation measures are provided.

DMSO238

Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres.

4.0 TRENDS IN THE MANAGEMENT OF HOUSEHOLD WASTE

4.1 MANAGEMENT OF DAY-TO-DAY HOUSEHOLD WASTE

According to the EPA's *Household Waste Statistics for Ireland*,⁷ Ireland generated approximately 1.8 million tonnes of household waste in 2022, consisting of c. 1.76 million tonnes of "managed" waste and an estimated 36,970 tonnes of "unmanaged" waste. "Managed" waste consists of waste that is either collected at kerbside or brought to a designated "bring centres" (i.e., Civic Amenity Sites (CASs), recycling centres, bring banks, and WEEE collection centres). Unmanaged waste is all other waste not collected or brought to a waste facility. This waste is likely to cause pollution to the environment through fly-tipping and backyard burning.

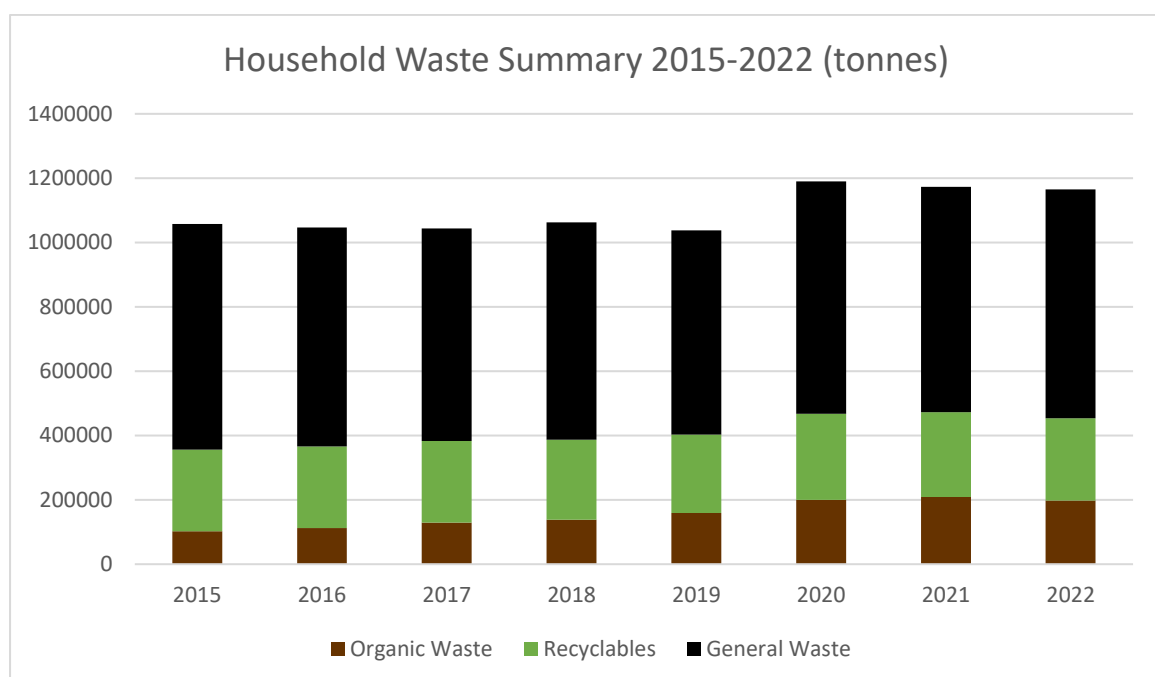


Figure 1 - Household Waste Summary 2015-2022.

Household Waste Statistics for Ireland notes the following trends in the management of household waste level at national level.

- The majority of household waste managed in 2022 was collected at kerbside (66 per cent), with the balance collected from bring centres.

⁷ <https://web.archive.org/web/20251116181705/epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/household/>

⁸ <https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/waste-statistics-data-archive/household-waste-data-archive/>

- The quantity of managed household waste generated in Ireland equates to 342 kilogrammes per person; this is a decrease from 2021 (361 kg/person), but an increase from 2018 (314 kg/person).
- Household waste level dropped back slightly in 2021 and again in 2022 following lifting of COVID -19 restrictions. However, the continuation of remote working and blended working patterns means that people are spending more time in their household than they were pre-COVID and as a result are generating more waste there.
- Approximately 40 per cent of household waste was collected in the municipal residual waste (MRW) (black) bin in 2022. MRW comprised 61 per cent of all waste collected at kerbside.
- Approximately 15 per cent of household waste was collected in the mixed dry recycling (MDR) (green) bin in 2022.
- Approximately 11 per cent of household waste was collected in the organic waste (OW) (brown) bin in 2021.

Residual waste in Ireland is generally incinerated for energy recovery or landfilled. The 2022 EPA municipal waste characterisation study⁹ shows that:

- Almost two thirds (64 per cent) of waste placed in household MRW bins should instead be placed in MDR or OW bins, or brought to bring centres. This is an increasing trend.
- Over a third (36 per cent) of waste placed in household MDR bins was not actually recyclable.
- Only 5 per cent of waste placed in household OW bins was not compostable. This is a decreasing trend. However, almost two thirds of all organic waste is incorrectly placed in the general waste bin.

These studies demonstrate that even where recycling services are available a lack of awareness amongst householders means that a large proportion of waste is not reused or recycled.

Regional differences occur in the quantity of household waste collected per person at kerbside. According to the EPA's Household Waste Statistics for Ireland,¹⁰ these variations are likely to be linked to the nature and availability of waste services and infrastructure in the area, e.g., 2-bin MRW-MDR systems (common in rural areas) versus 3-bin MRW-MDR-OW systems (common in urban areas).

In Fingal, the percentage of households with Mixed Residual bin (black bin) collection is 93 per cent,¹¹ while 92 per cent have Mixed dry recyclables collection (green bin) collection and 85per cent have organic waste bin (brown bin) collection.

The availability and nature of a household waste collection service will also have a significant influence on the achievement of waste management targets.

Taking the above into account, there are a broad range of factors that will contribute towards the achievement of household waste targets. These include the awareness and behaviour of individual households as well as the

⁹ epa.ie/publications/monitoring--assessment/waste/national-waste-statistics/2022-household-municipal-waste-characterisation-report

¹⁰ <https://web.archive.org/web/20251116181705/epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/household/>

¹¹ Note: does not include bin-sharing.

availability of waste collection services and infrastructure. This is acknowledged in current Government policy on waste management as set out in the national Waste Action Plan for a Circular Economy. Some of the key measures to be implemented in pursuit of waste management targets are:

- Municipal waste recycling targets will be a collection of waste collection permits.
- Improved waste segregation through awareness campaigns, incentivised charging and enforcement actions.
- Standardised colour coding of bins.
- Introduction of waste recovery levy.
- Household waste management to made an operational and enforcement priority for all stakeholders.
- Expand the range of recyclable materials.
- Mandatory provision of organic waste bin as part of waste collection services.
- Engagement with relevant stakeholders to improve waste segregation in apartment complexes.

4.2 ADDITIONAL WASTE MATERIALS GENERATED BY HOUSEHOLDS

In addition to day-to-day waste materials as described in the foregoing sections, households in the development will also generate additional waste that will need to be managed separately.

These additional waste items may include –

- **Batteries:** Waste batteries must be separated from other waste and disposed of separately. Most supermarkets have receptacles for the recycling of batteries. Additionally, the nearby CAS accepts batteries.
- **Waste Electrical and Electronic Equipment (WEEE):** Under the WEEE Directive 2002/96/EC and associated European Union (WEEE) Regulations 2014 it is the responsibility of the manufacturer to take back WEEE. Retailers are also obliged to take back WEEE where a similar product is purchased.
- **Textiles** – Clothes and textiles should be recycled and reused within individual households where possible. Clothes and textiles may be donated to charity shops and organisations, or resold via online and social media channels, such as for example eBay and DoneDeal.ie, which provide a selling platform for unwanted items of clothing. Finally, the closest bring bank to the approved development has a clothing and textile recycling bin.
- **Furniture** - Furniture and other bulky items that may be generated by occupants of dwellings from time to time may be donated to charity shops or charitable organisations for re-use or re-purposing. Alternatively, there are several online and social media channels, such as for example Facebook Marketplace and DoneDeal.ie, which provide a selling platform for unwanted household items and furniture.

5.0 WASTE AND RECYCLING FACILITIES IN BALBRIGGAN AND ENVIRONS

5.1 AUTHORISED WASTE COLLECTION FIRMS

In Ireland, the bye-laws require all holders of household or commercial waste to have a contract in place with an authorised kerbside waste collector, or be able to prove that they regularly use a civic amenity site or recycling centre.

For a managed apartment complex, the management company must ensure adequate containers are provided for residual and recyclable wastes in designated waste storage points, and must provide residents with the written information regarding the arrangements in place. Segregation within the apartments, and the correct use of these communal bins, is then the responsibility of the occupant.

Tusla, the Early Years Inspectorate provides guidance to childcare services on waste disposal as part of their publication Quality Regulatory Framework¹². It is the responsibility of the service operator to manage waste within the childcare setting and bring bins to the kerb for collection.

All authorised waste collectors must hold a valid waste collection permit, which is issued by the National Waste Collection Permit Office (NWCPO). The list of waste collectors authorised to provide kerbside wheelie bin collection in Dublin is available on the MyWaste.ie website and detailed below.

Table 1	
Collector	Licence No.
The City Bin Co. Unlimited Company	NWCPO-09-03628-07
Thorntons Recycling	NWCPO-09-01190-05
Panda Green	NWCPO-13-11193-06
Tommy's Waste and Recycling Ltd	NWCPO-17-11918-01
Able Recycling Ltd	NWCPO-09-01195-07
Allied Recycling	NWCPO-12-11002-05
Advanced Waste Recycling	NWCPO-14-11395-05
AES Recycling	NWCPO-08-10601-07
Clearer Waste Management	NWCPO-13-11133-06
Ecoway Waste Management Ltd	NWCPO-14-11486-04
Greyhound Household	NWCPO-14-11447-06
Key Waste Management Ltd	NWCPO-09-01156-06

¹² Tusla (2018) Quality and Regulatory Framework: Full Day Care Service and Part-Time Day Care Service, Dublin: Early Years Inspectorate, Tusla.

5.2 CIVIC AMENITY/RECYCLING CENTRES

Fingal currently operates two recycling centres, the Coolmine Recycling Centre in Dublin 15 and Estuary Recycling Centre in Swords. There is also a recycling centre in Drogheda, this being the V&W Recycling Centre. There are a number of Bring Banks in Balbriggan, with the closest being located c1km from the application site at O'Dwyers GAA Club. There is a lightbulb drop off centre at Stephenstown Industrial Park, c2km from the application site. Aldi, Tesco and Dunnes supermarkets accept batteries for recycling. Many of these retail providers now also include Re-Turn deposit areas for cans and plastic bottles. A number of the bring banks marked on the map below also include clothes banks.



Figure 2 - Satellite Image showing locations of recycling facilities in Balbriggan.

6.0 THE PROPOSED DEVELOPMENT

The proposed development will contain 146no residential units and a creche in the mix detailed by Table 2 below. A site layout plan is attached at Appendix B.

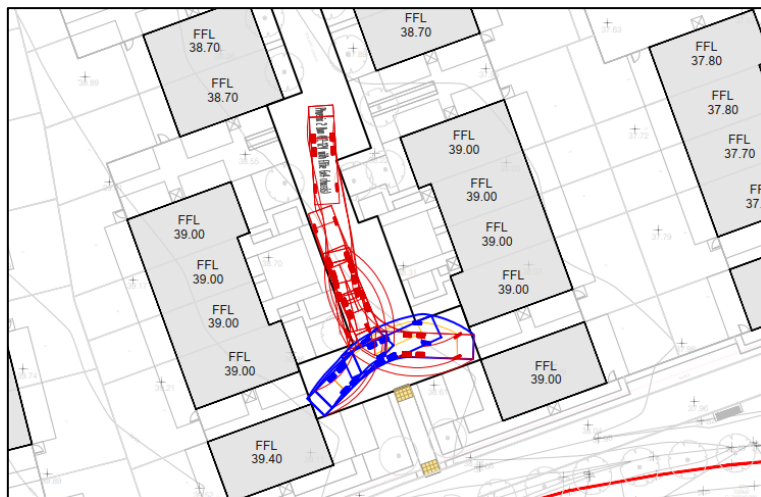
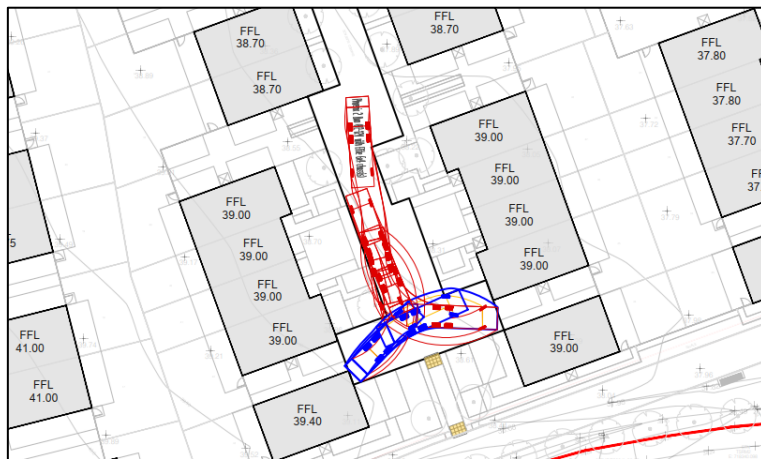
Table 2: Proposed Residential Mix					
Unit Type	1-bed	2-bed	3-bed	4-bed	Total
House	-	16	91	13	120
Apartment	13	13	-	-	26
Total	13	29	91	13	146

The creche building is designed to cater for 80no full-time childcare spaces and will have a separate and dedicated waste storage area, as shown on JFOC drawing no. PD2005 and PD5001.

7.0 WASTE DESIGN QUALITY AUDIT

7.1 CRITERION 1 EASE OF ACCESS FOR WASTE COLLECTORS

The internal access road serving the development has been designed to accommodate ease of access and movement for typical waste collection vehicles across the site, including reverse manoeuvring. Provision has been made for interim works to ensure efficient waste collection if the western link road is not completed at the opening year for the proposed development. The layout plans were subject to an Autotrack swept path analysis at by Waterman Moylan Engineering Consultants (drawing ref. no. P0120). Not-to-scale extracts from the submitted Waterman Moylan drawing are provided below. All waste storage areas are situated in close proximity to the principal estate roads along which typical refuse collection vehicles can easily pass and manoeuvre. Reversing movements are kept to a minimum. The type and frequency of collection will be at the discretion of individual households depending on which waste collection company they choose.



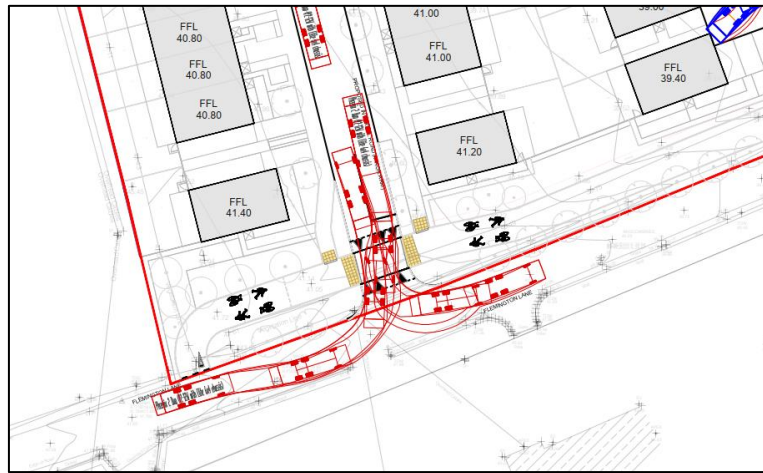


Figure 3 - Extracts from Dwg. No. P0120 by Waterman Moylan.

7.2 CRITERION 2 WASTE STORAGE AREA FOR HOUSES

Detached, semi-detached and end of terrace dwellings have side access to rear gardens for bin storage areas to the rear of the property. There is adequate space to the side of all houses to allow movement of receptacles to the front of houses for collection /emptying of waste.

Mid-terrace dwellings are provided with a screened waste storage area to the front of the property. The designated storage areas as detailed by JFOC Dwg. No. PD7005 are capable of accommodating 3 no typical 240 litre wheelie bins for the collection of residual, dry recyclables and organic waste. Waste storage areas will be screened and rendered (Fig. 4 & 5). All bin stores are externally located, ensuring adequate ventilation.

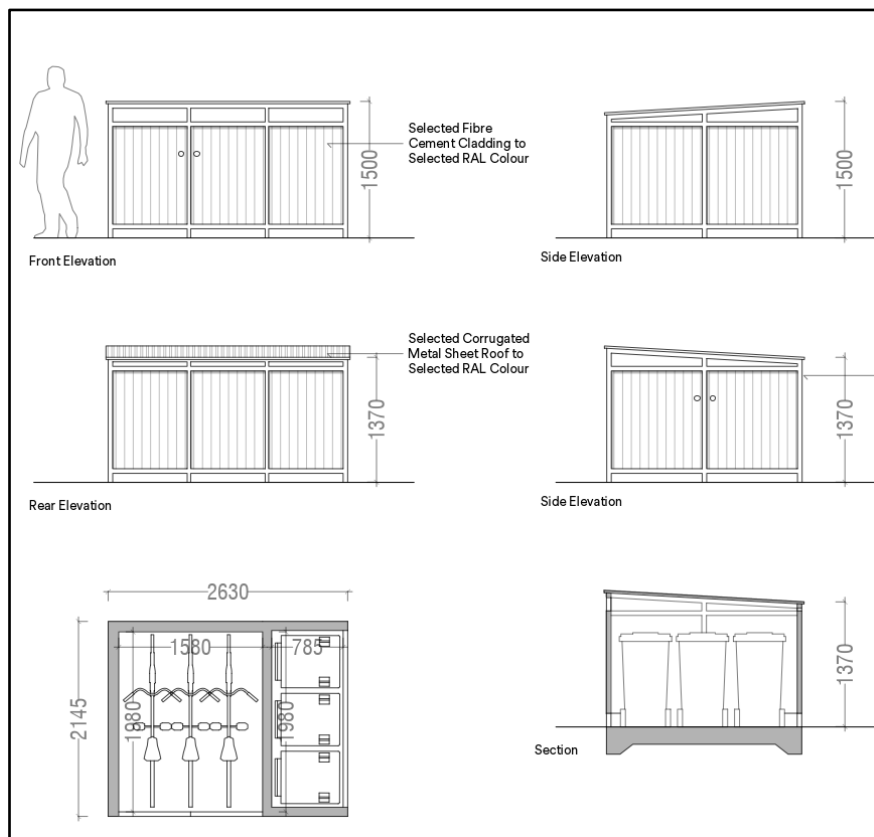


Figure 4 - Extract from JFOC Drawing No. PD7005 – Bin and Bike Store

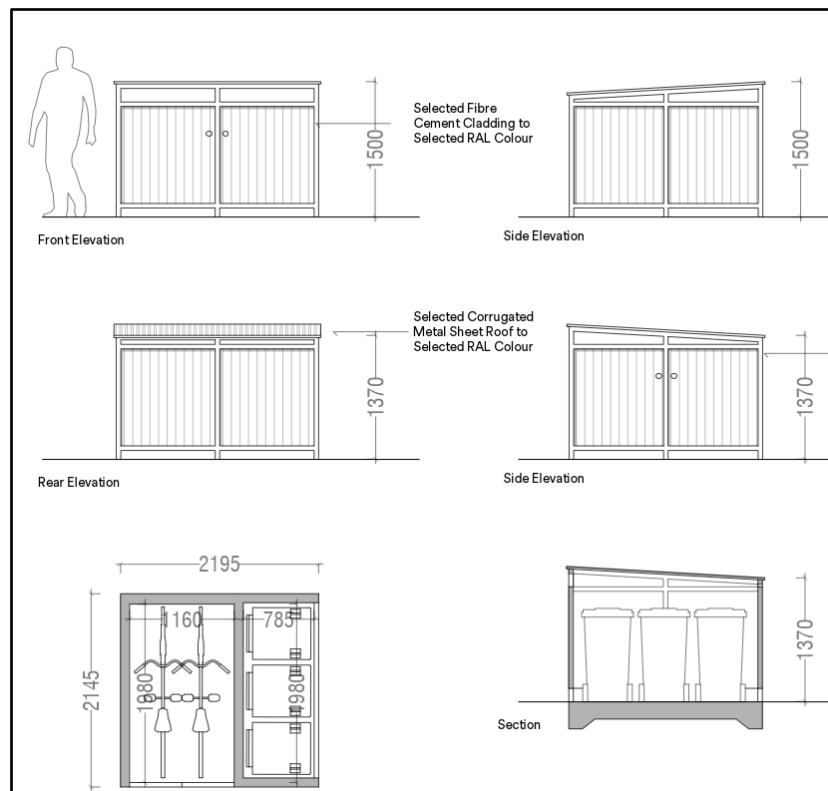


Figure 5 - Extract from JFOC Drawing No. PD7005 – Bin and Bike Store

7.3 CRITERION 3 WASTE STORAGE AREAS FOR APARTMENTS

The proposed development includes three blocks of simplex/duplex apartment buildings. All apartments have their own front door. The communal bin storage is to be located beneath the stairwells of the apartments and are screened from public view.

The waste storage areas are design to comply with the requirements of Section 4.2 the Planning Design Standards for Apartments (2025) and Section 5.3.6 of the Sustainable Residential and Compact Settlement Guidelines (2024). Waste storage facilities are accessible to each apartment via the communal open space. Storage structures are large enough to facilitate the three-bin system to allow for the segregation of waste. It will be the responsibility of the apartment occupiers to carry out the segregation of waste at source and then bring it to communal bin storage areas where bins will be clearly labelled. The waste storage areas are located close to the apartment buildings, in communal open spaces that will not be taken in charge.



Figure 6 – Extract from JFOC Drawing No. PD4105 'Block A Side Elevations and Section' showing bin storage access (highlighted). **Update from draft**

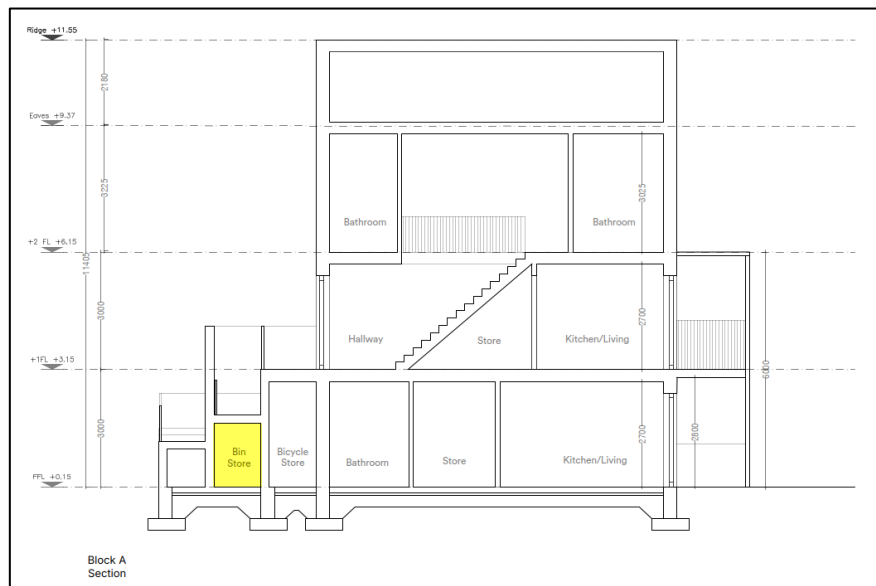


Figure 7 - Extract from JFOC Drawing No. PD4105 'Block A Side Elevations and Section' showing bin storage (highlighted).

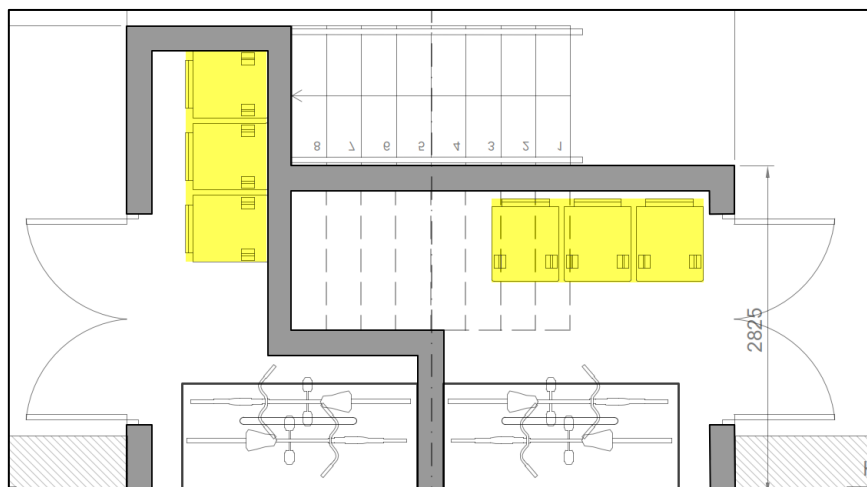


Figure 8 - Extract from JFOC Dwg. No. PD4101 'Block A Ground Floor Plan' showing internal bin storage layout. 3-bin system highlighted.

Waste storage structures are designed to hold 660 litre bins with the quantity required to serve the number of apartments sharing the receptacles. As illustrated on the Architect drawings above, the bin stores will be in a designated space beneath the stairs of the apartment blocks, be easily accessible to residents, and be adequately screened from sight.

Bin storage locations are indicated in JFOC drawing no. PD2005 'Waste Management.'



Figure 9 – JFOC Dwg. No. PD2005 'Waste Management.'

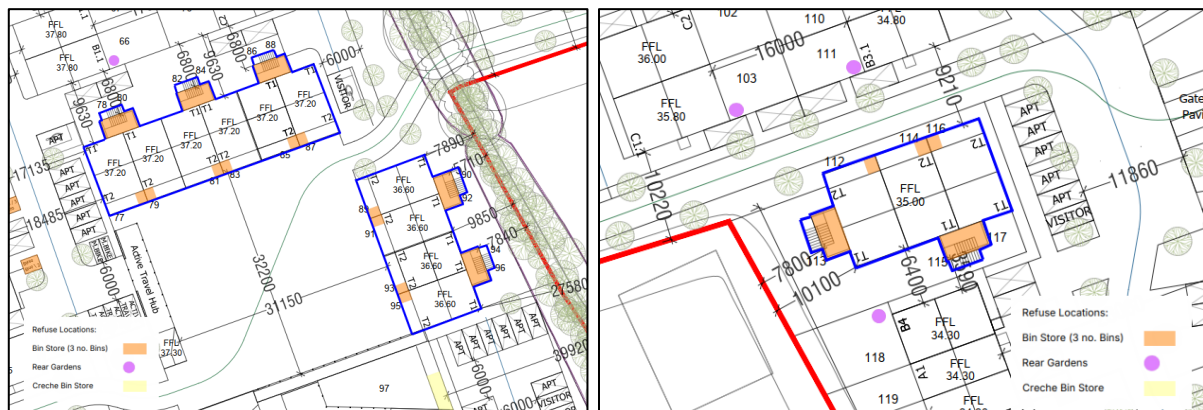
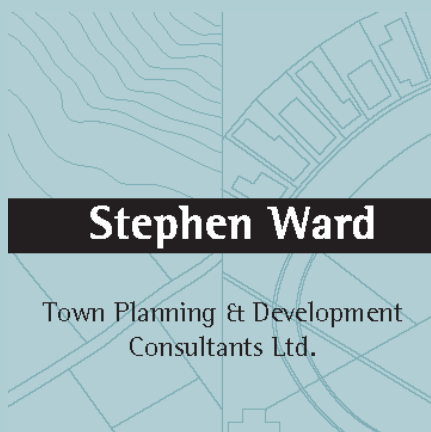


Figure 10 - Extracts from JFOC Dwg. No. PD2005 with duplex apartments outlined in blue, showing locations of dedicated in-curtilage bin storage.

8.0 CONCLUSION

The design and layout of the proposed development provide an opportunity for a high level of recycling, reuse and recovery of all types of household waste by future occupants in compliance with relevant legal requirements, waste policies and best practice management guidelines.



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APPENDIX A – COOLMINE AND ESTUARY RECYCLING CENTRES

Coolmine and Estuary Recycling Centres are for household waste only. Commercial waste is not accepted.

The following items are accepted free of charge:

- Paper
- Cardboard
- Cartons
- Tins and cans
- Glass bottles and jars
- Plastic bottles (they should be washed and squashed with lids removed)
- Clean plastic packaging
- Clothes
- Waste Electrical and Electronic Equipment
- Fluorescent tubes and energy-saving bulbs
- Car and household batteries
- Cooking oil and engine oil

The following items are accepted with a charge:

- Bulky waste (e.g. furniture, carpet, mattresses)
- Wood
- Metal
- Green waste
- Soil and stones
- Duvets and pillows
- Household hazardous waste (paint, herbicides, household cleaners, etc.)

APPENDIX B – SITE LAYOUT PLAN WITH WASTE MANAGEMENT DETAILS

Refuse Locations:

Bin Store (3 no. Bins)



Rear Gardens



Creche Bin Store

