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Project Title: Cabra PBSA

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1.0 Introduction

Lohan & Donnelly have been commissioned to prepare a Demolition Justification Report to support a planning application for purpose-built student accommodation at 2A Faussagh Avenue, Dublin 7, ranging from 4-6 storeys tall.

The objectives of this report are to inform the planning authority regarding the reasons for demolition of the existing structures within the proposed site. The report will set out the rationale for the demolition having regard to the embodied carbon of existing structures and demonstrate that all options other than demolition, such as refurbishment, extension or retrofitting are not possible; as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures.

The report will assess the site and development proposals in accordance with the requirements of the “Dublin City Development Plan 2022-2028”.

2.0 Project Overview

2.1 Site Location

The development proposal is located at Faussagh Avenue, Cabra, Dublin, opposite St. Finbars GAA club, as shown in Figure 2.1 below. The site is approximately 0.51 hectares in area and is bounded by Faussagh Avenue to the South and the DART railway line to the West. The site is within the administrative jurisdiction of Dublin City Council.



Figure 2.1: Site Location.

2.2 Existing Site

The existing site is approximately 0.51 hectares (or 5113m²) in area. The site is predominantly made up of greenfield to the rear of derelict building. The development site has remained vacant for several years being formerly used as a pub. The existing site comprises of an existing commercial structure varying between 1 and 2 storeys in height. The area of the site surrounding the building is a mainly hardstanding area, comprised of mainly tarmac paving. There are parking areas evident on site, located on the hardstanding area to the front of the derelict building. The surrounding area displays a varied character of mainly residential, but also some commercial uses. The site itself is located alongside the DART railway line (to the West) and residential dwellings (to the East).

2.3 Proposed Development Description

The proposed development provides for a Large-Scale Residential Development, which in summary, shall consist of:

- a) Demolition of the former ‘Matts of Cabra’ public house and associated structures (approx. 376.55 sqm).
- b) Construction of a purpose-built student accommodation scheme consisting of 249 no. student bedspaces arranged in 32 no. clusters of 4, 7, 8, 9 and 10-bedroom units (including 13 no. accessible units and 10 no. studio units) each with associated shared kitchen/living/dining areas in 2 no. blocks ranging in height from 4-6 storeys;
- c) Internal amenity spaces (approx. 347.1 sqm) including a student lounge area, laundry room, postal room and a reception / office / kitchen / tearoom across the ground floor and first floor levels;
- d) External amenity areas (approx. 2,971.4 sqm) including 1 no. outdoor terrace at fourth floor level of Block A (193.1 sqm);
- e) Approx. 405.5 sqm of public open space in the form of a public plaza fronting Fassaugh Avenue;
- f) Switch room, ESB substation, sprinkler room and bin storage all in a single storey services building along the eastern site boundary;
- g) A total of 308 no. bicycle parking spaces at surface level (258 no. long term, covered bicycle parking spaces including 12 no. cargo bicycle parking spaces and 50 no. visitor bicycle parking spaces);
- h) Vehicular access to be provided from Fassaugh Avenue;
- i) 1 no. accessible car parking space proposed within the site;
- j) It is proposed that the development will be used for short term tourist or visitor accommodation outside of academic term times, in accordance with the definition of student accommodation.

The development will also provide for all associated service connections, public lighting, cold water storage and thermal store room, hard and soft landscaping, planting, formal activity equipment, removable bollards, tactile paving, boundary treatments, nature-based SuDS features, green and blue roofs, and all associated site clearance, excavation and development works above and below ground.

3.0 Justification of Demolition

According to Dublin City Development Plan 2022-2028 clause 15.4.3 Sustainability and Climate Action “To minimize the waste embodied energy in existing structures, the re-use of existing buildings should always be considered as a first option in preference to demolition and new build”. The relevant policy within the Development Plan regarding reuse of existing buildings is as follows:

CA6: Retrofitting and Reuse of Existing Buildings

To promote and support the retrofitting and reuse of existing buildings rather than their demolition and reconstruction, where possible.

Upon inspection of the existing building on site, it has been determined that their retention or reuse is not feasible in the context of the proposed development. The structure in question comprises of small, outdated commercial building of limited construction quality. It is not readily available for residential use without significant structural intervention and extensive refurbishment. Furthermore, due to the shape of the site, and the position of the existing building within the site, it would not be possible to have an active frontage and permeability through the site, both of which are important in creating a safe, attractive and well-connected residential environment.

The condition of the building has also further deteriorated in recent years. In 2022, the roofs of both the primary two-storey section and the adjoining single-storey structure to the west were removed for health and safety reasons. This failure has resulted in significant water ingress and the growth of vegetation within the internal spaces, further compromising the integrity of the buildings.

The site has also remained vacant for some time and was formally entered into the derelict sites register in 2019, reflecting its underutilisation and lack of contribution to the surrounding area.

Overall, the existing structure is considered to be of low architectural or conservation value. The structures are not listed as a protected structure nor located within an Architectural Conversation Area, and as such there are no statutory constraints on their removal. The proposed demolition and redevelopment will provide an opportunity to redesign the site with more efficient and compact layout, thereby improving both the functionality and the visual appeal of the property.

In terms of embodied carbon, the existing building is in such poor condition that extensive renovation and structural intervention would be required simply to bring it back to a habitable standard. The scale of remedial work needed would be so substantial that the embodied carbon impact would approach that of a complete new build, without delivering the same long-term performance or efficiency.

On this basis, the retention or reuse of the existing structures isn't warranted. It is also noted that the demolition of the buildings has already been approved by the PA/ACP, having regard to the planning history of the site.

4.0 Demolition Waste

As mentioned above the demolition of all existing structures within the site boundary along with earthworks is necessary to allow the construction of the proposed development.

4.1 Predicted Waste Types

4.1.1 Non-Hazardous Waste:

The predicted non-hazardous wastes that will be generated as part of the demolition include the following:

- Concrete, masonry.
- Asphalt, tar, and tar products.
- Metals (segregated into iron, aluminium, high grade stainless steel, low grade stainless steel etc., where practical).
- Hard plastics.
- Plasterboard.
- Glass.
- Wood.
- Packaging (paper/cardboard, plastic, wooden, metallic, glass, textile, etc.)
- General (non-recyclable) waste.
- Organic waste (shrubs, topsoil etc.).

Wastes will be segregated into the above waste types where practical to ensure compliance with waste legislation and guidance while maximizing the recycling, reuse, and recovery of waste with diversion from landfill wherever possible.

4.1.2 Hazardous Waste:

A waste classification report was carried out by Ground Investigations Ireland in April 2025, this report found that the majority of soils and made ground materials sampled across the site were classified as non-hazardous, with the exception of one sample (TP19, 0.00–0.60m), which was identified as hazardous waste due to elevated levels of total petroleum hydrocarbons (TPH) and associated carcinogenic and mutagenic properties. Trace levels of asbestos fibres were also detected in two samples (TP18), but at concentrations well below hazardous thresholds. These findings confirm that with appropriate segregation and management during excavation, the majority of site material can be disposed of to suitably licensed facilities under non-hazardous waste codes. The presence of minor hazardous materials does not preclude redevelopment but does require proper remediation oversight.

In addition to the classified samples, the *Waste Classification Report* and site walkover noted evidence of historic and modern illegal dumping across the site, see figures 4.1.1 and 4.1.2

below. These historically dumped areas were not specifically investigated during the waste classification survey, and it is therefore anticipated that additional hazardous waste may be present in these locations, potentially including materials such as:

- Lamps / lighting (fluorescent, mercury).
- Insulation materials and asbestos containing materials (if present following an asbestos survey prior to commencement of any works on-site).
- PCB containing materials (sealants, resin-based flooring etc.).
- Oil wastes and wastes of liquid fuels.



Figure 4.1.1: Dumping behind existing building



Figure 4.1.2: Dumping towards North of site

4.2 Estimated Demolition Waste Arising

As mentioned above the demolition of all existing structures within the site boundary is required for the construction of the proposed development. Figure 4.2 shows the existing building within the proposed site numbered. A description of each section of the building and its materials is as follows:

- Section 1 - Two story structure, roof removed (previously timber hip roof with concrete tiles) with vegetation, shrubbery growing inside, masonry walls, timber floors.
- Section 2 – Single story structure, mainly timber hip roof with concrete tiles, flat timber roof on section to the North-West, masonry walls, timber floors.
- Section 3 - Single story structure, roof removed, mainly timber hip roof with concrete tiles, flat timber roof on section to the South-East with vegetation, shrubbery growing inside, masonry walls, timber floors.
- Section 4 – Two story structure, flat timber roof, masonry walls, timber floors.
- Section 5 - Single story structure, flat timber roof, masonry walls, timber floors.



*Figure 4.2: Aerial Photograph of Existing Buildings to be Demolished.
(Source: Google Maps – Photo is outdated as it shows the now removed roofs of sections 1 & 3)*

The quantity of waste arising was estimated based on a review of the site and the make-up of the buildings currently on site. See Table 4.2 below for estimated quantities of each waste material.

Demolition Waste	Material Quantities
Concrete	30m³
Masonry	180m³
Metals	10m³
Plastics	3m³
Wood	35m³
Glass	4m³
Plasterboard	20m³
Hazardous Waste	6m³
General Waste	40m³

Table 4.2: Estimated Demolition Waste Arisings.

4.3 Demolition Procedure

The demolition works shall be undertaken in a manner which maximises the potential for recycling, including source segregating waste where appropriate. Activities shall be carried out in the following sequence, outlined in Table 4.3 below:

Demolition Activity Sequence	General Description
Disconnection of Services	Shutoff of ESB, Gas, Sewers etc.
Inventory of Hazardous Wastes	e.g. Lighting, Lamps, Asbestos Survey
Removal of abandoned furniture / equipment	e.g. Furniture, White Goods etc.
Removal of Hazardous Materials	e.g. Application of H&S Procedures
Removal of Fixtures	e.g. Fitted Units etc.
Removal of Timber	e.g. Removal of Doors, Floors etc.
Demolition of Structural Shell	Manual or Mechanical Demolition
Source segregation of Material Fractions	Separation into Designated Material Fractions
Transport of Material from Site to Treatment Facilities	e.g. C&D Waste Recycling Facility
Transport of Material from Site to Controlled Disposal Sites	e.g. Inert/Hazardous Landfill Sites
Site Preparation	e.g. Formation Level for New Structure

Table 4.3: Demolition Sequence



5.0 Demolition Waste Management

The Waste Management Hierarchy (Article 4 of the Waste Framework Directive (Directive 2008/98/EC)) states that the most preferred option for waste management is prevention and minimization of waste, followed by re-use and recycling, other recovery (i.e., waste to energy and anaerobic digestion) and, least favoured of all, disposal. Efficient on-site waste management and segregation of wastes into categories will ensure maximum recycling, reuse and recovery is achieved during the demolition process.

Where possible all suitable demolition waste material will be re-used on site. Concrete and masonry will be segregated and collected to be crushed and reused for a piling mat during construction works for the proposed development as the proposed foundation is a piled raft foundation. Steel and timber can be reused or recycled where possible.

5.1 Disposal of Demolition Waste

It is anticipated that some waste materials will not be suitable for re-use and will have to be moved off-site. Material to be removed off-site has been classified in the Waste Classification Report by Ground Investigations Ireland. The classifications are 'Hazardous', 'Non-Hazardous' and 'Inert'. Material of a particular classification is to be disposed of to a landfill or facility licensed to take that class of material. All contracted haulers and disposal facilities used to dispose of excavation waste from the site must be licensed to dispose of this waste as noted, and all licenses/permits must be valid, and conditions adhered too.

It is proposed that a full asbestos survey will be completed prior to the demolition of the existing buildings on site. All work involving materials composed of or containing asbestos requires a written risk assessment and a management plan to be prepared under The Safety, Health, and Welfare at Work (Construction) Regulations 2013 and subsequent amendments. Hazardous wastes will be identified, removed, and kept separate from other demolition waste materials to avoid contamination.

These mitigation measures will ensure the waste arising from demolition is dealt with in compliance with the provisions of the Waste Management Act 1996 (as amended 2001), and associated Regulations, the Litter Act of 1997, and the Dublin Waste Management Plan (2005 - 2010), and achieve optimum levels of waste reduction, re-use, and recycling.


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Appendix A – Pictures of Existing Structure



Figure A1: Front of Section 1 / Entrance to site



Figure A2: Rear of existing structure



Figure A3: Front of Section 2



Figure A4: Existing lands to rear of existing structure



Figure A5: On-site dumping



Figure A6: On-site dumping