Resource Waste Management Plan

Nos 87–93 Middle Abbey Street, Dublin 1, D01 NH70 (known collectively as ‘Independent House’)

April 2025

Waterman Moylan Consulting Engineers Limited
Block S, Eastpoint Business Park, Alfie Byrne Road, Dublin D03 H3F4
www.waterman-moylan.ie

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This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015)

Issue	Date	Prepared by	Checked by	Approved by
LRD Stage 2	8 November 2024	B McCann	J Gibbons	J Gibbons
LRD Stage 3	April 2025	B McCann	J Gibbons	B Gallagher

Comments

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We disclaim any responsibility to the Client and others in respect of any matters outside the scope of the above.

This report is confidential to the Client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk.

Content

1. Introduction

1.1 Introduction

This Resource Waste Management Plan (RWMP) has been prepared by Waterman Moylan on behalf of Summix IHD Developments Limited to accompany a planning application to Dublin City Council (DCC) for a mixed-use development at a c. 0.3 Ha site at Nos 87 – 93 Middle Abbey Street, Dublin 1 D01 NH70 (known collectively a 'Independent House'). The purpose of this plan is to provide a practical and informed approach to the management of Construction & Demolition (C&D) waste associated with the proposed development and to provide the information necessary to ensure that C&D waste is managed properly in accordance with current legislation. This RWMP has been prepared in accordance with the Environmental Protection Agency (EPA) *"Best Practice Guidelines for the preparation of resource waste management plans for construction & demolition projects"* sets out the approaches to prevent waste, reuse materials, reduce waste and better manage C&D wastes that cannot be prevented on this development project.

We would confirm that the applicant is committed to minimising waste and will utilise modern methods of construction to reduce residual wastes. The applicant is committed to adhering to the EPA guidelines on waste management.

1.2 Policy and Legislation

Construction and demolition waste arising from the construction stage of the development will be managed in accordance with the following guidance note published by the EPA in 2021: -

- Best Practice Guidelines on the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects.

The guidelines reflect current waste legislation and policy including National Waste Policy "*A Waste Action Plan for a Circular Economy – Irelands National Waste Policy 2020-2025*".

In 2021 the government announced measures to tackle housing issues in Ireland. "Housing for All, a new Housing Plan for Ireland", the national housing plan to 2030 includes objectives including highlighting best practice construction and demolition waste management, reducing costs associated with construction and demolition wastes, reducing the demand for virgin raw material and supporting reuse.

In Ireland the primary waste legislation is the Waste Management Act 1996, as amended, and Section 32 of the Act places a general obligation on the holder of waste to comply with legislation and ensure all wastes are managed within the requirements of the Act. In short, the obligation to manage waste legally lies with the holder of waste which means the waste producer of the person who is in possession of the waste. At a construction site the mandatory obligation to appropriately manage waste generated at a construction site lies with the Client and the Contractor.

Waste policy has shifted from the linear economic model to a circular economic model. Circular economy inspired interventions focus not only on increasing recycling quantitatively but also on:-

- Reducing the use of virgin resources
- Keeping materials in the economy as long as possible
- Maintaining their intrinsic value/quality as high as possible; and

- Reducing hazardous substances in products and waste

1.3 Location

The site is generally bound by Prince's Street North to the north, William's Lane and Nos. 94-96 Middle Abbey Street to the west, Middle Abbey Street to the south, and Nos. 35-39 O'Connell Street Lower (known as 'Penneys') to the east. The site comprises 6 No. interconnecting, long-standing vacant structures as follows: (a) a principally part 5 No. to part 6 No. storey above basement level building fronting Middle Abbey Street, known as Independent House, with a single storey workshop building to the rear; (b) a 5 No. storey (above basement level) building at the corner of Middle Abbey Street and William's Lane, known as Emerald Chambers; (c) a triple height (at basement level) structure towards the centre of the site, known as the 'Printing Hall'; (d) a 2 No. storey (above basement level) warehouse and office fronting William's Lane; (e) a part 3 No. to part 4 No. storey (above basement level) loading bay and office fronting Prince's Street North; and (f) a 3 No. storey (above basement level) office in the eastern portion of the site, bounded by Penneys. The site includes 2 No. Protected Structures (RPS Ref. Nos. 18 & 8797). The site location is shown in Figure 1.

The gross floor area of the development is c. 15,413 sq m comprising c. 12,751 sq m above basement level.

The development's surface water and foul water drainage network shall discharge from the site into the existing combined sewer located along Prince's Street North to the north-west of the site. A new pedestrian crossing and upgrade works to the footpath and kerb along Prince's Street North are proposed. Public realm improvements are also proposed to William's Lane. The development site area, drainage works, road works and public realm improvements will provide a total application site area of c. 0.33 Ha. While the site is currently a brownfield with 100% hardstanding area.

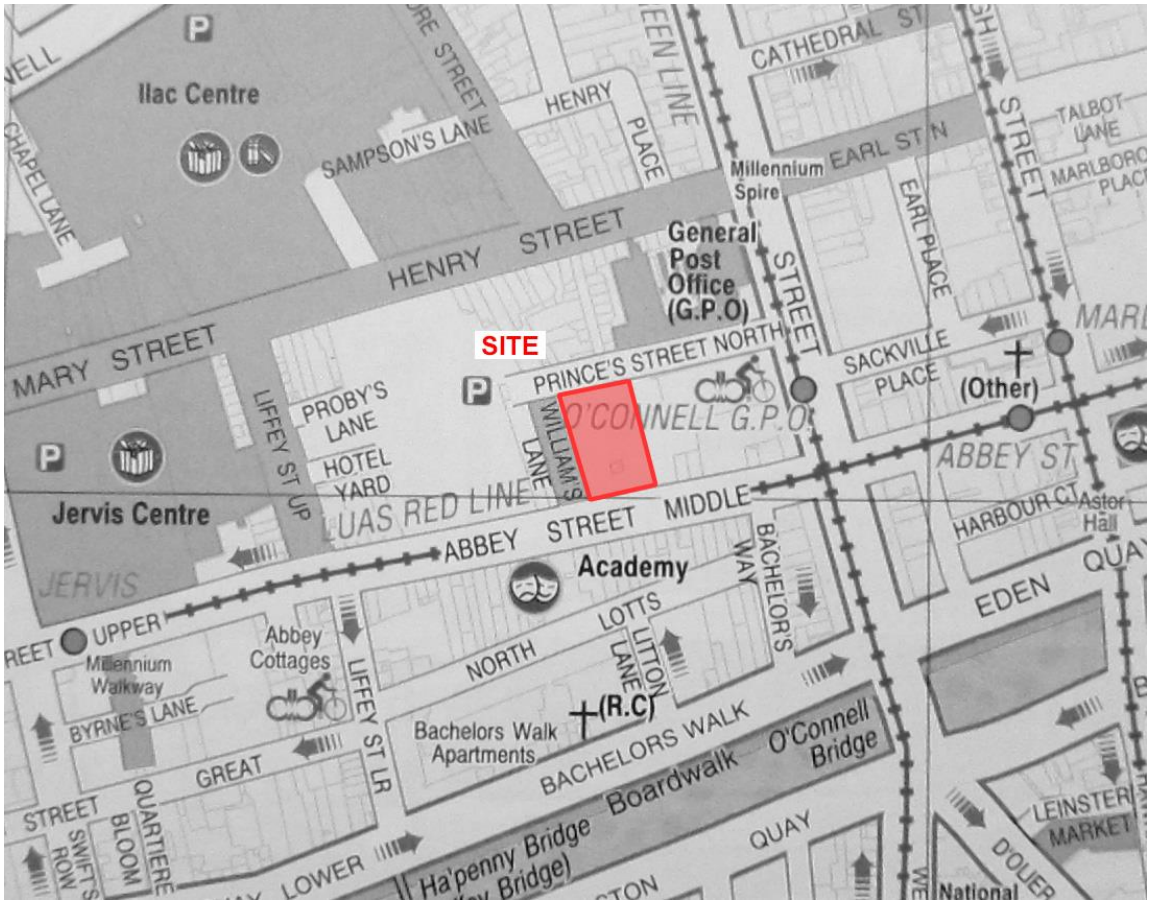

Figure 1: Location Map

1.4 Building History

The site has suffered long term vacancy over 20 years since departure of its newspaper production function. The building became unsuitable for the function for which it was originally constructed (printing newspapers) in the early 2000's with Independent Newspapers moving to a purpose built facility in west Dublin. With the loss of that original active printing function, no new viable use for the site has emerged, notwithstanding its sale and resale, and receipt of a planning decision to redevelop.

Its vacancy has had a corresponding negative impact on the enclosing urban environment, neighbouring protected structures, and the adjoining ACA.

Long term vacancy has also had a considerable negative impact on the building range itself, which has suffered extensive water ingress, deterioration and decay. The consequence of such water ingress to a concrete framed building is critical, as affected structural components have become corroded with loss of adhesion of the few decorative linings present. The challenges of conserving a damp concrete building are well researched and complex.

The subject site contains a collection of buildings that once housed the Offices and Printing Hall of Independent Newspapers and include two protected structures - No. 87-90 Abbey Street Middle Dublin 1 (RPS REF 18) (Independent House) and No. 90-91 Middle Abbey Street (RPS REF 8797).

This site comprises lands bounded by Abbey Street, Princes Street North and William's Lane. The structures are uninhabited and in very poor condition following 20 years of dereliction. They have suffered extensive water damage over the period.

The buildings do not comply with current regulatory codes and require significant adaptation, intervention, and alteration to meet fire and access requirements.

2. Description of Proposed Development

2.1 Site Location and Description

The site for the proposed development is bounded by Middle Abbey Street to the south, Williams Lane to the west and Princes Street North to the north. See Figure 1.

Up to 2004, the site was occupied by the Independent Group of Newspapers. The various buildings on the site buildings included Independent House, Emerald Chambers, Printing Hall and warehouses. See Figure 2.

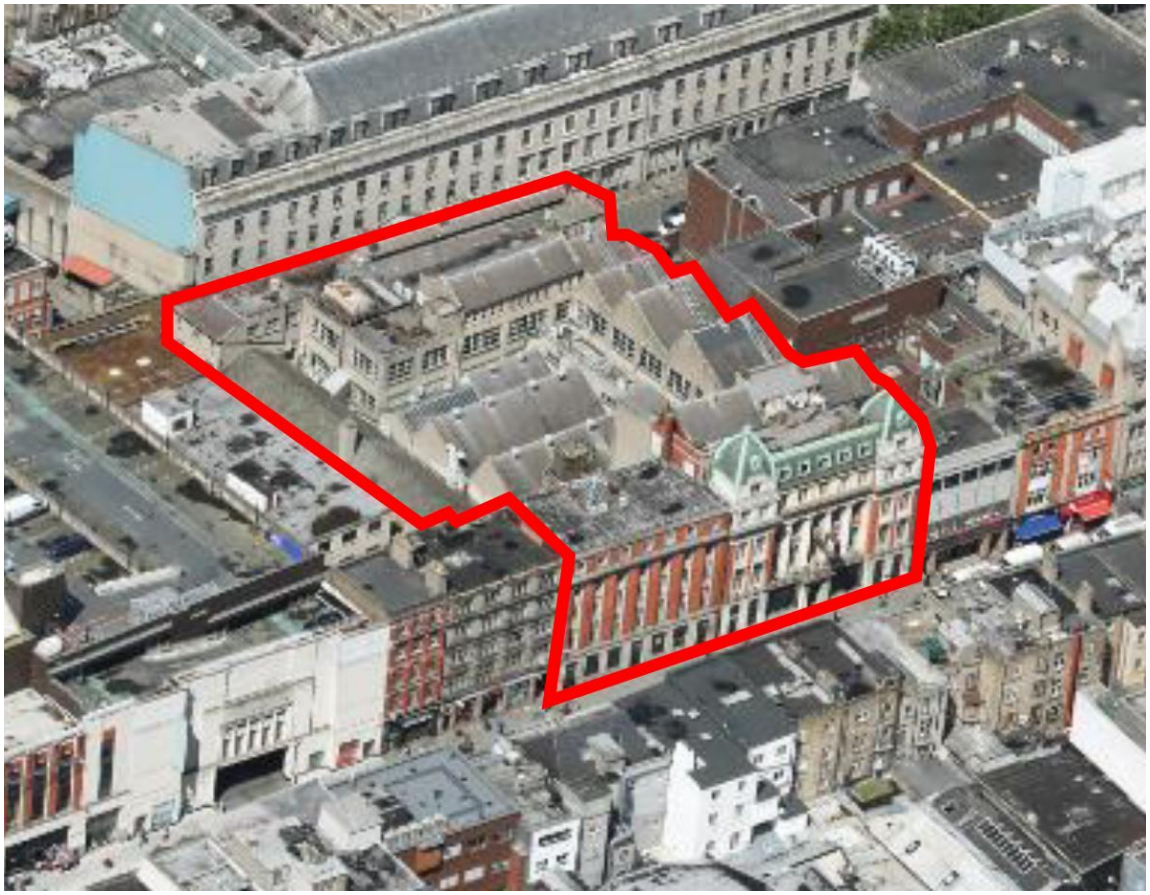

Figure 2: Aerial View of Site

2.2 Description of Proposed Development

The development will principally consist of: the retention and refurbishment of part of the building façade along Prince's Street North; the demolition of the 3 No. former warehouses and offices (c. 5,270 sq m) and the lowering of part of the basement level thereat; the demolition of part of the adjoining wall to the north-east of the site, bounding the Penneys loading bay; the partial demolition of the Printing Hall (c. 457 sq m) and the rear of Emerald Chambers (c. 150 sq m) and Independent House (c. 100 sq m); the

removal of the existing concrete roof slab at Emerald Chambers to facilitate an increase in floor-to-ceiling height at fourth floor level; the lowering of part of the ground floor level in Independent House and Emerald Chambers for universal access; refurbishment works to the Protected Structures including general internal and external works for conservation repairs, maintenance, change of use and upgrading of the buildings; and the construction of a part 1 No. to part 9 No. storey over basement building connecting into the retained structures and principally comprising 316 No. Student Accommodation bedspaces (267 No. standard rooms, 5 No. accessible rooms, 2 No. twin studios (4 No. bedspaces), 10 No. accessible studios and 30 No. single studios) with associated facilities, which will be utilised for short-term let during student holiday periods. The 272 No. standard and accessible rooms are provided in 42 No. clusters ranging in size from 5 No. bedspaces to 8 No. bedspaces, and all clusters are served by a communal living/kitchen/dining room.

The development also provides: ancillary internal and external communal student amenity spaces and support facilities; cultural and community floor space (c. 644 sq m); 3 No. retail units (c. 216 sq m); a café/restaurant (c. 254 sq m); bicycle stores at basement and ground floor levels; visitor cycle parking spaces; bin stores; ESB substation; hard and soft landscaping; green/blue roofs; new telecommunications infrastructure at roof level, together with all associated equipment; boundary treatments; PV panels; plant; lift overruns; and all associated works above and below ground.

The gross floor area of the development is c. 15,413 sq m comprising c. 12,751 sq m above basement level.

The layout of the proposed ground floor and basement are illustrated on Figures 3 and 4 and on the drawings included with the planning application.

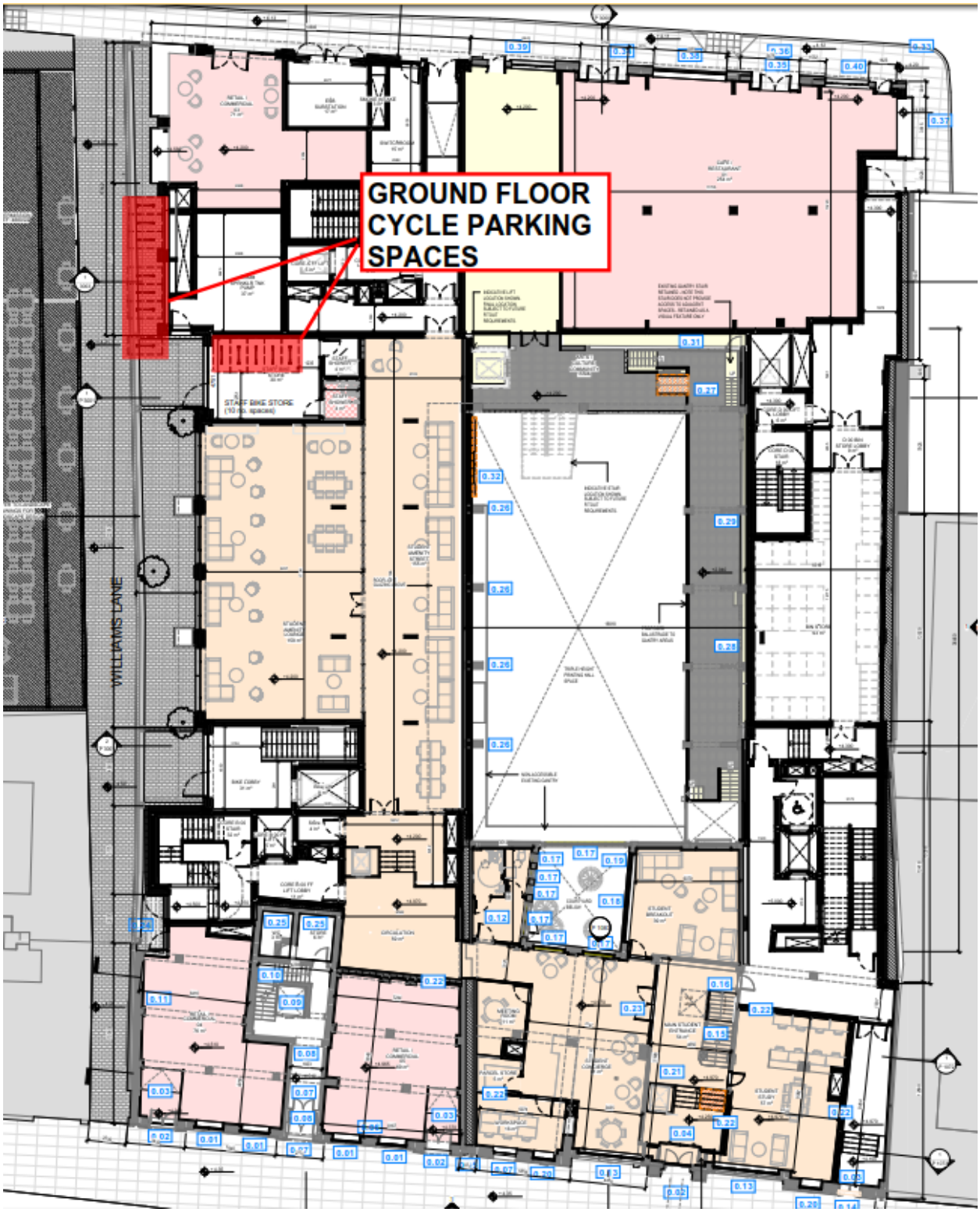
GROUND FLOOR
CYCLE PARKING
SPACES
WILLIAMS LANE

Figure 3: Proposed Ground Floor Plan

(Extract from Henry J. Lyons Drg. No. IHS-HJL-ZZ-ZZ-M3-A-P1010 Rev P02)

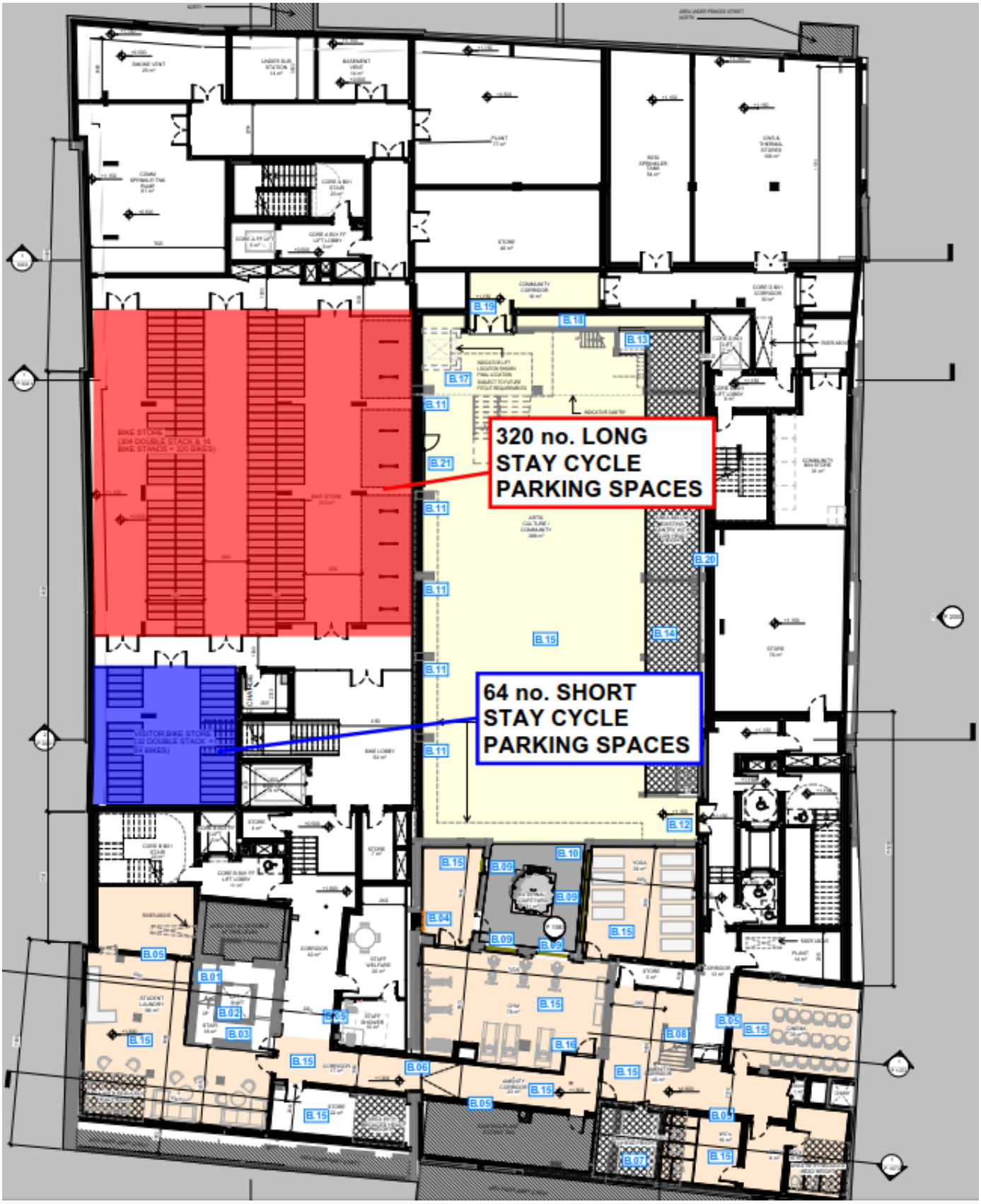
320 no. LONG STAY CYCLE PARKING SPACES
64 no. SHORT STAY CYCLE PARKING SPACES

Figure 4: Proposed Basement Plan

(Extract from Henry J Lyons Drg No IHS-HJL-ZZ-ZZ-M3-A-P1009 Rev P02)

3. Resource & Waste Management Plan

3.1 Roles & Responsibilities

The Client

The Client is Summix IHD Developments Limited and will be responsible for the following:

- Establishing the ambition and the performance targets for the project
- Set out commitments and targets in relation to prevention and minimisation in the project brief, tendering documentation including pre-qualification requirements, invitation to tender, etc.
- Require the preparation and submission of an RWMP as part of the design and planning submission, even if not requested by the planning authority for planning.
- Require the preparation and submission of an updated RWMP as part of the construction tendering process.
- Ensure that the RWMP is agreed and submitted to the local authority prior to commencement of works on site; and
- Request the end-of-project RWMP from the Contractor.

The Design Team

The design team is responsible for the following:

- Drafting and maintaining the RWMP through the design, planning and procurement phases of the project.
- Appointing a Resource Manager (RM) to track and document the design process, inform the Design Team and prepare the RWMP.
- Include details and estimated quantities of all projected waste streams. This should also include data on waste types (e.g. waste characterisation data, contaminated land assessments, site investigation information) and prevention mechanisms (such as by-products) to illustrate the positive circular economy principles applied by the Design Team.
- Incorporate relevant conditions imposed in the planning permission into the RWMP.
- Handover of the RWMP to the Contractor at commencement of construction for the development of the RWMP in a similar fashion to how the safety file is handed over to the Contractor; and
- Work with the Contractor as required to meet the performance targets for the project.

The Local Authority

The Local Authority (or An Bord Pleanála) as the planning regulator is responsible for the following:

- Ensure that the requirement for an RWMP for C&D Projects (as specified in these guidelines) is required for all planning applications (through setting this requirement as an

objective of the County Development Plan or local planning policy) for development where construction or demolition is proposed

- Ensuring that any RWMP submitted with planning complies with the requirements of these guidelines.

- Setting appropriate planning conditions as required in line with the requirements of Section 34(4)(l) of the Planning and Development Acts, as amended.

- Ongoing enforcement of planning conditions relating to waste management through the construction phase.

Contractor

The principal Contractor procured by the Client to undertake the construction operations is responsible for the following:

- Preparing, implementing and reviewing the RWMP through construction (including the management of all suppliers and sub-contractors) as per the requirements of these guidelines.

- Identifying a designated and suitably qualified Resource Manager (RM) who will be responsible for implementing the RWMP.

- Identifying all hauliers to be engaged to transport each of the resources / wastes off-site. Note that any resource that is legally a 'waste' must only be transported by a haulier with a valid Waste Collection Permit (refer to Appendix F for a resource to find a suitably authorised local haulier).

- Please note that the movement of hazardous waste material off-site falls under the European Communities (Shipments of Hazardous Waste exclusively within Ireland) Regulations 2011. Each shipment of hazardous waste material off-site is to be legally accompanied by a Waste Transfer Form (see details Appendix F). Hazardous waste such as asbestos should only be handled by competent persons with appropriate training and expertise. More information on handling of asbestos-containing material is available from the Health and Safety Authority.

- Identifying all destinations for resources taken off-site. As above, any resource that is legally a 'waste' must only be transported to an authorised waste

- End-of-waste and by-product notifications addressed with EPA where required

- Clarification of any other statutory waste management obligations, which could include on-site processing

- Full records of all resources (both wastes and other resources) should be maintained for the duration of the project

- Preparing a RWMP Implementation Review Report at project handover.

3.2 Design Approach

During the During the development of the design proposals the Client and Design Team have carefully considered the EPA Best Practice Guidelines for the Preparation for Resource & Waste Management Plans for Construction & Demolition Projects". Through workshops and design team meetings during the project feasibility and evaluation process the Client and Design Team considered the following in respect of reuse of materials and recycling:

A) Establishing the potential for any reusable site assets which included the retention of parts of the existing buildings and structures and the reuse of materials.

B) The potential for refurbishment and refit of existing structures or buildings rather than demolition and new build. In this regard those parts of the existing building /structure which were considered for refurbishment were identified and retained.

C) Assessing existing buildings and structures for refurbishment – detailed testing and assessments were undertaken to identify the suitability of the existing structures to be retained.

D) Enabling the optimum recovery of assets from the site. Materials suitable for recovery/reuse were assessed.

Excavation on site has been kept to a minimum as there is already an existing basement within the site. The design took into account the minimum excavation works required in order to provide a basement which meets with current design standards and headroom.

It is proposed that demolition works will be carried out on site. A detailed audit of the materials to be generated by the demolition and recorded in an inventory of materials with a view to maximise recovery of resources from demolition for beneficial reuse and recycling. The preparation of this inventory will be informed by the EU "*Guidelines for the waste audits before demolition and renovation works of buildings*".

In terms of Green Procurement, the design team will develop solutions, encourage innovation in tendering for the works and provide incentives to recognise sustainable approaches by tenderers. The design team will engage early and collaborate with the relevant parties in the supply chain to help realise significant opportunities and better resource management.

Proposals developed by the design team will support the use of off-site manufacturing, which has been shown to reduce residual waste by up to 90% (volumetric building versus traditional). Decisions to use offsite construction are typically cost led but there are significant benefits for resource management.

Design for materials optimisation will be undertaken by the design team, with the key design principle seeking to ensure that manufacturers and construction companies adopt lean production models, including maximising re-use of materials onsite.

The design team will also design for flexibility and deconstruction. The objective of this is to ensure that all products (including buildings) only contain materials that can be recycled and are designed for easy disassembly.

3.3 Typical Construction Waste/Key Materials

Typical construction waste/key materials which will be generated by the development is as follows; -

- Demolition waste such as timber, concrete, electrical cables, copper pipework, roofing materials, glass, metalwork, floor coverings, plasterboard, sanitary ware. Exact quantities have yet to be determined.
- Excavated material from the lowering basement level by approximately 600mm.
- There is no known contaminated soil present on the site but in the event that the contamination is discovered during the course of construction the excavated material will be required to be disposed of in a licensed landfill site.
- Asbestos may be present on site due to the age of the existing buildings. A detailed Asbestos survey will be undertaken prior to commencement of construction and appropriate plans put into place to deal with any asbestos identified.
- Packaging and waste construction materials generated during the course of the construction activities.

3.4 On-Site Construction Waste Management

The contractor will be ultimately responsible for the management of resources on the project. The following tasks are recommended in respect of site management:-

a) Agree and revise as necessary any commitments or targets included in this RWMP
b) Allocate responsibility for resource management to one or more individuals of sufficient seniority to put the relevant procedures into practice. Nominate a suitable qualified Resource Manager (RM) with expertise in waste and resource management to implement the RWMP
c) The RM will be required to update the plan as required to reflect new resource streams, work practices, suppliers or resource management options as required.
d) The RM will be responsible for the delivery of all training and induction in relation to resource management.
e) The RM will be responsible for ensuring site infrastructure is supplied and maintained fit for purpose.
f) The RM will be responsible for conducting all internal site audits including audits of sub-contractor operations.
g) The RM will be available as required for any Local Authority or other audits undertaken.
h) The RM will be responsible for maintaining site records for waste resources exported off site and ensuring these are taken by suitable authorised operators to suitably authorised sites.
i) The RM will be engaged with the relevant individuals who have access to ordering and stock control records to ensure supply chain initiatives have been adopted.

Copies of the RWMP will be made available to all relevant personnel on site. All site personnel and sub-contractors will be instructed about the objectives of the Waste Management Plan and informed of the responsibilities which fall upon them as a consequence of its provisions. Where source segregation, selective demolition and material reuse techniques apply, each member of staff will be given instructions on how to comply with the Waste Management Plan. Posters will be designed to reinforce the key messages within the RWMP and will be displayed prominently for the benefit of site staff.

3.5 Site Infrastructure

The contractor shall provide suitable on site signage, separation and storage for handling and managing waste resources. Suitable waste storage areas (WSAs) shall be set up on site. Site infrastructure requirements are set out below.

a) Prior to construction the site layout will be reviewed to ensure that the proposed WSAs have adequate space for storage and handling.
b) WSAs may include stockpiles (soil, stone, recovered/crushed concrete, aggregates etc0, skips (for metals, wood, glass, etc) or secure containers for hazardous materials. All WSAs should be assess as fit for purpose and should be suitably contained, bunded or defined as required.
c) The WSA will be set out to reduce any potential for impact on sensitive human (e.g. residential) or natural (e.g. watercourse, ecological site, etc) and a suitable buffer e.g. receptor should be applied to mitigate any impact.
d) Labelling and signage will be used on site to inform personnel of key WSA requirements and restrictions with clear signage provided for all WSAs.
e) Signage will be provided to provide information to assist good resource management/practice across the site,

All waste materials (where necessary, after in-situ reuse and recycling options have been fully considered) will be disposed of off-site, under the appropriate Duty of Care and subject to approvals/consents from the relevant statutory bodies.

It will be the responsibility of the Main Contractor / Contractor to ensure that any company to whom waste is transferred is legally permitted to do so and that the facility they bring the waste to is licensed to handle that type of waste as outlined in the Waste Management Act 1996, as amended. The Waste Collection Permit Register, in accordance with the Waste Management (Collection Permit) Regulations 2001 will be consulted to ensure that waste carriers hold the appropriate permit.

The relevant waste collection permits and waste licences will be provided by the Main Contractor.

An inspection of the site will be made by the Main Contractor / Contractor for hazardous substances, gas cylinders and the like. If such substances are encountered during the course of construction, then works must be halted. The project supervisor for construction stage (PSCS) and the responsible Statutory Authority will be informed immediately.

The Main Contractor / Contractor will prepare a detailed inventory of construction based hazardous waste generated, such as tars, adhesives, sealants and other dangerous substances, and these will be kept segregated from other non-hazardous waste to prevent possible contamination. Arrangements will be made for such substances for disposal in a safe manner to an authorized disposal site or by means acceptable to the relevant Authority.

The Main Contractor / Contractor will ensure that excavation works are carried out in accordance with best standard practice and excavation materials are well segregated to minimize any potential cross-contamination.

The Main Contractor / Contractor will carry out appropriate environmental chemistry testing in order to determine the waste classification of the soils that are to be excavated and that will include Waste Acceptance Criteria testing. The test regime will be agreed with the receiving landfill operator and the testing will be carried out by an accredited laboratory.

Should excavation materials be assessed to be hazardous, the Main Contractor / Contractor will carry out pretreatment of the waste soils to a methodology that is agreed with the receiving landfill operator and in accordance with Environmental Protection Agency guidance.

The Main Contractor is encouraged to reuse and recycle any waste materials as far as is reasonably practicable.

In respect of any liquid disposal including underground water, the Main Contractor / Contractor will carry out appropriate environmental chemistry testing in order to determine whether the liquid is contaminated or not. The test regime will be agreed with the receiving disposal facility and the testing will be carried out by an accredited laboratory.

The Main Contractor / Contractor will ensure that surface and ground waters are adequately protected from contamination by waste temporarily stored on development prior to disposal.

The Main Contractor / Contractor will manage and carry out the works in accordance with best environmental practice and in accordance with the requirements of Local Authority, EPA and all requirements as specified in this document.

Table 1: Estimated C&D Waste Arisings on Site

C & D Waste Material	Quantity (tonnes)
Clay and stones	*To be Completed by RM*
Concrete & Masonry	*To be Completed by RM*
Steel	*To be Completed by RM*
Roofing	*To be Completed by RM*
Wood	*To be Completed by RM*
Glass	*To be competed by RM*
Packaging & Other Waste Materials	*To be Completed by RM*
Hazardous Materials	*To be Completed by RM*
TOTAL ARISINGS OFF-SITE	*To be Completed by RM*

3.6 C&D Record Keeping

It is the duty of the RM Waste Manager to ensure that necessary licenses have been obtained as needed. Each consignment of C&D waste taken from the site will be subject to documentation which will conform with the table below along with Transportation Dockets to ensure full traceability of the material to its final destination.

Table 2: Details of Materials Taken from Site

Detail	Particulars
Project of Origin	Independent House, Middle Abbey Street, Dublin 1
Material being Transported	*To be completed by C&D Waste Manager*
Quantity of Material	*To be completed by C&D Waste Manager*
Date of Material Movement	*To be completed by C&D Waste Manager*
Name of Carrier	*To be completed by C&D Waste Manager*
Destination of Material	*To be completed by C&D Waste Manager*
Proposed Use	*To be completed by C&D Waste Manager*

4. Liaison with Third Parties

The appointed contractors shall liaise and consult with Dublin City Council Waste Regulation Unit in respect of removal of any C&D waste materials offsite and provide them with details of the proposed destination of each waste stream. Consultation with DCC should continue as required throughout the demolition and construction stages of the project.

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UK and Ireland Office Locations