



An
Bord
Pleanála

Inspector's Addendum Report

ABP-318805-24A

Development	Demolition of building, construction of 7 storey hotel with all associated site works.
Location	12 Camden Row, Saint Kevin's, Dublin 8.
Planning Authority	Dublin City Council
Planning Authority Reg. Ref.	3883/23
Applicant(s)	ORHRE Camden Row Limited
Type of Application	Planning Permission
Planning Authority Decision	Grant permission
Type of Appeal	Third Party
Appellant(s)	Philip Elliott Ivana Bacik TD
Observer(s)	None
Date of Site Inspection	18 th December 2024
Inspector	D. Aspell

1.0 Introduction

- 1.1.1. This report is an addendum report to the Inspector's report dated 23rd January 2025 in respect of ABP-318805-24. It is to be read in conjunction with that report and Board Direction BD-019654-25 dated 13th May 2025.
- 1.1.2. Following a meeting of the Board held 10th February 2025 the Board decided to defer consideration of the case and issued a notice to the applicant under Section 132 of the Planning & Development Act 2000 as amended, for further information as follows:
- *An updated demolition justification report prepared in the context of Objective CA6 and Section 15.7.1 of the Dublin City Development Plan 2022-2028, which provides the following information in respect of the proposed development:*
 - a) details of the embodied carbon of the existing structure in the context of the proposal for demolition and new build,*
 - b) demonstration that all options, such as refurbishment, extension or retrofitting are not possible for the proposed development,*
 - c) details of the use of resources and energy arising from the new construction relative to the reuse of the existing structures for the proposed development,*
 - d) a clear strategy for reuse and recovery of materials as a consequence of the proposed development.*
- 1.1.3. This report considers the Section 132 response from the applicant and any submissions made on foot of the abovementioned request.

2.0 Response of Relevant Parties to the Board's Decision to Request Further Information

- 2.1.1. All parties to the appeal were advised of the Direction. A response on behalf of the applicant was received by the Board on 14th March 2025. The response was circulated to the two third party appellants and the Planning Authority under S.131 of the Act. The last date for responses was 22nd April. No responses are recorded.

1.0 Applicant Submission

1.1.1. The applicant response comprises the following:

- letter from the applicant's Planning & Development Consultant;
- 'Whole Lifecycle Carbon Assessment' from the applicant's engineer;
- letter and drawings from the applicant's Architect;
- Structural Engineering letter, drawings, and a 'Strategy Report for the Recovery and Reuse of Materials at the Proposed Camden Row Hotel Development' prepared by the applicant civil & structural engineer.

I summarise the submitted documents below.

1.1.2. The Planning & Development Consultant letter makes the following points:

- Regarding points a) and c) of the Board's request, the letter states that the submitted 'Whole Lifecycle Carbon Assessment' indicates that the overall impact of demolition on the total embodied carbon is negligible. The letter states that Table 8 of the Assessment sets out embodied carbon analysis for new building and refurbishment scenarios. The letter indicates that whilst the total embodied carbon emissions would be higher for the new building, embodied carbon intensity per bedroom is higher for refurbishment of the existing building. It indicates that constructing a new building is more carbon efficient based on this metric. It states that the whole of life cycle carbon emission intensity per number of rooms is also lower for the new build option, due primarily to the improved spatial efficiency and optimised area usage, which is constrained by the existing building;
- The letter states that carbon is one of many considerations in comparing new build versus refurbishment. Regarding density, the existing building floor area is 175% lower than the proposed building. The existing building height is 4-storeys and the proposed height is 6/7-storeys. The proposed development ensures efficient reuse of infill brownfield lands in line with policy. Adoption of the existing building would be contrary to the Z4 Key Urban Villages zoning which seeks to ensure higher density development. The proposed

development would accommodate 46% more hotel bedrooms in the same space over 7 storeys than refurbishment / extension of the existing building;

- It states that the existing building is at the end of its lifecycle. Investment in conversion is likely to be uneconomical. Limitations of the existing building are clear having regard to its potential future life span and limited adaptability. The proposed development is designed to meet all energy efficiency standards. It is a more effective option in the context of embodied carbon;
- Regarding point (b) of the Board request, the letter states the applicant submits an Architect's letter and a Structural Engineering letter and drawings;
- It states that the architect letter provides a study to assess the feasibility of refurbishment and reuse of the existing building as a hotel, which would provide 38 no. rooms over 4 no. storeys compared to 195 no, rooms over 7 storeys for demolition/new build. The existing building takes up the entire site and as such lateral extension is not an option. Vertical extension would require substantial structural works. The building would be inefficient in terms of energy requirements and building regulations, and would require significant upgrades. Current fire tender access would be inadequate as the majority of the façade is inaccessible. The building footprint is inefficient for a hotel as the only windows are on the front elevation and internal courtyard. 38 no. rooms is not economically viable. Refurbishment, extension and retrofit are inefficient options, and refurbishment may be seen as underdevelopment of the site. The letter states that options such as refurbishment, extension or retrofitting are not possible for the proposed development;
- The letter states that regarding point (d) of the Board's request, the submitted Strategy Report for the Recovery & Reuse of Materials should be read in conjunction with the submitted Construction & Demolition Waste Management Plan, which together set out a strategy for reuse and recovery of materials.

1.1.3. The 'Whole Lifecycle Carbon Assessment' states that it responds to points (a) and (c) of the Board's request, and that it provides information on the whole life-cycle carbon assessment for the demolition of the existing building and construction of the proposed hotel. It makes the following points:

- Embodied carbon emissions were calculated in line with EN15978 using 'Life-Cycle Analysis' software. The assessment sets out details of calculation inputs, data, benchmarks, energy use, as well as assumptions and limitations of the methodology employed;
- Section 3.3 and 3.3.12 also set out details of 'Whole Life Carbon' which considers embodied carbon plus operational carbon over time. Section 4 sets out calculation results in these regards;
- It states that the total embodied carbon emissions for the refurbished building are lower than those for the new building, by c.73%, but adds that this comparison is misleading as the planned building is larger (by c.175%);
- To normalise the results the buildings are measured by area and per bedroom. Using the area metric, the difference decreases to 18-35%. However using the bedroom metric, the embodied carbon intensity per bedroom is higher for the refurbished building. The whole life cycle carbon emissions were also calculated by adding embodied carbon. The report sets out details of calculations in this regard and indicates that the demolition/new build option is preferable using the 'per bedroom' metric;
- The Assessment states that carbon is one consideration out of many. The report also considers density, space utilisation, adaptability, efficiency standards, and sustainable design. The report indicates the planned building is preferable on these measures.

1.1.4. The Architect letter responds to point (b) of the Board's request and states that a feasibility study of the existing building was undertaken to indicate what could be achieved by refurbishing the building envelope. In addition to the points summarised in the Planning & Development Consultant report, it also states that for conversion of the existing building, internal walls and ceiling fixtures & fittings would have to be replaced, and lifts would be required. It states that the building fabric would have to be upgraded to meet Building Control requirements. Indicative layouts of a hotel within a refurbished layout of the existing building are included.

1.1.5. The Structural Engineering letter states that the existing reinforced concrete frame structure would be deficient in meeting the structural requirements of a modern hotel, and therefore a vertical extension would not be viable. It makes the following points:

- Backdated structural certification cannot be provided for the existing building. The existing structure could potentially be used for hotel accommodation without structural strengthening, however for a vertical extension structural capacity would need to be increased to accommodate additional floors. This would involve major reinforcement of existing foundations and vertical load bearing elements for anything more than a single floor of lightweight construction. That form of lightweight construction would not be advisable to support green/blue roof in accordance with DCC policy;
- It references the proposed basement and states construction of a basement substructure beneath the existing building is not structurally feasible;
- It states that in a 'relatively short period of time' it is likely that steel reinforcement within the reinforced concrete will start to become vulnerable to corrosion due to ongoing carbonation of concrete. This will eventually lead to structural failure without expensive structural interventions;
- The letter concludes that it supports the proposal for demolition.

The submitted engineering drawings set out additional structural details of the proposed building.

- 1.1.6. The 'Strategy Report for the Recovery and Reuse of Materials at the Proposed Camden Row Hotel Development' states that it sets out a strategy for reuse and recovery of materials. It sets out information and measures in relation to waste segregation; waste transfer; expected demolition waste; expected construction waste; waste storage, contractors & recording; details in relation to the waste management hierarchy; and proposals for reuse of construction & demolition waste.

2.0 Third Party Response

- 2.1.1. None.

3.0 Planning Authority Response

- 3.1.1. None.

4.0 Assessment

- 4.1.1. As above, the applicant was requested to provide updated demolition justification report. My assessment is restricted to the Board Direction and the submission received from the applicant in this regard. I have due regard to the provisions of the Development Plan and Climate Action Plan 2025. I consider below the applicant response in the context of the specific points raised in the Board request, as follows:

4.2. An updated demolition justification report prepared in the context of Objective CA6 and Section 15.7.1 of the Dublin City Development Plan 2022-2028, which provides the following information in respect of the proposed development:

- 4.2.1. Whilst the response is not set out as a single report, I am satisfied the applicant has responded in full to the Board request and submitted a robust justification for the demolition and new build proposed. The Board's Direction focuses on the provisions of Policy CA6 and Section 15.7.1 of the Dublin City Development Plan 2022-2028, and the response documents likewise address the Board Direction and these provisions of the Development Plan.
- 4.2.2. Policy CA6 'Retrofitting and Reuse of Existing Buildings' seeks to promote and support the retrofitting and reuse of existing buildings rather than their demolition and reconstruction, where possible. Section 15.7.1 'Re-use of Existing Buildings' states that where development proposal comprises of existing buildings on the site, applicants are encouraged to reuse and repurpose the buildings for integration within the scheme, where possible in accordance with Policy CA6.
- 4.2.3. Section 15.7.1 'Re-use of Existing Buildings' also requires that a demolition justification report 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. It also required that the additional use of resources and energy arising from new construction relative to the reuse of existing structures is considered. It further requires that the existing building materials should be incorporated and utilised in the new design where feasible and that a clear strategy for the reuse and disposal of the materials should be included where demolition is proposed.

4.2.4. I am generally satisfied that the response includes the information requested, and that it broadly addresses the matters set out in Policy CA6 and Section 15.7.1 and related provisions of the Development Plan more generally. In broad terms I also consider that the response is robust and reasonable and generally sets out a considered justification for the proposed demolition and new build.

4.3. a). details of the embodied carbon of the existing structure in the context of the proposal for demolition and new build

4.3.1. The 'Whole Lifecycle Carbon Assessment' sets out detailed information, calculations and assessment in this regard, including for refurbishment and demolition/new build.

4.3.2. The Assessment compares embodied carbon calculations for new build and refurbishment. It acknowledges the total embodied carbon emissions for the refurbished building are significantly lower than those for the new building, but states this is because the proposed building is much larger. It states that to normalise the results the buildings were compared by area and per bedroom. Using the area measure the difference lessens to 18-35%. It states that using the bedroom metric the embodied carbon intensity per bedroom is higher for the refurbished building. The report concludes that on this basis demolition is more efficient and preferable (eg. Section 4.1 'Embodied Carbon').

4.3.3. In broad terms, given the nature of the proposed use as a hotel, I am satisfied with the approach taken which is to compare on an equalised basis per bedroom. In this regard I am generally satisfied the applicant demonstrates that new build rather than refurbishment is preferable on this basis in relation to embodied carbon.

4.3.4. I note that Policy CA6 and Section 15.7.1 refer to embodied carbon rather than whole life carbon, or equivalent. The Assessment provides information on embodied carbon and whole life cycle carbon. It states that the latter comprises embodied carbon and operational carbon. The Development Plan definition of embodied carbon does not include all carbon associated with the operational phase. The Assessment demonstrates demolition and new build is preferable on both measures.

4.3.5. Overall I consider the applicant has provided the information requested by the Board and has met the requirements of the Development Plan in this regard. I am also

satisfied that the submitted information and conclusions are reasonable and that the proposed development is acceptable in this regard.

4.4. b). demonstration that all options, such as refurbishment, extension or retrofitting are not possible for the proposed development

- 4.4.1. The submitted documentation addresses the potential for extension, refurbishment and retrofitting of the existing building to accommodate the proposed hotel. Together the documents set out why, on different grounds, demolition is the preferred option.
- 4.4.2. In particular I note that the submitted Planning & Development consultant report states all options such as refurbishment, extension or retrofitting are not possible for the proposed development. I note the Structural Engineering report states that, in relation to vertical extension of the existing building for the development of a hotel of this scale, this would not be viable for a number of reasons, including that it would involve major reinforcement of existing foundations and vertical load bearing elements. The submitted engineering letter also states that a basement substructure as proposed beneath the existing building is not structurally feasible. The architect letter addresses why lateral extension is not sufficient to accommodate the hotel.
- 4.4.3. In relation to refurbishment and retrofitting, the applicant indicates the size difference of the existing and proposed buildings and states that the approximately 38 no. room hotel which could be accommodated in the existing building would not be viable.
- 4.4.4. Whilst I am generally satisfied with the information and conclusions set out, I note that Policy CA6 and Section 15.7.1 promote and support the retrofitting, reuse and repurposing of existing buildings where possible. I consider that a narrow interpretation of the Development Plan wording in this regard would place an unreasonable burden on development, and as such I consider the intention of the Development Plan in this context is what is able to be done including having regard to development viability.
- 4.4.5. As such I am generally satisfied with the information submitted and conclusions reached in this regard, and that the applicant has demonstrated why all other options including refurbishment, extension or retrofitting are not possible.

4.5. c). details of the use of resources and energy arising from the new construction relative to the reuse of the existing structures for the proposed development

- 4.5.1. The submitted response documents set out information on the use of resources and energy from the new development relative to the reuse of the existing building.
- 4.5.2. In relation to use of resources, the submitted 'Whole Lifecycle Carbon Assessment' report sets out information and analyses of various resources to be used in the development for both the demolition / new build and reuse scenarios. It uses an approach based on IS EN 15978 (Irish / European Standard 'Sustainability of Construction Works - Assessment of Environmental Performance of Buildings - Calculation Method'). It analyses and compares the two scenarios in terms of defined construction materials, transport, and waste materials categories. In this regard it considers details of each building element including substructure, superstructure, enclosure, walls, finishes, services and external works. It also considers the type of materials involved in both scenarios including concrete, steel, aluminium, and other materials in both the demolition/new build and reuse scenarios, and compares each on grounds of embodied carbon.
- 4.5.3. In addition, the submitted 'Strategy Report for the Recovery and Reuse of Materials at the Proposed Camden Row Hotel Development' sets out corresponding details of the expected waste resources arising from demolition. These are set out to a finer grain, with the report setting out details in terms of brick, ceramics, plastic, timber, plasterboard, glass, organic material, electrical systems, and other recyclables.
- 4.5.4. I note too that the submitted Planning & Development Consultant letter sets out points relating to the more efficient use of city centre land arising from the proposed demolition / new build scenario.
- 4.5.5. In relation to use of energy, the 'Whole Lifecycle Carbon Assessment' report sets out information on the use of energy arising in the two scenarios of reuse versus demolition / new build. It sets out in depth consideration of energy consumption (electricity) arising for both reuse and demolition / new build, and sets out calculations of energy consumption in a number of scenarios relating to the likely extent of electrical grid decarbonisation over multi-year horizons.

4.5.6. Having regard to the information submitted I am satisfied the applicant has responded in full to the Board Request, and to the requirements of the Development Plan in this regard. I am further satisfied that the information and proposals provided in this regard are reasonable and acceptable.

4.6. d). a clear strategy for reuse and recovery of materials as a consequence of the proposed development

4.6.1. The submitted 'Strategy Report for the Recovery and Reuse of Materials at the Proposed Camden Row Hotel Development' sets out proposals for reuse and recovery of materials. It states that it should be read in conjunction with the submitted Construction & Demolition Waste Management Plan (C&DWMP).

4.6.2. The Strategy Report states the management of waste is to follow the waste management hierarchy of: prevention; minimisation; reuse; recycling/recovery; incineration/energy recovery; and disposal. It states that full details of specific volumes are not available at this stage of the design, however it does identify likely waste types. In relation to waste amounts, these are to be calculated at contract stage. The report states that Construction & Demolition waste is to be recovered and segregated as per the C&DWMP submitted at application stage. Waste is to be segregated on site and moved off-site to named receiving facilities according to waste type. It identifies options for each waste material including in terms of reuse; recycling/recovery; incineration/energy recovery; and disposal. Regarding reuse, it identifies concrete, steel, and soils/excavated materials as the main wastes for reuse in relation to the subject development. I note supporting information in the C&DWMP submitted at applications stage, including in relation to the reuse of materials.

4.6.3. I have reviewed the provisions of the Development Plan in this regard, including in relation to climate mitigation actions, Sections 15.7.1 'Reuse of Existing Buildings', 3.5.4 'Waste' and 9.5.5 'Waste Management and Circular Economy Practice', and Policies CA6 'Retrofitting and Reuse of Existing Buildings', CA24 'Waste Management Plan for Construction and Demolition Projects', SI27 Sustainable Waste Management', SI28 Sustainable Waste Management', and SI29 'Segregated Storage and Collection of Waste Streams'.

4.6.4. I am generally satisfied the applicant has responded to the Board's request and set out a reasonably comprehensive strategy in this regard. I am satisfied the strategy presented in conjunction with the information submitted with the application and appeal generally meets the requirements of the Development Plan in this regard.

4.7. Conclusion

4.7.1. I am satisfied that a demolition justification report has been provided in accordance with the Board Direction BD-019654-25 and Objective CA6 and Section 15.7.1 of the Dublin City Development Plan 2022-2028 as requested. I consider that all elements of the Boards Direction have been addressed satisfactorily. I am satisfied the information submitted as part of the application, appeal, and Board Request generally accord with the provisions of the Development Plan in these regards. I am also satisfied sufficient justification for the demolition of the existing structures as proposed in the application, appeal, and submitted response is overall acceptable.

5.0 Recommendation

5.1.1. I refer to the previous Inspector's Report and recommendation on this application dated 23rd January 2025. Having regard to the additional submission received, I am satisfied that all matters have been satisfactorily addressed; that no change to my recommendation arises; and that no conditions require to be inserted, altered or omitted having regard to the Board Direction (dated 13th May 2025).

- I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way. -

Dan Aspell
Planning Inspector

30th May 2025