



Waste Action Plan Consultation  
Waste Policy & Resource Efficiency  
Department of Communications, Climate Action and Environment (DCCAE)  
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**Re: Public Consultation: Waste Action Plan for a Circular Economy**

A Chara,

The Department of Housing Planning & Local Government (DHPLG) supports the broad aims of your Department's Waste Action Plan for a Circular Economy and welcomes the opportunity for consultation, at this stage of the process.

The inclusion of reference, on page 7, to the delivery of Project Ireland 2040 and a need for the reduction of construction waste in order to achieve "*the sustainable management of our resources*" is an important consideration.

Mindful of the above, Section 9: Construction & Demolition (C&D) Waste is of most relevance in preventing, recycling and therefore reducing the amount of construction waste.

As you may be aware, current practice in terms of the planning process, and in particular, planning applications under Section 34 of the Planning and Development Act 2000 (as amended), are informed by "*Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects, June 2006*".

Project C&D Waste Management Plans are required, as a condition of planning permission, for development in excess of the following thresholds:

- (1) New residential development of 10 houses or more;
- (2) New developments other than (1) above, including institutional, educational, health and other public facilities, with an aggregate floor area in excess of 1,250 m<sup>2</sup>;
- (3) Demolition/renovation/refurbishment projects generating in excess of 100m<sup>3</sup> in volume, of C&D waste;





- (4) Civil Engineering projects producing in excess of 500m<sup>3</sup> of waste, excluding waste materials used for development works on the site.

Project Management Plans are largely appraised /considered and enforced by the local authorities.

The Best Practice C&D waste publication is referenced in Section 7.8.1 of *Guidelines for Planning Authorities on Development Management, June 2007*, which were issued under Section 28 of the Planning and Development Act 2000 (as amended). All planning authorities “should have regard to” *Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects*, “or any subsequent revision”.

It is noted that it is a short term measure of the draft Waste Action Plan to “*revise the 2006 Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Waste Projects*”.

The current Best Practice Guidelines on the Preparation of Waste Management Plans for Construction & Demolition Projects, set out an integrated approach to construction and demolition (C&D) waste management, throughout the duration of a project, in order to promote sustainable development, environmental protection and optimum use of resources. The Guidelines provide direction on the preparation of project C&D waste management plans for certain classes of project, which exceed specified threshold limits.

The proposed action to update and revise the Best Practice Guidelines for C&D waste is appropriate. It remains the case that Section 34(2)(a)(iv) of the Planning and Development Act, as amended, allows for regard to be had to the policies of other Ministers, at planning application stage and moreover, that the current Section 28 ministerial Guidelines for Planning Authorities on Development Management further supports this.

However, it is noted in Section 9.6, that the Draft Action Plan states that:

*“DCCA will seek to work with the Department of Housing, Planning and Local Government to produce Section 28 Planning Guidelines on Construction Waste to further drive the prevention and recycling of C&D waste”.*

In light of proposed revised Best Practice guidelines for C&D waste and Section 7.8.1 of Guidelines for Planning Authorities on Development Management, it not considered necessary for the Minister for Housing, Planning and Local Government to issue further specific guidance on construction waste under Section 28 of the Planning and Development Act 2000 (as amended).

This would be more appropriately addressed by the proposed revised Best Practice guidance, which will continue to be supported by current Section 28 ministerial Guidelines for Planning Authorities on Development Management, or any future update/successor document.

DHPLG is committed to working alongside DCCA on any matters regarding the successful delivery of more sustainable development and in particular, the proposed revision to the 2006 Guidelines, which we would also assist and support in bringing to the attention of the Planning Authorities.



Yours sincerely,

Paul Hogan  
Acting Principal Adviser/Chief Planner