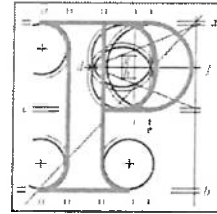


Our Case Number: ABP-317780-23

Your Reference: Redrock Donnybrook Ltd



**An
Bord
Pleanála**

John Spain Associates
39 Fitzwilliam Place
Dublin 2
D02 ND61

Date: 12 October 2023

Re: Bray to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2023
Bray to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your letter of objection on behalf of your client, Redrock Development Ltd in relation to the above-mentioned compulsory purchase order.

In respect of same, please note that in circumstances where

(i) no objections are received by the Board within the period provided for making objections, or

(ii) all objections made are subsequently withdrawn, or

(iii) all objections made relate exclusively to matters which can be dealt with by a property arbitrator the Board will inform the local authority as appropriate and, in such circumstances, the local authority can itself confirm the order with or without modification or refuse to confirm the order in accordance with the provisions of section 216 of the Planning and Development Act, 2000, as amended.

The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you on this matter in due course.

If you have any queries in the meantime, please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Sarah Caulfield
Executive Officer
Direct Line: 01-8737287
CH03

Tel	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Sarah Caulfield

From: Sarah Caulfield
Sent: Wednesday 11 October 2023 10:48
To: rkunz@johnspainassociates.com
Cc: Klaudia Wieszowska
Subject: RE: ABP REF.:317780 23 – CPO APPLICATION Bray to City Centre by the NTA

Dear Rory,

The Board acknowledges receipt of your email and attached submission on the above-mentioned application.

Kind Regards,
Sarah

From: Rory Kunz <rkunz@johnspainassociates.com>
Sent: Tuesday, October 10, 2023 4:21 PM
To: LAPS <laps@pleanala.ie>
Subject: re: ABP REF.:317780 23 – CPO APPLICATION Bray to City Centre by the NTA

Dear Sir/Madam,

On behalf our client, Redrock Donnybrook Ltd., Millington, 3 Crosthwaite Grove, Dun Laoghaire, Co. Dublin we wish to make a submission in respect of our client's lands at Circle K Garage, Donnybrook Dublin 4 in relation to the Bray to City Centre Core Bus Corridor Scheme, CPO application which invited submissions up until the 10th of October 2023.

As our client's lands are proposed for acquisition, this submission is exempt from the prescribed €50 fee.

We would kindly request confirmation of receipt.

Best regards,

Rory

Rory Kunz, *Executive Director*,

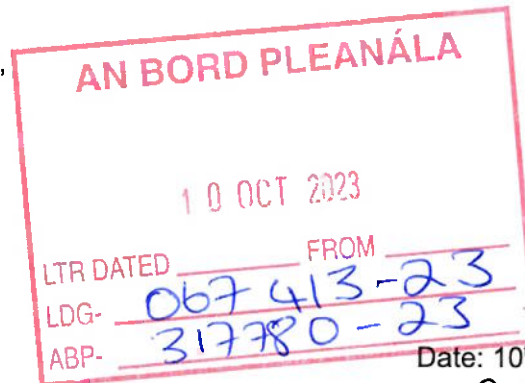
John Spain Associates,
39 Fitzwilliam Place,
Dublin 2,
D02 ND61.

T: 01 662 5803
M: 087 322 5858
e-mail: RKunz@johnspainassociates.com
web: www.jsaplanning.ie

 **John Spain Associates**
Planning & Development Consultants
Chartered Town Planners & Chartered Surveyors

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An Bord Pleanála,
(Strategic Infrastructure Division),
64 Marlborough Street,
Dublin 1,
D01 V902.



Date: 10th October 2023
Our Ref: RK 20091

Dear Sir/Madam,

RE: SUBMISSION TO AN BORD PLEANÁLA IN RESPECT OF THE PROPOSED BUS CONNECTS BRAY TO CITY CENTRE CORE BUS CORRIDOR APPLICATION - AND COMPULSORY PURCHASE ORDER 2023 NUMBER ON MAP DEPOSITED AT NTA - 1017(1).1C/ 1017(2).2C IN RESPECT OF LANDS AT CIRCLE K GARAGE, DONNYBROOK, DUBLIN 4.

ABP REF.:317780 23 – CPO APPLICATION
Plot - 1017(1).1C/ 1017(2).2C

On behalf our client, Redrock Donnybrook Ltd., Millington, 3 Crosthwaite Grove, Dun Laoghaire, Co. Dublin we wish to make a submission in respect of our client's lands at Circle K Garage, Donnybrook Dublin 4 in relation to the Bray to City Centre Core Bus Corridor Scheme, CPO application which invited submissions up until the 10th of October 2023.

At the outset our client broadly welcomes the Bray to City Centre Core Bus Corridor Scheme which will provide an enhanced high quality/frequency bus service along this key route and for the District Centre of Donnybrook.

As our client's lands are proposed for acquisition, this submission is exempt from the prescribed €50 fee.

It is noted our client has engaged with the NTA in respect of the subject site including as part of a permitted Build to Rent development (DCC Reg. Ref. 2244/21 (ABP-310204-21) refers).

Our client is grateful for this engagement with the NTA and more recently our client also engaged with the NTA in relation to the subject lands and a letter from the NTA is included with this submission (see appendix 3).

Our client is confident that the design measures included in the permitted development are appropriate and can be accommodated for other development proposals which our client is currently exploring with regard to a Purpose Built Student Accommodation Scheme/future development of the site.

In this regard our client is seeking that the Board amends the application and CPO as applied for as it relates to our client's landholding (and excludes our clients landholding from the CPO) as both the NTA Bus Connects scheme and the sustainable development of our client's landholding (using the layout arrangements as agreed previously with the NTA) can be accommodated along our client's landholding on the Donnybrook Road.

1.0 Site Location

Our clients' lands are bounded by Donnybrook Road to the east, an existing commercial site to the south, and Brookvale Road to the west and north. The site is currently occupied by Circle K Service Station. Access to the Circle K service station is primarily from Donnybrook Road with additional access available from Brookvale Road

Figure 1.1: Aerial View of the subject site



(Source: Google Maps: Note Red line indicative)

2.0 Planning History

DCC Reg. Ref. 2244/21 (ABP-310204-21) – Build to Rent Scheme

On the 11th of August 2022, An Bord Pleanála granted permission for the development of a Build to Rent scheme comprising the demolition of structures on site and construction of a 10-storey mixed development including 67 no. apartments.

The Board's Inspector's report noted the following in relation to the Bus Connects proposals:

"The NTA have made a submission to the Board, stating that they are in receipt of material which illustrates the interface between the proposed development and the route. The NTA state that the proposed development as amended and set out in the named drawing, will not prejudice the delivery of the CBC, subject to 4 no. specific requirements.

I am satisfied that the issue raised by both the NTA and the Planning Authority has been addressed. Should the Board decide to grant permission, these can be achieved by way of condition."

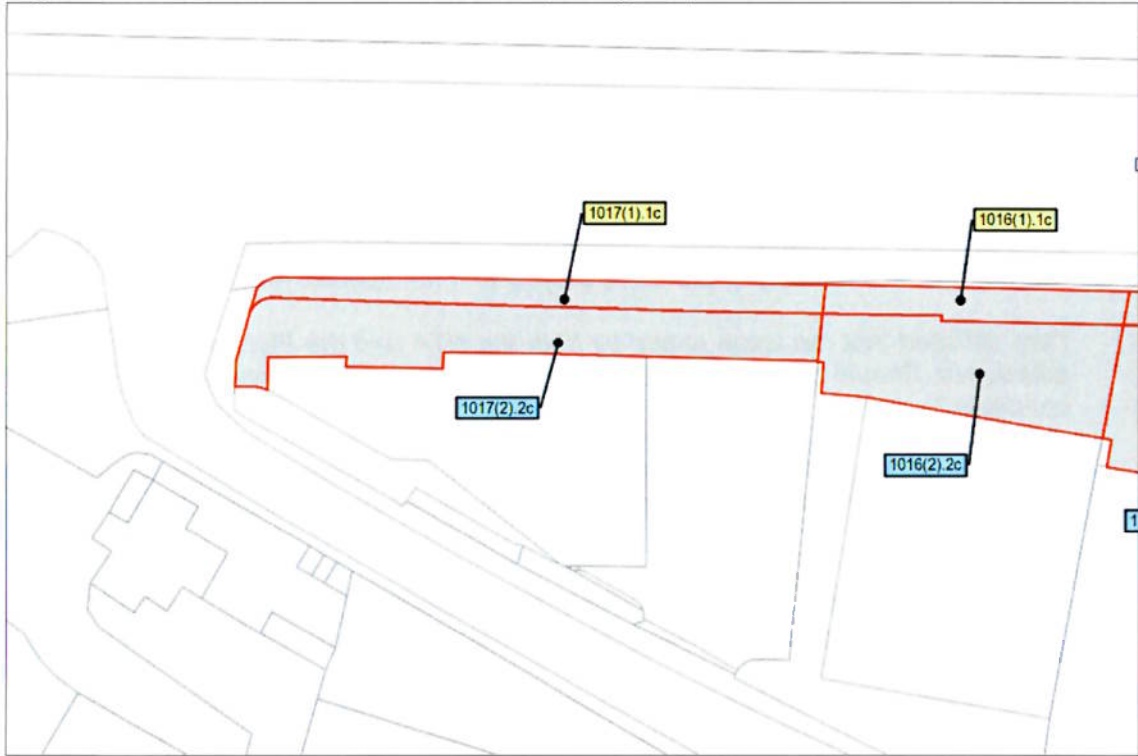
Condition no. 10 of the Board's Order included the specific requirements which our client is happy to facilitate as part of the subject lands (and any current/future development proposals.)

- *The development interface with the BusConnects proposals which shall be clearly depicted and made available in Irish Transverse Mercator ITM coordinates.*
- *Demonstration of how the building construction, operation and maintenance will be managed in relation to the overhang along Donnybrook Road with consideration towards safety and any proposed disruption to public space, bus, cycle and pedestrian movements.*
- *The footpath under the overhang shall be maintained free from all obstruction, such as advertising, seating, signs.*
- *The substratum under the proposed overhang, which shall be free from construction such as underground services, columns, pillars or any other obstruction and*
- *The provision of adequate public lighting.*

2.0 Bus Connects Proposals along our Client's Boundary

The subject plots for permanent and temporary acquisition are identified below:

Figure 2.1: Plots for Permanent and Temporary Acquisition



Land parcel 1017(1).1c relates to the permanent acquisition whereas 107(2).2c relates to the temporary acquisition of land during the construction phase.

Section FF shows the Typical Section F-F Donnybrook Road

Figure 2.2: Typical Section F-F Donnybrook Road

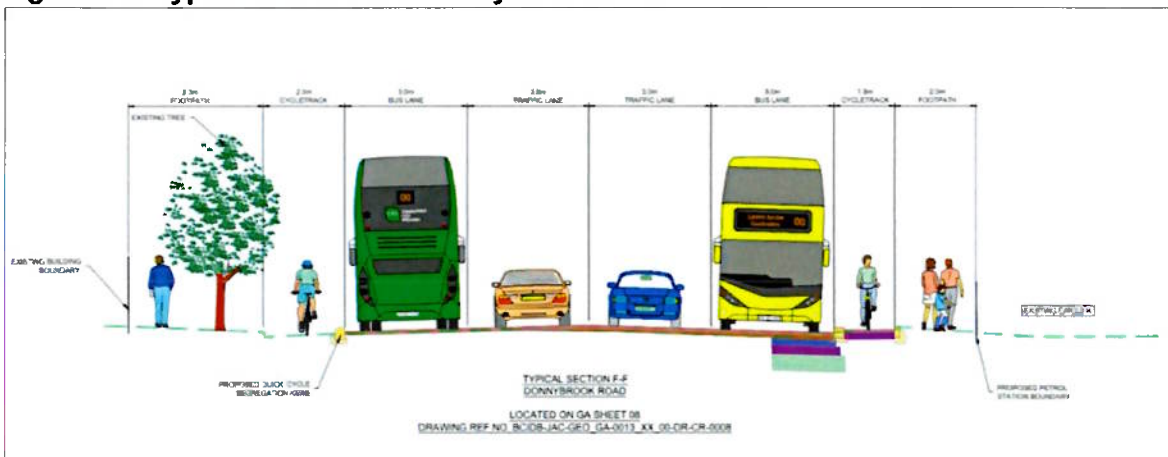
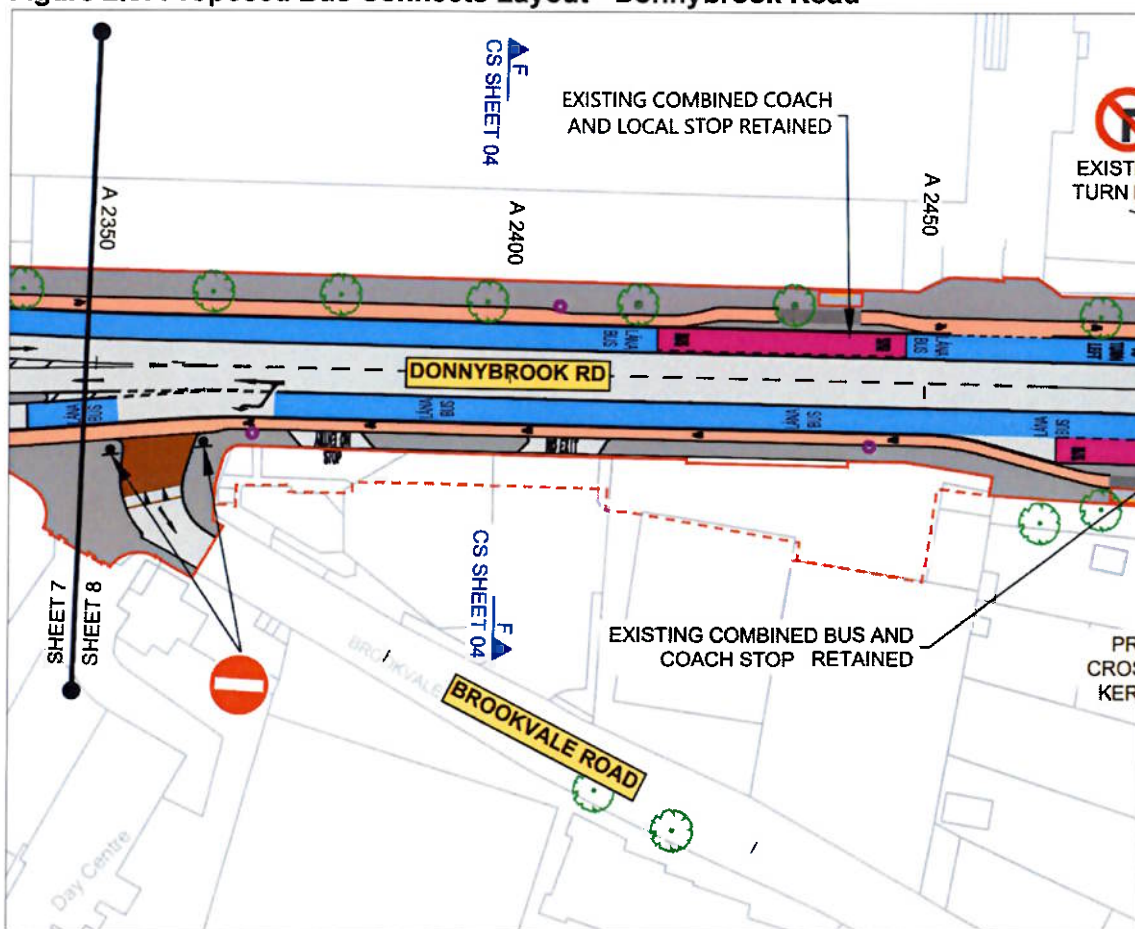


Figure 2.3: Proposed Bus Connects Layout - Donnybrook Road



(Source: Sheet no. 8)

3.0 Previously Agreed Design Solution along our Client's Boundary DCC Reg. Ref. 2244/21 (ABP-310204-21) – Build to Rent Scheme

Our client engaged with the NTA to discuss their requirements in respect of the subject site during the application/appeal process relating to DCC Reg. Ref. 2244/21 (ABP-310204-21).

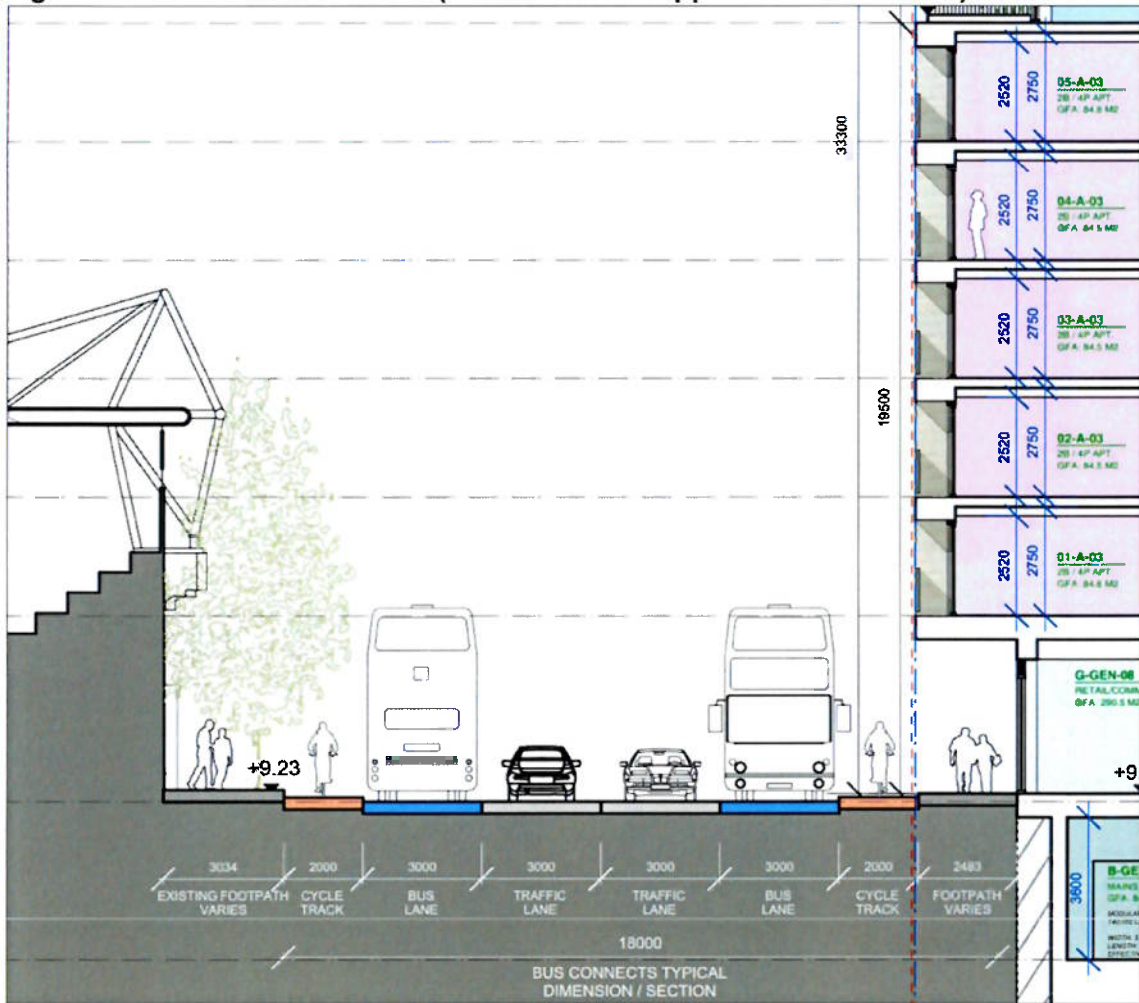
From this, an agreed line for setback of the building line between our client and the NTA was provided at ground floor and basement level which would ensure the proposed redevelopment of our client's landholding would not prejudice the future delivery of BusConnects has already been defined, which is illustrated in the DTA drawings (see Appendix 1).

Essentially, a 2 metre width at ground level is required by the NTA from the site to provide for a pedestrian footpath inside a cycle lane. This was achieved by bringing the building line at ground level deeper into the site, 2.5 metres on both sides. Please refer to drawings by DTA Architects (contained in Appendix 1) incorporating this setback.

The basement area beneath the footpath has been brought back to the same setback line.

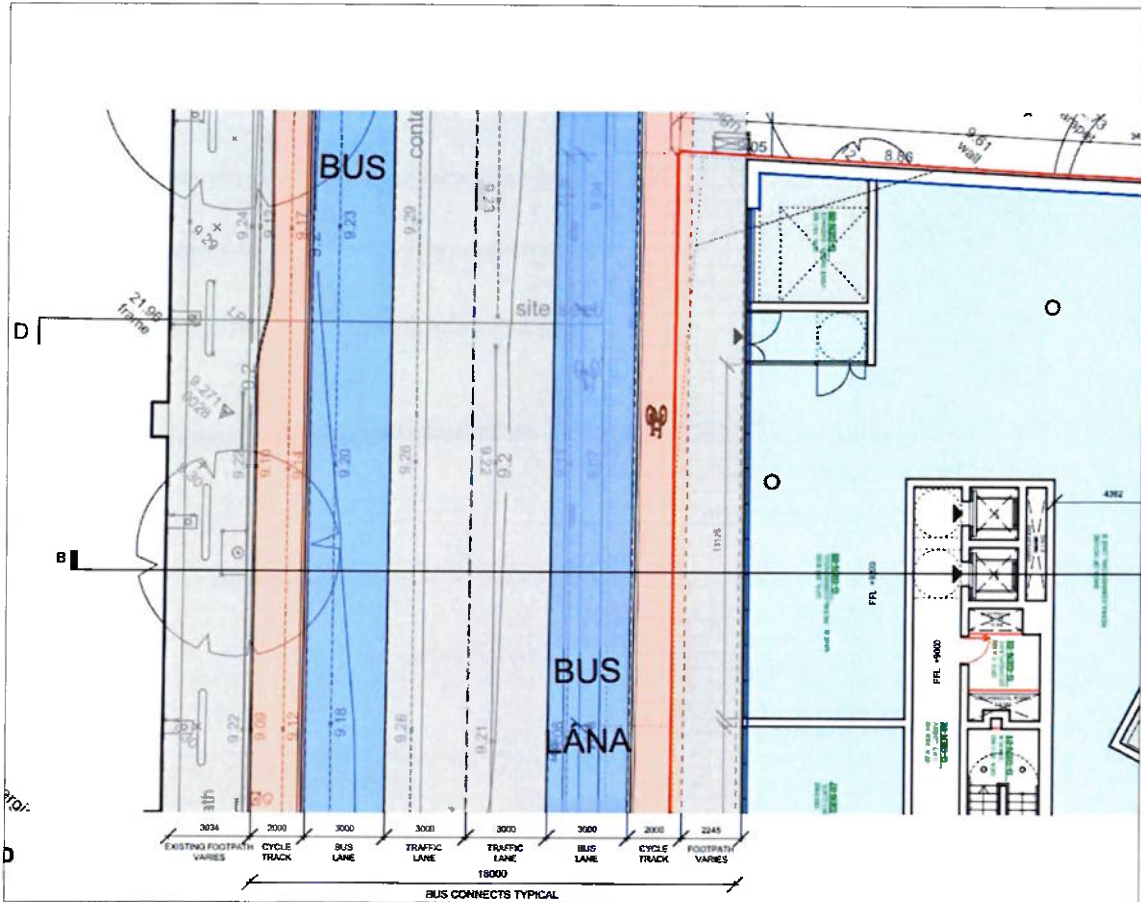
It is respectfully submitted that a similar arrangement can be accommodated along our client's boundary. Please see the enclosed drawings for further detail.

Figure 3.1: Cross Section Detail (submitted with Appeal ABP-310204-21)



DTA Drawing no. 2002-DBH-PL-405-(submitted with appeal)

Figure 3.2: Permitted Ground Floor Plan with Future Busconnects CBC13 Road Layout Overlaid

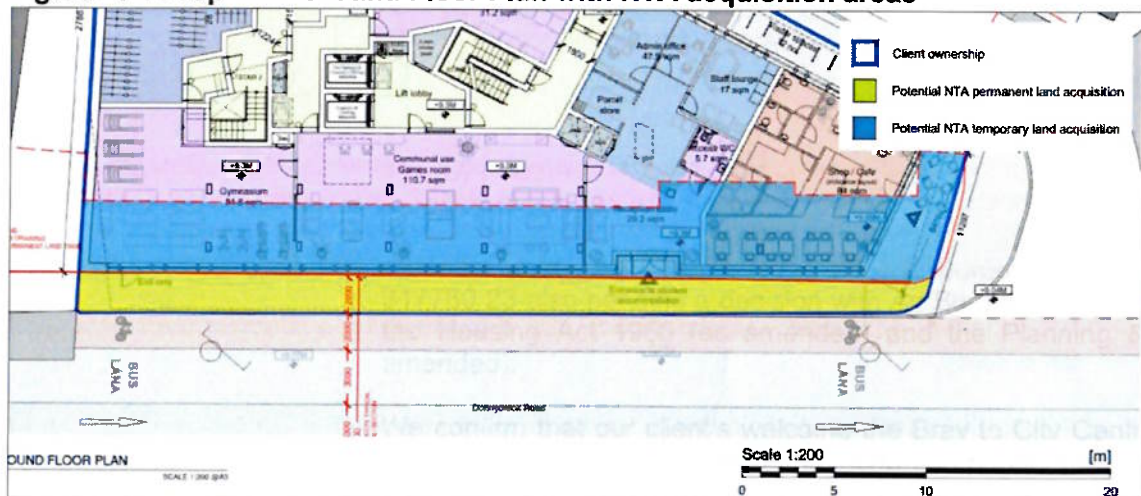


DTA Drawing no. 2002-DBH-PL-405- (submitted with appeal)

4.0 Proposed Student Accommodation Scheme 2023

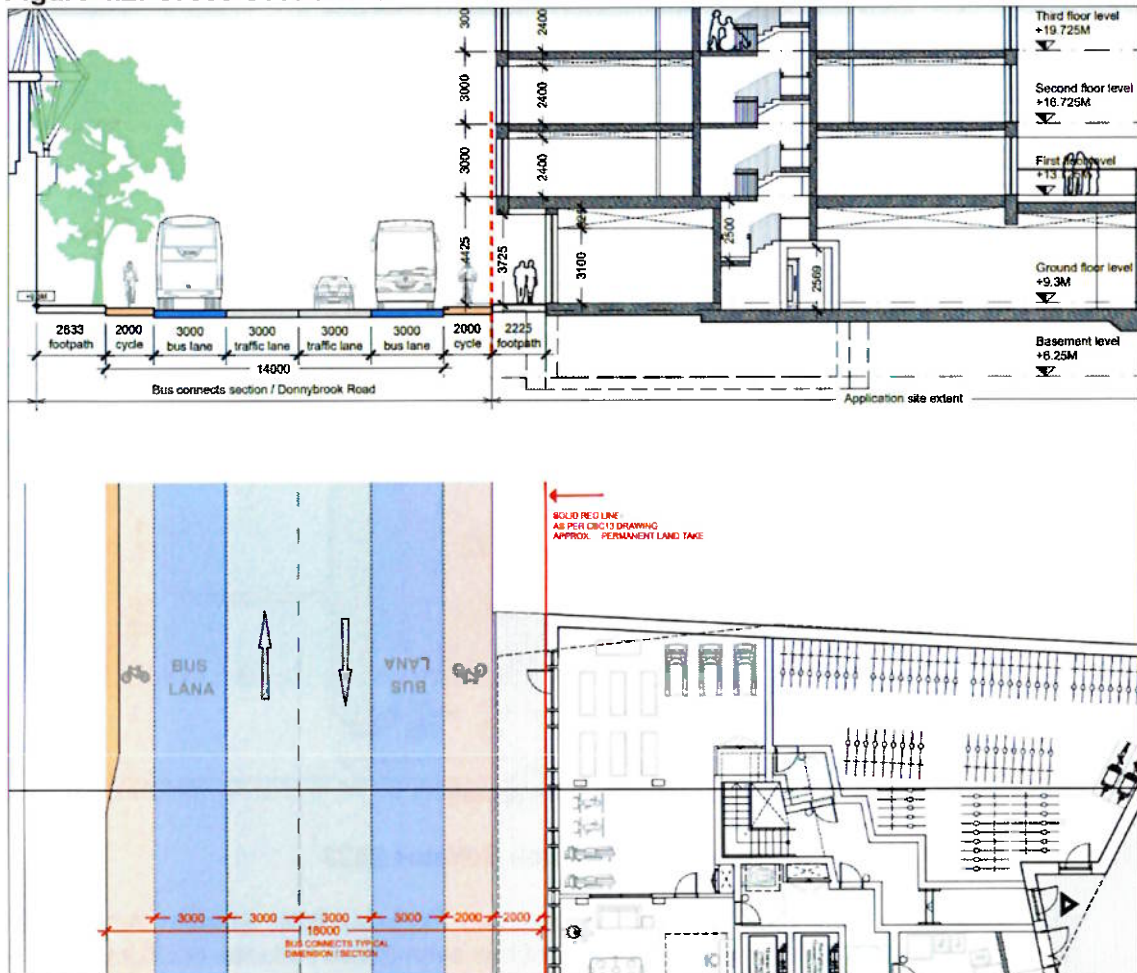
Our client is currently progressing a proposed Purpose Built Student Accommodation Scheme on the subject lands. Appendix 2 of this submission includes draft drawings of how the current layout can accommodate the BusConnects proposals.

Figure 4.1: Proposed Ground Floor Plan with NTA acquisition areas



The 2023 design takes cognisance of the NTA Bus Connect scheme and as such there are permanent works located within the potential permanent land acquisition area as shown on the plan views.

Figure 4.2: Cross Section Detail – PBSA 2023 Draft Scheme



The draft Purpose-Built Student Accommodation design takes cognisance of the NTA Bus Connect scheme as shown on the plan views. The 18m typical Bus Connect section width is accommodated as shown in the section views included.

5.0 Conclusions

On behalf of our client, Redrock Donnybrook Ltd., Millington, 3 Crosthwaite Grove, Dun Laoghaire, Co. Dublin, we wish to make a submission to the Bray to City Centre Core Bus Corridor Scheme Application currently registered and pending a decision with An Bord Pleanála under ABP Ref: 317742-23 and Compulsory Purchase Order 2023 ABP Ref. 317780 23 also pending a decision with An Bord Pleanála. The CPO Order is made under the Housing Act 1966 (as amended) and the Planning & Development Act 2000 (as amended).

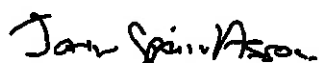
We confirm that our client's welcome the Bray to City Centre Core Bus Connects Project having regard to the proposed enhanced bus priority measures and the improvements to pedestrian and cyclist infrastructure.

In this regard our client is seeking that the Board amends the application and CPO as applied for as it relates to our client's landholding (and excludes our clients landholding from the CPO) as both the NTA Bus Connects scheme and the sustainable development of our client's landholding (using the layout arrangements as agreed previously with the NTA) can be accommodated along our client's landholding on the Donnybrook Road.

We respectfully request that An Bord Pleanála takes into consideration our clients existing permission and also the agreed approach relating to our client's boundary, which has been with the NTA.

Our client respectfully requests that An Bord Pleanála takes the above submission into account in assessing both the BusConnects Bray to City Centre Core Bus Corridor Scheme application Ref: 317742-23 and the associated Compulsory Purchase Order 2023 application Ref: 317780 23.

Yours sincerely,



John Spain
Managing Director John Spain Associates Ltd.

**APPENDIX 1 – PERMITTED AGREED LAYOUTS AND BUS CONNECTS SECTION
(DCC Reg. Ref. 2244/21 (ABP-310204-21) – Build to Rent Scheme)**

- 2002-DBH-PL-400-EXISTING GROUND FLOOR PLAN - BUSCONNECTS
- 2002-DBH-PL-401-PROPOSED GROUND FLOOR PLAN - BUSCONNECTS
- 2002-DBH-PL-405-PROPOSED SECTION BB & PART PLAN WITH CBC13 ROAD LAYOUT INCLUDED

BUS

BUS

LANA
BUS

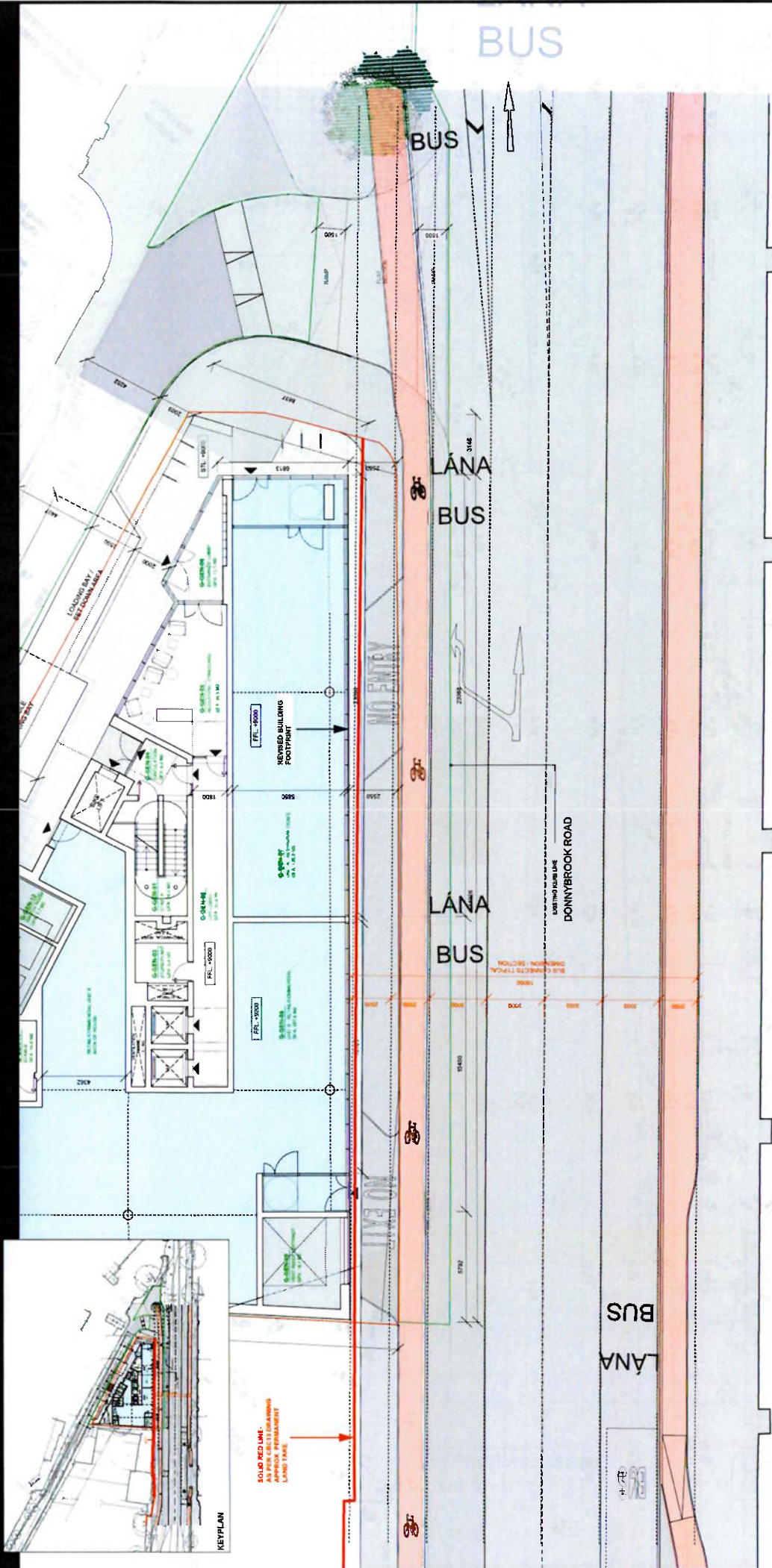
LANA
BUS

LANA
BUS

NOTE: BUSCONNECTS CEC13 DRAWING OVERLAD

PROPOSED GROUND FLOOR PLAN-BUSCONNECTS OVERLAD
1:200 (A)

DIA ARCHITECTS
Architects & Planners
1000 10th Ave S
Seattle, WA 98104
Tel: 206.461.1000
www.diaarchitects.com



LOADING BAY / SETTING AREA

REVERSED BUILDING FOOTPRINT

NO ENTRY

NO EXIT

DONNYBROOK ROAD
EXISTING ROAD LINE

BUS CONNECTS TRAIL
HOLLERS MARKING

SOLID RED LINE -
AS PER CEC13 DRAWINGS
APPROX. PERMANENT
LAND TAKE

KEYPLAN



PROPOSED GROUND FLOOR PLAN-BUSCONNECTS OVERLAD
1:200 (A)

**APPENDIX 2 – DRAFT PUPROSE BUILT STUDENT ACCOMMODATION SCHEME
2023 DRAWINGS JFA ARCHITECTS**

- DBR_STU-JFA-AR-P2000-Proposed_Ground_floor_plan-NTA acquisition BUS CORRIDOR
- DBR_STU-JFA-AR-P2000-Proposed_Ground_floor_plan-NTA acquisition
- DBR_STU-JFA-AR-P2012-Proposed_Basement_plan-P2012
- DBR_STU-JFA-AR-P4001_Elevation-1
- DBR_STU-JFA-AR-P5003_Section-P5004
Proposed_section_and_plan_with_CBC13_road_layout_included
- DBR_STU-JFA-AR-P5003-
Proposed_site_plan_with_CBC13_road_layout_included-P5003

DRAFT - IN PROGRESS

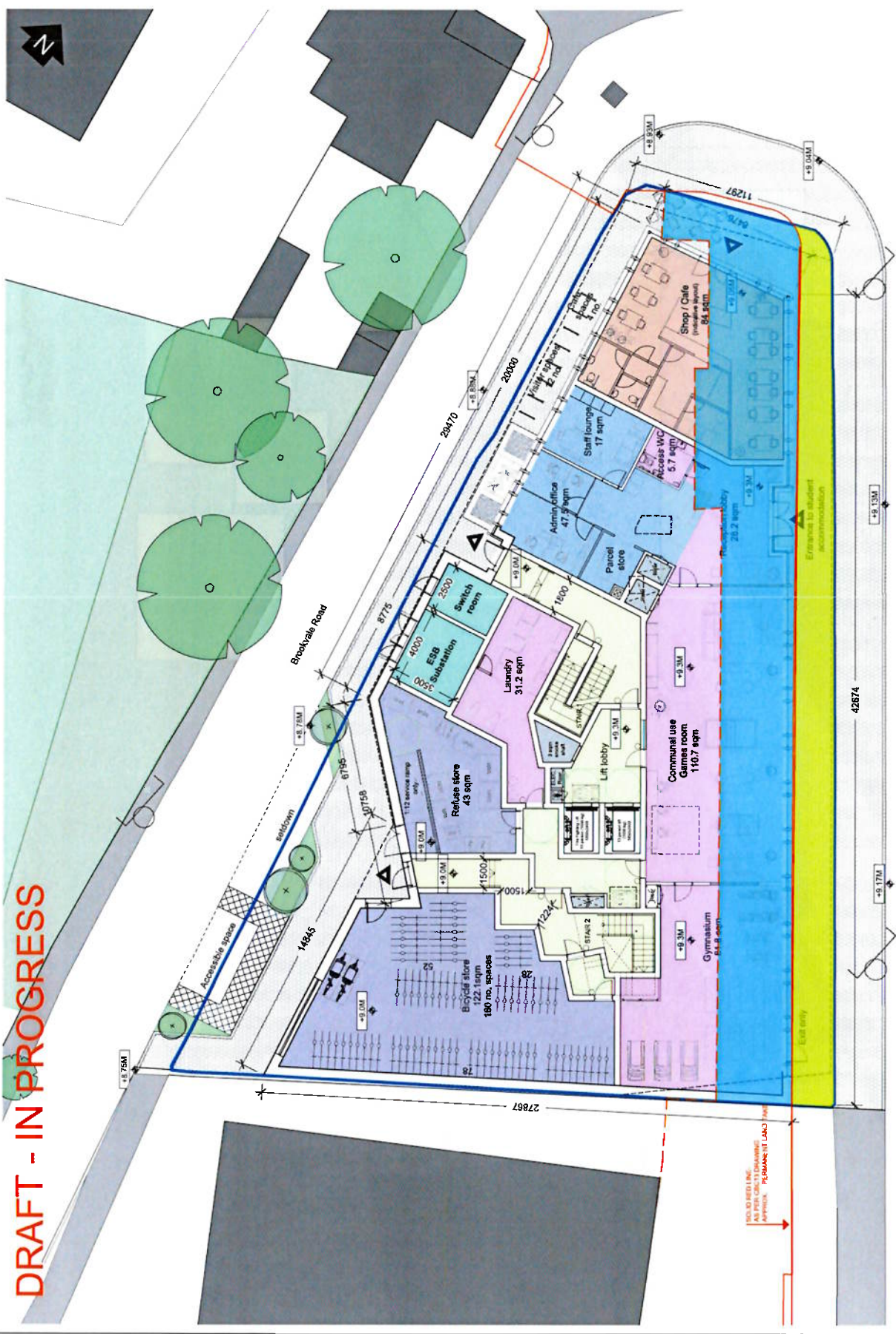
REVISIONS

1. COMPLETE REVISION
2. CHECK FOR CONFLICTS AND COORDINATION
3. CHECK FOR CONFLICTS AND COORDINATION
4. CHECK FOR CONFLICTS AND COORDINATION
5. CHECK FOR CONFLICTS AND COORDINATION
6. CHECK FOR CONFLICTS AND COORDINATION
7. ALL REVISIONS MUST BE APPROVED BY THE ARCHITECT
8. CHECK FOR CONFLICTS AND COORDINATION

NO.	DATE	DESCRIPTION	BY
1	20/07/22	001 Final CAD File - Proposed Plan	LF
2	20/07/22	002 Final CAD File - Proposed Plan	LF

LEGEND

- Client ownership
- Potential NTA permanent land acquisition
- Potential NTA temporary land acquisition



JOHN FLEMING ARCHITECTS
 THE GABLE HOUSE, 17 BUCHANAN STREET
 ST. LEONARDS, NEWCASTLE, NSW 1585
 T: 02 4961 1111 F: 02 4961 1112
 WWW.JOHNFLEMINGARCHITECTS.COM.AU

Client: Red Rock Developments

Project: Student Accommodation

Drawing: Proposed Ground Floor Plan with NTA acquisition areas

Scale: 1:200 @A3

Drawn by: LF

Checked by: LF

Drawing Number: NA

Revision: 1

Drawing Location:

Drawing Style: FOR DISCUSSION



REVISIONS

1. NOT FOR CONSTRUCTION. FOR APPROVAL PURPOSES ONLY.
2. ALL DIMENSIONS UNLESS OTHERWISE SPECIFIED TO BE IN METERS.
3. ALL DIMENSIONS ON THIS DRAWING ARE TO FACE UNLESS OTHERWISE SPECIFIED.
4. ALL DIMENSIONS TO FACE UNLESS OTHERWISE SPECIFIED.
5. ALL DIMENSIONS TO FACE UNLESS OTHERWISE SPECIFIED.
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9. ALL DIMENSIONS TO FACE UNLESS OTHERWISE SPECIFIED.
10. ALL DIMENSIONS TO FACE UNLESS OTHERWISE SPECIFIED.

REV	DATE	DESCRIPTION	BY

LEGEND

- Application boundary
- Plant
- Circulation

JOHN FLEMING ARCHITECTS
 1011 BROADWAY, SUITE 1000, NEW YORK, NY 10018
 TEL: 212 675 1234 FAX: 212 675 5678
 WWW.JOHNFLEMINGARCHITECTS.COM

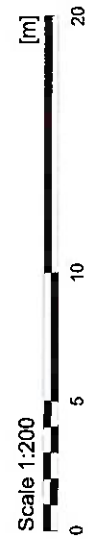
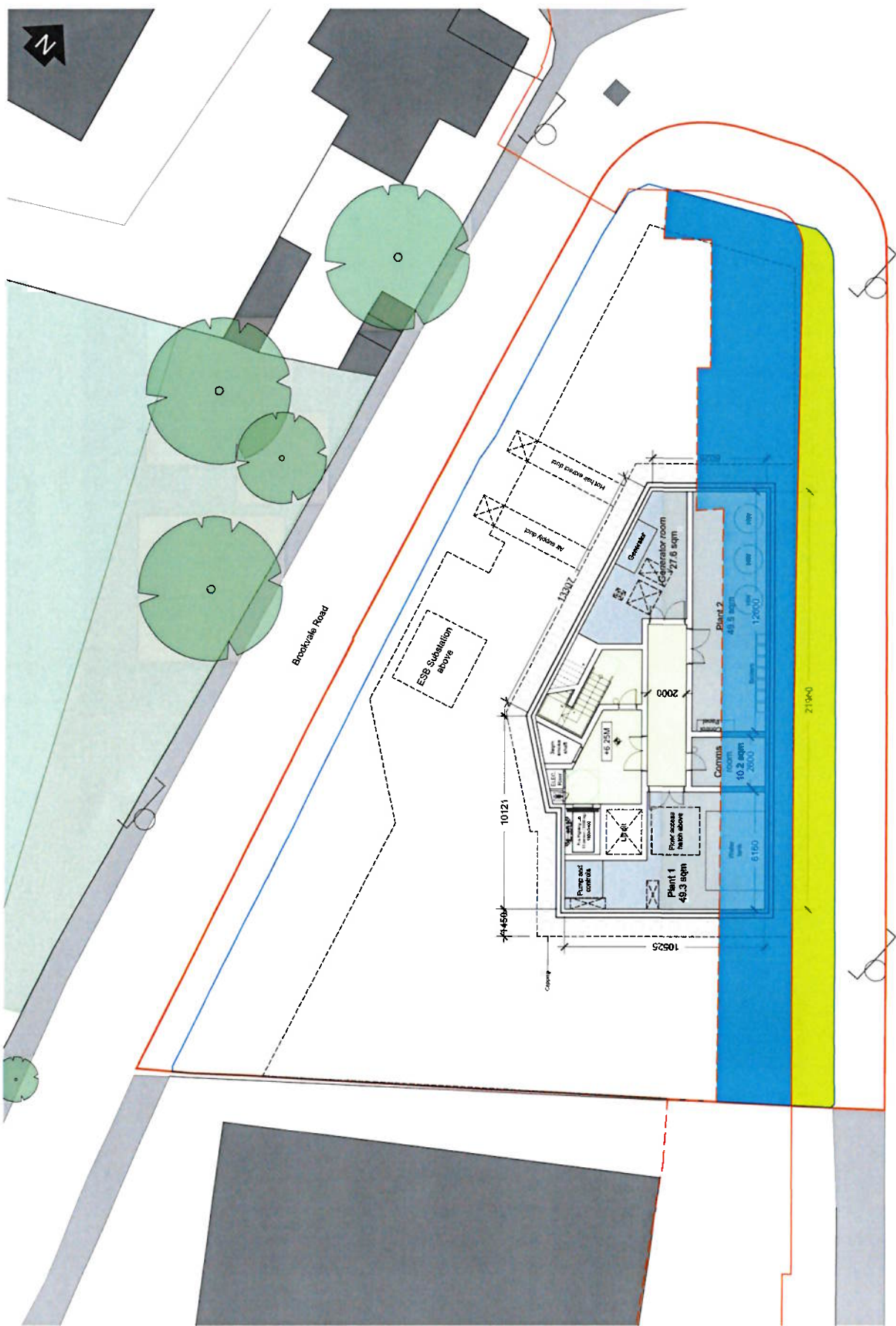
CLIENT
Red Rock Developments

PROJECT
Student Accommodation

LOCATION
100 Brookside Road, Dublin 4

DRAWING
Proposed Basement Plan

SCALE	JOB NO
1:200 @A3	2242
DRAWN BY	DATE
DBR	Aug 20
DRAWING NUMBER	REVISION
DBR_STU-JFA-AR-P2012	2
DRAWING LOCATION	PROJECT LOCATION
PLANNING	



REVISIONS

NO.	DATE	DESCRIPTION	BY



- LEGEND
1. Proposed New
 2. Existing
 3. Proposed New with Existing
 4. Proposed New with Existing



01 PROPOSED DOWNBROOK ROAD ELEVATION
SCALE: 1/8" = 1'-0"



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 1000 West 10th Street
 Suite 100
 Denver, CO 80202
 Phone: (303) 733-1111
 Fax: (303) 733-1112
 www.johnfleming.com

Red Rock Developments

Project: Student Accommodation
 Location: Downbrook Road, Suite 1
 Downbrook Road Station

Area: 1,500 sqm
 Date: 2022
 Drawing No: DR-22-001
 Drawing Title: DBR_STU1-FR-AR-001
 Drawing Scale: 1/8" = 1'-0"

DATE: 2022
 DRAWING NO: DR-22-001
 DRAWING TITLE: DBR_STU1-FR-AR-001
 DRAWING SCALE: 1/8" = 1'-0"

PLANNING



02 PROPOSED DOWNBROOK ROAD ELEVATION
SCALE: 1/8" = 1'-0"

APPENDIX 3: NTA LETTER

Mr David Magner,
Leading Edge Project Directors.



Harcourt Lane, Dublin 2

Dún Scéine, Baile Átha Cliath 2

tel: 01 879 8300

fax: 01 879 8333

email: info@nationaltransport.ie

web: www.nationaltransport.ie

10th October 2023

Re: Residential Development at Donnybrook

Dear Mr Magner,

The NTA has reviewed the following drawings prepared by John Fleming Architects that you supplied in relation to the above development;

Title	Drawing Number	Rev	Date
Proposed Ground Floor Plan with NTA acquisition areas	NA	1	July 23
Proposed Ground Floor Plan with NTA acquisition areas	NA	1	July 23
Proposed Basement Plan	DBR_STU-JFA-AR-P2012	2	August 23
Proposed Elevation 1 Donnybrook Road Elevation	DBR_STU-JFA-AR-P4001	0	August 23
Proposed Section and Plan with CBC13 road layout included (Bray-City Centre)	DBR_STU-JFA-AR-P5004	1	August 23
PROPOSED SITE PLAN WITH CBC13 ROAD LAYOUT INCLUDED	DBR_STU-JFA-AR-P5003	0	August 23

In relation to the interface between the proposed development and the Bray to City Centre Core Bus Corridor Scheme on Donnybrook Road. The NTA are satisfied that the proposed development, as amended and indicated in the above drawings, would not prejudice the delivery of the CBC, subject to the following being addressed to the satisfaction of the planning authority:

- The development interface with the BusConnects proposals should be clearly depicted within the developer's planning application documentation and the design should be made available in ITM coordinates.
- The developer should demonstrate how the building construction, operation and maintenance will be managed in relation to the overhang along Donnybrook Road with consideration towards safety and any proposed disruption to public space, bus, cycle and pedestrian movements.
- Maintenance of the footpath under the overhang shall be free from all obstructions, such as advertising, seating, signs etc.
- The provision of adequate public lighting.
- The NTA as part of the Bray to City Centre Scheme intend to CPO the substratum under the proposed overhang, therefore there should be no construction in this area such as underground services, columns, pillars or any other obstructions.

In undertaking our role as a statutory consultee under Article 28 of the Planning and Development Regulations (2001-1), the NTA reserves the right to submit further observations on other aspects of the proposed development at any subsequent stage of the planning process.

Yours sincerely,

Oliver Wynne
Project Manager